

Blackwater Gold Project										
ADMIN		COMMENTS								
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response	Response Date
236	21-Oct-21	FLNRO		Duncan McColl	WMMP		Wildlife & Habitat		Response Addendum: Text in Section 3.3.2 now clarifies point about edge maintenance: "Mitigate for edge effects created from clearing forest by: - Clearing as little vegetation as possible to limit the total length of forest edge created, and thereby the total forested area potentially affected by edge effects (MT 9-39); - Retaining and enhancing forest edge habitat along road areas (i.e., restoration of forest habitat along edge after clearing activities, where possible for safety considerations) to provide escape or thermal cover for birds (MT 9-5);"	05-Apr-21
237	21-Oct-21	FLNRO		Duncan McColl	WMMP		Wildlife & Habitat	"Sound deterrents (e.g., air cannons) provide a cost effective primary deterrent option;" how does this link to the sensory disturbance section?	Water quality monitoring will be informed by the following guidelines: BC Source Drinking Water Quality Guidelines (BC ENV 2020d), Health Canada Drinking Water Quality Guidelines (Health Canada 2020), BC CSR (BC Reg 376/96) Schedule 3.2 generic numerical water standards for drinking water	30-Dec-21
237	21-Oct-21	FLNRO		Duncan McColl	WMMP		Wildlife & Habitat		Response Addendum: Section 3.10.3 now includes details on deterrence methods for birds. Relevant text now reads: "Sound deterrents (e.g., air cannons) provide a cost effective primary deterrent option, but are not appropriate for all areas as the sound can disturb other wildlife"	05-Apr-21
238	21-Oct-21	FLNRO		Duncan McColl	WMMP		Wildlife & Habitat	"If water quality drops below objectives, deterrence methods will be re-implemented." will the monitoring be at a frequency sufficient to mitigate the risks to wildlife?	Water quality monitoring will be sufficient to mitigate risks to wildlife. The tradeoffs between effectively deterring birds while avoiding disturbance to other wildlife will need to be taken into account when choosing and placing bird deterrent systems. BW Gold will include consideration of this tradeoff in the next version of the WMMP in January 2022.	30-Dec-21
238	21-Oct-21	FLNRO		Duncan McColl	WMMP		Wildlife & Habitat		Response Addendum: Section 3.10.3 includes statement: "The Mine Site Water and Discharge Monitoring and Management Plan (Appendix 9-E) describes the mine site water sampling program."	05-Apr-21
239	21-Oct-21	FLNRO		Duncan McColl	WMMP		Wildlife & Habitat	"If caribou are observed on site, within 500 m of the open pit, then blasts will be paused until caribou leave the area" how will this be monitored prior to blasting and what distance constitutes leaving the area?	Please note that the CMMP is being updated and is the primary source for mitigation for caribou. Observations of caribou near the open pit will be reported opportunistically, while caribou will be considered to have "left the area" when they are no longer observed.	30-Dec-21
240	21-Oct-21	FLNRO		Duncan McColl	WMMP		Wildlife & Habitat	"Adaptive management actions if Clark's nutcracker are not sufficiently propagating whitebark pine cones (as determined through monitoring of Clark's nutcracker)." - what is sufficient? While monitoring clarks nutcracker is useful white bark pine seedlings establishment could be monitored.	Adaptive management actions for Clark's nutcracker are provided in the Whitebark Pine Management Plan. Clark's Nutcracker population in white bark pine areas is monitored according to federal condition 8.20.5.2. The Whitebark Pine Management Plan includes specific whitebark pine management and monitoring activities.	30-Dec-21
240	21-Oct-21	FLNRO		Duncan McColl	WMMP		Wildlife & Habitat		Response Addendum: The monitoring plan for Clark's Nutcracker (WMMP Section 4.7.3.7) now includes adaptive management measures and a plan for establishing triggers and thresholds: "-Survey design and number of sampling stations will be evaluated and updated for their effectiveness following the first few years of monitoring during the early stages of the construction period. -A power analysis will also determine what changes in abundance can be detected. -Before-After-Control-Impact (BACI) analysis will be conducted after each sampling period following the onset of the operations period - Formal triggers and thresholds will be determined based on the power to detect change after the first two years of data collection." The monitoring plan also includes information on adaptive management measures: "Adaptive management responses may include: -Increase the number of survey sites, or frequency of surveys to improve power of detection. -Investigate Project related disturbances that may be impacting Clark's Nutcracker beyond predicted levels, such as habitat alteration effects (noise, light, dust) in and around whitebark pine habitat, and construction and/or operations activities occurring in whitebark pine habitat. - Adaptive management actions will be suggested according to specific findings, and may include additional mitigations or habitat restoration or compensation measures. - Review the WPMP with the intent of increasing the amount of whitebark pine on Mt. Davidson. "	05-Apr-21
241	21-Oct-21	FLNRO		Duncan McColl	WMMP		Wildlife & Habitat	restoration and reclamation - The terms are not interchangeable. Reclamation is defined the reclamation provisions of the Mines Act and the Health, Safety and Reclamation Code for Mines in British Columbia. Restoration is to return the site 's hydrology, topography and natural vegetative communities to predisturbance conditions. through out the document reclamation is used until S. 3.10. then restoration is implied to be the same as reclamation.	Comment acknowledged.	30-Dec-21
241	21-Oct-21	FLNRO		Duncan McColl	WMMP		Wildlife & Habitat		Response Addendum: Section 3.9 now includes specific language for reclamation and restoration measures, rather than using the terms interchangeably.	05-Apr-21
242	21-Oct-21	FLNRO		Duncan McColl	WMMP		Wildlife & Habitat	changes in amphibian movement will require detailed surveys of pre construction movement patterns. Has this been done?	The updated WMMP included in the MAEMA no longer refers to monitoring changes in amphibian movement, and focuses on the predicted effects of the project on toads (See WMMP, November 2021, Section 4.1.3)	30-Dec-21

Blackwater Gold Project										
ADMIN	COMMENTS									
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response	Response Date
242	21-Oct-21	FLNRO		Duncan McColl	WMMP		Wildlife & Habitat		Response Addendum: Toad monitoring (Section 4.1.3) includes: habitat loss monitoring, monitoring of mortality on roads, monitoring at breeding ponds, and monitoring of facility waterbodies. Pre-construction surveys were done in 2021 to identify toad breeding ponds and breeding habitat in the mine site and transmission line LSAs. These surveys and data are summarized in Section 4.1.1.	05-Apr-21
243	21-Oct-21	FLNRO		Duncan McColl	WMMP		Wildlife & Habitat	relocation of amphibians to wetland offset projects will require those offset projects to be complete and functional prior to relocation. Is this possible? Have the offset wetlands already be successfully created?	The WMMP (November 2021) includes monitoring to identify toad breeding ponds that will require salvage (conducted in 2021) and salvage relocation ponds (to be conducted in 2022). The plan is to use naturally occurring wetlands and ponds as receiving environments for salvaged toads. The existing wetland offsetting locations will be reviewed and additional sites surveyed in 2022 as possible candidate sites.	30-Dec-21
244	21-Oct-21	FLNRO		Duncan McColl	WMMP		Wildlife & Habitat	the baseline inventory and assessment, including a comprehensive risk assessment for amphibians can be found where?	Additional baseline surveys for toads were conducted in summer 2021 and will be reported in a 2021 wildlife baseline report and updated in the next version of the WMMP in January 2022.	30-Dec-21
244	21-Oct-21	FLNRO		Duncan McColl	WMMP		Wildlife & Habitat		Response Addendum: Baseline inventory and assessment work was continued in 2021 as part of pre-construction surveys (Section 4.1.1). Risk assessments will be conducted prior to salvage at each breeding pond.	05-Apr-21
245	21-Oct-21	FLNRO		Duncan McColl	WMMP		Wildlife & Habitat	Please define "an observable effect" in the context of adaptive management	The triggers and thresholds for adaptive management were updated for the November 2021 version of the WMMP and include specific triggers for each study and wildlife VC.	30-Dec-21
246	21-Oct-21	FLNRO		Duncan McColl	WMMP		Wildlife & Habitat	"hibernacula typically occur in caves located in karst (limestone) formations." Please reference. The potential to use other features needs to be considered.	The federal Recovery Strategy for Little Brown Myotis, Northern Myotis, and Tri-colored Bat (COSEWIC 2015) indicates that hibernacula for these species of bats: "are generally underground openings, including caves, abandoned mines, wells, and tunnels, but at some sites only specific sections of the site will be used for hibernation. The sections used for hibernating typically have a temperature range between 2°C and 10°C (Fenton 1970, Anderson and Robert 1971, Vanderwolf et al. 2012), and relative humidity levels > 80% to reduce evaporative water loss (Cryan et al. 2010, but see Kurta 2014)." In the Project Area, which is consistently below freezing throughout the winter, only larger subterranean hibernacula (i.e., caves) can maintain these stable temperatures through winter. However, some anthropogenic features such as buildings can be used as hibernacula and these were searched in summer 2021 for characteristic signs of bat hibernacula as well.	30-Dec-21
246	21-Oct-21	FLNRO		Duncan McColl	WMMP		Wildlife & Habitat		Response Addendum: Text added to the beginning of Sections 4.2: "In northern areas, such as the Project location, hibernacula typically occur in caves located in karst (limestone) formations which are deep enough to maintain a constant temperature above freezing. No limestone formations are located in the Project site. Some bat species hibernate in habitat such as rootwads, crevices, and tree bark, however these features are not likely to be suitable for hibernation in the Project area due to lack of insulation from extremely cold winter temperatures."	05-Apr-21
247	21-Oct-21	FLNRO		Duncan McColl	WMMP		Wildlife & Habitat	Have the preconstruction surveys for bats been completed? Where is the information? (and also for caribou, moose, fur bearers, amphibians, birds...) this links to the adaptive management and the EA conditions.	Pre-construction surveys are discussed in Section 4: Section 4.4.1 (amphibians); Section 4.4.2 (bats); Section 4.4.1 (moose); Section 4.5.1 (Furbearers); Section 4.6.1 (grizzly bear); and Section 4.7.1 (birds). Pre-construction caribou surveys are discussed in Section 5.4. Section 2021 pre-construction wildlife surveys were undertaken for amphibians, bats, caribou grizzly bears, and birds. Wildlife survey results will be reported in a 2021 baseline wildlife report and incorporated into the next version of the WMMP in January 2022.	30-Dec-21
247	21-Oct-21	FLNRO		Duncan McColl	WMMP		Wildlife & Habitat		Response Addendum: Pre-construction surveys are discussed in Section 4: 2021 pre-construction wildlife surveys were undertaken for amphibians (Section 4.1.1), bats (Section 4.2.1), caribou (Habitat suitability work, not yet presented/prepared-will be included in the CMMP), moose (Section 4.4.1), furbearers (Section 4.5.1), grizzly bears (Section 4.6.1), and birds (Section 4.7.1). The 2021 pre-construction baseline survey report with detailed results is in prep for 2022.	05-Apr-21
248	21-Oct-21	FLNRO		Duncan McColl	WMMP		Wildlife & Habitat	reasonably long term data sets are needed for analysis of trends in Table 4.2-1: Adaptive Management Response for Bats	During the development of the August 2021 WMMP, the objective was to have a common trigger for adaptive management using statistical significance as a threshold. This was true for both the CMMP and WMMP. Following comments from parties on this approach to setting triggers/thresholds, the November WMMP included in the MAEMA was updated to include species and study-specific triggers that are unrelated to	30-Dec-21
249	21-Oct-21	FLNRO		Duncan McColl	WMMP		Wildlife & Habitat	monitoring timelines are inconsistent with in the document	Monitoring timelines will be updated in the next version of the WMMP.	30-Dec-21
249	21-Oct-21	FLNRO		Duncan McColl	WMMP		Wildlife & Habitat		Response Addendum: Monitoring programs in Section 4 now incorporate standard layouts, including monitoring frequency, survey timelines, and duration.	05-Apr-21
250	21-Oct-21	FLNRO		Duncan McColl	WMMP		Wildlife & Habitat	"these caribou live in mature and old growth forest and rely on arboreal lichen as a main source of food, particularly in winter (MFLNRO 2014)" this is incorrect. Tweedsmuir herd is a northern mountain herd not a southern mountain herd	BW Gold is using the Recovery Strategy for Southern Mountain Caribou (EC 2014) which lists the Tweedsmuir as part of the northern group of SMC. However, we recognize that the province has proposed a change in this designation.	30-Dec-21

Blackwater Gold Project										
ADMIN		COMMENTS								
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response	Response Date
251	21-Oct-21	FLNRO		Duncan McColl	WMMP		Wildlife & Habitat	Population level surveys are likely not appropriate to examine site level effects. (moose and caribou)	The November 2021 WMMP includes updated monitoring for moose, which focuses on the predicted effects of the project on moose from the EAC/Application - habitat loss, mortality due to vehicle collisions and moose distribution and density relative to the project site. An aerial survey every 5 years is proposed to meet this objective. BW Gold is open to discussing whether there is a better methodology to meet this monitoring	30-Dec-21
251	21-Oct-21	FLNRO		Duncan McColl	WMMP		Wildlife & Habitat		Response Addendum: Updated monitoring methods for ungulates (moose and caribou) have now been included in the WMMP and CMMP. Monitoring will occur via pellet counts and/or snow track surveys (final method to be determined based on first year of results).	05-Apr-21
252	21-Oct-21	FLNRO		Duncan McColl	WMMP		Wildlife & Habitat	Significant pre construction data would be required to assess changes in movement patterns, does this data exist?	Baseline surveys conducted during the summer of 2021 identified movement corridors for a variety of species and installed wildlife cameras to monitor the use of these corridors prior to construction. These data will be used to compare against wildlife observations in construction and operations phases of the project.	30-Dec-21
252	21-Oct-21	FLNRO		Duncan McColl	WMMP		Wildlife & Habitat		Response Addendum: Updated monitoring methods for ungulates (moose and caribou) have now been included in the WMMP and CMMP. Monitoring will occur via pellet counts and/or snow track surveys (final method to be determined based on first year of results).	05-Apr-21
253	21-Oct-21	FLNRO		Duncan McColl	WMMP		Wildlife & Habitat	Aerial surveys provide point in time information. I am unsure how the connections to the various adaptive management questions, mitigation effectiveness, etc, can be made using this type of information.	Note that the WMMP was updated significantly in November 2021 to provide more information on pre-construction and monitoring programs, as well as newly designed triggers and thresholds for adaptive management. Aerial surveys are proposed for moose in the WMMP (November 2021) with added clarity on objectives, methods triggers and adaptive management.	30-Dec-21
254	21-Oct-21	FLNRO		Duncan McColl	WMMP		Wildlife & Habitat	The conditions in the EA certificate around pre surveys and data collection have not been demonstrated to be met. The data collected, when it was collected, who collected it, the standards applied to the collection, the location it is stored, are not clear in this document.	Baseline surveys conducted during the summer of 2021 to satisfy federal and provincial pre-construction requirements. The survey methods and data will be reported in a 2021 wildlife baseline report and updated in the next version of the WMMP in January 2022.	30-Dec-21
254	21-Oct-21	FLNRO		Duncan McColl	WMMP		Wildlife & Habitat		Response Addendum: Summaries of pre-construction work are included with each VEC monitoring section (Section 4). The 2021 pre-construction baseline survey report with detailed results is in prep.	05-Apr-21
255	21-Oct-21	FLNRO		Duncan McColl	WMMP		Wildlife & Habitat	A long fluff charge ending 3-10 m from you - typo should be Bluff not Fluff.	Typo will be corrected in the updated version of the WMMP in January 2022.	30-Dec-21
255	21-Oct-21	FLNRO		Duncan McColl	WMMP		Wildlife & Habitat		Response Addendum: Corrected in Bear Aware SOP (Appendix C)	05-Apr-21
256	28-Jan-22	Indigenous Communities	Table	LDN/UFN	WMMP	3.3.1	Compliance	8.9.2: "notify, prior to construction, the Agency and Indigenous groups of these time periods and of the areas within which each of these time periods shall apply;" No mention of this notification to the Agency and Indigenous groups.	The text in Section 3.3.1, Sensitive Timing Windows, has been updated to indicate that the Agency and Indigenous groups will be notified of the time periods and areas where these time periods shall apply by sending the WMMP for review.	05-Apr-21
257	28-Jan-22	Indigenous Communities	Table	LDN/UFN	WMMP	4.7	Compliance	8.16: "The Proponent shall, prior to construction and in consultation with Indigenous groups and relevant authorities, conduct pre-construction surveys to identify short-eared owl (Asio flammeus) moderate to high-value nesting and foraging habitat, and shall implement measures to mitigate the loss of short-eared owl (Asio flammeus) habitat caused by the Designated Project. " No mention of surveys, habitat, or mitigation measures for short-eared owl"	Evaluation of habitat and surveys for short-eared owl (SEOW) were conducted during baseline surveys in 2021. The WMMP has been updated to describe these data in WMMP, Section 4.7.1.	05-Apr-21
258	28-Jan-22	Indigenous Communities	Table	LDN/UFN	FDS Table of Concordance	FDS Condition 6.15; Section 5.2	Compliance	FDS Condition 6.15 is not met.	A description of plain language summaries (Condition 6.15) for the results of the moose followup program and other wildlife monitoring programs has been added to WMMP Section 5.2, Reporting, including: 1) a plain language summary of the WMMP Report, 2) presentation of this plain language summary to the Environmental Monitoring Committee (EMC), 3) presentation at the Community Liaison Committee (CLC) if there is interest at that venue, and 4) posting of the WMMP report and plain language summary on a website.	05-Apr-21
259	28-Jan-22	Indigenous Communities	Table	LDN/UFN	FDS Table of Concordance	DS Condition 8.9; Sections 3.3, 4.1, 4.2, 4.3, 4.4, 4.5, 4.6, 4.7	Compliance	FDS Condition 8.9 is not met.	The text in Section 3.3.1, Sensitive Timing Windows, has been updated to indicate that the Agency and Indigenous groups will be notified of the time periods and areas where these time periods shall apply by sending the WMMP for review.	05-Apr-21
260	28-Jan-22	Indigenous Communities	Table	LDN/UFN	FDS Table of Concordance	DS Condition 8.16; Section 4.7	Compliance	FDS Condition 8.16 is not met.	Evaluation of habitat and surveys for short-eared owl (SEOW) were conducted during baseline surveys in 2021. The WMMP has been updated to describe these data in WMMP, Section 4.7.1.	05-Apr-21

Blackwater Gold Project										
ADMIN		COMMENTS								
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response	Response Date
261	15-Feb-22	EAO	Table	Tracey Janes	WMMP		Condition #23 - General	<p>Revise in response to comments from Aboriginal groups, FLNRORD, ECCC and the EAO, provided to BW Gold prior to February 25, 2022. Resubmit to the EAO for approval prior to the commencement of Construction.</p> <p>As provided December 30, the plan does not meet the requirements of Condition 23.</p> <p>Deficiencies noted (examples):</p> <ul style="list-style-type: none"> • Lacking implementation in several places – e.g., establishment of policies (23 (j)(i)). Plan mentions that a policy 'will' be put into place, but is not currently • Lacking specificity for 'how' mitigation measures will be implemented, examples: <ul style="list-style-type: none"> o Management of lighting o Vegetation and access management plan for the transmission line right of way o Road use – 50 km/hour speed limit on all project roads • Respond to FLNR comments regarding adaptive management requirements • Respond to outstanding comments from ECCC 	<p>The WMMP has been updated in response to comments from Aboriginal groups, FLNRORD and the EAO provided to BW Gold prior to February 25, 2022, plus comments on bats delivered by ECCC on February 28th. The WMMP has been updated extensively, particularly in sections 3 and 4 to meet requirements of Condition 23, including:</p> <ul style="list-style-type: none"> - policies have been written in to the document, - specificity has been added to mitigation throughout Section 3, - Adaptive management requirements have been updated for all species in Section 4, - Comments from ECCC have been addressed, including those delivered on February 28th on the plan for offsetting bat roosts. 	05-Apr-21
262	28-Feb-22	ECCC	Letter	Lilly Cesh	WMMP	Not Specified	Wildlife & Habitat	<p>ECCC requests clarification on how far in advance 'pre-construction' surveys will be conducted to determine if roosting habitat will be lost for little brown myotis and northern myotis. Any necessary compensation should be provided prior to any roosting habitat loss from construction. Furthermore, bat boxes are not a satisfactory 'offset' or solution for significant loss of habitat for roosting or hibernacula sites. ECCC recommends wildlife tree conservation/creation (particularly aspen trees), restoration of aspen habitat, and consideration of BrandenBark™, or similar designs, as mitigation measures to offset impacts to bat roosting habitat.</p>	<p>On February 2, 2022, BW Gold shared a draft plan for installing bat boxes as offset for lost roosting habitat. ECCC responded on February 28th, 2022, with comments 262 through 277. BW Gold met with ECCC and FLNRORD on March 7, 2022 to discuss these comments and discuss possible habitat augmentation plans.</p> <p>In response to the ECCC comments and discussion with ECCC and FLNRORD, BW Gold has updated the WMMP to indicate that bat boxes will not be used to offset for lost roosting habitat. Instead, BW Gold will manage the loss of bat habitat as suggested by ECCC, though:</p> <ul style="list-style-type: none"> - Avoiding removal of bat roosts wherever possible, - Restoring habitat at closure, - Augmenting bat habitat through wetland augmentation through road restoration as part of the CMMP and wetland offsetting as part of the WOMP, - A financial offset to fund monitoring of bats in the region using NABAT protocols, and - Conducting a study on bats to be determined with ECCC during 2022. <p>Pre-construction surveys were conducted during summer of 2021 to search for bat roosts, and these surveys will be repeated in summer 2022 to identify any available bat roosts.</p>	05-Apr-21
263	28-Feb-22	ECCC	Letter	Lilly Cesh	WMMP	Not Specified	Wildlife & Habitat	<p>In addition to the above mitigation measures for bats, ECCC also considers a financial contribution to bat research a suitable compensation measure. For example, commitment to fund 5-years of monitoring of a NABAT grid cell in the area could provide useful information to help conserve bats in the region.</p>	<p>Please see the response to 262.</p>	05-Apr-21
264	28-Feb-22	ECCC	Letter	Lilly Cesh	WMMP	Not Specified	Wildlife & Habitat	<p>ECCC does not recommend bat boxes as mitigation for loss of bat roosting habitat. If other roosting 'structures' are selected to be used for compensation ECCC should review these plans prior to installation.</p>	<p>Please see the response to 262.</p>	05-Apr-21
265	28-Feb-22	ECCC	Letter	Lilly Cesh	WMMP	Not Specified	Wildlife & Habitat	<p>Bat boxes were not designed to replace natural habitat. Large free-standing structures were initially implemented in North America to try and attract insectivorous bats to a specific location to increase their numbers and provide insect pest control (Storer 1926). Later developments saw these being operationalized as smaller structures that could be mounted on buildings or poles to provide an alternative roost when bats had to be evicted from roosting in buildings in urban or other human dominated settings (Tuttle 1988). Similarly, in Germany, bat boxes were used to provide roost resources with the goal to augment populations and provide pest control for forest pests (Altum 1876, cited in Rueegger 2019). In other areas of Europe, observations of bats occupying bird houses placed in forests in Europe led to the development of small bat houses being placed on trees in forests (Altringham 1998; Mering and Chambers 2014). Since then, bat boxes have been deployed for a wide variety of purposes around the globe but remain largely untested in meeting goals as effective tree roost replacements such that they could be used for compensation for the destruction of natural roosts. Recent reviews continue to show that empirical evidence for effectiveness as a conservation tool remains largely absent owing to limited long-term monitoring studies that explicitly test effectiveness using rigorous designs (Mering and Chambers 2014; Rueegger 2019; Crawford and O'Keefe 2021,). This makes implementation of constructed bat boxes at a landscape scale particularly risky in having adverse outcomes, as uncertainty in their use for positive outcomes remains high. As noted by a recent global review of bat boxes, "Bat boxes should not be used as a justification for the removal of trees that comprise potential roost cavities" (Rueegger 2019).</p>	<p>Please see the response to 262.</p>	05-Apr-21

Blackwater Gold Project										
ADMIN		COMMENTS								
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response	Response Date
266	28-Feb-22	ECCC	Letter	Lilly Cesh	WMMP	Not Specified	Wildlife & Habitat	Bat houses may be ecological traps, a habitat resource where bat fitness is lower than in other available habitats (Robertson and Hutto 2006). Using bat boxes as habitat replacement enhancement tools without knowledge of their roosting needs and the specific environmental context, may lead to unintentionally facilitating the creation of ecological traps (Lausen et al., in press). Despite recommendations for their installation, few studies to date have examined how well bats fare in these structures against a range of fitness measures (such as reproductive success, survival and age structure, e.g., Boyd and Stebbings 1989). Guidance for and assessment of their use has typically focused on capacity (how many individuals they can accommodate; Tuttle 1988) or simply documented basic use (e.g., occupancy as in presence of a bat in a box). Occupancy does not necessarily equal reproductive success. There remains much uncertainty on whether bats using bat boxes have equal or increased survival or reproductive success (compared to natural roosts).	Please see the response to 262.	05-Apr-21
267	28-Feb-22	ECCC	Letter	Lilly Cesh	WMMP	Not Specified	Wildlife & Habitat	Potential for over-heating. Recent concerns have developed around bat boxes having microclimates that have inappropriate thermal profiles (e.g., structural qualities leading to unstable and highly variable profiles) such that they can overheat and cause mortality (Bidguren et al., 2019; Crawford and O'Keefe 2021). This is especially concerning under scenarios of climate change where variability is increasing and extreme temperature events may become more common (Griffiths et al., 2018). High temperatures can also be reached in boxes from factors such as bat box placement at a site (e.g., unshaded areas in high sun exposures; Lausen et al., in press). This may represent an ecological trap as females may seek roosts with warmer temperatures for some key stages (e.g., pregnancy and lactation; Garroway and Broders 2008; Patriquin et al., 2016) that on some roost days, bat boxes may provide. However, some boxes may become too hot such that the bats are pushed beyond their thermal limits. Further, there may be risks associated with large groups of bats occupying a bat box where overcrowding in some bat box designs can reduce the ability of the colony to dissipate heat. Mass mortality from overheating has been observed in various areas of the world (e.g., Spain (Flaquer et al., 2014); Australia (Griffiths 2021)). Overheating in occupied bat boxes has also recently been documented in southern British Columbia where bats were observed fleeing the box to seek shade at a site in the interior when the ambient temperature exceeded 40°C. In the Lower Mainland, a similar heat event occurred when the ambient temperature reached 46°C where approximately 75 bats died during that event (Lausen et al., in press).	Please see the response to 262.	05-Apr-21
268	28-Feb-22	ECCC	Letter	Lilly Cesh	WMMP	Not Specified	Wildlife & Habitat	Potential for increased predation risk. Bat boxes can be an ecological trap if they increase predation risk to bats when they use them (Lausen et al., in press). For example, a Western Screech-Owl in the Okanagan perched on a bat house and learned to depredate one bat after another as they flew out of the bat house for its evening foraging bout (S. Dulc, pers comm.).	Please see the response to 262.	05-Apr-21
269	28-Feb-22	ECCC	Letter	Lilly Cesh	WMMP	Not Specified	Wildlife & Habitat	Potential for changes in roosting behaviour, ecology. Bats roosting in natural structures (e.g., trees, rock crevices) use a network of resources over the active summer season changing roosts frequently (e.g., every 1-2 days; reviewed in Lewis 1995; Barclay and Kurta 2007). These roost networks are reused as bats exhibit site fidelity to an overall area as well as to some specific roosts over their lifetimes which can be upwards of 20-30 years. A key component of roosting ecology is also the linkage in having suitable foraging opportunities and habitat nearby (Duchamp et al., 2007). For some species, roost switching also corresponds with social structure exhibited such that sharing roosts may facilitate social thermoregulation, interactions and cohesion of the bat community (Willis and Brigham 2004; Russo et al., 2017). This use of a roost network may be partly driven by the ephemerality of these roost resources (e.g., natural decay of trees or destabilization of rock crevices) requiring knowledge and use of multiple roosts, but also from different roosts having different thermal properties. This means that using a roosting network facilitates bats being able to select the most appropriate roost for daily conditions in relation to their own health status, e.g. pregnant or nursing bats (Garroway and Broders 2008; Patriquin et al., 2016). Bats may also switch roosts frequently to reduce parasite load and predation risk (Barclay and Kurta 2007). Given the complex needs and properties of roosts used by bats in their use of roosting networks, a handful (1-2) bat boxes may be insufficient to meet the needs of bats, particularly maternity colonies. This is especially a concern if current designs/site setups are prone to overheating. If only 1 or 2 structures are provided to the bats they may only have these structures or perceive these as the only suitable roosts, and will not have the options for use of other more buffered and cooler thermal roosts on exceptionally hot days. Lastly, without baseline data prior to installation and long-term monitoring after installation, we do not have sufficient knowledge of how colony roosting dynamics have changed to have confidence that bat boxes provide equally for the long-term social roosting requirements of bats.	Please see the response to 262.	05-Apr-21

Blackwater Gold Project										
ADMIN		COMMENTS								
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response	Response Date
270	28-Feb-22	ECCC	Letter	Lilly Cesh	WMMP	Not Specified	Wildlife & Habitat	Potential for competitive exclusion and change in community structure. Landscape context and box design can lead to the preferential use and domination of bat boxes by only one or a few species and can include favoring non-target species by competitive exclusion (Mering and Chambers 2014; Rueegger 2019). This has triggered concerns that the installation of boxes may cause an overall shift in community composition as recently shown in Australia (Griffiths et al., 2018). For example, while some tree crevice roosting bats in the United States and Canada have adapted to human-built structures, only 15 of 47 species (32%) have been documented using bat boxes (M. Kellner, unpublished data cited in Lausen et al., in press).	Please see the response to 262.	05-Apr-21
271	28-Feb-22	ECCC	Letter	Lilly Cesh	WMMP	Not Specified	Wildlife & Habitat	Use of bat boxes by northern myotis is limited and no long-term studies have been undertaken to assess long-term suitability or effectiveness of bat boxes on the species. Northern myotis, is a forest interior specialist using primarily trees in forest stands for roosting and also foraging largely within the forest (Owen et al., 2003; Henderson and Broders 2008; Thorne et al., 2021). In contrast, the little brown myotis, is a generalist species that roosts in buildings and trees in a variety of landscape settings including forests and open, urban/agricultural settings and also forages in more open locations around ponds, forest edges etc. (Coleman and Barclay 2011; Olson and Barclay 2013; Thomas and Jung 2019). With differences in roosting resources used between these two species it is reasonable to expect differences in thermal microclimate preferences and possibly tolerances. Little brown myotis can be frequent occupants of bat boxes (e.g., Alberta Community Bat Program) because their more generalist resource requirements provides them with greater flexibility in roost site selection. With current bat box design and site placement recommendations favoring generalist species such as the little brown myotis, there is concern that the installation of bat boxes in a forest setting may favour little brown occupancy at the expense of northern myotis. Without baseline studies of current bat community structure and roosting ecology to compare to, it is not appropriate to implement bat box installation over a large, primarily forested landscape for northern myotis. Although northern myotis are listed as bats likely to be occupants of bat houses in the Bat house builders Handbook (Tuttle et al., 2013), no studies have been undertaken to assess long-term suitability or effectiveness of bat boxes on the species. Limited studies are restricted to bat box occupancy studies from Indiana (Ritzi et al., 2005; Whitaker et al., 2006) and West Virginia (De La Cruz et al., 2018) with most occurrences documented as individuals and fewer occurrences of maternity colonies. The later West Virginia study was from one year after installation and is thus quite limited in scope.	Please see the response to 262.	05-Apr-21
272	28-Feb-22	ECCC	Letter	Lilly Cesh	WMMP	Not Specified	Wildlife & Habitat	Use the information collected for the Environmental Assessment (EA) and during the pre- construction surveys to map areas for conservation of bat habitat (i.e., riparian areas, water bodies, wetlands, forest stands, rock outcrops, talus slopes) and wildlife tree retention where practices can be put in place to avoid or minimize disturbance to roosting habitat and loss of roosts is avoided or minimized when it cannot be avoided altogether. Conservation of known bat roosts, identified candidate wildlife trees, or stands containing wildlife trees is of high priority since they provide or are likely to provide current roosting resources for bats (Kalcounis et al., 2005; Fabianek et al., 2015; Drake et al., 2020). There should be a focus on maintaining the integrity of foraging, drinking, and roosting habitat where connectivity among these is also maintained.	Please see the response to 262.	05-Apr-21
273	28-Feb-22	ECCC	Letter	Lilly Cesh	WMMP	Not Specified	Wildlife & Habitat	Plan to retain key bat habitat resources when possible. Using the information collected for the EA and during the pre-construction surveys to identify key bat habitats, incorporate these into the long term planning to set them aside for bats. Planning should include identifying forest stands of varying ages such that continual recruitment of trees and snags for bat roosts is incorporated into long-term land management objectives making sure important roosting, foraging and commuting habitat resources are retained and conserved to support bat populations beyond the life of the project.	Please see the response to 262.	05-Apr-21
274	28-Feb-22	ECCC	Letter	Lilly Cesh	WMMP	Not Specified	Wildlife & Habitat	Restoration of disturbed habitats. The restoration and reclamation plan should be carried out to ensure the continuity of forest stand succession to provide and maintain appropriate roosting and foraging areas well into the future as existing trees die off. Retention of forest stands of a range of ages, including old-growth which more often contains the types of roosting trees preferred by bats (Kalcounis et al., 2005), would provide mature trees for bat roosting resources in the future. The restoration of disturbed habitat should also consider the wildlife tree density required for bats.	Please see the response to 262.	05-Apr-21

Blackwater Gold Project										
ADMIN	COMMENTS									
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response	Response Date
275	28-Feb-22	ECCC	Letter	Lilly Cesh	WMMP	Not Specified	Wildlife & Habitat	Where protected and/or restoration habitat areas for other wildlife (e.g., caribou, migratory birds, western toads) have been identified as offsets, consider implementing measures within these areas (e.g., Capoose HE-UWR, caribou and wetland restoration areas) that are beneficial to bats. This could include creating an inventory of current habitat resources that are important to bats in the proposed offset areas such that they can be prioritized for protection and maintenance within the offset plan. These include riparian, wetland and water sources for foraging, commuting and drinking, as well as identified roosting resources (e.g., suitable wildlife trees (Kalcounis et al., 2005), wildlife tree patches, mature forest stands, rock outcrops, etc.). Where offset area plans identify areas for habitat restoration, consider including measures that restore or create habitat resources for bats. If the offset area contains areas subject to previous forest harvest, consider silvicultural techniques/activities and forest management principles that create or conserve bat habitats. For example, the retention of developing stands of native species that may be of less commercial value could be important resources for bat roosts (e.g. aspen stands containing trees that have defects (cracks, broken limbs, heart rot forming cavities etc.; Vonhof and Wilkinson 1999; Psyllakis and Brigham 2006). Depending on the temporal bounds of the offset, planning should be carried out to ensure the continuity of forest stand succession to provide and maintain appropriate roosting areas continuously as existing trees die off. Retention of forest stands of a range of ages would provide mature trees for bat roosting resources in the future.	Please see the response to 262.	05-Apr-21
276	28-Feb-22	ECCC	Letter	Lilly Cesh	WMMP	Not Specified	Wildlife & Habitat	ECCC considers a financial contribution to bat research a suitable compensation measure. For example, commitment to fund 5-years of monitoring of a NABAT grid cell in the area could provide useful information to help conserve bats in the region.	Please see the response to 262.	05-Apr-21
277	28-Feb-22	ECCC	Letter	Lilly Cesh	WMMP	Not Specified	Wildlife & Habitat	ECCC does not support the current proposed bat box study (draft work plan provided on Feb. 2, 2022); however, is open to discussing other potential bat studies.	Please see the response to 262.	05-Apr-21

Exhibit 7

Wetlands Management Offsetting Plan (ITT)

	Round 1 Comments
	Round 2 Comments

Blackwater Gold Project – Wetland Management and Offsetting Plan									
ADMIN	COMMENTS								
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Section or Page	Section in Updated Plan	Comment Theme	Comment	Response
W1	1/Nov/21	Indigenous Communities		LDN/UFN	General Note			The condition states "to offset wetland function" not to offset wetland area - this is not clearly demonstrated in this plan	Wetland offsetting planning will be re-described in an updated WMOP (targeting Q4 2022) once wetland function baseline data are collected. The plan will offset wetland function and will clearly describe how functional offsets will be met once data are available. Wetland offsetting actions are described in Section 10 and 11 of the WMOP.
W1	14/Jan/22	Indigenous Communities	Table	LDN/UFN	General Note			It would be possible if BW Gold undertook appropriate baseline studies to try to understand and quantify wetland function. It doesn't have to be based solely on government direction - it could have been based on year over year wetland monitoring data of parameters relative to function (water level, vegetation community, etc.). You've had these conditions since 2019 and could have developed a plan to have 3 years of monitoring data that would satisfy this need. How is BW Gold proposing to address this information gap?	Comment Acknowledged. To address these areas of uncertainty, BW Gold has actively worked hand-in-hand with LDN and UFN and their technical consultants developing two scopes of work collaboratively (one developed by Ecologic and another that will be issued to consultants as an RFP – Appendix E and F) to conduct wetland surveys to map wetlands in the mine site within the project footprint as well as the offset location. More information is available in Sections 7.1.3 and 7.3.
W2	1/Nov/21	Indigenous Communities		LDN/UFN	General Note	Appendix C		Condition 24 b) a detailed description for each wetland that would be lost or altered as a result of the project - if this is being pushed to Q4 2022 how is this plan meeting the condition?	Baseline data from wetlands that were surveyed to inform the EAC Application has been added and included in Appendix C. These data show the locations and properties of the wetlands that will be affected by the Project. BW Gold has worked collaboratively with LDN and UFN on the development of workplans to see necessary data collected in the Mine Site and the Mathews Creek Ranch (MCR) offsetting area. Data will be collected in 2022 and the plan will be updated with the newly collected data.
W2	14/Jan/22	Indigenous Communities	Table	LDN/UFN	General Note	Appendix C		Data in Appendix C should be amended to 1) display less duplicate information (columns 3, 4 and 5) and 2) contain soil information (i.e., organic or mineral substrate) in order for the reviewer to verify calls. Some calls appear questionable simply based on wetland type and seepage depth. The Nations request to review this information in greater detail in order to understand if what is being proposed as part of the 2022 verification is sufficient to amend the baseline data.	The data available in this appendix are presented as it was in the 2013 baseline. New data will be collected in 2022 following Appendix E and F of the revised WMOP.
W3	1/Nov/21	Indigenous Communities		LDN/UFN	General Note	Section 7.1		Condition 24 c) a detailed description of the methods used to determine the function and overall condition of wetlands - not provided, does not meet the condition requirement	A new section (Section 7.1) has been added to describe the methods that were used to prepare the Application/EIS, including functional assessments. These methods are from an appendix of the Application/EIS.
W3	14/Jan/22	Indigenous Communities	Table	LDN/UFN	General Note	Section 7.1		Resolved	N/A
W4	1/Nov/21	Indigenous Communities		LDN/UFN	General Note	N/A		There is a net-loss to wetland function which is unacceptable under the Federal condition and guidance BMPs - the offsetting ratio is less than 1:1	The current plan results in a net loss of wetland extent and function. BW Gold is committed to achieving no net loss and is seeking conditional approval of the plan, subject to updating the plan in 2022 after additional surveys have been undertaken to identify additional offsetting projects in collaboration with LDN and UFN.
W4	14/Jan/22	Indigenous Communities	Table	LDN/UFN	General Note	N/A		Section 2.1 states that there will be a deficit by year +8 - confirm when the deficit begins (year +2 or +8?)	The plan has been updated so that no wetlands will be impacted in 2022 until baseline data are collected and offsetting planning can be undertaken in Q4 2022. Refer to Section 7.1.3.
W5	1/Nov/21	Indigenous Communities		LDN/UFN	Question			Has Artemis taken into consideration any impacts to wetlands through exploration?	Conditions in the federal Decision Statement and BC EAC require the Project's impacts on wetlands to be offset. The offsetting plan focuses on mitigating impacts from Project development and not exploration effects. That said, much of the exploration is on the mine site and located in areas that will be overprinted by mine infrastructure. As such, wetlands that have been affected by exploration on the mine site will generally be offset by the offsetting plan.
W5	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Question			Resolved	N/A
W6	1/Nov/21	Indigenous Communities		LDN/UFN	Section 5			First bullet - information not provided on methods, bare minimum information provided on location	Section 5 has been revised and this comment is no longer applicable.
W6	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Section 5			Resolved	N/A
W7	1/Nov/21	Indigenous Communities		LDN/UFN	Section 5			Fifth bullet - methods not provided and do not address wetland function	Section 5 has been revised and this comment is no longer applicable.
W7	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Section 5			It is possible, but not with the baseline data that was collected.	Section 5 has been revised and this comment is no longer applicable.
W8	1/Nov/21	Indigenous Communities		LDN/UFN	Section 5			Sixth bullet - information not provided	Section 5 has been revised and this comment is no longer applicable.
W8	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Section 5			Resolved	N/A

Round 1 Comments
Round 2 Comments

Blackwater Gold Project – Wetland Management and Offsetting Plan									
ADMIN	COMMENTS								
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Section or Page	Section in Updated Plan	Comment Theme	Comment	Response
W9	1/Nov/21	Indigenous Communities		LDN/UFN	Section 5			Seventh bullet - information not provided	Section 5 has been revised and this comment is no longer applicable.
W9	14/Jan/22	Indigenous Communities	Table	LDN/UFN				Resolved	N/A
W10	1/Nov/21	Indigenous Communities		LDN/UFN	Section 6	Section 6		Training should be provided more than once for workers on site throughout the life of the mine	The following text has been added to Section 6: "Refresher training will be provided to all personnel annually."
W10	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Section 6			Resolved	N/A
W11	1/Nov/21	Indigenous Communities		LDN/UFN	7. WETLAND CONTEXT AND BASELINE WETLAND INFORMATION			Page 7-1 Description of function and characteristics of different classes of wetland very superficial and inaccurate, e.g. fens rarely exhibit emergent vegetation (should not be grouped with marshes), section needs a rewrite to clearly describe wetland characteristics and functions of the different classes, in order for any offsetting to be evaluated against the like for like guidance from BMPs.	This has been removed. Wetland class and associations are described in accordance with Mackenzie and Moran 2004.
W11	14/Jan/22	Indigenous Communities	Table	LDN/UFN	7. WETLAND CONTEXT AND BASELINE WETLAND INFORMATION			Resolved	N/A
W12	1/Nov/21	Indigenous Communities		LDN/UFN	7. WETLAND CONTEXT AND BASELINE WETLAND INFORMATION			Page 7-1 Statement that "Swamps and bogs have similar habitat functions for wildlife..." needs to be justified by reference to the literature, vegetation species composition of the two classes are starkly different and likely result in very different wildlife use.	This has been removed.
W12	14/Jan/22	Indigenous Communities	Table	LDN/UFN	7. WETLAND CONTEXT AND BASELINE WETLAND INFORMATION			Resolved	N/A
W13	1/Nov/21	Indigenous Communities		LDN/UFN	Section 7.1 Page 7-1	Section 7.1		Reference is made to 209 wetlands surveyed within study area, a map of the project footprint and wetlands should be provided in the text or in an appendix rather than requiring readers to go to a separate document that they do not have ready access to.	A map of the 209 wetlands surveyed and included in the EAC Application as they relate to the Joint MA/EMA Permits Application footprint has been added as Figure 7.1-1.
W13	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Section 7.1 Page 7-1	Section 7.1		Resolved	N/A
W14	1/Nov/21	Indigenous Communities		LDN/UFN	Section 7.1 Page 7-1			provide reference to wetland function assessment method used and details - either here or in a technical appendix - we do not want to take your word for these things, we want to see the data (e.g., what was measured for "hydrodynamic indicator observations for hydrological function"?)	Please see response to ID W3.
W14	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Section 7.1 Page 7-1			Resolved	N/A
W15	1/Nov/21	Indigenous Communities		LDN/UFN	Section 7.1 Page 7-1			Page 7-1 states "A total of 209 wetlands were surveyed in the mine site..." Does this mean that 209 wetlands were identified/mapped in the study area or that 209 were surveyed while other identified/mapped wetlands were not surveyed? If the latter, what proportion of wetlands were surveyed? We'd also like to understand what wildlife sign was recorded - was it both terrestrial and aquatic?	209 wetland were identified and surveyed between spring 2011 and fall 2013, in conjunction with terrestrial ecosystem mapping (TEM), to classify wetland ecosystems. Wetland extent was not mapped and wildlife sign was not recorded.
W15	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Section 7.1 Page 7-1			The proportion of wetlands sampled is not provided, you provide the area of wetlands and number of samples but not the number of wetland polygons within the project components or LSA so it is difficult to know how thorough the sampling was. Table 7.2-1 enumerates the wetlands within project components, how does this compare to the wetlands in the LSA, what proportion of wetlands in the entire LSA are being impacted. Section 7.1.1.1 states that wildlife observation for habitat function were recorded (see fourth bullet) as part of the baseline wetland assessment - your response indicates otherwise.	The proportion of wetlands sampled is unknown, baseline studies from 2013 did not map wetland locations; they are spatially lost in TEM polygons. Baseline studies following the plans presented in Appendix E and F will be used to build on existing baseline data in 2022.
W16	1/Nov/21	Indigenous Communities		LDN/UFN	Section 7.1 Page 7-1			"209 wetlands were surveyed in the mine site, along the Mine Access Road (MAR), and freshwater supply system" in Section 5 you talk about surveying along many more features - was this not completed or were there no wetlands identified in those footprints?	The first sentence in Section 7.1 has been revised as follows: "A total of 209 wetland-related surveys were completed between summer 2011 and summer 2013 in the Mine Site Local Study Area (LSA; Appendix 5.1.2.5A in Appendix Volume 8 of the Project's Application for an Environmental Assessment Certificate/Environmental Impact Statement [Application/EIS]; New Gold 2015)."
W16	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Section 7.1 Page 7-1			Survey intensity varied based on wetland study area. Explain. How were samples selected? Describe sampling plan.	This information is not available. For 2022, a new baseline survey will be undertaken following the workplans presented in Appendix E and F of the WMOP.

	Round 1 Comments
	Round 2 Comments

Blackwater Gold Project – Wetland Management and Offsetting Plan									
ADMIN	COMMENTS								
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Section or Page	Section in Updated Plan	Comment Theme	Comment	Response
W17	1/Nov/21	Indigenous Communities		LDN/UFN	Section 7.1 Page 7-1			Transmission line not identified in Section 5	The transmission line alignments were surveyed in July 2017 and will not be re-surveyed as part of pre-construction.
W17	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Section 7.1 Page 7-1			Resolved	N/A
W18	1/Nov/21	Indigenous Communities		LDN/UFN	Section 7.1 Page 7-2			What work was done in 2021 - how many wetlands were surveyed? What were the results? Has this data been presented herein - if not when will it be available? Does Early Works avoid all known wetlands within the CPD?	A limited survey of select riparian wetlands was conducted in 2021. This survey does not constitute pre-construction surveys and these surveys are planned in 2022. They will be conducted in collaboration with LDN and UFN and results will be available in Q4 2022. Early Works are required to maintain a minimum 30m buffer from all waterbodies and watercourses, including wetlands.
W18	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Section 7.1 Page 7-2			This is contradictory to what is provided in Table 10.4-1 which shows that 73.9 ha will be lost during early works construction in years -2 and -1. In order to assess losses to wetlands, all wetlands (any any routes of hydraulic conductivity) must be preserved until catalogued	Table 10.4-1 has been removed and the plan has been revised. No wetlands will be impacted until baseline surveys are complete.
W19	1/Nov/21	Indigenous Communities		LDN/UFN	Section 7.1 Page 7-2			Is it acceptable that this work is being completed after the start of construction? Maybe a question for the Province - Nations do not agree with this work being pushed to Q4 2022.	The Early Works Joint MA/EMA Permit Application CEMP committed to maintain a minimum 30m buffer around all wetland areas. As such, wetlands within the Early Works footprint will remain in place during this construction phase and surveyed during summer 2022, with results being incorporated into the offsetting plan by Q4 2022.
W19	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Section 7.1 Page 7-2			See W18	Pre-construction monitoring requirements added to section 7.1.3, Section 9, Section 11.2 to ensure that Pre-construction surveys will be conducted to flag TEM polygons mapped as having the potential to contain a wetland so as to avoid potential loss of wetlands before baseline surveys are complete.
W20	1/Nov/21	Indigenous Communities		LDN/UFN	Section 7.1.1 Mine Site Page 7-2			Statement that “No blue- or red-listed wetlands were found in the Mine Site LSA because there are no listed wetlands in the ESSF mv 1 and ESSF mvp BEC Zones in the Stuart Nechako Natural Resource District” may be the result of lack of sampling in these BGC units rather than rare wetlands being absent from the study area and shows a poor understanding of how candidate rare ecosystems should be searched for using available tools. In searching the BC Species and Ecosystems Explorer web application for the geographic area around the study area (not the specific BGC units of the study area) over a dozen potential rare wetlands are identified that the local wetlands should be assessed against. The method to ensure compliance with condition set out that no listed wetlands occur is wetlands are surveyed and their characteristics are compared to descriptions for known listed wetlands rather than suggesting no listed wetlands occur because they have never been found before in the study area.	A description of the methodology used to identify and describe red- and blue-listed wetlands is provided in Section 7.1. Additionally, in discussion with LDN and UFN the applicability of wetland management for red- and blue-listed wetlands is moot because impacts to all wetlands need to be managed and offset.
W20	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Section 7.1.1 Mine Site Page 7-2			This section has been revised, but still does not convey that there is potential for rare wetlands within all BEC units, e.g. Table 7.1-1 suggests that there are no listed wetlands associated with the ESSmv1, ESSFmvp, and SBSmc3. While this may be true, the lack of a listed ecosystem in a particular BEC unit does not preclude the potential for rare wetlands to occur in that BEC unit. The lack of listed wetlands in some BEC units is likely due to lack of wetland sampling and possibly a lesser extent of wetlands in the particular BEC unit. This is especially true for the higher elevation units, where wetland occurrence is less prevalent and so the value of these uncommon ecosystems is higher. The impression presented in this section is that rare wetlands do not occur in the ESSFmv1, ESSFmvp and SBSmc3, while the opposite may well be the case in that rare but undocumented (not listed by CDC) are more often found in these units. The wetlands found in these units should be assessed to see if they correspond to listed wetlands elsewhere or described common wetlands. Section 7.2.1 states that no blue- or red-listed were found because none are listed for the BEC units in questions. The wetlands must be compared to rare wetlands noted elsewhere as well as descriptions for common wetlands, (there is potential that undescribed wetlands occur on the study site). If all wetlands found on the study area correspond to common wetlands then you can say no listed (rare) wetlands occur.	Wetland surveys planned for 2022 will identify listed wetlands. Wetland offsetting will require all wetlands (regardless of listed wetland status) to be offset.

	Round 1 Comments
	Round 2 Comments

Blackwater Gold Project – Wetland Management and Offsetting Plan									
ADMIN	COMMENTS								
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Section or Page	Section in Updated Plan	Comment Theme	Comment	Response
W21	1/Nov/21	Indigenous Communities		LDN/UFN	7.1.2 Transmission Line			Need citation for Wb01, Wf02, Wf05, and Wf08. Were these wetland types were not found in the Mine site study area, please confirm.	The mine site is in ESSFmvp and ESSFmv1. These wetlands are not red-or blue-listed in these BEC zones. These listed wetlands were identified as potentially affected along the transmission line corridor, which is in SBS dk, dw3, and mc 2. A citation to the transmission line study has been added to the WMOP, see Section 7.2.2.
W21	14/Jan/22	Indigenous Communities	Table	LDN/UFN	7.1.2 Transmission Line			Resolved	N/A
W22	1/Nov/21	Indigenous Communities		LDN/UFN	7.1.3 Other Project Components			Excessive use of acronyms, e.g., MAR and FWSS (inconsistent use), why not AAARC for airstrip and airstrip access road corridor or TL for transmission line? Readability would gain from a slight increase in document length.	The use of acronyms and abbreviations is consistent with the Joint MA/EMA Permits Application. First-use definitions and subsequent references to the MAR, FWSS, and TL in the WMOP have been revised to be consistent with the application.
W22	14/Jan/22	Indigenous Communities	Table	LDN/UFN	7.1.3 Other Project Components			Resolved	N/A
W23	1/Nov/21	Indigenous Communities		LDN/UFN	7.1.3 Other Project Components			For transmission line wetlands are noted by site association e.g., Wf01, here only at site class, e.g., fen. Please justify and report out on whether listed wetlands are found in other project components.	The potential for red- and blue-listed wetlands was found to be throughout the entire Project area. However, red- and blue-listed wetlands were only identified in the transmission Line.
W23	14/Jan/22	Indigenous Communities	Table	LDN/UFN	7.1.3 Other Project Components			This comment not addressed. Need to set out when wetland class is to be used and when association. Unclear if all sampled wetlands were classified to association and to what level all mapped wetlands are classified.	Wetland baseline surveys are planned for 2022 and will be classified according to class and association.
W24	1/Nov/21	Indigenous Communities		LDN/UFN	8. POTENTIAL EFFECTS ON WETLAND FUNCTIONS			Table 8-1 Wetland function has yet to be defined in this document - what are "all" functions that are being lost - how can we assess offsetting success if we don't have this information? This is the main goal of the provincial condition and all you have provided on this is one table?	Wetland functions include biochemical, ecological, hydrological, and habitat. Definitions and assessment components used during Project baseline studies have been added as Table 7.1-2, and described in Section 7.1.1.1. Detail on how the plan offsets functional loss is summarized in Table 10.2-1. As it is not possible to quantify the amount of function that could be lost at a given wetland, wetland area is used as a proxy for quantified wetland function in the WMOP.
W24	14/Jan/22	Indigenous Communities	Table	LDN/UFN	8. POTENTIAL EFFECTS ON WETLAND FUNCTIONS			"...were included in this LSA, so the 100m area associated with the linear components were incorporated into the effects assessment." Unclear what is meant here 100m is a length not an area, please reword. I imagine you mean a buffer of 100m on either side of the linear components was used in the assessment. Table 8.2.2 is unclear whether these widths are to have a 100m X 2 buffer added as the text above seemed to indicate. Need to clarify.	Table 8.2-2 revised
W25	1/Nov/21	Indigenous Communities		LDN/UFN	8. POTENTIAL EFFECTS ON WETLAND FUNCTIONS			How can all functions be affected in one phase, and not all in another? Please clarify.	The assessment assumed that when a wetland was lost all wetland functions were also lost. Once a wetland is lost it cannot be lost again in a subsequent phase so losses were identified as permanent and long term.
W25	14/Jan/22	Indigenous Communities	Table	LDN/UFN	8. POTENTIAL EFFECTS ON WETLAND FUNCTIONS			Resolved	N/A
W26	1/Nov/21	Indigenous Communities		LDN/UFN	8. POTENTIAL EFFECTS ON WETLAND FUNCTIONS			Need to clarify how affected wetland function was determined for each project phase and component, particularly for those where it is suggested that not all functions are affected.	Wetland functions were identified based on wetland class. Baseline surveys in 2011-2013 were used to evaluate wetland function. The functions associated with each wetland class were described following Hanson et. al 2008.
W26	14/Jan/22	Indigenous Communities	Table	LDN/UFN	8. POTENTIAL EFFECTS ON WETLAND FUNCTIONS			Resolved	N/A
W27	1/Nov/21	Indigenous Communities		LDN/UFN	9. MITIGATION AND MANAGEMENT MEASURES			NOT REVIEWED Tables 9-1 and 9-2: is not an effective use of a table and should be redone to increase readability and comprehension - review will be completed once this has been done, it is currently unreadable and requires that the personnel on site reading this plan have access to 1) provincial conditions, 2) federal conditions, 3) mitigations table - that is unlikely, this table will likely not end up being read and is ineffective as a result	The tables have been re-formatted to improve readability.
W27	14/Jan/22	Indigenous Communities	Table	LDN/UFN	9. MITIGATION AND MANAGEMENT MEASURES			Resolved	N/A
W28	1/Nov/21	Indigenous Communities		LDN/UFN	9. MITIGATION AND MANAGEMENT MEASURES			Is acronym P used in this table - consider removing is not? Acronym P is not provided in the footnote. The footnote should be copied over to Table 9-2 as well. Acronyms P and DS are not used in Table 9-2.	The acronyms P and DS have been removed from the footers. The footnotes have been copied to Table 9-2.
W28	14/Jan/22	Indigenous Communities	Table	LDN/UFN	9. MITIGATION AND MANAGEMENT MEASURES			Resolved	N/A

	Round 1 Comments
	Round 2 Comments

Blackwater Gold Project – Wetland Management and Offsetting Plan									
ADMIN	COMMENTS								
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Section or Page	Section in Updated Plan	Comment Theme	Comment	Response
W29	1/Nov/21	Indigenous Communities		LDN/UFN	9. MITIGATION AND MANAGEMENT MEASURES			The avoidance measures documented e.g., "BW Gold sited Project infrastructure outside of the Blackwater River watershed to avoid important heritage and natural resources, including extensive wetland complexes" and those in Table 9-1 need to be clearly demonstrated where they have been implemented to date. Clear evidence needs to be provided rather than broad statements with little substantiation.	The majority of the mitigation measures presented in Section 9 are construction related, and as such have yet to be implemented. Detailed design of the transmission line (i.e., tower placement) has also not occurred.
W29	14/Jan/22	Indigenous Communities	Table	LDN/UFN	9. MITIGATION AND MANAGEMENT MEASURES			Resolved	N/A
W30	1/Nov/21	Indigenous Communities		LDN/UFN	9. MITIGATION AND MANAGEMENT MEASURES			Measures outlined in Table 9-1, need to show how these will be achieved. Reference to management plans that provide sufficient detail to ensure that measures suggested are implemented needs to be detailed.	The means by which adherence to mitigation measures will be achieved can be diverse, and providing that level of detail is not considered to be within scope of the WMOP or other management plans,
W30	14/Jan/22	Indigenous Communities	Table	LDN/UFN	9. MITIGATION AND MANAGEMENT MEASURES			Resolved	N/A
W31	1/Nov/21	Indigenous Communities		LDN/UFN	Table 9-1			Footnote 1 suggests that Offset discussed in section 7, it appears that it is discussed in section 10.	The reference has been removed.
W31	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Table 9-1			Resolved	N/A
W32	1/Nov/21	Indigenous Communities		LDN/UFN	Table 9-1			In numerous places, "where practical" is used. This could be a justification to do nothing, as practicality always favors least short-term economic cost. Need to better justify and explain "where practical".	References to "where practical" have been removed from the plan.
W32	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Table 9-1			Resolved	N/A
W33	1/Nov/21	Indigenous Communities		LDN/UFN	9. MITIGATION AND MANAGEMENT MEASURES			Should provide Mitigation Table referred throughout this section in an appendix so it is readily available to refer to. OR find a way to incorporate it into Tables 9-1 and 9-2 so they have substance.	EAC Mitigation Table IDs have been added to Table 9-1 and 9-2.
W33	14/Jan/22	Indigenous Communities	Table	LDN/UFN	9. MITIGATION AND MANAGEMENT MEASURES			Resolved	N/A
W34	1/Nov/21	Indigenous Communities		LDN/UFN	Section 10			Provincial condition reference is wrong - offsetting is 24 d), f), g) and h)	The opening sentence of Section 10 has been revised as follows "This section describes the wetland offsetting plan, required by DS Condition 5.3 and EAC Condition 24 d), f), g) and h)."
W34	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Section 10			Resolved	N/A
W35	1/Nov/21	Indigenous Communities		LDN/UFN	Section 10			Add reference to Provincial condition for how offsetting consider habitat for grizzly bear as well (see condition 24 f)	Reference to EAC Condition 24 (f) has been added to section 10.2.2 with respect to wildlife habitat restoration objectives, including grizzly and moose.
W35	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Section 10			Resolved	N/A
W36	1/Nov/21	Indigenous Communities		LDN/UFN	10.1 Wetland Balance			The offsetting calculations are predicated that one hectare of offset equals one hectare of lost wetland. The notion that created wetlands provide equivalent habitat, hydrological and other values of the lost wetlands is not demonstrated. If quality of wetlands is to be offset then wetlands will need to offset at greater than a 1:1 ratio based on area. Even if area estimates are conservative as stated, planning for offsets should start from an assumption that wetland function will be offset not wetland area. No specifics on offsetting for listed wetlands lost are provided. No accounting of type of wetland lost is provided. Presumably if x ha of swamp are lost, then x plus factor for potential loss of quality ha of swamp should be replaced. An accounting of wetland lost at least to class level needs to be provided and the offset plan needs to address this accounting.	The offsetting plan (Section 10) has been edited to reflect the iterative nature of impacts and implementation of the offset. The offsetting plan is not complete and will need to be revised again in 2022 with additional details to clarify the extent of loss and identify additional offsetting targets.

	Round 1 Comments
	Round 2 Comments

Blackwater Gold Project – Wetland Management and Offsetting Plan									
ADMIN	COMMENTS								
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Section or Page	Section in Updated Plan	Comment Theme	Comment	Response
W36	14/Jan/22	Indigenous Communities	Table	LDN/UFN	10.1 Wetland Balance			<p>Method used for accounting is not clearly spelled out. This is a critical area to understand. In Table 10.4.1 how area loss is calculated is clear. How gain is calculated is not. E.g., Mathews Cr Ranch (Zone B) gain is suggested as 121.2 ha. How was this area calculated? Can't be entire area of Zone B as it includes already functioning wetland that will not see functional improvement, e.g. Black Spruce bog shown in inset of Figure 10,2-1. Not all this area will become effective/functional wetland, even if cattle have been removed from this entire area, the functional restorative value extends only to lack of input of manure to water and invasive plants in feed. There is some sort of factoring of how effective the gain is relative to loss (ratio column) but this is not explained or justified. How is the balance column calculated? This need a clear explanation.</p> <p>Accounting for gain and loss is hypothetical at this stage, although losses can be likely more accurately predicted. Modeling of gains and losses very crude.</p> <p>Accurate accounting can only be done once an effective monitoring program is instituted. As the expectation is no net loss based on a like for like replacement, the accounting process must take into account wetland type and function, so that a hectare of lost swamp is compensated by a gain of a hectare of comparable quality swamp.</p>	References to wetland accounting have been removed. Wetland accounting will be updated once baseline data are collected in 2022.
W37	1/Nov/21	Indigenous Communities		LDN/UFN	Table 10-1 footnote 1			How can all wetlands be lost but adjacent wetlands not be impacted from a function perspective? There is a ton of literature that details the connectivity of non-floodplain wetlands. If this is an assumption of the plan, this needs to be well discussed and referenced. At face-value I believe this is an incorrect and detrimental assumption.	<p>The footnote does not say that the adjacent wetlands will not be impacted. The footnote states that wetlands adjacent to the transmission line will not be lost. The wetlands adjacent to development are susceptible to degradation or alteration to function, however, implementation of mitigation measures should prevent loss of functions in areas where the wetlands are not lost. The monitoring plan will target these areas and if additional losses are identified then adaptive management measures will be implemented to stop the additional loss.</p> <p>Additionally, Section 8.5 discusses uncertainties associated with the assessment of wetlands in the transmission line area. As a conservative measure all wetlands in the 40m right of way were assessed as lost. In reality the wetlands will not be lost unless they are damaged by construction i.e., an access road is built in them, a tower is built in them, or they are cleared because they contain tall trees. Most of the wetlands mapped in the transmission line are dominated by emergent grass-like vegetation meaning they will not be cleared and provided that access roads and towers are not cited in these wetlands they will not actually be lost.</p>
W37	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Table 10-1 footnote 1			Resolved	N/A
W38	1/Nov/21	Indigenous Communities		LDN/UFN	Table 10-1 footnote 2			Explain "cumulative total loss" is this not contradictory to footnote 1?	This footnote is no longer accurate as a final transmission line route has been identified. The loss associated with this route has been updated in the revised table.
W38	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Table 10-1 footnote 2			Resolved	N/A
W39	1/Nov/21	Indigenous Communities		LDN/UFN	Table 10-1 footnotes 3, 4			Please explain.	Both the Lake 15/16 connector channel and fisheries offsetting ponds are defined, constructed features with a footprint. Any wetland loss associated with those features was assumed to be limited to the area within the footprints.
W39	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Table 10-1 footnotes 3, 4			Resolved	N/A
W40	1/Nov/21	Indigenous Communities		LDN/UFN	Table 10-1 footnote 6			Are you implying that by removing cattle from the land you are "restoring" it? Restoration is an active undertaking of work - not allowing for the passive regeneration of the land by removing pressure. This should not be considered in this table as it is not restoration. Restoration will occur when work starts.	Removal of cattle and cessation of agricultural practices are the first step to restoration of the Mathews Creek Ranch wetland. Specific actions and objectives are also identified for three zones stepping out restoration activities over the next three years.
W40	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Table 10-1 footnote 6			Resolved	N/A

Round 1 Comments
Round 2 Comments

Blackwater Gold Project – Wetland Management and Offsetting Plan									
ADMIN	COMMENTS								Response
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Section or Page	Section in Updated Plan	Comment Theme	Comment	Response
W41	1/Nov/21	Indigenous Communities		LDN/UFN	Page 10-3			"Wetland loss was determined by overlaying the footprint of Project components (except the transmission line)" why? Table 10-1 details wetland loss as a result of the transmission line construction. By not including this are you not underestimating wetland loss?	The transmission line in its entirety (both on site and off-site, including the cumulative total of three re-routes) was included in the wetland balance calculations.
W41	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Page 10-3			Resolved	N/A
W42	1/Nov/21	Indigenous Communities		LDN/UFN	Page 10-3			CPD and TL not in acronym list. TL not introduced earlier.	These references have been corrected.
W42	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Page 10-3			Resolved	N/A
W43	1/Nov/21	Indigenous Communities		LDN/UFN	Page 10-3			Assumption #1 considered wetland area not function - this is not the intention of this plan	The following has been added to Section 8.5 (Assessment Uncertainties): "There are no methods in BC to quantify the amount of wetland function at one wetland and compare it to another wetland. There are methods for measuring and describing aspects of function and then qualitative descriptors of function associated with individual wetland classes. For this assessment it was assumed that all wetlands currently on the landscape were functioning at maximum capacity, i.e., they had all wetland functions specific to the wetland class as defined by Hanson et al. (2008). To quantify the loss of function a class/area approach was used where the functions associated with each class were assumed lost to the magnitude of the wetland area."
W43	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Page 10-3			Resolved	N/A
W44	1/Nov/21	Indigenous Communities		LDN/UFN	Page 10-3			Assumption #2 clarify TL inclusion/exclusion in this - there's conflicting information throughout. Also, the final route has been selected - this report should incorporate that	Please see response to ID W38. The final transmission line alignment will be incorporated into the updated wetland balance following the 2022 surveys.
W44	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Page 10-3			Resolved	N/A
W45	1/Nov/21	Indigenous Communities		LDN/UFN	Page 10-3			Nations are not in agreement that this plan should be approved prior to having all the relevant information - the Provincial condition must be met fully prior to the start of construction (currently estimated at Q2 2022)	Currently the WMOP does not achieve a no-net-loss of wetland function as a result of Project development. BW Gold commits to achieving a no-net-loss of wetland function, and will not cause a loss without having an EAO-approved plan in place to offset associated losses. The following is BW Gold's plan to get there: 1. Conduct pre-construction surveys in summer 2022 to refine the wetland balance. This work is expected to identify significant reductions in the Project footprint overlap with wetland areas. With respect to timing, completion of surveys can still occur in 2022 as the Early Works Joint MA/EMA Permits Application committed to maintain a minimum 30m buffer around all wetland areas. As such, wetlands within the Early Works footprint will remain in place during this phase. 2. Collaborate with LDN and UFN to identify additional restoration sites such that project effects on wetlands will be offset prior to the impact occurring.
W45	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Page 10-3			See W18	Please see response to W18
W46	1/Nov/21	Indigenous Communities		LDN/UFN	Page 10-3			"Hydraulically connected or adjacent wetlands are not considered in the wetland balance as the implementation of mitigation measures are expected to prevent loss to wetland function and extent" How is this being done? The only mitigation provided in Table 9-1 and 9-2 that addresses hydraulic connectivity of wetlands is the installation of culverts. Different wetlands require different management and monitoring approaches - the current approach does not take this into consideration. Each class of wetland has unique characteristics, meaning that the potential impacts of crossings may be different depending on what class they are traversing. Hydrology underlies much of the ecological functioning of wetland ecosystems. There are numerous guides on how to approach this issue - consider referencing.	Tables 9-1 and 9-2 have been edited for readability. Mitigation Measures 3-1, 3-3, 3-4, 3-16, 3-17, and 3-19 all provide mitigation measure to minimize the impacts to hydrologically connected wetlands.
W46	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Page 10-3			Resolved	N/A
W47	1/Nov/21	Indigenous Communities		LDN/UFN	Page 10-3			"Overall, the Project is expected to result in the loss of 308.3 ha of wetland" including the transmission line or no?	Correct. However, this has been revised to 301.7 given the final transmission line alignment is now confirmed and there have been other small changes to mine infrastructure which has reduced the extent of wetland loss.

	Round 1 Comments
	Round 2 Comments

Blackwater Gold Project – Wetland Management and Offsetting Plan									
ADMIN	COMMENTS								
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Section or Page	Section in Updated Plan	Comment Theme	Comment	Response
W47	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Page 10-3			Resolved	N/A
W48	1/Nov/21	Indigenous Communities		LDN/UFN	Page 10.1-2			If expectation is no net-loss why is the offsetting ratio less than 1:1?	BW Gold is committed to achieving no less than a 2:1 ratio.
W48	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Page 10.1-2			Resolved	N/A
W49	1/Nov/21	Indigenous Communities		LDN/UFN	Page 10-3			What parameters were considered when looking at "biological equivalency"?	The class/area approach was use to connect wetland function to a quantifiable measure.
W49	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Page 10-3			See W155	Table 11.4-3 includes a form called BW wetland function. Additional requirements are described in Appendix A and B.
W50	1/Nov/21	Indigenous Communities		LDN/UFN	Page 10-3			What was considered when looking at "cultural value"? The Nations have expressed that Matthews Creek was selected with very little consultation/buy-in until the plan was already in place to use this location. To date, the Nations have had no input on the selection of other offsetting areas so how can a consideration of "cultural value" be claimed here?	The Mathews Creek offsetting site was proposed in the Conceptual Wetland Compensation Plan provided in the Application/EIS (Appendix 5.3.7A in Volume 16 of the Appendices). Reference to 'cultural value' has been removed from the section. BW Gold is committed to collaborating with LDN and UFN on the wetland offsetting plan, including by identifying additional wetlands offsetting projects, subject to the 2022 wetland surveys and confirmation of the extent of wetland impacts.
W50	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Page 10-3			Resolved	N/A
W51	1/Nov/21	Indigenous Communities		LDN/UFN	Page 10-3			"The Mathews Creek wetland complex was selected as an offsetting site because there has been intensive agriculture and livestock grazing for the past 50 years which has resulted in degradation of the natural wetland ecosystem" while this is true of the degradation, this is not why the location was selected. The land is privately owned by the Proponent and overlies their mineral claims.	BW Gold respectfully disagrees with the comment. While it is true that BW Gold owns the property, the property provides a unique opportunity near to the mine site to restore a degraded natural wetland ecosystem and to integrate the work with proposed fish habitat offsetting.
W51	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Page 10-3			Resolved	N/A
W52	1/Nov/21	Indigenous Communities		LDN/UFN	Page 10-4			"Detailed mapping of the complex is not available" this seems like a pretty key component to proposing, measuring and monitoring this plan - when will it be available? If you have no/little baseline data on what is there, how will you measure success? How will you plan what needs to be done?	Commitments to complete surveys in 2022 have been written into the plan.
W52	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Page 10-4			Resolved	N/A
W53	1/Nov/21	Indigenous Communities		LDN/UFN	Page 10-4			"The plan includes wetland compensation at Mathews Creek Ranch and Lower Mathews Creek by way of restoration of 181.1 ha of wetland" include a map and figure reference here	The text in Section 10.2 has been revised and a map is provided specific to restoration zones has been developed to help demonstrate the planned activities needed to restore each zone.
W53	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Page 10-4			Resolved	N/A
W54	1/Nov/21	Indigenous Communities		LDN/UFN	Page 10-4			"Restoration within the wetland complex began when BW Gold (and the previous owners, New Gold) purchased the property, ceased agricultural practices on the land, and excluded cattle" same comment as above - no it didn't. This is false statement that overstates the work done to date (which is nothing). As a result of the purchase, the land can passively respond to the removal of a stressor (cattle).	The wording has been revised to state that removal of cattle and cessation of agricultural practices have started restoration but the extent of that restoration is not known and additional mitigation activities need to be conducted.
W54	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Page 10-4			Resolved	N/A
W55	1/Nov/21	Indigenous Communities		LDN/UFN	10.2.1 page 10-4			The "how" is missing from all of these objectives.	Table 10.2-1 has been added to help describe how the activities will restore the four wetland functions.
W55	14/Jan/22	Indigenous Communities	Table	LDN/UFN	10.2.1 page 10-4			Resolved	N/A
W56	1/Nov/21	Indigenous Communities		LDN/UFN	10.2.1 page 10-4			Objective #3 no mention of grizzly bears (as stated in provincial condition)	Please see response to comment ID W35.
W55	14/Jan/22	Indigenous Communities	Table	LDN/UFN	10.2.1 page 10-4			Resolved	N/A
W57	1/Nov/21	Indigenous Communities		LDN/UFN	10.2.1 page 10-4			Why no consideration so reptiles, amphibians throughout this plan?	Reptiles and amphibians will be protected under the Wildlife Mitigation and Management plan. This plan is specific to wetland resources.
W57	14/Jan/22	Indigenous Communities	Table	LDN/UFN	10.2.1 page 10-4			Resolved	N/A
W58	1/Nov/21	Indigenous Communities		LDN/UFN	10.2.1 Mathews Creek Ranch, page 10-7			It is unclear how the 140.4 ha has been calculated. Need to clearly define how offsetting will compensate for lost habitat. Also not confident that all these numbers add up - previously stated as 181.1 ha (Table 10.1-2)	Table 10.1-2 has been removed and a better explanation of restoration within the Mathews Creek Ranch has been provided. Three restoration zones are identified and restoration objectives and actions were described for each of these zones linking the actions back to the individual functions that will be offset. Reference to all areas for wetland offsetting have been removed until baseline studies are complete.

	Round 1 Comments
	Round 2 Comments

Blackwater Gold Project – Wetland Management and Offsetting Plan									
ADMIN	COMMENTS								Response
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Section or Page	Section in Updated Plan	Comment Theme	Comment	Response
W58	14/Jan/22	Indigenous Communities	Table	LDN/UFN	10.2.1 Mathews Creek Ranch, page 10-7			Resolved	N/A
W59	1/Nov/21	Indigenous Communities		LDN/UFN	page 10-7			Objective #5: Increase shallow-water and marsh habitat along Mathews Creek for migratory birds (incl. waterfowl) and moose. Unclear how this will be accomplished. Need to detail measures that will result in this or explain how plans will be prepared.	Zone A of the Mathews Creek Ranch includes the riparian areas of Mathews Creek and fish habitat offsetting ponds. These ponds will provide open water habitat for wildlife staging. However to avoid double counting restoration areas, the ponds have been included as an impact in the wetland accounting table.
W59	14/Jan/22	Indigenous Communities	Table	LDN/UFN	page 10-7			Concern remains around accounting. Riparian planting, including these overwintering ponds, is included in the Schedule 2 Amendment. We need to clearly see how this accounting has been done, and it should show how the Schedule 2 Amendment planting areas has been excluded.	All areas for wetland offsetting have been removed until additional baseline studies are complete and restoration activities are identified.
W60	1/Nov/21	Indigenous Communities		LDN/UFN	page 10-7			36.6ha and 140.4 ha are referred to but it is unclear what land areas these areas refer to. Figure 10.2-2 is cited but does not show the two areas clearly. Need to clarify.	All areas for wetland offsetting have been removed until baseline studies are complete and restoration activities are identified.
W60	14/Jan/22	Indigenous Communities	Table	LDN/UFN	page 10-7			Resolved	N/A
W61	1/Nov/21	Indigenous Communities		LDN/UFN	page 10-7			"Figure 10.2-2 presents the compensation objectives and actions that would be required at this site." It is unclear from Figure 10.2-2 what this area will look like post treatment. Need to clearly identify areas of increased shallow water and marsh and how 177 ha of lost wetlands will be offset by actions here. Has any consideration been given to introduce/increase beaver activity in the area?	Three restoration zones are identified and objectives and actions for each of the three zones are described. Also described is how the restoration activities are connected to wetland function. Additionally commitments are included to conducted 2022 surveys to identify additional restoration activities that could be implemented.
W61	14/Jan/22	Indigenous Communities	Table	LDN/UFN	page 10-7			The Plan does not identify wetland types to be restored relative to what exists within the mine site. The offsetting must be like for like and there is no indication that this is possible currently. The objectives for each of the restoration zones provides little confidence that wetland properties will be (or can be) restored at Mathews Creek	The WMOP will be updated in Q4 2022 once baseline studies are complete and it is known what types of wetlands can be created.
W62	1/Nov/21	Indigenous Communities		LDN/UFN	page 10-7			"Habitat function could be rapidly restored." What is rapid? Could be or will be? Better ensure that you can evaluate this rigorously.	This has been removed.
W62	14/Jan/22	Indigenous Communities	Table	LDN/UFN	page 10-7			Resolved	N/A
W63	1/Nov/21	Indigenous Communities		LDN/UFN	page 10-7			"The black spruce forested wetlands are anticipated to include bog wetlands in areas where peatland soils remain, in addition to swamp wetlands." There is no explanation how black spruce forested wetlands are about to be created or enhanced and over what time frame this is expected and how success will be evaluated. Need a clear explanation about the anticipated area and composition of the various components of the mosaic of wetlands restored. Before this can be placed into context of meeting offset goals, also need a clear inventory of wetland composition and function at the site, so that positive change can be quantified.	This has been removed.
W63	14/Jan/22	Indigenous Communities	Table	LDN/UFN	page 10-7			Resolved	N/A
W64	1/Nov/21	Indigenous Communities		LDN/UFN	Page 10-7			"The offset wetlands will be restored to a mosaic of black spruce, shrub, and emergent wetland habitats" so no fens then? As noted earlier, fens and marshes should not be grouped, they are very different in their composition	This has been removed.
W64	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Page 10-7			Resolved	N/A
W65	1/Nov/21	Indigenous Communities		LDN/UFN	10.2.2 Lower Mathews Creek			"Re-establishment of shrub and forested wetland habitats in riparian areas is anticipated to occur naturally after taking these actions." What actions? These actions need to clearly spelled out. Also, what do you mean by "may be available"? Opportunity for restoration may be available at this site is stated from this it isn't clear that the site has been thoroughly assessed, is it going to be restored or not?	Agreed. This section has been re-written to reflect a zone based stepwise approach to restoration.
W65	14/Jan/22	Indigenous Communities	Table	LDN/UFN	10.2.2 Lower Mathews Creek			Resolved	N/A
W66	1/Nov/21	Indigenous Communities		LDN/UFN	Section 10.2.3			Define "the duration of time that the Tailings Impoundment Area is in use" this is vague - the Nations want to see a measurable commitment (i.e., until when?)	The wetland compensation works will be protected for a minimum of 25 years, subject to a legislative mechanism being available to provide long-term protection.
W66	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Section 10.2.3			See W148	The WMOP will be updated once baseline studies are complete in 2022

Round 1 Comments
Round 2 Comments

Blackwater Gold Project – Wetland Management and Offsetting Plan									
ADMIN	COMMENTS								
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Section or Page	Section in Updated Plan	Comment Theme	Comment	Response
W67	1/Nov/21	Indigenous Communities		LDN/UFN	Section 10.2.3			This feels like a great place to highlight the important conversations that have been going on between Artemis and the Nations about securing this land in perpetuity - we understand we don't have a final answer yet, but please include/acknowledge	BW Gold is committed to exploring options to secure this land and also to work with LDN and UFN to better understand the Nations' vision(s) for use of the Mathews Creek property.
W67	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Section 10.2.3			Resolved	N/A
W68	1/Nov/21	Indigenous Communities		LDN/UFN	Section 10.3			Can you provide proof?	Work was done in 2018 to identify regional partnership opportunities. However, these numbers have been removed from this version of the plan, and a statement has been added to indicate that BW Gold will work with LDN and UFN to identify suitable sites in the region for additional restoration.
W68	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Section 10.3			Resolved	N/A
W69	1/Nov/21	Indigenous Communities		LDN/UFN	10.4 Freshwater Reservoir			"...6.9 ha of riparian swamp wetland habitat will be created by allowing the freshwater reservoir to convert to wetland habitat" It is unclear how the entire reservoir will be converted to a swamp. This will require the water levels to drop dramatically from an open water setting. Reference is made to the reclamation and closure plan, there is no mention of this work in the RCP.	This has been removed.
W69	14/Jan/22	Indigenous Communities	Table	LDN/UFN	10.4 Freshwater Reservoir			Resolved	N/A
W70	1/Nov/21	Indigenous Communities		LDN/UFN	10.5 Schedule			Critical to a rigorous evaluation of offsetting effectiveness and the meeting of regulatory conditions is monitoring of activities. These must be included in the schedule.	Additional details on offset effectiveness monitoring have been added to Section 11.
W70	14/Jan/22	Indigenous Communities	Table	LDN/UFN	10.5 Schedule			Resolved	N/A
W71	1/Nov/21	Indigenous Communities		LDN/UFN	Figure 10.2-2			No definition is provided for the difference between Compensation Area and Additional Compensation Area - why are these delineations important? What do they mean?	This has been removed.
W71	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Figure 10.2-2			Resolved	N/A
W72	1/Nov/21	Indigenous Communities		LDN/UFN	Figure 10.2-3			Where is this relative to the area in the previous figure?	This Project has been removed.
W72	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Figure 10.2-3			Resolved	N/A
W73	1/Nov/21	Indigenous Communities		LDN/UFN	Section 10.5 Construction			Inconsistent spelling of Mathews Creek	The spelling of Mathews Creek has been revised throughout.
W73	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Section 10.5 Construction			Resolved	N/A
W74	1/Nov/21	Indigenous Communities		LDN/UFN	Section 10.5 Construction			When does this start? Provide a year (e.g., Y+1)	Additional detail on the wetland restoration implementation schedule for Mathews Creek has been added to Section 10.3.
W74	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Section 10.5 Construction			Resolved	N/A
W75	1/Nov/21	Indigenous Communities		LDN/UFN	Section 10.5 Construction			First bullet point - this is already complete no? Doesn't seem fair to include it.	This step is a necessary first step in the restoration of Mathews Creek. It is not the entire plan and restoration efforts in three zones have been better described to illustrate plans for restoration in this area.
W75	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Section 10.5 Construction			Resolved	N/A
W76	1/Nov/21	Indigenous Communities		LDN/UFN	Section 10.5 Construction			There could not be less information provided here - what's your revegetation plan? How will you inventory the site for invasive plant species and persistent agronomics? How will you assess wetland function and reassess wetland class once hydrology impacts are removed/restored? How will your revegetation plan take into consideration each type of wetland class? At face value, this is not a construction plan. This is a bare-bones high level overview of the low-hanging fruit with respect to restoring this area.	Baseline surveys in the Mathews Creek Ranch need to be completed prior to development of detailed plans. These surveys and plan development are planned for 2022.
W76	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Section 10.5 Construction			There is still no information about what will be done, where, when, etc. There is no revegetation plan. There are no guidelines for assessing success at the offsetting site - or discussion of how this is expected to be achieved. Comment is not addressed.	Restoration planning will be conducted after baseline surveys are completed in 2022.
W77	1/Nov/21	Indigenous Communities		LDN/UFN	10.5 Schedule Construction			Having all works at Matthew Creek Ranch and Lower Mathews Creek complete in one year seems optimistic in the extreme. Ongoing work to implement invasive plant control and wetland enhancement should be anticipated for several years.	Agreed, Lower Mathews Creek has been dropped from the Project list and restoration activities at Mathews Creek Ranch are rolled out over 3 years.

Round 1 Comments
Round 2 Comments

Blackwater Gold Project – Wetland Management and Offsetting Plan									
ADMIN	COMMENTS								
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Section or Page	Section in Updated Plan	Comment Theme	Comment	Response
W77	14/Jan/22	Indigenous Communities	Table	LDN/UFN	10.5 Schedule Construction			Resolved	N/A
W78	1/Nov/21	Indigenous Communities		LDN/UFN	10.5 Schedule Closure			Need to provide a expected duration for the work at the freshwater reservoir. Outcomes, expectations? Again, why is there no information provided about what this entails?	Freshwater reservoir has been removed.
W78	14/Jan/22	Indigenous Communities	Table	LDN/UFN	10.5 Schedule Closure			Resolved	N/A
W79	1/Nov/21	Indigenous Communities		LDN/UFN	11. MONITORING			A monitoring plan that clearly states proportion of wetlands to be measured on the ground, parameters to be measured, scale of mapping necessary to detect changes in wetland extent and character, needs to be provided.	Parameters that will be measured as part of offset effectiveness monitoring and are provided in Section 11.4 (see also Table 11.4-3). Wetlands will be mapped at a scale of 1:5,000 as indicated in Section 7.1.3.
W79	14/Jan/22	Indigenous Communities	Table	LDN/UFN	11. MONITORING			Resolved	N/A
W80	1/Nov/21	Indigenous Communities		LDN/UFN	Section 11.1			Same comment throughout, is construction starts in Q2 2022 (Early Works) how can this be accomplished?	The Early Works Joint MA/EMA Permit Application CEMP committed to maintain a minimum 30m buffer around all wetland areas. As such, wetlands within the Early Works footprint will remain in place during this construction phase and surveyed during summer 2022, with results being incorporated into the offsetting plan by Q4 2022.
W80	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Section 11.1			See W18	Please see reponse to W18
W81	1/Nov/21	Indigenous Communities		LDN/UFN	11.2.1 Monitoring within EAC Certified Project Description Boundary			"The baseline surveys and assessment conclusions were conservative and overestimate the area of impacted wetlands..." Confirm this please. Also, to meet the Provincial condition, you need to be monitoring and offsetting for loss of function - this has not been addressed other than to say that you will not impact function. This must be addressed in detail.	Uncertainties associated with baseline data are discussed in Section 7.3, and BW Gold's plan to address uncertainties associated with the WMOP has been added as Table 12-1.
W81	14/Jan/22	Indigenous Communities	Table	LDN/UFN	11.2.1 Monitoring within EAC Certified Project Description Boundary			Resolved	N/A
W82	1/Nov/21	Indigenous Communities		LDN/UFN	Section 11.2.2			Why only monitoring extent for select wetlands?	Wetland extent at select wetlands will be used as an indicator of hydrological status of all wetlands. It is not feasible to map wetland extent of all remaining wetlands on an annual basis.
W82	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Section 11.2.2			Resolved	N/A
W83	1/Nov/21	Indigenous Communities		LDN/UFN	Section 11.2.2			The third bullet is confusing - please clarify... why are you proposing the third bullet point about monitoring vegetation when this section is specifically talking about monitoring wetlands "after vegetation clearing" (do you mean that wetlands won't be cleared)? This bullet also discusses offset sites? How is this relevant to cleared areas on the mine site?	This is intended to refer to wetlands that will remain on site as they lie within the mine site boundary but outside the cleared Project footprint. This is the language used in the EAC condition.
W83	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Section 11.2.2			Resolved	N/A
W84	1/Nov/21	Indigenous Communities		LDN/UFN	Section 11.2.3			How will you make observation about soil nutrients?	Section 11.4.2 provides the following details on soil nutrient evaluation: "Soil nutrients will be characterized through observational data such as color, level of decomposition, texture and water availability, and wetland class will be verified according to MacKenzie and Moran (2004). Plants will be identified to species using Plants of Northern British Columbia – 2nd edition (MacKinnon et al. 1999) and E-Flora BC: Electronic Atlas of the Flora of British Columbia (Klinkenberg 2018) and will include observations regarding vigour."
W84	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Section 11.2.3			See W158	Appendix E and F present work plans and an RFP developed in consultation with LDN and UFN to collect appropriate data on the mine site and in the offsetting area.
W85	1/Nov/21	Indigenous Communities		LDN/UFN	Section 11.2.3			This seems like a copy/paste from the previous section - why is accidental infilling relevant? Why would there be pollutant discharge? Are you not doing this with the aim of reducing vegetation stress? Rewrite.	Section 11.4 includes visual inspection for accidental infill and pollutant discharge as some wetlands will remain within the mine site boundary, but outside of the Project footprint, therefore could be impacted by these causes.
W85	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Section 11.2.3			Resolved	N/A
W86	1/Nov/21	Indigenous Communities		LDN/UFN	Section 11.3			Is there a scenario in which a trigger for more frequent monitoring would be required?	Potential need for more frequent monitoring will be evaluated through the adaptive management program (Section 13). Potential for revisions to the monitoring program would be evaluated for "Low Level" monitoring triggers or higher.

Round 1 Comments
Round 2 Comments

Blackwater Gold Project – Wetland Management and Offsetting Plan									
ADMIN	COMMENTS								Response
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Section or Page	Section in Updated Plan	Comment Theme	Comment	Response
W86	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Section 11.3			Resolved	N/A
W87	1/Nov/21	Indigenous Communities		LDN/UFN	Section 11.4			Row 1 Wetland extent - add use of ground-based surveys as analysis method	Additional detail regarding the scope of pre-construction surveys has been added to Section 11.2.
W87	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Section 11.4			Resolved	N/A
W88	1/Nov/21	Indigenous Communities		LDN/UFN	Section 11.4			Row 2 Vegetation community - add assessment of planting/seeding success	The following objective has been added to Section 11.4 (11.4 Monitoring of Loss and Gain in Wetlands): "Vegetation monitoring (incl. invasive plants) to document plant cover, plant species, and survival to ensure the offset sites are on a successional trajectory towards the intended habitat types." Methods will include (Section 11.4.2): identification to species using Plants of Northern British Columbia – 2nd edition (MacKinnon et al. 1999) and E-Flora BC: Electronic Atlas of the Flora of British Columbia (Klinkenberg 2018) and will include observations regarding vigor.
W88	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Section 11.4			Resolved	N/A
W89	1/Nov/21	Indigenous Communities		LDN/UFN	Section 11.4			Row 3 Water quality - is reference to baseline valid? If it's a degraded system, reference to BCWQG is applicable reference	Water quality results will be compared to Provincial Water Quality Guidelines for Aquatic Life, Wildlife & Agriculture as described in Section 7.1.1.1.
W89	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Section 11.4			Resolved	N/A
W90	1/Nov/21	Indigenous Communities		LDN/UFN	Section 11.5			Relates to row 83 - what wetlands are being preserved? The RCP discusses how all wetlands will be lost and soils salvaged for use in reclamation.	Please see comment response to W 83.
W90	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Section 11.5			Resolved	N/A
W91	1/Nov/21	Indigenous Communities		LDN/UFN	11.5.1 Performance Standards			"Non-native and invasive plant species populations are not increasing by more than 10% over the course of the mine life. This 10% is identified as a "low level" change in Table 12-1." If we are aiming for no net loss, then no increase in non-natives should be the goal.	The 10% threshold has been removed and this performance standard in Section 11.6.1 has been revised as follows: "Non-native and invasive plant species populations are not increasing".
W91	14/Jan/22	Indigenous Communities	Table	LDN/UFN	11.5.1 Performance Standards			Resolved	N/A
W92	1/Nov/21	Indigenous Communities		LDN/UFN	11.5.1 Performance Standards			After post-construction surveys complete should be able to provide an areal extent of wetlands lost and then compared to wetland restored and this should balance and be stated as a performance standard.	The following performance standard has been added to Section 11.6.1: "No-net-loss of wetland considering: pre-construction wetland extent, as-built survey of Project footprint, and offset area"
W92	14/Jan/22	Indigenous Communities	Table	LDN/UFN	11.5.1 Performance Standards			Resolved	N/A
W93	1/Nov/21	Indigenous Communities		LDN/UFN	Table 12-1: Adaptive Management Response for Wetlands			Need to justify no modification of management plan if wetland loss 20% greater than anticipated. All actions are predicated on no net loss and this needs to be demonstrated.	A "Low Level" trigger (10 to 20% increase) will result in an update to the WMOP. The following has been added as a "Low Level" response: "Identify potential new mitigation measure(s) if trends continue and discuss as recommendations in monitoring report and update the WMOP as necessary."
W93	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Table 12-1: Adaptive Management Response for Wetlands			Resolved	N/A
W94	1/Nov/21	Indigenous Communities		LDN/UFN	Table 12-1			The losses proposed in this table (10 to >30%) would result in Artemis having to offset upwards of an additional 1,000 ha - given that the 1:1 ratio is not met through the use of Matthews Creek how can the Nations take stock in this plan? How can Artemis realistically make up these potential losses?	In the unlikely scenario of a 30% increase, this would represent approximately 400 additional ha, not 1000 ha as the reviewer indicates. In this very unlikely situation, losses that could not be accounted for by the Mathews Creek complex would be made up through additional regional partnership opportunities.
W94	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Table 12-1			Concerns remain around viability of Mathews Creek success and the ability of the proponent to find additional restoration opportunities	Acknowledged. Baseline studies planned for 2022 will be used to refine planning and identify specific restoration activities.
W95	1/Nov/21	Indigenous Communities		LDN/UFN	overall remarks			Given the incremental improvements over the Matthew Creek restoration area (which doesn't equal the land area of the affected wetlands of the project) it is unclear how the total loss of wetlands within the footprint and at least partial loss along the transmission line and elsewhere are adequately compensated for in this plan even if all 83 ha of partnership opportunities are acted upon.	Restoration activities of the Mathews Creek Ranch wetland have been better explained to show the stepwise approach to restoration over a three year period. BW Gold is committed to collaborating with LDN and UFN on identifying restoration options.
W95	14/Jan/22	Indigenous Communities	Table	LDN/UFN	overall remarks			Resolved	N/A

	Round 1 Comments
	Round 2 Comments

Blackwater Gold Project – Wetland Management and Offsetting Plan									
ADMIN	COMMENTS								Response
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Section or Page	Section in Updated Plan	Comment Theme	Comment	Response
W96	1/Nov/21	Indigenous Communities		LDN/UFN	Section 14			Timelines are not aligned for submitting this prior to the start of construction (estimated at Q2 2022) - see also Section 15	This plan has been revised to seek provisional approval prior to a baseline year in 2022. The provisional approval requires that baseline studies be completed to specifically map wetlands at the 1:5000 scale and evaluate restoration activities at Mathews Creek to ensure that actions here restore the amount of wetlands thought, and identify additional restoration areas so that no net loss of wetland function is met.
W96	14/Jan/22	Indigenous Communities	Table	LDN/UFN	Section 14			Resolved	N/A
W97	4/Nov/21	FLNRORD	Letter	Duncan McColl	Section 7.1		Wetland Balance, Impacts, and Offsetting Requirements	Section 7.1 of the WMOP indicates that a total of 3121.68 ha will be impacted by the mine site, 1101.7 ha by the transmission line, and 19.26 ha for associated project components. The overlap with wetlands are given as percentages. This section should re-written to clearly indicate the overlaps. The wetland balance assuming impacts are restricted to direct overlap and that there are no hydrological impacts or additional impact outside of the footprint is given as 308.29 ha. Given that the final wetland surveys and classification are not presented here it is difficult to fully assess the impacts and offsetting requirements.	Wetland accounting has been removed. BW Gold has also added commitments to survey and map wetlands at the 1:5000 scale with LDN and UFN to identify the locations of individual wetlands.
W98	4/Nov/21	FLNRORD	Letter	Duncan McColl	Section # not specified		Offsetting Condition	It is indicated that BW Gold has selected to undertake wetland restoration to meet the offsetting condition from the EA. With the intent of no-net-loss of all wetland function. How was the offset calculated? It is not clear if provincial guidance for offsetting was considered; it is in the "Secondary Sources" list along with other citations that are not present in the document How is uncertainty addressed for potential additional impacts due to possible hydrologic connectivity between and among streams and wetlands impacted by mine operations?	BW Gold is seeking conditional approval of this plan so that additional studies can be undertaken to better account for wetland location and wetland offsetting. The additional field work will be conducted in collaboration with LDN and UFN.
W99	4/Nov/21	FLNRORD	Letter	Duncan McColl	Section # not specified		General Comment	Within the document restoration and reclamation are used interchangeably. These terms are not the same and are not interchangeable. Reclamation is defined within the reclamation provisions of the Mines Act and the Health, Safety and Reclamation Code for Mines in British Columbia (Mines Code). Restoration is to return the sites' hydrology, topography, and natural vegetative communities to pre-disturbance conditions.	The language has been revised to refer to reclamation when referring to reclamation planning under the mines code and restoration when referring to offsetting activities planned at the Mathews Creek Ranch Wetland.
W100	4/Nov/21	FLNRORD	Letter	Duncan McColl	Section # not specified		General Comment	The current draft WMOP does not fulfill condition 24 of EAC.	BW Gold is seeking conditional approval of this plan so that additional studies can be undertaken to better account for wetland location and wetland offsetting. The additional field work will be conducted in collaboration with LDN and UFN.
W101	4/Nov/21	Indigenous Communities	Table	LDN/UFN	Section 7			The description and functions of the characteristics of different classes of wetlands is superficial and often inaccurate. I.e. Describes "fens" as exhibiting emergent vegetation, which is not true. Section 7 needs re-write to clearly describe wetland functions of the characteristics of the different classes, in order for any offsetting to be evaluated against when looking at like for like offsetting, based on best mgmt practices and guidance	This has been removed.
W102	4/Nov/21	Indigenous Communities	Table	LDN/UFN	Section 7			The statement "Swamps and bogs have similar habitat functions for wildlife". This needs to be justified by reference to literature. This is an opinion. The vegetation species composition of swamp and bog wetland classes are wildly different and will likely result in different wildlife use.	This has been removed.
W103	4/Nov/21	Indigenous Communities	Table	LDN/UFN	Section 7			Reference to 209 wetlands surveyed within study area - provide map of project footprint and wetlands (currently in a separate document - not ideal)	Figure 7.1-1 has been added that shows the current Year +23 footprint and wetland plots conducted during baseline studies.
W104	4/Nov/21	Indigenous Communities	Table	LDN/UFN	Section 7			Re: 209 wetlands surveyed at mine site: Unclear whether there was a total of 209 wetlands "identified and mapped" or that there was a total of 209 wetlands "surveyed" (Were some were surveyed while other not?)	209 wetland were identified and surveyed between spring 2011 and fall 2013, in conjunction with TEM mapping efforts, to classify wetland ecosystems. Wetland extent was not mapped during this effort.
W105	4/Nov/21	Indigenous Communities	Table	LDN/UFN	Section 7			Comment relating back to the EA - Statement that "no blue or red listed wetlands were found in the mine site LSA..." Suspect that this is due to a lack of sampling in these beck units rather than wetlands being absent from the study area. Shows poor understanding of how candidate rare ecosystems should be searched for. A search was performed using BC species & ecosystems explorer in the study area, not specific to the beck units of the study area, and over a dozen potential rare wetlands were found.	Baseline studies are planned for 2022. The baseline data will be used to refine any potential listed wetlands.

	Round 1 Comments
	Round 2 Comments

Blackwater Gold Project – Wetland Management and Offsetting Plan									
ADMIN	COMMENTS								Response
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Section or Page	Section in Updated Plan	Comment Theme	Comment	Response
W106	4/Nov/21	Indigenous Communities	Table	LDN/UFN	Section 7			Concerns with offsetting calculations which predicted that 1 ha of offset equals 1 ha of lost wetland; assumes that creating wetlands provide equivalent habitat, hydroecological and other values of the lost wetlands. Therefore, offsetting ratio may need to be greater than 1:1. Although stated throughout the report that estimates are conservative, planning for offset should start from an assumption that wetland "function" will be offset not wetland "area". Consideration of wetland function needs to be included in the plan.	Wetland offsetting planning will be refined once baseline surveys are complete in 2022.
W107	4/Nov/21	Indigenous Communities	Table	LDN/UFN	Section 7			Because there are no listed wetlands based on baseline data, there are no specifics for offsetting for listed wetlands	Wetland offsetting planning will be refined once baseline surveys are complete in 2022.
W108	4/Nov/21	Indigenous Communities	Table	LDN/UFN	Section 7			No accounting of the type of wetlands lost (i.e, x ha of fen, X ha of swamp...). In accounting of wetland lost, at least the class level needs to be provided and offset plan needs to address this accounting.	Wetland offsetting planning will be refined once baseline surveys are complete in 2022.
W109	4/Nov/21	Indigenous Communities	Table	LDN/UFN	Section 7			In general, a lot of details missing, i.e, "objective #5 is to increase shallow water and marsh habitat along Matthews creek for migratory birds, including water fowl and moose". From reviewing the plan it is unclear how this will be accomplished. Need to details measures that will result in this or explain how plans will be prepared in the future to address this. Level of detail lacking.	Wetland offsetting planning will be refined once baseline surveys are complete in 2022.
W110	4/Nov/21	Indigenous Communities	Table	LDN/UFN	Section 7			Lack of detail: "The black spruce forested wetlands are anticipated to include bog wetlands in areas where peat land soils remain in addition to swamp wetlands" There is no explanation of how black spruce forested wetlands are going to be created, over what time frame and how success will be evaluated.	Wetland offsetting planning will be refined once baseline surveys are complete in 2022.
W111	4/Nov/21	Indigenous Communities	Table	LDN/UFN	Section 7			Lack of detail: "Riparian swamp habitat will be created by allowing the freshwater reservoir to convert to wetland habitat"; Missing the "how"	The Project's freshwater reservoir will no longer be considered a compensatory wetland or wetland gain in the WMOP.
W112	4/Nov/21	Indigenous Communities	Table	LDN/UFN	Section 7; Schedule 10.5			Very little information included on monitoring; Critical to a rigorous evaluation of offsetting effectiveness and meeting of regulatory conditions is monitoring of activity. Schedule 10.5 needs to be updated.	The effectiveness monitoring program is presented in Section 11.3 and timing/frequency in Section 11.4.
W113	4/Nov/21	Indigenous Communities	Table	LDN/UFN	Section 7; Schedule 10.5			General comment - having all the work done in 1 year seems very optimistic	Agreed, Lower Mathews Creek has been dropped from the project list and restoration activities at Mathews Creek Ranch are rolled out over 3 years.
W114	4/Nov/21	Indigenous Communities	Table	LDN/UFN	Section 7			Back to the comment of "Conclusions are conservative and represent an over estimate of area of impacted wetlands" Needs clarification - unsubstantiated statement.	See comment response to W4. In addition, Section 7.3 has been added to the WMOP and presents all uncertainties with respect to the baseline information.
W115	4/Nov/21	Indigenous Communities	Table	LDN/UFN	Section 7; Schedule 11.0			A monitoring plan that clearly states the proportion of wetlands to be measured, on the ground parameters to be measured, and scale of mapping are all necessary to detect changes in wetland extent and character. Needs to be provided.	The monitoring plan will be refined once baseline surveys are complete in 2022.
W116	4/Nov/21	Indigenous Communities	Table	LDN/UFN	Section 7; Schedule 11.0			Subsection for performance standards: stating that "non-native and invasive plant species populations are not increasing by more than 10% over the course of the mine life". 10% is identified as a low level change (table 12-1); Concerned that if we are aiming for no net loss to wetlands then how can you have an increase of 10% of invasive plant species? That would be degradation of a wetland - Red flag as you can't use chemical control on invasive species in wetlands. Are there invasive plants currently in this wetland? If there are no invasive plant species and you have a 10% increase over the course of the mine life, that would indicate that you are doing something wrong	The 10% threshold has been removed and this performance standard in Section 11.6.1 has been revised as follows: "Non-native and invasive plant species populations are not increasing".
W117	4/Nov/21	Indigenous Communities	Table	LDN/UFN	Section 7			Given the incremental improvements over the Matthews creek restoration area, which doesn't equal the land area of the affected wetlands of the project, it is unclear how the total loss of wetland is within the footprint and at least partial loss along the transmission line and elsewhere are adequately compensated for, even if all 83ha of partnership opportunities are acted upon.	Wetland offsetting planning will be refined once baseline surveys are complete in 2022.
W118	5/Nov/21	ECCC	Table		Page 7-1		Wetland Context and Baseline Information	ECCC requests that upon completion of the additional wetland surveys a summary table be included in Section 7 of an updated version of this report that describes the areal extent of each wetland type surveyed, summed by project component as well as total for the entire project, and displayed in hectares.	A summary table based on baseline study results has been added as Table 7.2-1. This table will be revised in the final WMOP to reflect results of the additional wetland extent mapping being conducted in 2021/2022.
W118	9/Mar/22	ECCC	Table		Page 7-1			Resolved.	N/A

	Round 1 Comments
	Round 2 Comments

Blackwater Gold Project – Wetland Management and Offsetting Plan									
ADMIN	COMMENTS								
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Section or Page	Section in Updated Plan	Comment Theme	Comment	Response
W119	5/Nov/21	ECCC	Table		Page, 10-2		Wetlands Balance by Component,	<p>ECCC notes that the proposed total offset of 271 ha is not sufficient to compensate for the 308.29 ha of wetlands directly lost as a result of the Project. Further noting that the Proponent is not committed to implementing the 83 ha of additional optional/contingency area identified in Section 10.3, making the current total proposed offsetting just 188 ha to compensate for 308.29 ha lost. ECCC understands that the Proponent considered the WMOP to overestimate the total area of wetlands affected by the Project, however, there are also assumptions related to the Project's indirect effects that should be taken into consideration (Please see comment ECCC-03 below).</p> <p>The WMOP should clarify the commitments to compensate for all effects to wetlands in alignment with the principles outlined in the federal guidelines: Operation Framework for Use of Conservation Allowances, to enable meeting the objective of no net loss. This includes, but is not limited to, the following key criteria:</p> <ol style="list-style-type: none"> 1) Compensation for both direct and indirect effects, at a minimum 2:1 ratio; 2) Establishment of performance standards for wetland habitat function; 3) Adherence to the mitigation hierarchy for wetland compensation, including: <ol style="list-style-type: none"> a) prioritize wetland restoration over enhancement and wetland enhancement over creation b) compensation occurring as close to the proposed Project as feasible; 4) Compensation for equivalent function will be prioritized, including consideration of effects to migratory birds and species at risk; and, 5) Development of a follow-up program to determine the effectiveness of wetland compensation and verify the conclusions of the EEE, including: <ol style="list-style-type: none"> a) development of adaptive management measures, as needed b) annual monitoring by a qualified professional for a minimum of five years and until established performance standards are met. 	BW Gold is seeking conditional approval of this plan so that additional studies can be undertaken to better account for wetland location and wetland offsetting. The additional field work will be conducted in collaboration with LDN and UFN.
W119	9/Mar/22	ECCC	Table			Page, 10-2	Wetlands Balance by Component,	<p>Not Resolved. The WMOP must demonstrate, through commitments and detailed planning, that all wetlands and wetland functions lost or altered as a result of the project through all phases of construction, operation and decommissioning, have been compensated for at an appropriate offset ratio. The current plan does not include the commitments previously recommended and while the offsets in year -2 are expected to have a ratio of 3.2 (offset:loss) the overall offsetting for the entire Project is 0.6. This offsetting ratio does not follow the guidance in the Operational Framework for Use of Conservation Allowances as outlined in Federal Condition 5.3 and will not achieve no net loss of wetland functions.</p> <p>ECCC maintains that the WMOP should clarify the commitments to compensate for all effects to wetlands in alignment with the principles outlined in the federal guidelines: Operation Framework for Use of Conservation Allowances, to enable meeting the objective of no net loss. This includes, but is not limited to, the following key criteria:</p> <ol style="list-style-type: none"> 1) Compensation for both direct and indirect effects, at a minimum 2:1 ratio; 2) Establishment of performance standards for wetland habitat function; 3) Adherence to the mitigation hierarchy for wetland compensation, including: <ol style="list-style-type: none"> a) prioritize wetland restoration over enhancement and wetland enhancement over creation b) compensation occurring as close to the proposed Project as feasible; 4) Compensation for equivalent function will be prioritized, including consideration of effects to migratory birds and species at risk; and, 5) Development of a follow-up program to determine the effectiveness of wetland compensation and verify the conclusions of the EA, including: <ol style="list-style-type: none"> a) development of adaptive management measures, as needed b) annual monitoring by a qualified professional for a minimum of five years and until established performance standards are met. 	<p>The WMOP as written does not meet the commitments. The WMOP will be updated in Q4 2022 with baseline data collected in 2022 that will better identify the amount of wetlands affected by the project and wetland offsetting activities at MCR.</p> <p>BW Gold is committed to</p> <ol style="list-style-type: none"> 1) Compensation for residual effects to wetlands at a minimum 2:1 ratio; 2) Establishment of performance standards for wetland habitat function; 3) Adherence to the mitigation hierarchy for wetland compensation, ; 4) Compensation for equivalent function; and, 5) Development of a follow-up program to determine the effectiveness of wetland compensation and verify the conclusions of the EA.

	Round 1 Comments
	Round 2 Comments

Blackwater Gold Project – Wetland Management and Offsetting Plan									
ADMIN	COMMENTS								
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Section or Page	Section in Updated Plan	Comment Theme	Comment	Response
W120	5/Nov/21	ECCC	Table				General Comments	The EIS made assumptions that the loss of wetland would be restricted to the project footprint and no effects to wetland function would occur within adjacent wetland habitat. How does the monitoring program intend to confirm these assumptions and address them through adaptive management where necessary?	Wetland monitoring will focus on wetland specific parameters including wetland size and vegetation composition. Changes to wetland size and wetland type will result in a change of function. Monitoring size and type along wetland with shallow groundwater will help identify changes to wetland function.
W120	9/Mar/22	ECCC	Table				General Comments	Not Resolved. ECCC comment W120 has not been fully addressed. Page 11-2 states "Immediately adjacent wetlands will be monitored", please describe how these wetlands will be monitored for change in function, what performance standards will be used for monitoring (as outlined in Condition 5.4), and what adaptive management strategies and additional offset measures will be put in place should these functions be affected?	Wetland monitoring will be updated once the plan is updated in Q4 2022.
W121	5/Nov/21	ECCC	Table		Page 10-3		Wetland Balance	"Hydraulically connected or adjacent wetlands are not considered in the wetland balance as the implementation of mitigation measures are expected to prevent loss to wetland function and extent." This project will include barriers to movement for wildlife, both perceived and physical. This should be considered and incorporated into the compensation plan, specifically as it relates to an indirect loss of function. With regard to the above statement, how does the plan consider and mitigate for indirect effects on wildlife including loss of and access to habitat. How has the potential for the remaining wetlands to function as an ecological sink been considered in the plan? ECCC requests additional information on how this will be mitigated, monitored, and compensated.	Mitigation measures for hydraulically connected wetlands are presented in Tables 9-1 and 9-2. Wildlife and wildlife habitat are managed under the wildlife plan. The offsetting approach has used a class/area approach where like for like amounts of each wetland class will be required to offset the corresponding functions. As there is no provincial or federal methods used to quantify wetland function this approach allows a reasonable approximation of wetland functional offsetting.
W121	9/Mar/22	ECCC	Table			Page 10-3	Wetland Balance	Not Resolved. One of the ecological functions of wetlands is that it provides habitat for wildlife including movement and migration habitat. The WMOP should include measures to mitigate, monitor, and offset effects of the Project on wetlands to function as wildlife habitat. ECCC recommends a minimum 2:1 offset ratio and notes that currently the plan does not meet the federal guidelines or wetland objectives as noted in comment W119.	Data collection planned for 2022 will be used to develop a comprehensive offsetting plan which will move towards a 2:1 Offsetting Ratio. Measures to mitigate, monitor, and offset effects of the Project on wetlands to function as wildlife habitat will be developed based on the workplans provided in Appendix E and F. All other wildlife monitoring is outlined for the the project is located in EAC Plan - Wildlife Monitoring and Mitigation Plan.
W122	5/Nov/21	ECCC	Table		Page 10-1		Wetland Offsetting Plan	ECCC requests the following additional information on the long-term conservation/protection status of the different off-site compensation sites and how compensation for these habitats will be addressed in the WMOP: - The ecological community of wetland that will be created/restored/enhanced and the rationale for choosing these types and how they would be biologically equivalent to the lost wetland functions; - Specific functions that will be created/restored/enhanced by the off-site compensation, including functions related to specific Species at Risk and migratory birds, where applicable. - If found during pre-construction surveys, the ecological community of the red and blue-listed wetlands that will be lost or degraded, with their respective areas in hectares; and - Specific functions that will be lost or degraded for each of the red and blue-listed wetlands, including functions related to specific Species at Risk and migratory birds, where applicable;	Baseline surveys in the Mathews Creek Ranch need to be completed prior to development of detailed plans. These surveys and plan development are planned for 2022. However, based on landscape position corresponding functions of each offsetting zone were described.
W122	9/Mar/22	ECCC	Table			Page 10-1	Wetland Offsetting Plan	Pending. ECCC continues to request the WMOP be updated to include the information outlined in comment 122 and 124 following completion of baseline surveys in 2022.	Offsetting will be re-evaluated once data are collected in 2022.
W123	5/Nov/21	ECCC	Table		Page 10-4		Mathews Creek Ranch	Are there any additional restoration actions that can be taken to restore water quality functions? Currently, the only action to be taken is to remove livestock, which will improve future water quality but does not address current conditions.	In addition to removing livestock, biochemical function of Mathews Creek Ranch wetlands restoration efforts will include support of riparian vegetation development to provide thermal regulation.
W123	9/Mar/22	ECCC	Table			Page 10-4	Mathews Creek Ranch	Not Resolved. ECCC recommends additional actions that could improve water quality functions in the short-term, such as vegetation planting.	Offsetting will be re-evaluated once data are collected in 2022.

Round 1 Comments
Round 2 Comments

Blackwater Gold Project – Wetland Management and Offsetting Plan									
ADMIN	COMMENTS								
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Section or Page	Section in Updated Plan	Comment Theme	Comment	Response
W124	5/Nov/21	ECCC	Table		Page 10-4		Mathews Creek Ranch	"Objective #3: Restore forested wetland habitat to support wildlife use to support fulfillment of federal DS Condition 5.3 - Actions: Eliminate agricultural production, and plant appropriate native trees, shrubs, herbs and graminoids along the riparian corridor and in patches to create a mosaic of habitat types in the restored wetlands. This is aimed at restoring a diversity of native plant communities in the wetlands to foster wildlife use by mammals such as migratory birds and moose, amphibians, and invertebrates that utilize this resource." ECCC requests additional information on the objectives of the plan, specifically, which species at risk, wildlife, and migratory birds will benefit from the proposed measures; which wetland habitats and functions will be restored, including consideration of specifics such as dispersal, breeding, foraging habitat; and how that is linked to the residual project effects identified within the application materials.	The offsetting plan (Section 10) has been edited to reflect this and other comments.
W124	9/Mar/22	ECCC	Table			Page 10-4	Mathews Creek Ranch	Not Resolved. The information previously requested remains outstanding. ECCC continues to request this information as well as a summary of the species at risk and migratory birds likely to be impacted by the loss of wetlands and how these impacts will be offset by the activities proposed in the WMOP. Effects to species at risk and migratory birds must be addressed through compensation measures beyond offsets specific to fish and fish habitat functions.	Measures to mitigate, monitor, and offset effects of the Project on wetlands to function as wildlife habitat will be developed based on the workplans provided in Appendix E and F. All other wildlife monitoring (including species at risk) is outlined for the the project is located in EAC Plan - Wildlife Monitoring and Mitigation Plan.
W125	5/Nov/21	ECCC	Table		Page 10-7		Mathews Creek Ranch	Please describe the methods and species to be used to "create open marsh habitats in restored wetlands to provide habitat for migratory birds and moose". Please also identify where these restored wetlands will be located and over what timeframe these habitats are expected to be created.	The methods are described in the Schedule 2 Fish Offsetting Plan. Additional, planning in 2022 will identify specific actions that can be undertaken where possible to provide value to these species.
W125	9/Mar/22	ECCC	Table			Page 10-7	Mathews Creek Ranch	Resolved.	N/A
W126	5/Nov/21	ECCC	Table		Page 10-7		Mathews Creek Ranch	<i>"During EA review, working group members expressed concern with this plan (1) because much of the wetland would not be created until mine closure representing a temporal lag and (2) because of concerns that water quality in the areas proposed for wetlands may preclude safe wildlife use."</i> ECCC notes that tailings restoration poses technical challenges, therefore there is uncertainty in achieving successful restoration, and there will be a time lag between when the restoration begins (after mine closure) and is fully restored (unknown) and when the wetlands are lost during construction. The WMOP states that reconnaissance-level field activities concluded that the water quality in the mine site post closure would be safe for wildlife use, yet no rationale was provided to support this statement. ECCC requests information to support such claims and that the WMOP describes how timing and equivalency factors have been considered for this project. Further to the above, in reference to creation of black spruce forested wetlands, the WMOP states that "habitat function could be rapidly restored." As stated above, tailings restoration is a difficult and lengthy process if successful. Where there is risk that a compensation plan will not be successful, it may then be recommended that the plan be designed to provide greater than equivalent ecological functions. This is typically accomplished through the use of a higher offsetting ratio than 2:1.	The Tailings Storage Facility was proposed as an offsetting site in the Conceptual Wetland Offsetting Plan, presented with the EAC/EIS Application. The TSF is no longer being considered a viable option as a wetland offset in this WMOP, in part due to the temporal lag but also revised water quality considerations. Similarly, the Freshwater Reservoir is no longer being considered a wetland offset option due to the associated temporal lag of being able to realize the gain. By focusing offsetting efforts on the Mathews Creek Ranch wetland complex, an off-site area, wetland restoration activities can progress during Project construction period (between Y -2 and Y -1) when the Project will realize the greatest losses. The previous version of this WMOP reference an the objective of creating a black spruce forested wetland at the Mathews Creek wetland (where restoration activity would have been initiated in Y-2), not the TSF. Regardless, this objective has been removed from the WMOP.

	Round 1 Comments
	Round 2 Comments

Blackwater Gold Project – Wetland Management and Offsetting Plan									
ADMIN	COMMENTS								
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Section or Page	Section in Updated Plan	Comment Theme	Comment	Response
W126	9/Mar/22	ECCC	Table			Page 10-7	Mathews Creek Ranch	Not Resolved. ECCC notes that no additional wetland offsetting has been proposed to replace the TSF and Freshwater Reservoir, offsetting components that were removed from the previous draft WMOP. ECCC recommends that the plan be updated to include additional offsetting measures, offsite and on-site where feasible, to compensate for wetland loss consistent with the Operational Framework for Use of Conservation Allowances and the goal of no net loss of wetland functions at a minimum 2:1 offset ratio. ECCC also notes, wetland offsets must be additional and not a requirement under other legislation, regulations, policies etc., as outlined in the Operational Framework for Use of Conservation Allowances.	Data collection planned for 2022 will be used to develop a comprehensive offsetting plan which will move towards a 2:1 Offsetting Ratio.
W127	5/Nov/21	ECCC	Table		Page 10-7		Lower Mathews Creek	Has the proponent prepared a detailed plan for the Lower Mathews Creek project? ECCC requests detailed information on how this site will be restored and provide specifically, at minimum, the following additional details: - methods of restoration; - plant species to be used for revegetation; - projected timelines - who/what partners will be involved in restoring this area; - consultation approach; - how functional losses of wildlife habitat will be addressed with this plan.	Offsetting will be re-evaluated once data are collected in 2022.
W127	9/Mar/22	ECCC	Table			Page 10-7	Lower Mathews Creek	Resolved.	N/A
W128	5/Nov/21	ECCC	Table		Page 10-7		Lower Mathews Creek	It's unclear if/how all proposed compensation options will be monitored and meet performance standards to ensure that measures are successful and that all assumptions are validated, and further how they take into consideration time lags and uncertainties in the proposed approaches. For example the assumption noted in this statement for the Lower Mathews Creek compensation, "Re-establishment of shrub and forested wetland habitats in riparian areas is anticipated to occur naturally after taking these actions."	Offsetting will be re-evaluated once data are collected per baseline workplans provided in appendices of the updated WMOP in 2022.
W128	9/Mar/22	ECCC	Table			Page 10-7	Lower Mathews Creek	Not Resolved. ECCC continues to request the WMOP include details for how all proposed compensation options will be monitored and meet performance standards to ensure that measures are successful and that all assumptions are validated as stated in Federal Conditions 5.4 and 5.5, and further how time lags and uncertainties have been considered in the proposed approaches.	Offsetting will be re-evaluated once data are collected per baseline workplans provided in appendices of the updated WMOP in 2022.
W129	5/Nov/21	ECCC	Table		Page 10-7		Land Tenure and long-term Preservation	ECCC requests clarification on the following statement: " <i>BW Gold will protect the compensation works from ongoing cattle disturbances following the creation of the compensation measures for the duration of time that the Tailings Impoundment Area is in use</i> ". ECCC further recommends that compensation measures be protected until project-related effects have been deemed fully restored. Restoration of the Tailings Impoundment Area is likely to include large time-lags and compensation measures should be actively maintained to ensure equivalent ecosystem functions to that which was lost.	The wetland compensation works will be protected for a minimum of 25 years, subject to a legislative mechanism being available to provide long-term protection.
W129	9/Mar/22	ECCC	Table			Page 10-7	Land Tenure and long-term Preservation	Not Resolved. Given the irreversibility of the loss of wetlands and wetland function in the Project footprint, ECCC recommends that wetland compensation works be protected in perpetuity.	Offsetting will be re-evaluated once data are collected per baseline workplans provided in appendices of the updated WMOP in 2022.

	Round 1 Comments
	Round 2 Comments

Blackwater Gold Project – Wetland Management and Offsetting Plan									
ADMIN	COMMENTS								
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Section or Page	Section in Updated Plan	Comment Theme	Comment	Response
W130	5/Nov/21	ECCC	Table		Page 10-8		Additional Compensation Project Opportunities	Please describe the kinds of works that would be conducted and wetlands that would benefit through these partnerships. Partnership opportunities are not scheduled until Year 8 of operation and page 10-11 states "Regional wetland project opportunities will be finalized during Year 8, if required." Table 10.1-1 includes the 83 ha identified through partnership opportunities as part of the calculated total offset of 271 ha. ECCC requests the proponent commit to these partnership opportunities and provide details, including but not limited to: funding, timelines, and types of work/restoration goals proposed. In addition Condition 5.3 states "The Proponent shall start the implementation of the wetland compensation plan prior to the wetlands being adversely affected." Please provide rationale for why regional Compensation Project Opportunities will not be implemented during construction as well as operation phase. ECCC recommends that offsetting begin prior to construction, or as soon as feasible, in order to account for time lags between wetland loss and achievement of restoration/enhancement objectives.	Regional partnership opportunities have been removed from the revised version of the WMOP, including the 83 ha associated with these from the wetland balance in Table 10.4-1. The regional opportunities that were identified in 2018 may no longer be viable, and further work is required to a) determine if additional offsetting is required based on pre-construction survey results, and b) work with the LDN, UFN, and potentially NGOs to identify current opportunities. BW Gold has committed to collaboratively develop a scope of work with the LDN and UFN to inventory and map possible additional restoration sites at the regional level in 2022. Mathews Creek Ranch offsets wetland loss until Y+8. As such, BW Gold is seeking staged approval of this WMOP to permit Project development to Y+3 while BW Gold confirms the need for additional wetland offset, and develops plans if required.
W130	9/Mar/22	ECCC	Table			Page 10-8	Additional Compensation Project Opportunities	Not Resolved. Additional wetland offsetting, at a minimum 2:1 offset ratio, will be required to achieve no net loss of wetland functions, consistent with the Operational Framework for Use of Conservation Allowances.	Data collection planned for 2022 will be used to develop a comprehensive offsetting plan which will move towards a 2:1 Offsetting Ratio.
W131	5/Nov/21	ECCC	Table		Page 10-8		Freshwater Reservoir	ECCC notes that creation of the freshwater reservoir will destroy wetland habitat and will not be compensated for until early closure, after 24 years post-construction. These 6.9 ha should not be considered compensation as the time lag between habitat loss and restoration is long-term.	The Project's freshwater reservoir will no longer be considered a compensatory wetland or wetland gain in the WMOP.
W131	9/Mar/22	ECCC	Table			Page 10-8	Freshwater Reservoir	Resolved.	N/A
W132	5/Nov/21	ECCC	Table		Page 11-1		Pre-construction	ECCC requests to receive results of the pre-construction wetland surveys and an updated version of the WMOP, that includes information on the current types, extent (ha), and locations of wetlands that will be lost, restored and offset.	BW Gold commits to providing ECCC the pre-construction survey results as well as the updated WMOP in Q4 2022 for review and further comment.
W132	9/Mar/22	ECCC	Table			Page 11-1	Pre-construction	Resolved. ECCC looks forward to reviewing the survey results and updated WMOP in Q4 2022.	N/A
W133	5/Nov/21	ECCC	Table		Page 11-2		Timing and Frequency	ECCC agrees with the statement that "Sampling times, methods and locations will be planned to avoid sensitive habitats or sensitive timing windows such as breeding and rearing periods." Please describe, using specific date ranges and individual species, supported by appropriate references, which sensitive habitats and timing windows will be avoided.	
W133	9/Mar/22	ECCC	Table			Page 11-2	Timing and Frequency	Not Resolved. ECCC's previous comment has not been addressed in the WMOP and this information remains outstanding. In addition, field work is scheduled during the summer migratory bird breeding season, therefore ECCC requests the addition of mitigation measures to avoid harm to migratory birds during such activities. Please refer to ECCC's Guidelines to Reduce Risk to Migratory Birds and avoidance information available at: https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds.html	
W134	5/Nov/21	ECCC	Table		Page 11-3		Performance Standards	Please describe in the WMOP the specific wildlife habitat functions for each wetland type and how this function will be monitored at all compensation and offset locations. ECCC recommends including monitoring of performance standards indicative of wildlife habitat (e.g. monitoring of wildlife occurrence). Water quality standards should also be used as a performance indicator for wildlife habitat function. ECCC recommends providing more detail about the monitoring of the wetland compensation sites to assess compensation effectiveness, including consideration of vegetation survivorship, bird use/productivity and water quality, frequency of monitoring, and scheduling of monitoring during and post construction.	Further detail on monitoring are provided in Section 11 and Appendices E and F. Wildlife specific monitoring will be conducted under the wildlife Mitigation and Monitoring Plan.
W134	9/Mar/22	ECCC	Table			Page 11-3	Performance Standards	Not Resolved. ECCC recommends that the results of wildlife specific monitoring at restored wetland sites be included in the WMOP as wildlife habitat is an important function of wetlands that must be compensated for as noted in comment W124.	Wildlife species will be monitored following the wildlife monitoring plan. This plan is to manage wetland ecosystems which do provide important wildlife habitat. Offsetting will be re-evaluated once data are collected in 2022.

	Round 1 Comments
	Round 2 Comments

Blackwater Gold Project – Wetland Management and Offsetting Plan									
ADMIN	COMMENTS								
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Section or Page	Section in Updated Plan	Comment Theme	Comment	Response
W135	5/Nov/21	ECCC	Table				General Comment	As previously commented on the WCP, ECCC requests the WMOP be updated to include: - Identification and results of consultation with potential non-government conservation partners, such as Ducks Unlimited Canada, that could assist in designing, costing out, and implementing the compensation projects; - Development of a legally binding agreement that identifies the roles and responsibilities of the Proponent, regulatory agencies, and non-government agencies responsible for ensuring the Compensation Plan is implemented and successful; - Identification of project funding commitments in support of completing the compensation projects.	BW Gold is seeking conditional approval for the WMOP based on impacts to wetlands in Year 1 and the offsetting proposed for Mathews Creek Ranch. All other offsetting projects have been removed for this version of the plan but BW is committed to working with LDN and UFN as well as other conservation groups to identify and secure additional projects.
W135	9/Mar/22	ECCC	Table				General Comment	Not Resolved. ECCC continues to recommend that additional wetland offsetting projects and partnerships be described in the WMOP with the following information: - Identification and results of consultation with potential non-government conservation partners with wetland restoration expertise, such as Ducks Unlimited Canada, that could assist in designing, costing out, and implementing the compensation projects; - Development of an agreement that identifies the roles and responsibilities of the Proponent, regulatory agencies, and non-government agencies responsible for ensuring the Compensation Plan is implemented and successful; - Identification of project funding commitments in support of completing the compensation projects.	Offsetting will be re-evaluated once data are collected in 2022.
W136	14/Jan/22	Indigenous Communities	December 2021 Version	LDN/UFN	Section 2.1			Third paragraph "BW Gold will achieve on-net-loss of wetland from Project development..." please clarify - wetland, what? Extent, function, etc.?	Revised to state no-net-loss of wetland function throughout the WMOP
W137	14/Jan/22	Indigenous Communities	December 2021 Version	LDN/UFN	Section 2.1			Critical to understand when this plan is good until - there are dates such as first year after operations, year +8 and year +3 included in the plan and in these responses.	The purpose of the Wetland Management and Offsetting Plan (WMOP) is to manage potential impacts to wetlands and provide a plan to offset the loss of wetland and wetland functions caused by the Project within the early works construction period or until a new WMOP has been approved by the EAO. Early works construction includes only those activities approved in the Mines Act and Environmental Management Act Early Works permits. Prior to any other construction activities occurring, the baseline data outlined below will be collected and reported out on to all required groups. The plan will also be updated in 2022 to incorporate additional information provided by the summer 2022 baseline programs proposed (Appendix A and B).
W138	14/Jan/22	Indigenous Communities	December 2021 Version	LDN/UFN	Section 3			What supporting role does the IEM, ITRB and TSF QP play in the implementation of the wetland plan? Are these relevant?	The role of the IEM is laid out in Sections 2, 7.1.3, 7.3 and 11.2. The IEM will be regularly observing and inspecting BW Gold compliance's to all of the requirements laid out in EAC condition #24 as well as the federal DS conditions in addition to all other EAC and DS requirements. As the wetlands offsetting is not relevant to TSF construction, there are no direct roles for the TSF QP or ITRB in the implementation of the offsetting required by this plan.
W139	14/Jan/22	Indigenous Communities	December 2021 Version	LDN/UFN	Section 4.4			"Aside from the DS and EAC conditions identified in Section 4.2, there are no other existing permit requirements related to wetlands" is this true or does the Early Works permit apply? It is referenced throughout as a mitigation measure (30 m buffer) for the protection of wetlands through the work.	BW Gold has committed to maintaining a 30 m buffer from the edge of all wetlands, riparian areas, watercourses and waterbodies through the MA/EMA permit application for the Early Works. Environmental monitors and Aboriginal monitors will be onsite during Early Works.
W140	14/Jan/22	Indigenous Communities	December 2021 Version	LDN/UFN	Section 7.1			"Additional pre-construction wetland surveys within the mine site..." is it pre-construction? It is technically more accurate to say pre-Operation phase, as Construction phase begins as soon as Early Works clearing and grubbing begins	The following has been added to section 2: <i>Provide pre-construction surveys to identify extent and flag 30 m buffers around all Terrestrial Ecosystem Mapped (TEM) wetlands during early works and up until the necessary baseline information has been collected by QP. Work with the IEM to schedule site visits when tree clearing is taking place in proximity to flagged wetland areas. Aboriginal Group Monitors on rotation at the time of the surveys will be invited to participate in surveys.</i>
W141	14/Jan/22	Indigenous Communities	December 2021 Version	LDN/UFN	10.2 Mathews Creek Ranch			One item that is poorly described is a re-vegetation plan. Central to this is ascertaining which areas were wetland prior to drainage. While it might be possible to create wetlands in locations that were initially upland, priority should be given to restoring wetland areas that existed prior to the draining of the fields.	Offsetting will be re-evaluated once data are collected in 2022.

	Round 1 Comments
	Round 2 Comments

Blackwater Gold Project – Wetland Management and Offsetting Plan									
ADMIN	COMMENTS								
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Section or Page	Section in Updated Plan	Comment Theme	Comment	Response
W142	14/Jan/22	Indigenous Communities	December 2021 Version	LDN/UFN	Section 10.2.1			How will cattle continue to be excluded into the future - use fencing as a contingency plan	Measures to exclude livestock are discussed in Section 10.2.4. By way of BW Gold owning the private land in the area, and through continued collaboration with MFLNRORD, an added layer of protection has been given to the land to avoid future degradation from ranching and agricultural activity.
W143	14/Jan/22	Indigenous Communities	December 2021 Version	LDN/UFN	Section 10.2.1			Not clear on how this isn't duplicating the work being proposed through the Schedule 2 amendment. All riparian planting around Mathews Creek is being compelled through this process so how does this section differ?	Offsetting will be re-evaluated once data are collected in 2022.
W144	14/Jan/22	Indigenous Communities	December 2021 Version	LDN/UFN	Section 10.2.2			Zone B Hay fields and pasture land - no action is identified to reverse drainage control of these fields in order to rewet this area. Without this establishment of wetland plants is unlikely to succeed.	Offsetting will be re-evaluated once data are collected in 2022.
W145	14/Jan/22	Indigenous Communities	December 2021 Version	LDN/UFN	Section 10.2.2			In the intro to this section it states that "are would have been some combination of marsh or fen emergent grass like wetlands" but objective #2 talks about restoring forested wetland habitat - please clarify	Offsetting will be re-evaluated once data are collected in 2022.
W146	14/Jan/22	Indigenous Communities	December 2021 Version	LDN/UFN	Section 10.2.2			Re: planting along riparian corridor and in patches 1) the riparian planting was already discussed in 10.2.1 and is part of the Schedule 2 amendment, this is duplicate information again 2) where are you planting the patches? What kind of species are you anticipating? How can you plant wetland species in an area that is still essentially "upland"? This step has to occur much later than the timeline of this version of the plan - once hydrologic function is restored and the site has wetland features - you've already provided this definition, so does this site meet the definition of a wetland to justify planting wetland species by 2024?	Offsetting will be re-evaluated once data are collected in 2022.
W147	14/Jan/22	Indigenous Communities	December 2021 Version	LDN/UFN	Section 10.2.2			What is your contingency plan? What if rough and loose surface preparation is required to reduce compaction? What if persistent agronomic species outcompete native species? What if the water table doesn't come up with infill?	Offsetting will be re-evaluated once data are collected in 2022.
W148	14/Jan/22	Indigenous Communities	December 2021 Version	LDN/UFN	Section 10.2.4			Why is the TSF life used as an end date for protections? It should be until the end of the project, when all reclamation requirements have been fulfilled.	The WMOP will be updated once baseline studies are complete in 2022
W149	14/Jan/22	Indigenous Communities	December 2021 Version	LDN/UFN	Section 10.3			The time lag between the destruction of wetlands at the project site (those lost to project infrastructure footprints) is not addressed through this plan. There remains considerable uncertainty in the feasibility of this plan.	The WMOP will be updated once baseline studies are complete in 2022
W150	14/Jan/22	Indigenous Communities	December 2021 Version	LDN/UFN	Table 10.4-1 Wetland Balance by Component			Unclear how Zone B of Mathews Ranch can be calculated as a gain over the entire area as the establishment of functioning wetland over this entire area has not been demonstrated and portions of the area have functioning wetlands that will not be enhanced. The Nations have expressed concerns about this accounting prior to this plan being submitted to EAO and it has not been addressed.	All wetland offsetting areas have been removed until baseline studies can be completed in 2022.
W151	14/Jan/22	Indigenous Communities	December 2021 Version	LDN/UFN	Section 11			Are these reference wetlands the same as the ones presented earlier in this plan?	No. The reference wetlands established for the 2011-2013 baseline studies are not suitable for monitoring project effects.
W152	14/Jan/22	Indigenous Communities	December 2021 Version	LDN/UFN	11. Monitoring			How will sample size be determined? No mention of this. The design should be vetted by a biostatistician before being approved and should likely be determined after 2022 field season that establishes baseline conditions.	All wetlands need to be characterized and mapped. The sample size needs to be 100%.
W153	14/Jan/22	Indigenous Communities	December 2021 Version	LDN/UFN	Section 11.4			"Changes to wetland area and function will be evaluated for wetlands located within the mine site that remain after vegetation clearing by:" the bullet points (1 and 3) listed here refer to offset locations - how are these relevant based on the quoted text?	Revised to state: <i>Changes to wetland area and function will be evaluated for wetlands located within the mine site that remain after vegetation clearing by:</i> <i>Visual inspections at each wetland offset to monitor wetland ecosystems, including hydrological conditions and wetland extent (select wetlands). Visual inspections will include meandering transects through wetlands to identify accidental filling, pollutant discharge, or other stresses on wetland ecosystem functioning and vegetation cover.</i> <i>Photo-points to visually document each wetland over time (select wetlands). Vegetation monitoring (incl. invasive plants) to document plant cover, plant species, and survival to ensure the offset sites are on a successional trajectory towards the intended habitat types.</i> <i>Incidental wildlife use observations.</i>

	Round 1 Comments
	Round 2 Comments

Blackwater Gold Project – Wetland Management and Offsetting Plan									
ADMIN	COMMENTS								Response
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Section or Page	Section in Updated Plan	Comment Theme	Comment	Response
W154	14/Jan/22	Indigenous Communities	December 2021 Version	LDN/UFN	11.4.1 Methods			Table 11.4.1 cites a number of guides for methods but the sheets provided in the Appendix D do not demonstrate that data for assessment of wetland function are being gathered. Appendix A of Hanson et al 2008 provides questions that address this, where are they?	Appendix E and F present work plans and an RFP developed in consultation with LDN and UFN to collect appropriate data on the mine site and in the offsetting area.
W155	14/Jan/22	Indigenous Communities	December 2021 Version	LDN/UFN	Section 11.4.1			The list of field data to be collected (bottom of page 48 of the PDF/page 11-4 of the document) is the same list of parameters that was collected in the baseline studies which has resulted in us knowing very little about wetlands around the project. Should this list be reconsidered?	Table 11.4-3 includes a form called BW wetland function. Additional requirements are described in Appendix E and F.
W156	14/Jan/22	Indigenous Communities	December 2021 Version	LDN/UFN	Section 11.4.2			List of sites (4) that need to be selected in 2022 - should this list include those wetlands within the CPD that are not being lost?	Wetlands within the CPD that are not being lost is included in 3. Sites adjacent to development.
W157	14/Jan/22	Indigenous Communities	December 2021 Version	LDN/UFN	Section 11.4.2			Notable observations should include changes to plant community	Changes to plant community has been added to the list of notable observations in Section 11.4.2.
W158	14/Jan/22	Indigenous Communities	December 2021 Version	LDN/UFN	Section 11.4.2			Confirm that soil data (organic vs mineral) will be collected initially and that "soil nutrients will be characterized through observational data" will occur only in the monitoring phase, add reference in applicable section to appropriate soil classification guide (CSSC, 1998) not FREP wetland protocol (unless it's been updated to be consistent with the classification for organic soils [i.e., >40cm organic matter])	Appendix E and F present work plans and an RFP developed in consultation with LDN and UFN to collect appropriate data on the mine site and in the offsetting area.
W159	14/Jan/22	Indigenous Communities	December 2021 Version	LDN/UFN	Section 11.4.2			Is recording "dominant plant species, form, vigor and recruitment" sufficient to track functional (or resultant class) changes to wetlands over time? I suspect a more detailed plant list may be necessary?	Appendix E and F present work plans and an RFP developed in consultation with LDN and UFN to collect appropriate data on the mine site and in the offsetting area.
W160	14/Jan/22	Indigenous Communities	December 2021 Version	LDN/UFN	Appendix C			Data is needed on soil classification - some values in this table (at face value) may indicate inappropriate wetland classification - this would be helpful to review	Appendix E and F present work plans and an RFP developed in consultation with LDN and UFN to collect appropriate data on the mine site and in the offsetting area.
W161	14/Jan/22	Indigenous Communities	December 2021 Version	LDN/UFN	General			Have you compared this with the RCP? Are there any wetlands remaining on site once all infrastructure is built?	It is expected that any wetlands within the mine site will be impacted as a result of construction. Data collected in 2022 will be used to refine the spatial and temporal loss of wetlands.
W162	14/Jan/22	Indigenous Communities	December 2021 Version	LDN/UFN	General			Add commitment to maintaining the largest possible buffer around all watercourses (e.g., Early Works Application specifies 30 m, this is the minimum expectation)	Added to the revised WMOP.
W163	14/Jan/22	Indigenous Communities	December 2021 Version	LDN/UFN	General			Add commitment to fully meeting Conditions 24 and 3 prior to the start of Major Works	Added to the revised WMOP.
W164	14/Jan/22	Indigenous Communities	December 2021 Version	LDN/UFN	General			Add schedule for proposed works that will bring the plan into compliance with conditions, including: - all necessary baseline data collection prior to the start of Major Works - establishment of permanent monitoring plots in 2022 (2022 should mark year 1 of monitoring)	The purpose and objectives has been revised to include "The purpose of the Wetland Management and Offsetting Plan (WMOP) is to manage potential impacts to wetlands and provide a plan to offset the loss of wetland and wetland functions caused by the Project within the early works construction period or until a new WMOP has been approved by the EAO. Early works construction includes only those activities approved in the Mines Act and Environmental Management Act Early Works permits. Prior to any other construction activities occurring, the baseline data outlined below will be collected and reported out on to all required groups. The plan will also be updated in 2022 to incorporate additional information provided by the summer 2022 baseline programs proposed (Appendix E and F)."
W165	14/Jan/22	Indigenous Communities	December 2021 Version	LDN/UFN	General			Clarify that "baseline data" definition includes: - mine site - Mathews Creek - other candidate offsetting sites	Appendix E and F present work plans and an RFP developed in consultation with LDN and UFN to collect appropriate data on the mine site and in the offsetting area.
W166	14/Jan/22	Indigenous Communities	December 2021 Version	LDN/UFN	General			Commitment to a 4:1 offsetting ratio to address 1) significant uncertainty with several aspects of the plan, and 2) time-lag between impacts and offsetting activities (e.g., time-lag between destroying a functional ecosystem and restoring a degraded/non-native ecosystem, no restoration work will occur in 2022 - maybe 2023? - will there be losses at the mine site by then?)	Data collection planned for 2022 will be used to develop a comprehensive offsetting plan which will move towards a 2:1 Offsetting Ratio. Adaptive management will be revised to respond to times when additional offsetting may be required to maintain the ratio.

Exhibit 8
Community Effects Monitoring and Management Plan (ITT)

ADMIN		Blackwater AQDMP Comments						COMMENTS		
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Section in Updated Plan	Comment Theme	Comment	Response
1	15-Nov-21	Northern Health	C.1_BW_Community Effects Monitoring and Management Plan	S. Western, B. Oke	CEMMP	Table 3-1			Can BW provide more information on the qualifications of the person who has been hired to be the Community Relations Advisor?	<p>The BW Gold's Community Relations Advisor has the following qualifications:</p> <ul style="list-style-type: none"> - has knowledge of environmental and social impact assessment processes; - has worked with communities potentially affected by the project - has knowledge and an understanding of vulnerable populations potentially affected by the project - has an understanding of the project and potential effects to communities - has an understanding of community concerns and expectations pertaining to the project - has experience managing feedback mechanisms and documenting engagement activities - has strong communication skills. <p>The Project's Environmental Assessment Certificate M#19-01 defines a Qualified Person as "a person who has training, experience and expertise in a discipline relevant to the field of practice set out in the condition.</p>
2	15-Nov-21	Northern Health	C.1_BW_Community Effects Monitoring and Management Plan	S. Western, B. Oke	CEMMP	Section 4.4			Please add the Northern Health Standard Comments Document - https://www.northernhealth.ca/sites/northern_health/files/services/office-health-resource-development/documents/standard-working-group-comments.pdf	This document has been added to Section 4.4.
3	15-Nov-21	Northern Health	C.1_BW_Community Effects Monitoring and Management Plan	S. Western, B. Oke	CEMMP	Table 8.3-1			<p>Provide incentives for employees to re-locate to communities to reduce the time a way from home.</p> <p>If there is expected to be a large surge of people relocating in the same time period, please ensure that there is close communication with the community to ensure proper planning and support.</p>	<p>Table 8.1-2 edited as follows: "Such incentives could include e.g. paid time to accommodate moving and related moving expenses."</p> <p>BW Gold acknowledges the importance of communication with communities if there is a large surge of people relocating to the area. Table 10.1-1 (Potential Effects and Indicators to Support Socio-economic Effects Monitoring) in the CEMMP includes a requirement for BW Gold to communicate and work with communities and services providers to anticipate and assess changes in demand for services and infrastructure.</p>
4	15-Nov-21	Northern Health	C.1_BW_Community Effects Monitoring and Management Plan	S. Western, B. Oke	CEMMP	Section 9		Employee Supports and Services	<p>Regarding the development of a transition plan, please note that effective planning should begin years in advance of closure.</p> <p>Also, the transition plan should identify ways to help employees navigate services (i.e. preparing for layoffs).</p>	<p>The underlined text has been added to Section 9 as follows: Transition plan. Develop a transition plan <u>in advance of planned permanent closure</u> to identify measures to mitigate socio-economic impacts of closure and <u>help employees navigate services to facilitate future employment</u>.</p> <p>The transition plan identifies measures to help employees navigate services. Measures identified in Section 9 include:</p> <ul style="list-style-type: none"> -finding new work, which could include career counselling; -preparing CVs; -setting up LinkedIn profiles; -using on-line job search tools; and -preparing materials to support employee applications for EI benefits.
5	15-Nov-21	Northern Health	C.1_BW_Community Effects Monitoring and Management Plan	S. Western, B. Oke	CEMMP	Section 10			Please clarify who at BW Gold will be in charge of implementing the socio-economic impact monitoring and adaptive management plans and actions?	BW Gold's Indigenous Relations Manager and Community Relations Managers (or designates) will be responsible for implementing socio-economic impact monitoring and adaptive management. They will be supported by the CLC through regular meetings and engagement.

6	15-Nov-21	Northern Health	C.1_BW_Community Effects Monitoring and Management Plan	S. Western, B. Oke	CEMMP	Section 10.2			<p>Condition 37 b ii) States: The CEMMP must include...the means by which additional communities would be identified and included in the plan should effects from the Project extend to other communities in the future;</p> <p>BW has not identified how such additional communities will be identified. What communication / data-gathering methods will be established for an additional community to indicate that they are experiencing socio-economic effects of the project?</p>	<p>The following underlined text has been added to Sections 10.2 and 11.2:</p> <p>Section 10.2: In the case that additional communities indicate that they are experiencing socio-economic effects of the Project (<u>e.g., based on feedback or complaints received through the Community Feedback Mechanism or through CLC engagement</u>), BW Gold will compile a data set, including any available data pre-construction, where publicly available. This information will then be compared against the conditions at the time that effects are being experience to determine if there is correlation between Project activities and impacts to these communities. <u>Once identified as a potentially affected community, effects monitoring and reporting will be undertaken as outlined in the CEMMP.</u></p> <p>Section 11.2: <u>The Community Feedback Mechanism, together with feedback and ongoing CLC engagement, will identify other potentially affected communities that should be included in future CEMMP monitoring and annual reporting.</u></p>
7	15-Nov-21	Northern Health	C.1_BW_Community Effects Monitoring and Management Plan	S. Western, B. Oke	CEMMP	Table 10.1-1	Population and Demographics		<p>The nature of publically available statistics such as BC Stats means that data is typically far behind real-time situations. As such, anecdotal data received from community needs to be taken seriously as a potential indicator.</p>	<p>BW Gold agrees. This is one of the reasons the CEMMP includes collection of data and input from the CLC (Section 10.3) to allow for the inclusion and consideration of any recent information. This CEMMP will require collaboration with the CLC to ensure that information is current and reliable. The following sentence has been added to Section 10.3 to highlight this point: "Publicly-available statistics, such as BC Stats, may not accurately present existing conditions. As such, supplementary data will be collected in collaboration with the CLC to provide current and reliable information on conditions in potentially affected communities. "</p>
8	15-Nov-21	Northern Health	C.1_BW_Community Effects Monitoring and Management Plan	S. Western, B. Oke	CEMMP	Table 10.1-1	Regional and Community Services (Health Services)		<p>We advise that the SEMMP also includes communicable disease rates as a context indicator (including the incidence rates of the following: HIV/AIDS, Hep C, Gonorrhea, Chlamydia and Syphilis). There will be an influx of workers from outside of the region, which may result in the introduction/transmission of communicable diseases into the community. As noted in our Health Considerations of Resource Development Projects document, there may be a potential for Projects to increase "communicable disease rates due to such factors as sanitation, drug and alcohol use, and a highly mobile work force dominated by certain demographics."</p>	<p>BW Gold has included this indicator, noting that it will rely on Northern Health to provide this data at a community or aggregate level, as the data is otherwise not publicly available.</p>
9	15-Nov-21	Northern Health	C.1_BW_Community Effects Monitoring and Management Plan	S. Western, B. Oke	CEMMP	Table 10.1-1	Regional and Community Services (Health Services)		<p>We ask that this indicator is amended to better capture potential health services impacts. Please include the following indicators:</p> <ul style="list-style-type: none"> - The number of non-local project workers that are being referred to and/or presenting to local health facilities (and for what, including urgent/non-urgent and occupational/non-occupational demands.) - Aggregated data on type and number of medical visits to the on-site medical facilities. Preference would be given to using a standard "Presenting Complaints List" as is used in emergency departments. - Information on the level and types of health services that are available on-site <p>We note this monitoring approach is being used for other projects, whereby workers report any local health care service utilization to the project health service provider (either before or after their visit). This monitoring should apply to all non-local Project workers, whether they are staying in camp or within the community.</p>	<p>The three suggested indicators have been added to Table 10.1-1. With respect to the number of non-local project workers presenting to local health facilities, BW Gold will rely on NH to provide this information as it is not publicly available.</p>

9	29-Jan-22	Northern Health	Email	S. Western, B. Oke	CEMMP	Table 10.1-1		Regional and Community Services (Health Services)	<p>Thank you and we will for clarification. We are also asking is for BW to report how many workers go to their clinic on site, and then also how many people are referred to the local healthcare system. NH and BW can then compare notes as needed.</p> <p>We also ask that you add qualitative feedback and observations from Northern Health as an indicator. There may be situations where no relevant quantitative data is present but where certain trends may be noted by health practitioners that need to be communicated.</p>	<p>The plan already contains indicators that would track Project use of medical services:</p> <ul style="list-style-type: none"> ■Number of non-local project workers that are being referred to local health facilities (for 1) urgent/non-urgent and 2) occupational/non-occupational demands) * ■Aggregated data on type and number of medical visits to on-site medical facilities* <p>The Information Request Form provided to CLC members will be used to collect qualitative and quantitative information. In addition to specific questions and requests included on the form, there will be an option to provide other qualitative feedback and observations. Also, a new indicator was added:</p> <ul style="list-style-type: none"> ■Number of Project workers referred to the local healthcare system, by key service category/diagnostic type
10	15-Nov-21	Northern Health	C.1_BW_Community Effects Monitoring and Management Plan	S. Western, B. Oke	CEMMP	Table 10.1-1		Regional and Community Services (Health Services)	<p>NH recommends including a context indicator of "number of Diagnostic and Treatment Centre and/or Emergency Room visits by non-residents" to capture the cumulative effects of shadow populations from multiple projects on health services. Please contact NH to access this data.</p>	<p>The requested indicator has been added to Table 10.1-1 with a note that this data will be provided by NH. In the case that the data is not provided by NH, and in consideration of the confidential nature of employee health status and needs, BW Gold will rely on other indicators in Table 10.1-1 including:</p> <ul style="list-style-type: none"> ■Number of times public health care services were accessed per community, total and by key service category ■Number of times health care emergency services were accessed by the Project, per provider/per community.
10	29-Jan-22	Northern Health	Email	S. Western, B. Oke	CEMMP	Table 10.1-1		Regional and Community Services (Health Services)	<p>Thank you and let us add that we would also like to see a breakdown of data -- aggregated but without personal information--showing how many people in each month went to the clinic, how many were related to which diagnosis. They should be aggregated by general diagnostic types (bone breaks, heart conditions, GI issues, flu, etc.). We ask for some breakdown so as to compare what Blackwater is sending v. what NH is receiving so we can compare notes later as needed.</p>	<p>An indicator was added to the report "Number of Project workers referred to the local healthcare system, by key service category/diagnostic type" that will aim to collect requested information if deemed as not confidential or violating workers' privacy.</p>
11	15-Nov-21	Northern Health	C.1_BW_Community Effects Monitoring and Management Plan	S. Western, B. Oke	CEMMP	Table 10.1-1		Regional and Community Services (Protective Services)	<p>Regarding monitored indicators, recent work suggests women (especially aboriginal women) often disproportionately experience the negative impacts of resource development activities, such as domestic violence, sexual assault/harassment, financial inequity, sexual exploitation, etc. This work includes the Communities and Construction Camps (C3) Workshop (June, 2016, report pending publication) and Amnesty International's Out of Sight, Out of Mind: Gender, Indigenous Rights, and Energy Development in Northeast BC (Nov, 2016). This work highlights the importance of considering gender-related impacts. Accordingly, we recommend that additional indicators are included to monitor for impacts to women. This might include monitoring for sexual assault and harassment, sexual exploitation, sex-trafficking, STI rates, etc.</p>	<p>Crime statistics by policing jurisdiction (available here https://www2.gov.bc.ca/gov/content/justice/criminal-justice/policing-in-bc/publications-statistics-legislation/crime-police-resource-statistics) is not available by gender and does not include any statistics related to sexual assault, harassment, sex-trafficking, etc. This type of data would have to be collected by and obtained from the regional RCMP unit. An agreement with the RCMP needs to be reached first to ensure that this type of data would be accessible for the report.</p> <p>An indicator pertaining to STIs has been added to Table 10.1-1 (see comment/response #8) as follows: "Statistics on communicable disease rates by community or aggregate (this can include incidence rates of the following: HIV/AIDS, Hep C, Gonorrhea, Chlamydia and Syphilis)."</p>
11	29-Jan-22	Northern Health	Email	S. Western, B. Oke	CEMMP	Table 10.1-1		Regional and Community Services (Protective Services)	<p>To the best of our knowledge, this kind of quantitative information is not available from the RCMP or anywhere in smaller communities. Instead, we recommend that you gather this data qualitatively by interviewing service providers (social services, RCMP, etc.)</p>	<p>Annual data for RCMP is available by policing jurisdiction and offence type from BC Stats (https://www2.gov.bc.ca/gov/content/justice/criminal-justice/policing-in-bc/publications-statistics-legislation/crime-police-resource-statistics). The Information Request Form provided to CLC members will be used to collect qualitative and quantitative information, where possible.</p>
12	15-Nov-21	Northern Health	C.1_BW_Community Effects Monitoring and Management Plan	S. Western, B. Oke	CEMMP	Section 11.2			<p>Northern Health encourages BW Gold to also promote its feedback mechanism in local papers, municipal websites, and social media as applicable.</p>	<p>Suggestion added to Section 11.2. Note that BW Gold is not actively using social media channels.</p>
13	15-Nov-21	Northern Health	C.1_BW_Community Effects Monitoring and Management Plan	S. Western, B. Oke	CEMMP	Section 11.2			<p>Can the complaints be made available to those on the CLC committee? It stands to reason that, by virtue of its mandate, the CLC should be aware of anonymized complaints being filed by community members.</p>	<p>Section 11.2.3 states that "In alignment with CLC meetings (as described in Appendix B), BW Gold will prepare a summary of feedback, complaints and their resolutions in order that CLC members are aware of the level of use of the mechanism, key topics garnering interest or concern by communities, and the number of complaints and their resolution status. "</p>

14	15-Nov-21	Northern Health	C.1_BW_Community Effects Monitoring and Management Plan	S. Western, B. Oke	CEMMP	Section 11.2; Section 10.2			Following up on the above point, there seems to be a gap between quantitative data gathering, qualitative data gathering from members of the CLC, and complaints. Though complaints do not necessarily need to be given the same weight as data collected from a formal research approach, this information could provide valuable insight that may otherwise be overlooked.	Appendix D: Draft Annual CEMMP Report Table of Contents highlights that Chapter 7 of the annual CEMMP report will provide a summary of community feedback. Where relevant, this feedback will be integrated with monitored effects if deemed reliable/relevant by the Qualified Person. Section 11.2 also is edited to highlight the need to consider results from the feedback mechanism in the assessment of impacts as applicable. The following text has been added to Section 11.2: "Feedback and complaints may also provide insight into the understanding of monitored effects."
14	29-Jan-22	Northern Health	Email	S. Western, B. Oke	CEMMP	Section 11.2; Section 10.2			To provide maximum transparency for community representatives, we urge BW to provide access to an anonymized version of all complaints. Additionally, as people living in the community, those on the CLC will be able to notice different patterns and significance in timing that BW employees may not.	The annual CEMMP report, as stated in Section 12.2, will provide a summary of all complaints received about the Project.
15	15-Nov-21	Northern Health	C.1_BW_Community Effects Monitoring and Management Plan	S. Western, B. Oke	CEMMP	Table 11.2-1			Looking at this table, NH asks how high traffic delays and noise complaints will be categorized. Such complaints may be shorter term or isolated to a small group of people, but are made due to significant alterations of quality of life for local people.	Additional criteria for complaints categorization have been added to Table 11.2-1 as follows: <ul style="list-style-type: none"> ■ Moderate priority: Short term and a measurable alteration of quality of life for more than ten (10) individuals or one (1) community, (e.g., traffic delay lasting more than 1 hour) ■ Urgent/High priority: Short term and a measurable alteration of quality of life for more than 20 individuals or three (3) community, (e.g., traffic delay lasting more than 1 hour)
15	29-Jan-22	Northern Health	Email	S. Western, B. Oke	CEMMP	Table 11.2-1			A 1 hour traffic delay is a VERY LONG time for a community of this size . Northern Health recommends that this duration is reconsidered. Also what if such traffic jams occurred multiple times—how would that effect the severity rating?	The wording around "one hour delay" is provided as an example. It does not mean that complaints about traffic delays of less than one hour would be ignored. All complaints about the Project will be treated seriously. Repeated complaints or negative feedback (including multiple complaints about traffic), as summarized in Table 11.2-1, will be rated as urgent/high priority. Text was revised to provide 30 min as an example.
16	15-Nov-21	Northern Health	C.1_BW_Community Effects Monitoring and Management Plan	S. Western, B. Oke	CEMMP	Section 13			We also recommend that the SEMMP includes a framework for adding additional indicators if unforeseen concerns arise that require monitoring and/or if additional data sources emerge.	The following text has been added to Section 10.1: "In the case of unforeseen impacts identified through the Community Feedback Mechanism, feedback from the CLC and other stakeholders, and at the discretion of the Qualified Person based on professional experience, BW Gold will identify new indicators to be monitored."
17	15-Nov-21	Northern Health	C.1_BW_Community Effects Monitoring and Management Plan	S. Western, B. Oke	CEMMP	Section 13; Table 10.1-1			Can the Evaluation and Adaptive Management Section be connected more clearly to the Socio-economic Impact Monitoring section (10.1-1)? For all of these categories the question remains: How will BW Gold know if mitigation measures are working? What are the triggers/ thresholds for altering /adapting/ upping mitigation measures?	Please refer to the Adaptive Management Triggers in Table 5.1-1, which identify the monitoring result and management response. Table 10.1-1 identifies the anticipated trend or effect direction, based on environmental assessment predictions. If an effect is not tracking as anticipated, adaptive management triggers will be applied.
18	12-Nov-21	LDN/UFN	C.1_BW_Community Effects Monitoring and Management Plan	Mikayla Davis	CEMMP	10	Compliance with EA Conditions	Is annual evaluation often enough to effectively evaluate mitigation measures?	It is an industry standard to undertake annual socio-economic data compilation and reporting. This cadence is in place in part due to the availability of socio-economic data. More frequent monitoring is typically required for environmental programs. Notwithstanding, as a result of the Community Feedback Mechanism, as well as the ongoing engagement of the CLC, there will be opportunities to receive input on the effectiveness of mitigation measures and adapt in response and as needed.	
19	12-Nov-21	LDN/UFN	C.1_BW_Community Effects Monitoring and Management Plan	Mikayla Davis	CEMMP	Context Statement	Compliance with EA Conditions	This plan was developed unilaterally by Artemis and then provided to the CLC for review and comment, not developed in a collaborative fashion with the CLC. In order to meet the requirement of the condition, Artemis must address this with revisions and other input from the CLC.	The draft CEMMP was provided to CLC members on October 1, 2021 for review and comment. Additionally, on December 9, 2021, CLC members met to review the CEMMP and solicit additional input. Comments were received from NH, LDN, UFN and the City of Quesnel. The District of Fort St James confirmed it had no comments on the CEMMP. All comments and revisions are considered and incorporated, wherever possible.	
20	15-Nov-21	LDN/UFN	C.1_BW_Community Effects Monitoring and Management Plan	Mikayla Davis	CEMMP	Appendix A-Condition 37b ii)	Compliance with EA Conditions	This is mentioned in section 2 as well, and note 13 in table 10.1-1 not note 14. However neither places where it is described does it explain how other affected communities would be identified, only that they might be identified. It should explain how you plan to identify other impacted communities.	Other communities, if impacted, would be identified through Community Feedback Mechanism, feedback from the CLC and other stakeholders. Results from annual monitoring relevant to this plan and professional judgement of the monitor would be also applied to identify other potentially affected communities. This clarification has been added to Section 11.2 and 12.2. Note the number was corrected from '14' to '13' in Appendix A- Condition 37b ii)	
21	15-Nov-21	LDN/UFN	C.1_BW_Community Effects Monitoring and Management Plan	Mikayla Davis	CEMMP	15	Compliance with EA Conditions	This section should include the following; " The plan and terms of reference, and any amendments thereto, must be implemented to the satisfaction of the Qualified Person throughout Construction, Operations, and for the first five years of Closure, and to the satisfaction of the EAO."	This statement has been added to section 15.	
22	15-Nov-21	LDN/UFN	C.1_BW_Community Effects Monitoring and Management Plan	Mikayla Davis	CEMMP	Appendix A-Condition 37b iv)	General	Add 10.1-1 to location in plan, as this table contains specific mitigation measures.	This table reference has been added to Appendix A- Condition 37b iv).	

23	15-Nov-21	LDN/UFN	C.1_BW_Community Effects Monitoring and Management Plan	Mikayla Davis	CEMMP	Appendix A-Condition 37b vij)		General	Skills training is outlined in section 8.2 not 8.1.	Section 8.2 is now referenced in Appendix A-Condition 37b vij).
24	15-Nov-21	LDN/UFN	C.1_BW_Community Effects Monitoring and Management Plan	Mikayla Davis	CEMMP	Table 5.1-1		General	Under medium level effect, the first bullet point has a typo in that it repeats "and is" twice.	"and is" repetition has been removed from Table 5.1-1.
25	16-Nov-21	LDN/UFN	C.1_BW_Community Effects Monitoring and Management Plan	William Popov	CEMMP	Table 8.1-2 and Table 8.3-1		General	Which specific incentives will be provided for employees to re-locate to local communities?	Table 8.1-2 edited as follows: "Such incentives could include e.g. paid time to accommodate moving and related moving expenses. "
26	16-Nov-21	LDN/UFN	C.1_BW_Community Effects Monitoring and Management Plan	William Popov	CEMMP	8.4		Compliance with EA Conditions	What, specifically, are the "limited and identified circumstances" under which employees would be allowed to drive their personal vehicles to the mine site?	A footnote was added to explain that: "Such circumstance may include senior management staff who are required flexibility in locations and timing of meetings, employees or contract with disabilities who need special access if not available on shuttle service, and employees requested to support Project activities on special basis (outside of their work schedule or regular shifts)"
27	16-Oct-21	District of Fort St James	C.1_BW_Community Effects Monitoring and Management Plan	Brooke Eschul	CEMMP	General		Overall Document	The District of Fort St. James doesn't have any comments on the document. It is very comprehensive. Thanks, Brooke	Noted.
28	15-Nov-21	City of Quesnel	C.1_BW_Community Effects Monitoring and Management Plan	Amy Reid	CEMMP	p.11		Name	Alexander Mackenzie Heritage Trail should be referred to as Nuxalk Carrier Grease Trail	Section 6 has been revised to include the Nuxalk Carrier Grease Trail.
29	15-Nov-21	City of Quesnel	C.1_BW_Community Effects Monitoring and Management Plan	Amy Reid	CEMMP	p. 18		content	Would be helpful to add exit interview/survey with all employees in the case of mine closure/major curtailment. This helps communities to focus their response.	BW Gold thanks the reviewer for the comment. Exit interviews are confidential so it is unclear how they would assist communities with their response in the event of temporary closure.
30	15-Nov-21	City of Quesnel	C.1_BW_Community Effects Monitoring and Management Plan	Amy Reid	CEMMP	p 21		content	Most of the indicators for population and employment are not available at the community level in this region. Would also be helpful to include School District enrollment numbers rather than just class sizes.	An effort has been made to identify indicators from multiple sources and different levels. Additionally, BW Gold expects that information will also be provided via the Community Feedback Mechanism and CLC engagement. School District #91 enrollment numbers has been added to Table 10.1-1 and it is expected that this information will be provided by the School District.
31	15-Jan-22	EAO	C.1_BW_Community Effects Monitoring and Management Plan	Tracey Janes	CEMMP			Condition #37 - General	Implement the plan as provided. Revise in consultation with the District of Vanderhoof, Village of Fraser Lake, Aboriginal Groups, NHA and the EAO and in accordance with timelines in the Document Submission Plan.	BW Gold will follow the EAO's guidance.

Exhibit 9
Air Quality and Fugitive Dust Management Plan (ITT)

Blackwater Gold Project											
ADMIN	COMMENTS										
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Section in Updated Plan	Comment Theme	Comment	Response	Author
1	10-Sep-21	RWDI		Jeff Lundgren	Air Quality & DMP	General	General	Editorial/Grammar	The document itself could potentially be edited to improve readability and provide a little more context.	Based on reviewers comments the document has been updated to improve readability and provide more context.	ERM
2	10-Sep-21	RWDI		Jeff Lundgren	Air Quality & DMP	2-1	2	Purpose and Objective	The bulleted list does not mention NO2, SO2 and PM2.5.	PM2.5 is a component of dust so does not need to be explicitly listed. The purpose and scope of the plan has been revised as follows: "The purpose of the Air Quality and Fugitive Dust Management Plan (AQMP) is to minimize the effects of the Project's air emissions on human health and the natural environment. The plan identifies dust-emitting sources, dust mitigation measures, and contingency measures in the event that primary control measures are not effectively controlling dust emissions."	ERM
3	10-Sep-21	RWDI		Jeff Lundgren	Air Quality & DMP	3-2	3	Editorial/Grammar	Passage: "The EM or designate will be responsible for reporting non-compliance to the CM, and EPC contractor". Reviewer commented "superfluous and?"	The sentence has been revised as follows: "The EM or designate will be responsible for reporting non-compliance to the CM, EPCM contractor..."	ERM
4	10-Sep-21	RWDI		Jeff Lundgren	Air Quality & DMP	4-1	5.2	Environmental Setting	The document could include wind roses here to help the reader visualize. Also, these may change over time, so I presume values given here will be updated as the plan and document evolves.	Blackwater Low and Blackwater High station wind roses figures have been added to the Environmental Setting (Section 5.2).	ERM
5	10-Sep-21	RWDI		Jeff Lundgren	Air Quality & DMP	4-1	5.3	Facility and Process Description	The arrangement in earlier years will be more relevant to the implementation and evolution of the plan. Will it differ notably from Y+23? Will that influence (or not) the plan actions in the initial years?	The size and presence of certain project components will change over time but the use of Year +23 allows all planned project components to be included in the AQMP. Using the Year +23 General Arrangement will not influence how mitigations or how actions are implemented in the earlier years of the Project.	ERM
6	10-Sep-21	RWDI		Jeff Lundgren	Air Quality & DMP	4-1	5.3	Editorial/Grammar	Passage: "BW Gold has integrated engineering controls to mitigate fugitive dust emissions from the processing plant, which include (Ausenco 2021)." Reviewer commented "This sentence fragmented from opening of bullet list?"	The sentence has been revised as follows: "BW Gold has integrated engineering controls to mitigate fugitive dust emissions from the processing plant, which includes active dust collection, wet grinding, enclosures, and stack emissions (Ausenco 2021). These controls are outlined below."	ERM
7	10-Sep-21	RWDI		Jeff Lundgren	Air Quality & DMP	4-1	5.3	Facility and Process Description	Last sentence on page seems fragmented, stops after 'which include'. Perhaps should read "BW Gold has integrated engineering controls to mitigate fugitive dust emissions from the processing plant (Ausenco 2021), which are outlined in the following sections."	See response to Comment #6	ERM
8	10-Sep-21	RWDI		Jeff Lundgren	Air Quality & DMP	4-6	5.3.3 and Table 6-1	Tailings Storage Facility	(1) In the first sentence in section 4.3.3, should the word 'potentially' just be 'potential'? Using the adverb makes it apply to the verb 'store', not the noun phrase 'acid generating waste'. That is, do you mean to say that you might store the acid waste, or you mean you will store waste that might generate acid. If the latter (as I expect) its just 'potential'. (2) The text here also states: "Construction of the TSF will commence in Y-2 with the diversion of Davidson Creek and construction of TSF C Diversion berm, downstream sediment control pond and the Interim Environmental Control Dam". Is this why 'dam construction' (emphasis mine) is listed under 'operations' rather than 'construction' in Table 6.1. If so, perhaps make that explicit here.	(1) The word 'potentially' is correct as it comes from the term "potentially acid generating" (PAG) rock. (2) Table 6-1 has been revised as follows: Construction: "Construction of TSF dams, interim environmental control dam" Operations: "Construction of TSF Main Dam D and Final environmental control dam"	ERM
9	10-Sep-21	RWDI		Jeff Lundgren	Air Quality & DMP	4-7	5.3.4	Stockpiles – 'Topsoil'	Will topsoil stockpiles be seeded if being stored unperturbed for longer periods of time (say more than a year)? Table 6.2 has the additional comment 'Until stockpiles are vegetated' alongside soil stockpiles, so I presume this is the case? If so, should note here also.	The following statement has been included: "Stockpiles will be seeded with non-propagating grass species, native grasses and forbs, and tree and shrub species to reduce erosion and invasive-species establishment. " A timeframe has not been included because all topsoil stockpiles will be seeded.	ERM
10	10-Sep-21	RWDI		Jeff Lundgren	Air Quality & DMP	5-1	7.2	Air Dispersion Modelling Results	This section could use just a little more detail to place results in context. Which project phase is represented in the results? Construction or Operations? If Operations, for what year from life of mine?	This has been updated to indicate that the modelling was conducted for Phase 1 of operations.	ERM
11	10-Sep-21	RWDI		Jeff Lundgren	Air Quality & DMP	5-1	7.2	Air Dispersion Modelling Results	Also, a brief mention of modelling protocol would also help with context. It need only be something like 'Modelling results represent a level 2 assessment conducted with the CALPUFF/AERMOD/OTHER regulatory over x number years from 20xx to 20xx'.	New subsection added to indicate the level of modelling that was conducted and the years of modelling.	ERM
12	10-Sep-21	RWDI		Jeff Lundgren	Air Quality & DMP	5-1	7.2	Air Dispersion Modelling Results	Also, this section is a specific example of the general comment given above relating to the document structure. NO2, SO2 and CO results are presented but neither sources or emissions of these CPOCs have been discussed to this point.	Dispersion modelling results presented in 7.2.	ERM
13	10-Sep-21	RWDI		Jeff Lundgren	Air Quality & DMP	5-1	7.2	Air Dispersion Modelling Results	Similarly, only 'dust' – i.e.: total PM - has been addressed. No mention of PM fractions or source that result in PM2.5, PM10 has yet been presented. Also perhaps make explicit reference that PM2.5 and PM10 are included because (as you note above) ENV recommends monitoring the fractional PM species rather than dust deposition.	Dispersion modelling results presented in 7.2.	ERM
14	10-Sep-21	RWDI		Jeff Lundgren	Air Quality & DMP	6-1	7	Identification of Potential Air Emission Sources	This is the main specific example of the general comment regarding the structure of the document. The content presented here is good. But I think it would be helpful to come earlier in the document. For example, by necessity emission sources must be identified and characterized in order to be able to conduct air quality dispersion modelling. Thus, it would, by extension, make sense that emissions sources are detailed prior to modelling results. Similarly, the specific information presented in section 4 might be better placed after the general summary provided here.	The plan has been restructured so air dispersion modelling and effects are presented in 7.2.	ERM

Blackwater Gold Project											
ADMIN	COMMENTS										
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Section in Updated Plan	Comment Theme	Comment	Response	Author
15	10-Sep-21	RWDI		Jeff Lundgren	Air Quality & DMP	6-1	Table 6-1	Activities Resulting in Fugitive Dust by Project Phase	See comment above regarding why dam 'construction' listed under 'Operations' Phase. Perhaps just note that phases are temporally based periods, and that 'construction' activities can still occur while the mine is in 'operations'	Table 6-1 has been updated to include the planned construction activities during the Operations phase consistent with the Development Schedule in Chapter 3 of the Application.	ERM
16	10-Sep-21	RWDI		Jeff Lundgren	Air Quality & DMP	6-3/4	5.3.4	Fugitive Dust Emission Sources by Project Component	As noted earlier, section 4.2.4 does not mention that soil stockpiles will be vegetated as is noted in table.	See response to Comment #9	ERM
17	10-Sep-21	RWDI		Jeff Lundgren	Air Quality & DMP	6-4	Table 6-3	Emission Sources and Predicted Emissions	Which Phase do these emissions reference? Presumably Operations?	The title has been revised as follows: "Operations Emission Sources and Predicted Emissions"	ERM
18	10-Sep-21	RWDI		Jeff Lundgren	Air Quality & DMP	7-1	Table 7-1	Federal and BC Ambient Air Quality Objectives	Presentation of the objective should be earlier. In particular, if these are shown prior to the dispersion model results in Section 5, then the reader is better able to grasp that model results are indeed well below the objectives that have already been introduced.	The presentation of the modelling results have been moved so that the objectives are presented before the modelling results.	ERM
19	10-Sep-21	RWDI		Jeff Lundgren	Air Quality & DMP	7-4	7	Editorial/Grammar	Passage: "It should be noted that naturally occurring small particulates produced by forest fires elevate PM 2.5 and PM 10 levels high above regulatory standards." Reviewer commented "true, but awkwardly worded..."	The sentence has been revised as follows: "Naturally occurring small particulates produced by forest fires can elevate PM2.5 and PM10 levels above guidelines."	ERM
20	10-Sep-21	RWDI		Jeff Lundgren	Air Quality & DMP	8-1/2/3	Table 8.2-1	Table 8.2-1: Air Quality Mitigation Measures, Best Management Practices, and Contingency Measures	Under soil stockpiles, vegetation is not mentioned, but is noted in Table 6.1 [6.2]	The following bullet has been added to the topsoil stockpile mitigations: "Stockpiles will be seeded to reduce erosion and establishment of invasive species."	ERM
21	10-Sep-21	RWDI		Jeff Lundgren	Air Quality & DMP	8-4	8.3.1	Meteorological Stations	Passage: "Wind onsite, which can cause fugitive dust events, comes predominantly from the west." Reviewer commented "annual reports? Specific dust generating events?"	The sentence has been revised as follows: "Prevailing winds have historically been observed to come from the west (see Section 5.2), which can cause fugitive dust events."	ERM
22	10-Sep-21	RWDI		Jeff Lundgren	Air Quality & DMP	8-6	8.3.5	Carbon Monoxide	Passage: "CO levels are below BC air quality objectives at the human receptor locations." Reviewer commented "perhaps note that they are *well* below objectives ie. <<5%".	The statement has been revised as follows: "Based on monitoring results, CO monitoring is not recommended as CO levels are below BC air quality objectives at the human receptor locations (i.e., less than 5% of the objective)."	ERM
23	10-Sep-21	RWDI		Jeff Lundgren	Air Quality & DMP	8-7	8.5.1	Editorial/Grammar	Passage: "In the event that the limits in the air discharge permit are exceeded [...]" Reviewer commented "in the final air discharge permit (above it noted that BW has not yet received a discharge permit). Perhaps note that this will be made specific in future versions when actual permit levels are in place".	The statement has been revised as follows: "In the event that COPC limits and corresponding concentration triggers identified in Section 4.4 (Adaptive Management Trigger Action Response) of the AQMP are exceeded, BW Gold will notify the EAO, ENV, EMLI, Northern Health and Aboriginal Groups and Independent Environmental Monitor."	ERM
24	10-Sep-21	RWDI		Jeff Lundgren	Air Quality & DMP	9-2	9.2	Editorial/Grammar	Bullet: "Meteorological station". Reviewer commented "meteorological stations?"	The bullet point has been changed to "Meteorological stations."	ERM
25	10-Sep-21	RWDI		Jeff Lundgren	Air Quality & DMP	10-1	10	Editorial/Grammar	Passage: "If based on the review, new sources are introduced [...]" Reviewer commented "needs comma - If, based on the review"	The sentence has been revised as follows: "Appropriate sections of the AQMP will be updated if the review concludes there are new emission sources, existing emission sources have been eliminated, or emissions are significantly reduced."	ERM
26	10-Nov-21	Northern Health	Table	Paula Tait	A.1 Air Quality and Fugitive Dust Management Plan	2-2		2.4 Linkages to Other Management Plans	It's not clear in this section how, specifically, this plan (or the data collected from this plan) will inform the Country Foods Monitoring Plan (CFMP) or the Wildlife Management and Monitoring Plan (WMMP). When will metals monitoring and analysis be completed and/or triggered? Please describe.	Metals monitoring in dustfall is not included in the AQDMP as it is not a recognized method of measurement by ENV. Metals monitoring will be conducted as part of the CFMP and is described in that document. The results will be used to inform the Wildlife Mitigation and Monitoring Plan (WMMP).	ERM
27	10-Nov-21	Northern Health	Table	Paula Tait	A.1 Air Quality and Fugitive Dust Management Plan	4-8		4.3.7 Refuse Incinerator	There is a land location for the incinerator provided in the plan, but it would be helpful to show the location of the incinerator on the site map and also where it is located in relation to the camp? How often will the incinerator be operating and will the PM2.5 monitoring (every 3 or 6 days?, less during the winter) capture days when the incinerator is operating? Please elaborate.	Incinerator has been added to Figure 7-1. Frequency of incinerator operation Yes, the PM2.5 monitoring will be on a regular schedule and as such is likely to capture days that the incinerator is operating.	ERM
28	10-Nov-21	Northern Health	Table	Paula Tait	A.1 Air Quality and Fugitive Dust Management Plan	6-1		6. Identification of Potential Air Emission Sources – Diesel generators	Where will the 6 diesel generators be located? Will any be close to the camp? Will the PM2.5 monitoring days coincide with days when the generators are operating? Are the emissions from the generators captured in table 6-3 under fired sources?	The diesel generators are only backup generators and are only to be used in rare circumstances when line power is unavailable. As these generators are only planned to be used as backups it is not known if PM monitoring will occur on days when the generators are running. The location of the generators will be added to Figure 5.3-1. Emissions from the generators are included in Table 6-3 under "Fired Sources".	ERM
29	10-Nov-21	Northern Health	Table	Paula Tait	A.1 Air Quality and Fugitive Dust Management Plan	7-1		7. Identification of Potential Effects of Fugitive Dust	Thank you for including: "As even low levels of air pollution can affect some individuals, air quality objectives should not be viewed as levels that can be 'polluted up to', but levels to stay well below." We support that all emissions should be kept as low as reasonable achievable.	Noted. BW Gold understands that there is no further action.	ERM
30	10-Nov-21	Northern Health	Table	Paula Tait	A.1 Air Quality and Fugitive Dust Management Plan	8-6		8.3.3 Particulate Matter Monitoring	"Fine particulate sampling will occur every third day, alternating between PM2.5 and PM10, between May and October. During winter conditions, sampling frequency will be weekly."	No comment.	ERM

Blackwater Gold Project												
ADMIN	COMMENTS											
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Section in Updated Plan	Comment Theme	Comment	Response	Author	
31	10-Nov-21	Northern Health	Table	Paula Tait	A.1 Air Quality and Fugitive Dust Management Plan	8-6		8.3.3 Particulate Matter Monitoring	Does this mean that PM2.5 will be monitored every 6 days and PM10 will be monitored every 6 days? Will these pollutants be monitored every 2 weeks, respectively, during the winter? This is not clear in the plan – please clarify. Will this monitoring frequency capture worst-case scenario conditions? For example, will monitoring for PM2.5 every 6 days pick up days when the incinerator is running, diesel generators are running and this coincides with high traffic/dusty days? The monitoring program should validate the model and human health risk assessment predictions on the worst-case scenario days. What would trigger particulate matter metals analysis? We recommend that a full suite of metals analyses is completed (at least initially and then scaled up/down depending on results) to validate that model assumptions and outputs were conservative/protective of public health.	Between May and October PM2.5 will be monitored every 6 days and PM10 will be monitored every 6 days. Between November and April the sampling interval of each parameter will be extended to once every 13 days. The sampling intervals during summer (likely to have the highest fugitive dust emissions) follow the 6 day frequency of the federal National Air Pollution Surveillance (NAPS) program which is designed to capture representative ambient concentrations of criteria contaminants during all emissions scenarios. Partisol samplers cannot be used to measure metals concentrations in PM10 and PM2.5. Metals concentrations in soil and plants will be measured as part of the CFMP and can be used to validate that modelling results were conservative with respect to public health.	ERM	
32	10-Nov-21	Northern Health	Table	Paula Tait	A.1 Air Quality and Fugitive Dust Management Plan	8-7		8.5.1 Notification	NH appreciates being notified when air quality exceedances occur. We also appreciate the plain language summary of the technical report since our time/capacities are limited. Any potential effects on human health should be clearly stated in the notification. Please include resource.development@northernhealth.ca for these notifications.	Noted. BW Gold understands that there is no further action.	ERM	
33	10-Nov-21	Northern Health	Table	Paula Tait	A.1 Air Quality and Fugitive Dust Management Plan	8-9		Table 8.4-1 Trigger Action Response	We support the staged approach to trigger action response.	Noted. BW Gold understands that there is no further action.	ERM	
34	10-Nov-21	Northern Health	Table	Paula Tait	A.1 Air Quality and Fugitive Dust Management Plan	8-9		Table 8.4-1 Trigger Action Response	There are not many details regarding when/where/how/who will complete the visual monitoring for dust in the plan. Is it everyone's responsibility to monitor and report on all dust events or are there specific roles assigned in specific locations during specific times? More detail seems appropriate/needed from an accountability lens.	The Fugitive Dust Management SOP (Appendix D) provides details on roles and responsibilities with respect to visual dust monitoring. Supervisors, including the Construction, Blasting, and Production Supervisors, will hold primary responsibility for active fugitive dust monitoring and for initiating an appropriate response in accordance with the SOP.	ERM	
35	10-Nov-21	Northern Health	Table	Paula Tait	A.1 Air Quality and Fugitive Dust Management Plan	8-9		Table 8.4-1 Trigger Action Response	Regarding the "Fine PM" monitoring program – How is the baseline concentration being established? We support that the monitoring frequency be ramped up as described in this table. When would metals monitoring and analysis be triggered? We recommend that some initial investigation regarding metals concentrations is completed and then the frequency can be adjusted based on initial monitored results.	The baseline concentration was determined as part of the EA process and described in Table 7.2-1. Metals monitoring will be conducted as part of the CFMP and is described in that plan.	ERM	
36	10-Nov-21	Northern Health	Table	Paula Tait	A.1 Air Quality and Fugitive Dust Management Plan	8-9		Table 8.4-1 Trigger Action Response	If any particulate matter annual objectives/standards are exceeded, what actions are triggered?	As stated in Table 9-1, if annual objectives for fine particulate matter are exceeded then BW Gold will: Develop causal analysis and associated mitigations in addition to a schedule for implementation Increase sampling frequency to daily	ERM	
37	10-Nov-21	Northern Health	Table	Paula Tait	A.1 Air Quality and Fugitive Dust Management Plan	9-1		9. Reporting and Record Keeping	Will these annual reports be available to NH upon request? NH capacity is limited, but access to reports upon request will help us if community concerns are raised.	The reports will be available to NH on request.	ERM	
38	10-Nov-21	Northern Health	Table	Paula Tait	A.1 Air Quality and Fugitive Dust Management Plan	9-1		9.1.2 Federal Decision Statement Annual Reporting	Does 'D' in the first sentence stand for Decision? How do these conditions differ from what is provided in Appendix B of this plan? Should these conditions be described in this plan?	"DS" refers to the Project's federal Decision Statement. This is first defined in Section 1 and included in the Acronyms and Abbreviations section. There are a number of conditions in the DS that require annual reporting and are applicable to a number of plans or programs required under the DS. Section 10.1.2 (Decision Statement Annual Reporting) describes how BW Gold will achieve compliance with these conditions as they relate to the AQDMP. For consistency with other Project management plans, the relevant conditions will be added to the concordance table (Appendix B) in a future version of the plan.	ERM	
39	10-Nov-21	Northern Health	Table	Paula Tait	A.1 Air Quality and Fugitive Dust Management Plan	11-1			Who participates with the "Blackwater Environment Committee"? Can NH be notified regarding revisions to the plan and provide feedback depending on capacity?	Pursuant to Condition 19 of the Project's EAC #M19-01, BW Gold has established an Environmental Monitoring Committee (EMC) to facilitate information sharing and provide advice on the development and operation of the Project, and the implementation of EAC conditions, in a coordinated and collaborative manner. Committee members include representatives of the Environmental Assessment Office (EAO), UFN, LDN, NWFN, SFN, NFN, Ministry of Energy, Mines and Low Carbon Innovation (EMLI), ENV and Ministry of Forests, Lands, Natural Resource Operations and Rural Development (FLRNORD). Revised draft and final versions of the AQDMP will be provided to Northern Health.	ERM	
40	31-Jan-22	Source	Memo	Pauline Mengote	C.1 Air Quality and Fugitive Dust Management Plan	5.3.7		Refuse Incinerator	Section 4.3.7 in the August 2021 version of the AQDMP locates the refuse incinerator at 53.178570 N and 124.85670 W, while section 5.3.7 of the November 2021 AQDMP locates the incinerator at 53.1923 N and 124.81354 W. Which of the two coordinates represent the accurate location? Clarification: Please clarify why the coordinates for the refuse incinerator differ between the August and November 2021 versions of the AQDMP and confirm whether the location under section 5.3.7 of the latest Plan is accurate. It would also be helpful to indicate the location of the incinerator on the site map in Figure 5.3-1.	53.1923 N and 124.81354 W are the correct coordinates. The location was updated due to revised information from the engineering team. The incinerator will be included on an updated site map.	ERM	

Blackwater Gold Project												
ADMIN	COMMENTS											
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Section in Updated Plan	Comment Theme	Comment	Response	Author	
41	31-Jan-22	Source	Memo	Pauline Mengote	C.1 Air Quality and Fugitive Dust Management Plan	8.3.1		Review of Monitored Meteorological Parameters	Section 8.3.1 states that two automated meteorological stations will collect data on meteorological parameters which will be reviewed monthly. It is unclear who will be responsible for reviewing this data and what the data will be reviewed for or against. Are there guidelines or standards for these parameters that cannot be exceeded? Are there particular values that are meant to be maintained? Recommendation: Please specify under Section 8.3.1 who will be responsible for reviewing monthly meteorological data and clarify what the responsible party would be looking out for in their review of the data. Section 8.3.1 states that two automated meteorological stations will collect data on meteorological parameters which will be reviewed monthly. It is unclear who will be responsible for reviewing this data and what the data will be reviewed for or against. Are there guidelines or standards for these parameters that cannot be exceeded? Are there particular values that are meant to be maintained? Recommendation: Please specify under Section 8.3.1 who will be responsible for reviewing monthly meteorological data and clarify what the responsible party would be looking out for in their review of the data.	Section 8.3.1 has been updated to include review by BW Gold employees overseen by the Environmental Manager. There are no standards or guidelines to compare against, the review will be used to validate that the instrumentation is operating properly and recording measurements that are realistic in nature. The Water and Air Baseline Guidance Document for Mine Proponents and Operators (BC MOE 2016) will be used as guidance.	ERM	
42	31-Jan-22	Source	Memo	Pauline Mengote	C.1 Air Quality and Fugitive Dust Management Plan	Table 8.2-1		Dust Control During Transport of Loads	The AQDMP does not specify control measures for dust that may arise from tailings or other loads that are in transit. Have dust control practices been considered for transporting loads? Examples include the use of tackifiers or temporary physical coverings like tarps. Recommendation: Please specify what control measures will be implemented to minimize the dispersion of dust from loads in transit. This could be included under Table 8.2-1.	Table 8.2-1 was updated to include the use of tarps and tackifiers on fine material transported by open bed trucks.	ERM	
43	31-Jan-22	Source	Memo	Pauline Mengote	C.1 Air Quality and Fugitive Dust Management Plan	8.3.3		Particulate Matter Monitoring	Section 8.3.3 states that sampling of fine particulate matter will be conducted weekly. Will sampling alternate between PM2.5 and PM10 as is done between May and October (i.e., each parameter will be sampled every 2 weeks), or will both parameters be sampled every 7 days? This is unclear in the Plan. Recommendation: Please clarify the sampling interval for particulate matter during the months of November to April – whether alternating between PM2.5 and PM10 or not.	The wording in Section 8.3.3 is "Fine particulate sampling will occur every third day, alternating between PM2.5 and PM10, between May and October. During winter conditions, sampling frequency will be weekly." This has been updated to "Fine particulate sampling will occur every third day, alternating between PM2.5 and PM10, between May and October. During winter November to April conditions, sampling frequency will alternate between PM2.5 and PM10 will be on a weekly basis."	ERM	
44	31-Jan-22	Source	Memo	Pauline Mengote	C.1 Air Quality and Fugitive Dust Management Plan	Figure 5.3-1		Backup Diesel Generators	It would be helpful to indicate the location of the diesel generators on the site map in Figure 5.3-1 as the planned location has not been discussed in the AQDMP. As the diesel generators are to be used only as backup power sources, how will emissions be monitored in the event that particulate matter monitoring does not occur on the days the generators are operating? Is there a plan that exists to account for this scenario? Recommendation: Please indicate in Figure 5.3-1 where the backup diesel generators will be located. Please also discuss what the monitoring plan is to ensure that emissions from the generators will be accounted for on days where PM monitoring does not coincide with operation of the generators.	The emissions of PM from the backup diesel generators, in the rare and short term case they operate, are expected to be a small fraction of overall PM emissions at site and will therefore have a negligible impact on overall ambient PM concentrations. If the backup generators are required for longer periods the existing monitoring will be sufficient to assess their impact. The locations of the generators will be added to Figure 5.3-1.	ERM	
45	31-Jan-22	Source	Memo	Pauline Mengote	C.1 Air Quality and Fugitive Dust Management Plan	Section 9.1		Air Quality Trigger Response Framework	The AQDMP mentions that the management responses for elevated PM concentrations may include an analysis to determine the source of PM and specify appropriate corrective actions (section 9.1). It is unclear what this analysis entails. Clarification: Please briefly describe what could be expected as part of the analysis to determine the cause of elevated PM concentrations.	This analysis will involve determining the operational and/or meteorological conditions that were present during the elevated PM event and determining if operational changes should be implemented to limit emissions.	ERM	
46	31-Jan-22	Source	Memo	Pauline Mengote	C.1 Air Quality and Fugitive Dust Management Plan	Table 9-1		Management Response for Medium Level Triggers	The medium level response for fine PM as well as SO2 and NO2 include development of causal analysis, mitigations, and implementation schedules (Table 9-1). However, these mitigation measures will only be implemented at the high action level. Please clarify whether there is a particular reason these mitigation efforts cannot be implemented as part of the medium level management responses. Clarification: Please provide a rationale as to why mitigation efforts are only carried out when air quality objectives are exceeded, as opposed to earlier on when it may be observed that PM/SO2/NO2 concentrations are trending toward these exceedances.	The rationale for only implementing further mitigation at the high level, beyond what is already included in the AQDMP, is that the medium level trigger does not imply that there is a trend towards exceedance only that a singular event has occurred. If those events become worse and AAQO are exceeded then there is an indication that existing mitigation needs to be augmented which why there is a trigger that exists for a high level response. It is not reasonable to increase mitigation at all response levels but only at those levels where it is determined that existing mitigation is insufficient to maintain ambient CAC concentrations below AAQO.	ERM	
47	31-Jan-22	Source	Memo	Pauline Mengote	C.1 Air Quality and Fugitive Dust Management Plan	Section 8.4		Typos	Section 8.4 (Community Feedback Mechanism) reads: "In the event that COPC limits and corresponding concentration triggers identified in Section 8.4 (Adaptive Management Trigger Action Response) of the AQDMP are exceeded..." This is an incorrect reference. Please correct "Section 8.4" to Section 9.	This has been updated to reference Section 9 rather than Section 8.4	ERM	

Blackwater Gold Project											
ADMIN	COMMENTS										
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Section in Updated Plan	Comment Theme	Comment	Response	Author
48	15-Feb-22	EAO	Table	Tracey Janes	C.1 Air Quality and Fugitive Dust Management Plan			Condition #20 - General	<p>Implement the plan as provided. Revise in consultation with EMLI, ENV, NHA and Aboriginal Groups and in accordance with timelines in the Document Submission Plan.</p> <p>Deficiencies noted:</p> <ul style="list-style-type: none"> Lacks evidence that plan was developed in consultation with Aboriginal groups Lacks reference to Condition 43 Mitigations Table (20 (a)) Not clear how Holder will notify required parties if contaminant concentration triggers are exceeded (20 (h)) 	<p>See Appendix A Condition #4. Draft AQDMP provided to Aboriginal Groups in August 2021 for review and comment. While BW Gold sets general timeframes for review and comments via written notice, BW Gold and Aboriginal Groups engage in ongoing communication to establish flexible timeframes agreed to by all parties.</p> <p>Condition 43 Mitigations Table is not part of the joint MA/EMA and has been completed and submitted to the EAO separately as required.</p> <p>See Section 8.4. In the event that COPC limits and corresponding concentration triggers identified in Section 8.49 (Adaptive Management Trigger Action Response) of the AQDMP are exceeded, BW Gold will notify the EAO, ENV, EMLI, Northern Health and Aboriginal Groups and Independent Environmental Monitor. As required by EAC Condition 20, the notification will include both a technical report and a plain language summary of the technical report. The report will be public by posting it to the Blackwater Project website.</p>	ERM

Exhibit 10 Noise and Vibration Management Plan (ITT)

Blackwater									
ADMIN					COMMENTS				
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response
1	13-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Title page	General	Noise and Vibration Effects Monitoring and Mitigation Plan	Changed
2	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	General	General	Appendix 5.2.2A and 5.2.2B need to be included.	These have been included.
3	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	General		Has the noise and vibration effects assessment been updated since the sensory buffer was updated to include a 3,000 m buffer around the open pit?	The development of the NVMP did not include an update to the effects assessment. Management of noise and vibration, and the documentation of impacts will occur through the compliance monitoring, feedback received through the CEMMP processes and any complaint based monitoring that may occur. Adaptive management approaches to verify mitigation performance or update mitigation, if needed, will occur in response to the results of planned and complaint based monitoring. The sensory buffer was acknowledged in Section 9.5 of the NVMP, where audibility was discussed.
4	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Section 2		Inconsistenet use of acronym (NVMP vs NVEMMP)	The acronym has been clarified through the document as NVMP.
5	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Table 3-1		Are there roles and responsibilities of the QP(s) who developed this plan that should be added to this table?	The Environmental Manager would reach out and engage the QP as required but the plan implementation would be managed by the onsite team
6	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Section 4.3		There is a good BMP document authored by the BC OGC that might be useful to include in here as well: https://www.bco.gc.ca/files/operations-documentation/Oil-and-Gas-Operations-Manual/Supporting-Documents/BC-Noise-Control-Best-Practices-Guideline-July-12-v.2.2-2021.pdf	The BCOGC Noise Best Practice guidelines are a good reference. The best practices listed in Section 4.0 of the BCOGC document are already listed in this NVMP. In terms of using this document as guidance for thresholds and impacts, this was not included as it would add a complexity that is not needed. Health Canada guidance has already been added on top of the thresholds used in the original assessment. The BC OGC document also lists requirements that are not applicable to the Project and not assessed.
7	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Section 5		Do: what kind of investigation can be done via a desktop study? Preference for "and/or" to be used n place of desktop study or field investigation so as not to exclude the potential for both to be required as part of the resolution.	Added "and/or" and provided a clarifying statement.
8	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Section 5		Adjust: does the EM have the qualifications to review the effectiveness of management measures alone - or would this be done with the support of the QP(s)? Same comment applies for the final sentence - a QP should be consulted is additional administrative or techincal controls are required.	Edited the Adjust: section and a part of the Monitor: section. Included that any review of monitoring or mitigation effectiveness should be conducted with the support of a QP.
9	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Section 6		Will employees and contractors be instructed on how to and who to make a complaint or other observation about noise or vibration while on site?	Training regarding reporting and/or logging noise or vibration complaints has been added to the section, as it is an important part of the adaptive management process and internal reporting.
10	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Section 7		More detail could be provided here so that people on site can visually see what was done, or really interpret what the results were - referring people to the EA or EIS document is not an effective way to communicate concerns and impacts that may result from the project and may present difficulties in ensuring effective management.	Some additional detail on the assessment approaches and results were added, as described in the following responses. The primary method for ensuring community concerns are well understood by those on the Project site is through the training program planned. The summary information provided in the NVMP highlights the activities and sources of concern that site personnel should be aware of.
11	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Section 7.1		Is this noise intermittent or 24/7?	Clarification added. It is assumed that construction noise will be intermittent. ARTEMIS: EIS section 5.2.2 did not specify 5.2.2.
12	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Section 7.2.2		It is important to include this map of spatial contours in this plan as it has the potential to irectly impact people living, recreating, and practicing their culture at sites along the shores of Tatelkuz Lake - please include.	Contour figures were not added to the NVMP to avoid confusion given the mapping and exact location of equipment/activity can vary as the Project progresses. The contours do represent the maximum expected extents for the sound levels reported. References to Figure 5.2.2-1 Noise Contours from Mine Site and Figure 5.2.2-2: Noise Contours from Pump Station are still included in the text.
13	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Section 7.2.3		For example (see Row 14) the types of planes, size of the airstrip, etc. included in the assessment of the project will be useful in flagging a potential issue to investigate if what is actually used/implemented is different from what was used to predict effects in 2013.	Edited to add the modelling context from EIS Section 5.2.2B. Overall levels used a Boeing 737, one take-off and on landing per day during daytime hours.
14	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Section 7.2.4		Similar comment as above - please include what assumptions were made in the initial assessment about explosive types, loading densities, weight, spacing of blast holes, detonator delays, etc.	Added "Overpressure noise modelling considered blasting effects from 1000 kg of ammonium nitrate/fuel oil (ANFO) charge at a depth of 15 m".

Blackwater									
ADMIN		COMMENTS							
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response
15	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Section 7.2.5		<p>Is the assumption about essentially no audible noise from the TL accurate? I can hear them when I stand under them, as a real life example - even when a helicopter was operating nearby. Please provide justification for this statement.</p> <p>Has "no noise will be generated along the 20km long freshwater supply pipeline during operation" been confirmed? Are there not 1 (or more?) pump stations required along its length?</p> <p>What is 17 trips/day compared to what there is now (likely very minimal traffic) - how has this statement been (or will be) backed up by data? How come there is only one-way traffic each day - please explain?</p>	<p>ARTEMIS: This section restates the EIS findings for noise, and is not meant to define any assumptions or conclusions regarding that document. RWDI does not have sufficient context and background on the EIS analysis and is not in a position to defend the selections. The following represents our recommended response given the reviewer is looking for a different assessment from what was approved, but need a clear review to ensure we have the details correct.</p> <p>RWDI recommended response: Regarding transmission line noise, the assessment defined sound generated as 'hardly' noticed - not that no noise would be generated. Transmission lines can generate sound from current flowing through the lines and from wind generated sound. Generally this sound is localized to very near the lines. The supply pipeline itself will not generate sound and the pump station at Tateleuz Lake was included in the assessment.</p> <p>Regarding traffic on the access road, 17 total trips (8 one direction, 9 in the reverse) were assessed. This represents less than 2 vehicles per hour, which is a very transitory sound that generally has a minimal effect on overall sound levels. There is transitory effects when the vehicle actually passes by.</p>
16	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Section 7.4		There will be carry-over effects from the TL, access road, possibly the airstrip into post-closure, no? Also, is there noise associated with ongoing active water treatment?	As stated in the EIS, no adverse impacts were identified for the post-closure phase of the Project.
17	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Section 8		Provide the appendix so that someone implementing this plan on site readily has access to it.	The appendices are not needed to establish appropriate mitigation or monitoring so are not included. Assessment details contain conservative assumptions. Follow-up on specific activities or noise sources is best achieved through measurement and comparison to noise thresholds given how equipment, technology and development plans can change between the time of assessment and start to mining activity.
18	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Section 8.1		Add: tree clearing and grubbing, soil salvage (is this captured in levelling and grading?), noise associated with bridge installation (e.g., slab grinder)	Added
19	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Section 9.2.2		Internal note: find location of mentioned recreation reserve and confirm no camping occurs at this location.	Note that the recreation reserves are shown on Figure 5.2.2-2, in the green boxes. There are two.
20	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Section 9.2.2		Clarify - "not used for sleep, it is not assessed against the HC 40 dBA nighttime trigger level" - what level is applicable then?	The applicable daytime sound level trigger is 55 dBA.
21	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Section 9.2.3	General	Include what "NEF" stands for.	Added "Noise Exposure Forecast (NEF)". Added to Acronyms Table.
22	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Section 10.1	General	Mitigation measure #2 and #5 are very similar, edit to avoid repetition.	This section lists the original mitigations as included in the response to Condition 43 of the approval, they were not changed.
23	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Section 10.1		Mitigation measure #6 - please provide a clear distinction between this plan and the referenced NVEMMP - this is not clear at this time	Clarification added.
24	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Section 10.1		Add: restrict use of engine breaking in proximity to residential and/or important wildlife areas along the access road - signage to be posted in these areas to notify operators of this restriction	Added as a mitigation that will be considered.
25	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Section 10.1		During the EA process, the Nations requested that a blasting schedule be developed and circulated - is Artemis committing to this?	BW has agreed to this as part of the Community Effects Monitoring and Management Plan. Section 11.1.2 lists that project activities will be communicated to the Community Liaison Committee, and the blasting schedules are part of the Project activities.
26	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Section 10.2	General	"Further details related to complaint monitoring is provided in Section 11.1.4 of the NVMP." There is no section 11.1.4 in this plan. See request for clarity in Row 27.	11.1.4 was added.

Blackwater									
ADMIN					COMMENTS				
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response
27	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Section 10.2.2		Confirm - compliance monitoring will be conducted a total of three times over an estimated 23 year life of the mine? Which season will be monitored twice - early spring/summer or late fall? How was this timing determined? How do you anticipate implementing adaptive management from a sample size of 3, with no significant replication at sample sites? How long (length of time) are each of these monitoring events - are they snapshots in time or do they include continuous monitoring over a period of time?	Added clarification. There will be a total of 6 monitoring programs. These will occur at three distinct phases: 1 - start of construction, 2 - start of operations, 3 - peak mining output. For each of these phases monitoring will occur in late spring to summer, and late fall. The length of each monitoring program is a minimum of 48 continuous hours and provides sufficient information to test the sound generated by regular mine activity.
28	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Section 10.2.3		Clarify - when will blast monitoring be completed? How is this done - continuous or snapshot in time? How many sampling events are being proposed?	Added framework for blast monitoring. Two programs will be completed with a minimum of two blasts captured during each program. The monitoring location will be at the southern boundary of the mine south of the pit where blasting will occur.
29	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Figure 1		Clarify - no assessment of noise impacts from use of helicopters to access the mine site (helipad listed in Figure 1)	Helicopters are also used to transport staff from the Vancouver office into and out of site as well and for wildlife surveys.
30	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Section 11.2	General	"The EM is responsible for data management and reporting related to waste management. " Typo?	Changed "waste" to "data"
31	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Section 9.2.4	General	"(Linehan and Wiss, 1980)" not included in reference list.	Added
32	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Section 11.1.3	Compliance	DS Condition 6.3 states <i>The Proponent shall develop, prior to construction and in consultation with Indigenous groups, a protocol for receiving complaints related to the exposure to noise and dust from the Designated Project.</i> Describe how the Community Feedback Mechanism was developed in consultation with Indigenous groups.	There is a community feedback mech in the CEMMP. We sent that plan to the nations for pre-consultation, consultation as part of the EAC requirements etc, so that would be how we consulted.
33	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Section 11.1.3	Compliance	DS Condition 6.3 states: <i>"The Proponent shall respond to any noise or dust complaint(s) within 48 hours of the complaint being received and shall implement corrective actions to reduce exposure to noise or dust in a timely manner."</i> Community Effects Monitoring and Management Plan states <i>"All complaints will be acknowledged by BW Gold within 3 days of receipt,"</i> Please adjust and include in the Noise and Vibrations Effects MMP.	Clarified that the Community Effects Monitoring and Management Plan uses 48 hours as the response timeline for complaints.
34	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Section 11.1.3	Compliance	Condition 21 states: <i>"include the means by which the Holder will provide to individuals or groups that could hear the blasts a schedule for the timing of blasting"</i> This is noted to be included in Section 11.1.3, however, this section only discusses complaint process and reporting, not proactive responses like sharing of blast schedules.	Communication of the blasting schedules is addressed through Community Effects Monitoring and Management Plan via the Engagement and Community Feedback Mechanism.
35	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Section 10.2.2	General	<i>"Compliance monitoring will occur a total of 3 times throughout the life of the Project during the early spring/summer and late fall."</i> Clarify: 3 times during each distinct period in both spring AND fall? Provide more detail on this schedule (e.g., how and when monitoring will be undertaken).	Added clarification. There will be a total of 6 monitoring programs. These will occur at three distinct phases: 1 - start of construction, 2 - start of operations, 3 - peak mining output. For each of these phases monitoring will occur in late spring to summer, and late fall.
36	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Section 9.5	Compliance	Condition 21 states: <i>"identification of the area where noise from the Project could be heard, and consultation with Aboriginal Groups regarding how different noise levels potentially affect their activities within the identified area and the mitigation measures to address those effects;"</i> This is said to be addressed in Section 9.5, however, there is no mention of identification of the area where noise from the Project will be heard or mitigation measures to address effects.	The extent to which the Project mining activities may be heard cannot be well defined as it depends on the ambient conditions at the time the noise was generated. Ambient sound levels can fluctuate daily based on wind, weather and seasonality. The character of the ambient sound fluctuates based on the type of sources (natural or man-made). Depending on the type of activity and time of year, it is possible for sound generated by the Project to be distinguishable from natural sounds at the identified sensitive receptor locations. Any project related sounds that are heard, would not be louder than other normally occurring sounds based on the distance between the Project and the identified receptors.

Blackwater									
ADMIN					COMMENTS				
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response
37	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Section 11.1.2	Compliance	Condition 21: "identification of land users who may be affected by Project noise and how information related to Project activities and the potential for noise will be communicated;" Identification of land users who may be affected is not included in Section 11.1.2 as noted. Also, this section references the Community Feedback Mechanism, however, this only involves feedback/complaints. There needs to be a protocol detailed to show how information related to Project activities and the potential for noise will be communicated.	The land users are identified in the Community Effects Monitoring and Management Plan in Section 11 and in general are the identified as the Aboriginal groups and tenure holders in the community.
38	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Section 11.1.3		Clarify - what is the complaint assessment process? How will BW Gold sift thorough complaints to determine which require action? How will this be justified and reported to stakeholders?	Reorganized this section to better detail the process from complaint. BW is required to respond to a complaint within 48 hours, and follow-up per the resolution process clearly laid out in the CEMMP. Corrective actions follow the adaptive management plan.
39	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Section 12		Clarify - how can adaptive management be implemented with such low frequency monitoring being proposed? What information will be available annually?	Management of noise from the project is a combination of compliance monitoring and complaint management. Adaptive management is used in follow-up from both aspects of noise management.
40	14-Dec-21	Indigenous Communities		Emma Cooke	Noise and Vibrations Effects Monitoring and Mitigation Plan	Section 14		What are the authors qualifications to draft this report as a QP?	Bio's of the QPs are provided along with these responses.
41	17-Dec-21	Northern Health		Sally Western	Noise and Vibrations Effects Monitoring and Mitigation Plan	Sect. 3 – Roles and Responsibilities		Could BW Gold describe the minimum professional certifications and years of experience that their Qualified Professional(s) will have?	<p>With respect to support from acoustical professionals, the QP will provide the oversight of technical professionals in the field of practice who may work on the project.</p> <p>The acoustical QP for noise and vibration monitoring provides the oversight and quality verification to the work performed. Possible designations include but are not limited to: P.Eng., B.Sc. (in an appropriate field), P. Phys., INCE (institute of noise control engineering). Minimum years of direct experience to quality assurance oversight is 15 years specific to acoustics.</p> <p>Others who would be considered QPs for specific tasks, e.g., conducting the monitoring program should have a minimum of two years experience, with designations such as: C.E.T (Environmental or Engineering), E.I.T, P.Eng., B.Sc. (in an appropriate field), P. Phys., INCE (institute of noise control engineering).</p> <p>It is important to note that the QP for managing Blast Vibration through blast design needs separate qualification as a certified blaster.</p>
42	17-Dec-21	Northern Health		Sally Western	Noise and Vibrations Effects Monitoring and Mitigation Plan	Sect. 9.5 - Traditional Ecological or Community Knowledge		Condition 21.e) requires BW Gold to identify the area where noise from the project can be heard. This section does not give this information.	<p>The extent to which the Project mining activities may be heard cannot be well defined as it depends on the ambient conditions at the time the noise was generated. Ambient sound levels can fluctuate daily based on wind, weather and seasonality. The character of the ambient sound fluctuates based on the type of sources (natural or man-made).</p> <p>Depending on the type of activity and time of year, it is possible for sound generated by the Project to be distinguishable from natural sounds at the identified sensitive receptor locations. Any project related sounds that are heard, would not be louder than other normally occurring sounds based on the distance between the Project and the identified receptors.</p>
43	17-Dec-21	Northern Health		Sally Western	Noise and Vibrations Effects Monitoring and Mitigation Plan	Sect. 10.1 - Mitigation measures		4. Locate construction and operations camps to minimize noise disturbance from the road and air traffic, and mine equipment based on adaptive management framework as outlined in Section 5. Please include more details. How have you chosen construction and camps to minimize noise disturbances? What informed these decisions?	The primary consideration was to place the worker camps at a location where mine operations was not immediately adjacent to the camp, yet have the camp close enough to project infrastructure to manage power and water requirements. Furthermore, the locations were identified during the EA and an effects assessment on noise impacts on workers at the camps was completed with no significant adverse impacts identified.
44	17-Dec-21	Northern Health		Sally Western	Noise and Vibrations Effects Monitoring and Mitigation Plan	Sect. 10.1 - Mitigation measures		Minimize the impact of aircraft noise within the community through the consideration of the type of aircraft used and frequency of flights based on adaptive management framework as outlined in Section 5. This is not a sufficient response to the requirements of Condition 21. Please explain in concrete detail how the details in section 4.3 will apply regarding the minimization of noise through the consideration of the type of aircraft used and frequency of flights.	<p>The guidance described in Section 4.3 establishes thresholds for management of noise over the day and night. The values are based on a geometric average level for all sound experienced at a location over the time periods set. Sound from aircraft will influence the daytime measured sound levels that will be compared to those thresholds.</p> <p>The guidelines are not the driver for how noise from aircraft will be minimized. Adaptive management will be applied:</p> <p>PLAN: in determining the appropriate aircraft for use, BW will work with Aviation contractors to ensure the type of aircraft is safe and appropriate for the purpose, and also include noise issues as part of the contract negotiations. The balance of frequency of flight to amount of sound from larger/smaller planes will be included.</p> <p>DO: once hired, aviation contractor flights will start.</p> <p>MONITOR: The planned noise monitoring will include effects from flights, and be of sufficient detail to identify aircraft influence. If monitoring indicates the need to revisit the aircraft type, then BW will initiate the discussion with the aviation contractor.</p>

Blackwater									
ADMIN	COMMENTS								
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response
45	17-Dec-21	Northern Health		Sally Western	Noise and Vibrations Effects Monitoring and Mitigation Plan	Sect. 10.2 - Monitoring		NH recommends that BW find more proactive ways to monitor noise rather than just waiting for complaints. For example, BW could actively consult the CLC as well as consulting the community at regular engagement sessions.	BW Gold's Community Effects Monitoring and Management Plan includes ongoing consultation with stakeholders through the community feedback mechanism (Section 11.2 of the CEMMP), including face-to-face meetings. Providing information on when activities will occur and will include opportunities for direct feedback.
46	17-Dec-21	Northern Health		Sally Western	Noise and Vibrations Effects Monitoring and Mitigation Plan	11.1.3 – Complaint Process and Reporting		This section does not, as the Table of Concordance suggests, explain "the means by which the Holder will provide to individuals or groups that could hear the blasts a schedule for the timing of blasting." Please describe how BW Gold will actually fulfill this condition requirement.	Blasting and blast activity scheduling will be communicated as part of the regular communications outlined in Section 11.1.1 of the CEMMP. Section reference added to the NVMP.
47	15-Feb-22	EAO	Table	Tracey Janes	Noise and Vibrations Effects Monitoring and Mitigation Plan		Condition #21 - General	<p>Implement the plan as provided. Revise in consultation with EMLI, ENV, NHA and Aboriginal Groups and in accordance with timelines in the Document Submission Plan.</p> <p>Deficiencies noted:</p> <ul style="list-style-type: none"> • Lacks evidence that plan was developed in consultation with Aboriginal groups • Lacks detail on how monitoring will be undertaken (21(d)). • Erroneous references to Section 11.1.4 (not included), some monitoring information in response to complaints in 11.1.3 • Requests for additional information from consulted parties (Aboriginal groups, Northern Health Authority) 	<ul style="list-style-type: none"> - Section 11.1.2 documents community involvement. Recent edits to the NVMP were based on comments received from Indigenous Communities and Northern Health Authority - Details on monitoring are provided in Section 10.2.1 on limits, 10.2.2 for noise, and 10.2.3 for vibration. The NVMP provides specific details for measurements on: the limits to assess, the locations, the durations, evaluation metrics, and details on specific events to be captured for each monitoring period. - The type in the Concordance table has been corrected to Section 11.1.3. - Additional information from consulted parties is included in in the table above.

Exhibit 11 Country Foods Monitoring Plan (ITT)

Blackwater Project									
ADMIN					COMMENTS				
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response
1	6/Dec/21	UFN/LDN		Steve, Keefer Ecological	Country Foods	Page 2-2	Insect sampling	Insects were suggested as a means of improving sample sizes and understanding the accumulation of pollutants in higher levels of the food chain. The sample sizes suggested appeared to be too low to detect changes in pollutants in the local environment - please expand this section to tell us how you dealt with low sample size expectations and how you are assessing bioaccumulation, as this was the point of the insects suggestion.	<p>The following text was added to the bullet related to insect sampling: <i>"BW Gold proposes to use donated game meat samples and a small mammal (rodent) sampling program as direct measures of parameter concentrations in mammal tissues (see Section 4.5) instead of using insects as a surrogate ."</i></p> <p>Additional text has been added to Section 4.5 (Small Mammal Sampling) to explain how data could be used to assess bioaccumulation.</p> <p>For context, Section 4(a) of the federal <i>Persistence and Bioaccumulation Regulation</i> (SOR/2000-107) defines a substance to be bioaccumulative if the bioaccumulation factor is equal to or greater than 5,000. Based on the food chain modelling completed for the Human Health Risk Assessment (HHRA), none of the metals are expected to bioaccumulate in higher trophic level organisms. Biotransfer factors (the amount of metal that an animal accumulates in their tissues compared to the amount of metal in their diet, also known as a bioaccumulation factor) used in the food chain model were all less than 1.0, meaning that only a fraction of the metal ingested is actually transferred to tissues where it could be consumed by people.</p> <p>Bioaccumulation can be assessed through the soil and plant/berry sampling, which will provide an indication of how metals are moving into the terrestrial food chain.</p>
1	18/Feb/22	UFN/LDN		Steve, Keefer Ecological	Country Foods	Page 2-2		<p>This approach has proven unsuccessful in the past. Concerns were raised in the December 9 meeting. How can you correlate this information to impacts from the mine site? Not including this sampling also does not satisfy one of the migration pathways in the CSM. The amount of small mammal kill required to satisfy the condition is not sufficient to disrupt food chains or population dynamics.</p> <p>Request is for a discussion with EAO about compliance with condition and best path forward.</p>	BW Gold looks forward to continuing the discussion with the Nations and EAO.
2	6/Dec/21	UFN/LDN		Steve, Keefer Ecological	Country Foods	page 4-12	Speciation analyses	You say that speciation analyses will not be included in routine analyses of future samples but do not explain why, can you justify this statement please	<p>Arsenic speciation was included in the analysis of the berry and fish tissue samples collected in August 2021. Initial review of the berry data indicates that arsenic is generally below detection limits, as are the concentrations of most species of arsenic. Given the cost of the analysis, the limited value it provided, and the results of the risk assessment that indicate that plants/berrries are not a significant contributor to overall arsenic ingestion doses, arsenic speciation is not going to be included in future sampling for plants or berries.</p> <p>Arsenic speciation was also completed in fish tissues collected in August 2021 (data are not expected to be available until the end of December 2021). This analysis will provide an indication of the amount of inorganic arsenic present in fish tissues relative to the total amount of arsenic. It is not expected that the proportion of inorganic to total arsenic will change in fish tissue as a result of Project activities (nor is the concentration of total arsenic predicted to change appreciably in either surface water or fish tissue due to the Project, see the HHRA update in Appendix 6-A of the Joint Application), so routine analysis of arsenic speciation is not recommended.</p> <p>The following text has been added to Section 4.4.1: <i>"Speciation will not be included in routine analyses as the Project is not anticipated to cause changes in metal speciation in the aquatic environment and Project-related changes in concentrations of these metals in surface water or fish tissue are small ."</i></p>

Blackwater Project									
ADMIN					COMMENTS				
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response
3	6/Dec/21	UFN/LDN		Steve, Keefer Ecological	Country Foods	page 4-17	EAC conditions: small mammal sampling	EAC conditions require small mammal sampling. You say you are implementing small mammal sampling only as an adaptive management response, triggered by results from veg, berry and soil sampling. Explain why you are not following the EAC conditions.	<p>Small mammal sampling has been included in the CFMP as two programs: one for regular analysis of donated samples from hunters, trappers, or other community members, and one as a triggered response based on results of monitoring in soil and vegetation. BW Gold has notified BC EAO in the form of an emailed letter to advise of our opinion and ask for their experience and perspective on this issue. BW Gold is of the opinion that:</p> <ul style="list-style-type: none"> • We are reluctant to complete a routine lethal wildlife sampling program if the potential impacts can be assessed through other non-lethal sampling (e.g., soil, plants, and berries) to provide an earlier warning system for trends in the receiving environment. The exposure pathway for terrestrial biota (such as small mammals like rodents) is through changes in soil and vegetation quality; without changes in soil and vegetation quality, no changes in country foods tissue quality would be expected. Predicted changes in soil and vegetation metal concentrations are small (less than 5% after the Operations phase). Significant changes in soil and vegetation quality measured during CFMP monitoring would trigger sampling of small mammals for tissue chemistry analysis. • There is usually a high degree of heterogeneity in small mammal tissue concentrations making it difficult to analyze results to identify potential project effects. • It is BW Gold's current understanding that the small mammals that have been discussed to be sampled (e.g., mice) are not those to be generally harvested as a country food by the Nations, but would rather be used to determine the potential risk of bioaccumulation in the food chain that supports larger mammals that are harvested as a country food. • BW Gold is proposing an Indigenous-led sampling program that would allow Nations to submit samples of country foods that are being consumed; while this will not enable the identification of Project-related effects on country foods quality, it will provide an understanding of the quality of country foods that are actually being consumed and can be used to provide calibration of site-specific food chain models used to predict tissue concentrations in country foods. • The HHRA predictions for the project support that the project risks with the greatest potential impacts to country foods are water quality changes, which is why the CFMP includes water sampling co-located with fish tissue sampling. <p>Consequently, we feel the need for small mammal sampling would be best served as an adaptive management trigger if changes to other media (e.g. soil, vegetation) are first encountered.</p>
3	18/Feb/22	UFN/LDN		Steve, Keefer Ecological	Country Foods	page 4-17		<p>This condition has not been met, this plan has no means to understand travel of pollutants from the mine into higher terrestrial mammals. Naturally, the trophic modelling conducted is unable to predict the movement of pollutants. I am unsure why a desktop modelling exercise is mentioned above.</p>	<p>Trophic modelling (i.e., the food chain model used in the HHRA Update) does predict the movement of parameters of concern based on concentrations of those parameters in underlying media (i.e., soil, water, plants) and bioaccumulation factors; it is a standard approach used in HHRA and is recommended by both provincial and federal guidance (BC MOH 2021, Health Canada 2010). If there are no significant changes in concentrations in the underlying media, no significant changes would be expected in mammal tissues either, particularly because bioaccumulation factors for the parameters of concern from the underlying media to tissue are low.</p> <p>Monitoring of small mammal tissue concentrations is included in the CFMP in two ways: routine analysis of donated game samples and triggered sampling of small mammals (likely rodents). The routine analysis of donated samples will serve two purposes: 1. to measure concentrations of metals in foods that people are actually consuming to provide a more direct understanding of potential risks and 2. data can be used to refine and calibrate food chain models, similar to the approach used for moose tissue metal concentrations in the HHRA Update (provided as Appendix 6-A of the Application). Data obtained from the donated game sample program will be more useful from a risk assessment perspective, as these data can be used to improve food chain models to be more site-specific and more accurate (as recommended by BC MOH 2021 and Health Canada 2010), thus improving risk characterization for human health. Data from the triggered sampling of small mammals will not be useful for either purpose since sampling is likely to be of animals that people do not eat and cannot be directly extrapolated to other larger animals (i.e., a mouse is not the same as a moose or bird).</p> <p>A new section (Section 5.3) will be included in the C.1 version of the CFMP to provide additional detail on how bioaccumulation will be monitored and how data collected from the donated tissue sample program can be used to refine and calibrate food chain models used in HHRA.</p> <p>References: BC Ministry of Health (MOH). 2021. British Columbia Guidance for Prospective Human Health Risk Assessment. Version 1.0. April 2021. Available online: https://www2.gov.bc.ca/assets/gov/health/keeping-bc-healthy-safe/healthy-communities/bc-hhra-guidance.pdf Health Canada. 2010. Federal Contaminated Sites Risk Assessment in Canada: Supplemental Guidance on Human Health Risk Assessment for Country Foods (HHRAfoods). Health Canada. Ottawa, ON.</p>

Blackwater Project									
ADMIN					COMMENTS				
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response
4	6/Dec/21	UFN/LDN		Steve, Keefer Ecological	Country Foods	page 4-17	small mammal sampling	The potential for pollutants to accumulate at higher levels in the food chain was discussed previously and it was agreed that Artemis would implement small mammal sampling to understand bioaccumulation. How are you dealing with this uncertainty of bioaccumulation effects to mammalian country foods if you are not conducting small mammal sampling.	<p>For context, Section 4(a) of the federal <i>Persistence and Bioaccumulation Regulation</i> (SOR/2000-107) defines a substance to be bioaccumulative if the bioaccumulation factor is equal to or greater than 5,000. Based on the food chain modelling completed for the HHRA, none of the metals are expected to bioaccumulate in higher trophic level organisms in the terrestrial environment. Biotransfer factors (the amount of metal that an animal accumulates in their tissues compared to the amount of metal in their diet, also known as a bioaccumulation factor) used in the food chain model were all less than 1.0, meaning that only a fraction of the metal ingested is actually transferred to tissues where it could be consumed by people.</p> <p>Bioaccumulation can be assessed through the soil and plant/berry sampling, which will provide an indication of how metals are moving into the terrestrial food chain.</p> <p>Small mammal sampling has been included in the CFMP as two programs: one for regular analysis of donated samples from hunters, trappers, or other community members, and one for as a triggered response based on results of monitoring in soil and vegetation. Hypothetically, bioaccumulation factors could be calculated based on soil or plant metal concentrations and concentrations measured in donated samples of country foods meat to provide an indication of potential bioaccumulation factors for game meats. The bioaccumulation factors could be used in the food chain model or the measured tissue concentrations could be used to calibrate the food chain model to further refine that model for usefulness as a predictive tool.</p> <p>A new paragraph has been added to Section 4.5 to indicate how the data from the donated sample small mammal tissue monitoring program could be used.</p>
4	18/Feb/22	UFN/LDN		Steve, Keefer Ecological	Country Foods	page 4-17		Unsure if response is sufficient; information not included the plan.	<p>Section 4.5 (Small Mammal Tissue Sampling) was revised. A paragraph related to the donated small mammal tissue monitoring program was included in the B.1 version of the CFMP:</p> <p>"This first component of the small mammal tissue sampling program is intended to provide local country foods consumers with direct information about the quality of their country foods from within the LSA, which may or may not be linked to changes associated with Project development. However, these measured data may be used to estimate bioaccumulation factors (based on tissue and soil or plant metal concentrations), as direct inputs into future HHRAs as the exposure point concentrations for specific country foods from the study area, or to calibrate the food chain model used in the HHRA (Entia 2022) to improve the accuracy of the food chain model."</p> <p>In addition, a new section (Section 5.3) will be added to data analysis in the C.1 version of the CFMP to further clarify how data can be analyzed and used from both the donated tissue sample program and the triggered small mammal sampling program.</p>
5	6/Dec/21	UFN/LDN		Steve, Keefer Ecological	Country Foods	page 4-17	small mammal sampling	The sampling of hunted wildlife is very unlikely to provide enough evidence to understand bioaccumulation, why is this your only method of assessing pollutants higher up in the food chain. Please justify.	<p>Analysis of donated game samples is not the only method for assessing bioaccumulation. Site-specific bioaccumulation factors can be calculated for plants or berries from soil, or in fish tissue from water. In addition, a food chain model has been developed for representative terrestrial country foods the Project (moose, hare, and grouse), which is a standard method used in HHRAs in cases where sampling is not possible. Data from donated samples could be used to calibrate the food chain model (as was done for moose, see the Human Health Risk Assessment Update report in Appendix 6-A of the Joint Application), or could be used to calculate bioaccumulation factors based on soil and plant/berry data collected within the study area.</p> <p>Note that there is uncertainty in using tissue concentrations in rodents, soil, and plants to calculate bioaccumulation factors as well. There is uncertainty in suggesting that bioaccumulation factors in rodents are the same as bioaccumulation factors in larger mammals (e.g., moose, deer) due to differences in physiology and metabolism.</p> <p>Direct measurement of metal concentrations in country foods that are actually consumed by people (i.e., donated samples), particularly if those samples come from animals with smaller home ranges that would live entirely within the study area, represents the best method for evaluating the potential risks posed by consumption of COPCs in country foods. Directly measuring the concentrations of parameters of concern in animal tissues eliminates the need for bioaccumulation factors (or models) and food chain models to estimate those concentrations, as they represent the actual, measured concentration of COPCs that people may ingest in country foods.</p>
5	18/Feb/22	UFN/LDN		Steve, Keefer Ecological	Country Foods	page 4-17		Unsure if response is sufficient; information not included the plan	<p>Section 4.5 (Small Mammal Tissue Sampling) has been revised. A paragraph related to the donated small mammal tissue monitoring program was included in the B.1 version of the CFMP:</p> <p>"This first component of the small mammal tissue sampling program is intended to provide local country foods consumers with direct information about the quality of their country foods from within the LSA, which may or may not be linked to changes associated with Project development. However, these measured data may be used to estimate bioaccumulation factors (based on tissue and soil or plant metal concentrations), as direct inputs into future HHRAs as the exposure point concentrations for specific country foods from the study area, or to calibrate the food chain model used in the HHRA (Entia 2022) to improve the accuracy of the food chain model."</p> <p>In addition, a new section (Section 5.3) will be added to data analysis in the C.1 version of the CFMP to further clarify how data can be analyzed and used from both the donated tissue sample program and the triggered small mammal sampling program.</p>

Blackwater Project									
ADMIN				COMMENTS					
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response
6	6/Dec/21	UFN/LDN		Steve, Keefer Ecological	Country Foods	page 5-1	Data Analyses wildlife sampling	You are asking questions relating to detection of pollution in wildlife, but do not have any reliable wildlife sampling, why are you asking questions you can't answer. These question can't be answered using wildlife hunting specimens unless you have a plan on where and how you will obtain relevant samples??	<p>For human health purposes, the question can be answered based on the food chain model developed for the Project (see the Human Health Risk Assessment Update report in Appendix 6-A of the Project's Joint Mines Act/Environmental Management Act Application). The food chain model uses concentrations of contaminants of potential concern (COPCs) in water, soil, and plants/berries as inputs to estimate the concentrations of COPCs in tissues of representative country foods species (moose, hare and grouse). The food chain model can be run at any time to model tissue concentrations in country foods species based on COPC concentrations in water, soil and plants/berries during Project monitoring, which can be compared to the modelled concentrations using baseline concentrations of water, soil, and plants/berries.</p> <p>In addition, the food chain model can be calibrated using the concentrations of COPCs measured in donated game samples, as was done for moose already in the food chain model (based on data reported by Rocky Lis, see the Human Health Risk Assessment Update report in Appendix 6-A of the Joint Application).</p> <p>However, to avoid confusion (since the CFMP does not include an ecological component), the word "wildlife" has been removed from Section 5.</p>
7	6/Dec/21	UFN/LDN		Steve, Keefer Ecological	Country Foods	page 4-12	Sampling sites fish tissue	You only have two sampling sites for fish tissue (in figure 4.4-1) and both are similar distances from the mine site. It is important that you justify how these sites are independent - ie one is an impact and the other the control site identified for the BACI analyses. Please justify and differentiate the inputs Tatelkus and Kuyakuz receive and how you know this to be true, this should be a paragraph in the report that allows readers to understand the validity of the BACI analyses.	Figure 4.4-1 has nine (9) locations for juvenile fish tissue samples and two (2) locations for adult fish tissue samples, which are also listed in the first paragraph in Section 4.4.2.1. The following has been added to the second paragraph in Section 4.4.2.1: <i>"Control sites are locations that are either upstream of Project influence or located in a different watershed than the Project and water quality at these sites are not predicted to be affected by the Project. Additional details about the sampling locations are found in Section 4.2 of the AEMP."</i>
7	18/Feb/22	UFN/LDN		Danny Smart, KES	Country Foods	Section 4.4.1		The question is not resolved, as the response does not provide a clear answer as to how two sites with similar distances from the mine site can be considered independent in the sampling regime proposed in this plan. Please add further information into the CFMP from the above comment rather than only reference to another plan. It is more beneficial to provide all information within the CFMP, especially from an operational standpoint.	BW Gold looks forward to continuing the discussion with the Nations and EAO.
8	6/Dec/21	UFN/LDN		Steve, Keefer Ecological	Country Foods	page 4-7	Sampling sites for plant tissue	Please detail where the impact, midfield and control sites are located (on the map and using distance) this is important for us to understand how the BACI analyses will be run and the validity of the analyses. Please also justify the independence of the controls from other samples, i.e. how do you know controls are outside of the area of impact of the mine- the independence of control sites is a requirement for the BACI analyses, some references would be useful to justify your approach.	<p>Figure 4.3-1 shows the location of the sample sites for vegetation and soil and bullet two on page 4-7 describes the criteria for how the sites were sorted into near, mid and control locations.</p> <p>A table has been added to the Appendix to show the site name, UTM coordinates, type of sampling completed at each site, and the distance of the site from the mine site boundaries. The following text has been added to the CFMP in Section 4.3.2.1 (bold emphasis added here to show new text): <i>"Sites and the plants or berries collected at each site are shown on Figure 4.3-1, with additional details of the sampling locations (e.g., coordinates, types of samples per site, distance from mine site) are provided in Appendix B, Table B-1."</i></p>
9	6/Dec/21	UFN/LDN		Steve, Keefer Ecological	Country Foods	page 5-2			No comment for response.
10	6/Dec/21	UFN/LDN		Steve, Keefer Ecological	Country Foods	page 4-17	Small mammal sampling	Have you done baseline studies to assess baseline levels of pollutants in small mammal tissues as this would be required to use small mammals as an indicator species, please expand on your baseline findings and the sample sizes used.If you do not have baseline data for small mammals and you do not intend to include small mammals other than a trigger	<p>Small mammal sampling has been included in the CFMP as two programs: one for regular analysis of donated samples from hunters, trappers, or other community members, and one as a triggered response based on results of monitoring in soil and vegetation.</p> <p>Some baseline tissue concentrations in mammals (moose) were collected and reported by Rocky Lis as part of his Masters thesis. BW Gold proposes to reinstate this program of measuring metal concentrations in tissues of the country foods that are actually consumed by people using the area around the mine site. In previous meetings, UFN and LDN indicated that their preference was for this program to be Indigenous-led, to improve buy in and participation in the program. BW Gold has indicated their support for an Indigenous-led sampling and analysis program of donated samples of game meats from within the study area by including this program in the CFMP.</p> <p>Sampling of small mammals was not possible in 2021 due to logistical and timing constraints. Depending on how the construction schedule progresses in 2022, it may be possible to conduct some small mammal sampling (rodents) to establish baseline conditions prior to significant construction activities that would have the potential to influence baseline conditions. Alternatively, it would be possible to conduct small mammal sampling at control sites outside of the zone of influence of activities at the mine site and use those data as a pre-construction baseline surrogate data across all sampling sites.</p>

Blackwater Project									
ADMIN					COMMENTS				
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response
10	18/Feb/22	UFN/LDN		Steve, Keefer Ecological	Country Foods	page 4-17		Unsure if response is sufficient; information not included the plan	Section 4.5 (Small Mammal Tissue Sampling) in Version C.1 of the CFMP has been revised to provide more detail. In addition, a new section (Section 5.3) will be added to data analysis in the C.1 version of the CFMP to further clarify how data can be analyzed and used from both the donated tissue sample program and the triggered small mammal sampling program. This section will include clarification about analysis of triggered small mammal tissue sampling, as follows: "Summary statistics will be calculated and control-impact statistical analysis will be completed (e.g., ANOVA or non-parametric equivalent) to identify whether there are differences in tissue concentrations between near field and control sites. Results of these analyses will be used in conjunction with data and analysis from other media (e.g., soil, plant tissue, berry tissue, water, dustfall) to determine whether Project-related changes to tissue metal concentrations have occurred in small mammals. This contributes to answering Question 3 in Section 5.1 (i.e., are changes in COPCs concentrations in country foods statistically significant)."
11	6/Dec/21	UFN/LDN		Steve, Keefer Ecological	Country Foods		Small mammal methods and BACI analyses	Please note if you do not have baseline small mammal data then you can not use BACI analyses to assess pollution effects and a new analyses method section is required to explain how you will analyse data from small mammals! Please include this new section or tell us what baseline data you have regarding small mammals.	Some baseline tissue concentrations in mammals (moose) were collected and reported by Rocky Lis as part of his Masters thesis. BW Gold proposes to reinstate this program of measuring metal concentrations in tissues of the country foods that are actually consumed by people using the area around the mine site. In previous meetings, UFN and LDN indicated that their preference was for this program to be Indigenous-led, to improve participation in the program. BW Gold has indicated their support for an Indigenous-led sampling and analysis program of donated samples of game meats from within the study area by including this in the CFMP. Sampling of small mammals was not possible in 2021 due to logistical and timing constraints. Depending on how the construction schedule progresses in 2022, it may be possible to conduct some small mammal sampling (rodents) to establish baseline conditions prior to significant construction activities that would have the potential to influence baseline conditions. Alternatively, it would be possible to conduct small mammal sampling at control sites outside of the zone of influence of activities at the mine site and use those data to represent pre-construction baseline across all sampling sites. Data analysis was not included for the donated game meat component of the small mammal program as it will depend on how many samples of game meats are received and from where. Data collected from the donated samples could be used to calculate bioaccumulation factors (based on tissues, soil, and plant concentrations), calibrate the food chain model (as was done for moose, see the HHRA Update report in Appendix 6-A of the Joint Application), or could be used directly in a future HHRA to represent tissue concentrations of country foods for human consumption. A new paragraph has been added to Section 4.5 to indicate how the data from the donated sample small mammal tissue monitoring program could be used. For the small mammal (rodent) sampling component, data analysis methods would be further developed upon being triggered by results of the soil, plant, and berry sampling program. Text in the data analysis section (Section 5) have been adjusted to be explicit that the BACI analysis applies to specific country foods (plants, berries, and fish tissue). Comparison against predicted concentrations and baseline concentrations based on either measured or modelled concentrations can be done for all country foods considered in the HHRA.
12	6/Dec/21	UFN/LDN		Jessica Lowey, KES	Country Foods	Section 2.1.1		Keefer Ecological Services Ltd.	No comment for response.
12	18/Feb/22	UFN/LDN		Danny Smart, KES	Country Foods	Section 2.1.1		"and their consultants (Keefer Environmental)," change to (Keefer Ecological Services Ltd.)	The change has been made in Section 2.1.1.
13	6/Dec/21	UFN/LDN			Country Foods	Section 2.1.3		Final sentence: confirm you mean EMB not EMC?	Thank you, correction has been made to the report to replace reference to "Environmental Monitoring Committee" in Section 1.2.1 and "EMC" in Section 2.1.3 with "Environmental Monitoring Board" and "EMB".
14	6/Dec/21	UFN/LDN			Country Foods	Section 3		Third bullet: ... does not drink surface water while residing at the camp.	Thank you. Changed word from "drinking" to "drink".
15	6/Dec/21	UFN/LDN			Country Foods	Table 3.1		Add to soil analysis: Cd, Cu, Pb, Se, Zn	Table 3.1 presents the COPCs and the exposure media in which they were identified. Details were presented in the stand-alone Conceptual Site Model (CSM) report. At minimum, all identified COPCs presented in the first column of Table 3-1 will be measured in each exposure medium under the CFMP. Thus, Cd, Cu, Pb, Se, and Se were already planned for inclusion in the soil analysis. The paragraph after the table states "At minimum, parameter lists for laboratory analysis of metals in environmental media or tissue samples will include all of the parameters listed in Table 3-1, plus additional metals if they are included in standard metals analysis packages ". This sentence has been revised to state (bold emphasis added here to show the change) "...listed in the first column of Table 3-1 ...". Text has also been adjusted in the report where Table 3-1 is referenced to indicate that, at minimum, all 18 COPCs listed in Table 3-1 will be analyzed.

Blackwater Project									
ADMIN					COMMENTS				
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response
15	18/Feb/22	UFN/LDN			Country Foods	Table 3.1		This comment is not asking for duplication of the CSM data. This comment is asking that the parameters and environmental media sampled in the baseline be identified in this table so that any changes since the baseline data was collected are evident. The comment is trying to understand - is the baseline data going to be the same as the future data? Will that data be useful? If not in this table, than in an uncertainties subsection (or similar). This was discussed on December 9.	Baseline concentrations of all parameters of concern are available for air, surface water, groundwater, and fish tissue. For soil and plant tissue data, the CSM identified gaps in the parameter list used in 2011/2012 by AMEC and that no berry samples had been collected (plants only). Additional baseline sampling of soil, plants, and berries was recommended and sampling was completed in 2021. Sampling completed for soil, plants, and berries in 2021 included all parameters of concern. The baseline data collection has been designed such that it will be useful for analysis of future data and be used as the foundation for the "before" component of a BACI analysis. A compilation of baseline data will be provided in the future report referred to in Section 8.1 (Human Health Triggers for Adaptive Management Report) once baseline data collection ends in all environmental media, once the Construction phase of the Project formally begins. Currently baseline data collection in environmental media is ongoing (e.g., surface water and groundwater). The C.1 Version of the CFMP will provide additional information about a draft implementation schedule in Section 7 and Table 7-1. Note that dates in this section are subject to change, as timing for implementation will ultimately be determined by when permits are received and when Construction phase formally begins. Based on this draft implementation schedule, the Human Health Triggers for Adaptive Management Report is anticipated to be available in 2023.
16	6/Dec/21	UFN/LDN			Country Foods	Section 3.1		When was the list of COPCs sent to Nations? Presentation from May 6, 2021 does not include this list.	Slide 7 of the May 6, 2021 presentation lists the parameters that BW Gold proposed for analysis in the aquatic environment (intended to be for the AEMP) and Slide 20 of the May 6, 2021 presentation lists the parameters that BW proposed for the terrestrial environment (i.e., metals and CACs). The following text has been added to Section 3.1: "The COPC classes identified in the May 6, 2021 presentation to UFN and LDN for monitoring in the aquatic environment included in situ parameters, total and dissolved metals, anions, nutrients, cyanides, and general parameters for surface water and fish tissue (metals). The COPC classes identified for monitoring in the terrestrial environment included metals and criteria air contaminants (CACs). The parameters shown in Table 3-1 (first column) and Section 3.1 were selected based on results of the CSM report (Entia 2021a) and the HHRA update report (Entia 2021b) and are the subset of parameters from the COPC classes from the May 6, 2021 presentation that are specific to human health."
17	6/Dec/21	UFN/LDN			Country Foods	Section 4.1.1		HHRA - should this be HHERA - what is the difference between these acronyms in the context of this report?	Section 4.1.1 speaks specifically to the Baseline HHRA (Human Health Risk Assessment) that was updated in 2021. A future HHERA (Human Health and Ecological Risk Assessment) is envisioned in Section 1.3.4 - <i>Permit Requirements</i> to be completed at the time of site closure to address known or suspected contamination. The difference between HHRA and HHERA is whether or not ecological receptors are included for assessment (no in HHRA, yes in HHERA). The CFMP is more relevant to just human health considerations (HHRA) as the objectives of the CFMP are focused on human health.
18	6/Dec/21	UFN/LDN			Country Foods	Section 4.1.3		Regarding before and after control and impact sites: - Was air quality monitored prior to any disturbance at the mine site? - Vegetation and soil samples were not collected at consistent locations from 2011/2012 through to 2021 - how will this comparison be done? 2021 samples may not be indicative of "before" given the extent of disturbance at the mine site already. - Soil and vegetation samples were not always co-located in 2011/2012 - how will this be addressed? Does BW Gold have the right data to use this approach and be able to actually detect a change?	Air quality baseline data for criteria air contaminants are described in Chapter 2 (Section 2.2.3) of the Joint Mines Act/Environmental Management Act Application and are based on regional data. This is typical of many mining projects in BC, where regional data are used to represent baseline concentrations where site-specific monitoring has not been conducted. Metal concentrations in air were estimated in the HHRA Update (Appendix 6-A of the Joint Mines Act/Environmental Management Act Application) using methods recommended by Health Canada. BW Gold has not completed the comparison of 2011/2012 soil and vegetation data to data collected in 2021 as 2021 data have just been received from the lab. Since these were all baseline data, the hypothesis is that there is no difference between these datasets. Data analysis will be completed in Q1 2022. Data collected in all years can be referred to as "existing conditions data" rather than baseline data, if that is the preference; the intent is that these data will represent the conditions that existed prior to the formal Construction phase of the Blackwater Project. Given the amount of natural variability in soil and plant metal concentrations, the influence of exploration activities to date are likely to have been negligible and are not likely to be distinguishable from baseline conditions. For 2011/2012 data where soil and plants were not co-collected, the missing data can be estimated based on Project-specific bioaccumulation factors and use of the available soil or plant data. This was done in the HHRA update, provided in Appendix 6-A of the Joint Mines Act/Environmental Management Act Application.
18	18/Feb/22	UFN/LDN			Country Foods	Section 4.1.3		Difficult for the reviewer to address this issue when data is unavailable. Q1 is well underway - request to review the updated report prior to the start of construction (end of Feb will be unacceptable if construction is slated for March still). No obvious updates made to the plan to address this - please indicates updated section(s).	Preparation of the 2021 Cumulative Soil and Vegetation Baseline Report is underway and will include a comparison of the 2011/2012 data with the data collected in 2021. The report will be shared as soon as it is available. We are targeting spring 2022 for completion.

Blackwater Project									
ADMIN					COMMENTS				
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response
19	6/Dec/21	UFN/LDN			Country Foods	Section 4.2.1		Nations presented alternative air monitoring locations to the one location presented on May 6, 2021 and carried over into this document (BW Gold camp). The Nations would like to see field sampling at Tatelkuz Lake, for example, where a permanent resident and cultural sites may be impacted by the project.	BW Gold is interested in receiving information about the specific type(s) of field sampling and location(s) that the Nations would like to see, as there is some uncertainty whether this means criteria air contaminant monitoring, dustfall monitoring, or something else. At the meeting on December 9, 2021, Keefer Ecological Services indicated that this meant dustfall monitoring; however, that is not consistent with the written comment which is referring to the air quality monitoring at the camp (which is for criteria air contaminants in addition to dustfall metals). Tatelkuz Lake, given it's distance from Project sources of air emissions and results of air quality modelling, is expected to be a control location. Since control locations for dustfall sampling have not been selected yet, it would be possible to include a location at Tatelkuz Lake (along with soil and plant/berry sampling) at this location.
19	18/Feb/22	UFN/LDN			Country Foods	Section 4.2.1		Add Tatelkuz Lake as a sampling location for all air quality parameters, including dustfall, to address actual and/or perceived impacts from the mine site as requested (control or otherwise). The residential area is directly downwind of the TSF which has considerable potential to generate dust. It is also within the range of dominant wind directions. The Nations feel this is an oversight by the BW Gold team, given that concerned community members live at Tatelkuz Lake. BW Gold could have reached out to the Nations about this to ensure it was included in this version of the plan. This was discussed on December 9.	At the December 9 meeting, BW Gold indicated that locating a dustfall, soil, and vegetation/berry sampling location at Tatelkuz Lake could be accommodated. BW Gold requested at the meeting that a specific location or locations be identified by the Nations; however, no specific locations were provided when the B.1 version was completed in December 2021 and this remains an "in progress" action item (Item 18.10, based on minutes from that meeting issued March 14, 2022). Since this will be a control location, given the distance from the mine site dust sources and results of the air quality modelling, baseline sampling can be completed this summer. If the Nations could provide a specific location or locations at Tatelkuz Lake that they would like to see monitored for dustfall, soil, and vegetation/berry, this information can be added to the C.1 version and sampling initiated in summer 2022. To be included in the sampling planned for 2022, BW Gold will need the location(s) to be identified by May 2022.
20	6/Dec/21	UFN/LDN			Country Foods	Section 4.2.2		Are dustfall impacts in Closure low? There's a lot of soil movement and placement proposed for reclamation and potentially exposed slopes prior to revegetation. Monitoring should be conducted until the mine site is revegetated and stable - otherwise air quality (e.g., dust) impacts are still possible. Also, section 4.3.2.1 indicates that sampling will cease in "... post-closure phase as there are not expected to be significant sources of Project-related dustfall once the mine site has been reclaimed..."	Thank you, there was an inconsistency in the document. The intent is that monitoring for terrestrial components would include some or all of Closure phase, while site activities have the potential to generate Project-related air emissions (dust primarily). Text in Section 4.2.2 has been adjusted to reflect this.
20	18/Feb/22	UFN/LDN			Country Foods	Section 4.2.2		Likely resolved, but indicate where this change has been made in the Plan so the reviewer can be certain	Text was updated in Section 4.2.2 in the B.1 version of the CFMP: "Monitoring for CACs and dustfall metal concentrations will begin in Construction phase. The need for continued monitoring through Operations and Closure will be evaluated after each monitoring cycle, in consultation with Indigenous groups and regulators, based on the results of the monitoring conducted in a given year. Trends or changes in CAC concentrations or dustfall metal concentrations will be evaluated and if no significant changes are identified the monitoring frequency may be reduced (see Section 4.3.2.2)."
21	6/Dec/21	UFN/LDN			Country Foods	Section 4.3		Confirm that the RCP will include the species collected in this plan - carex sp., for example, are not likely to be available given the current reclamation goals (i.e., no wet/receiving areas). Is this realistic?	Sampling under the RCP (Reclamation and Closure Plan) for vegetation is different and separate from sampling vegetation under the CFMP, although samples collected under the RCP may be considered for inclusion under the CFMP at the time of closure (as described in Section 4.3 of the CFMP). Towards the end of the Closure phase, reclaimed areas may become more accessible to people and will need to be evaluated either under the CFMP or a separate HHRA to ensure that soil, plant, and berry (if berries are used in revegetation) COPC concentrations do not pose a risk to people. The last sentence in the last paragraph of Section 4.3 acknowledges that there may be some differences between species sampled in the CFMP and those for reclamation and closure planning purposes (emphasis added: " Where possible, plant and berry species sampled for the reclamation monitoring program will align with those sampled for the CFMP "). The differences will be driven by the objectives of the programs, with the CFMP focused primarily on plants and berries outside of the mine site footprint and the Reclamation and Closure Plan monitoring focused primarily on plants intended for use in reclamation and revegetation within the mine site to meet end land use objectives.
21	18/Feb/22	UFN/LDN			Country Foods	Section 4.3		Resolved - but loosely resolved in the plan and described further in the ITT	Comment resolved.
22	6/Dec/21	UFN/LDN			Country Foods	Section 4.3.2.1		Why are near- and mid-field sampling locations along the access road the same (within 1 km)?	Thank you for noticing this discrepancy. Text has been updated so that mid field sites are more than 1 km away from both the mine site and the access road. An additional paragraph has been added to Section 4.3.2.1 to provide rationale for the distances from Project sources used to define near, mid, and control sites. Dusting from roads is not expected to extend beyond 1 km. Air quality modelling prepared in the Application/EIS (Appendix 5.2.4A) show that dust deposition (based on total suspended particulates, TSP) is localized around the mine site and access roads, with concentrations dropping rapidly with distance from the sources. Dust deposition studies suggest that 70% to 75% of dust is deposited within 10 metres (m) of a road, 93% by 30 m, and 97% by 125 m (Walker and Everett 1987). A set of five sampling sites were identified as targeted road transect sites in 2021 near Tatelkuz Lake to specifically monitor for dusting from road use. Walker, D. and K. Everett. 1987. Road dust and its environmental impact on Alaskan Taiga and Tundra. Arctic and Alpine Research 19 (4): 479-89.
23	6/Dec/21	UFN/LDN			Country Foods	Table 4.3-1		Carex spp - add: and may have high metal tolerance, or, located in a sensitive receiving environment under rationale	Added to third column of Table 4.3-1 as rationale for <i>Carex</i> spp.: " <i>Commonly located in sensitive environments and may have high metal tolerance.</i> "
24	6/Dec/21	UFN/LDN			Country Foods	Section 4.3.2.3		Third bullet - add: at a maximum distance of XX m from the co-located soil pit.	This information will be included in field SOPs for the co-collection of soils and plants in the next iteration of the CFMP.

Blackwater Project									
ADMIN					COMMENTS				
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response
24	18/Jan/22	UFN/LDN		Danny Smart, KES	Country Foods	Section 4.3.2.3		Third bullet - add: at a maximum distance of XX m from the co-located soil pit. Include in the plan in addition to SOPs	This information will be provided in the 2021 Cumulative Soil and Vegetation Baseline Report. Once the information is available in that report it will be transferred to the C.1 version of the CFMP. A formal SOP for field sampling of soil, vegetation, and berries is under development and will be provided to Indigenous nations and regulators for review once complete. The SOPs will form an appendix to the CFMP, once finalized.
25	6/Dec/21	UFN/LDN			Country Foods	Section 4.3.2.3		Fourth bullet - add: and changed between sample sites	Thank you. Added in 4th bullet of Section 4.3.2.3.
26	6/Dec/21	UFN/LDN			Country Foods	Section 4.3.2.3		Fifth bullet - how often are people washing berries that they are foraging while out in the bush? I would agree that this is not a conservative estimate, rather an estimate of what is happening in the field. Assuming berries are being washed is a best case scenario, not a conservative approach.	This may be a matter of opinion and personal preference. However, people may also take significant quantities of berries home for consumption throughout the rest of the year, where they are most likely to be washed before processing or consumption. Including dust on the surface of plants and berries in the chemical analysis is more conservative than washing plants and berries prior to chemical analysis. Text was changed to delete the sentence, since conservatism (or not) is not relevant for the CFMP and is more relevant for use of the data in a HHRA.
27	6/Dec/21	UFN/LDN			Country Foods	Section 4.3.2.3		Soil sample data should also include type of soil horizon(s) sampled (e.g., mineral or organic), and texture (e.g., fine, coarse - if proper field texturing is not possible) - different soil textures can translate to different contamination movement rates	As described in Section 4.3.2.3, soil samples under the CFMP will only be obtained from the top 30cm of soil in areas with vegetation. This is the soil available for incidental soil ingestion and for COPC uptake by plant roots. However, the following was added to the text of the report in Section 4.3.2.3, second list of bullets, 7th bullet: "soil horizon (mineral or organic), and soil texture will be recorded on field forms."
28	6/Dec/21	UFN/LDN			Country Foods	Section 4.3.3		What was the RPD for vegetation samples collected in 2021? Vegetation samples can have very high heterogeneity - will RPD still be a useful tool? What can be done to control heterogeneity?	Data analysis for samples collected in August 2021 has not been completed yet as the data were just received from the lab in the second week of December. Reporting of RPDs and other data analysis will be provided in a summary report in Q1 2022. This report will be made available for review and comment. As noted in previous discussions, heterogeneity can be a challenge with soil and plant/berry samples. Heterogeneity is decreased within a site as much as possible through the sampling of multiple locations on a single plant and multiple plants within a sampling site. This effectively generates a composite sample for the site, which is then replicated across multiple sites within a zone. Our experience has been that this does help to decrease heterogeneity. Reporting under the CFMP includes a "Human Health Triggers for Adaptive Management Report", which will provide a summary of the methods and concentrations used to identify the predicted concentrations, baseline concentrations, and applicable guidelines, standards, or benchmarks to be used as triggers. BW Gold looks forward to further discussion on those triggers once that report is available.
28	18/Feb/22	UFN/LDN			Country Foods	Section 4.3.3		Difficult for the reviewer to address this issue when data is unavailable. Q1 is well underway - request to review the updated report prior to the start of construction (end of Feb will be unacceptable if construction is slated for March still).	Information on RPDs will be provided in the 2021 Cumulative Soil and Vegetation Baseline Report. Preparation of the 2021 Cumulative Soil and Vegetation Baseline Report is underway and the report will be shared as soon as it is available. We are targeting spring 2022 for completion.
29	6/Dec/21	UFN/LDN			Country Foods	Section 4.4.1		Add to water analysis: As, Cd, Fe, Hg, cyanide, Zn - water quality analysis should likely be the same as fish tissue wrt to metals. The COPCs in Table 3-1 do not match what was presented May 6, 2021.	Table 3.1 presents the contaminants of potential concern and the exposure media in which they were identified. Details were presented in the stand-alone Conceptual Site Model (CSM) report. At minimum, all identified COPCs presented in the first column of Table 3-1 will be measured in each exposure medium under the CFMP. Thus, Cd, Cu, Pb, Se, and Se were already planned for inclusion in the soil analysis. The paragraph after the table states "At minimum, parameter lists for laboratory analysis of metals in environmental media or tissue samples will include all of the parameters listed in Table 3-1, plus additional metals if they are included in standard metals analysis packages ". This sentence has been revised to state (bold emphasis added here to show the change) "...listed in the first column of Table 3-1 ...". Text has also been adjusted in the report where Table 3-1 is referenced to indicate that, at minimum, all 18 COPCs listed in Table 3-1 will be analyzed.
29	19/Jan/22	UFN/LDN		Danny Smart, KES	Country Foods	Section 4.4.1	Add cyanide as per above response to water analysis in table 3-1		Cyanide was not identified as parameter of concern for human health as concentrations were predicted to remain below water quality guidelines, even at locations within the mine site. Cyanide is included in water quality monitoring under the AEMP. Parameters presented on May 6, 2021 included those under the AEMP and was not just limited to those under the CFMP.
30	6/Dec/21	UFN/LDN			Country Foods	Section 4.4.1		There is no column in Table 3-1 for fish tissue sampling - please clarify	Fish tissues are part of country foods (last column of Table 3-1).
30	19/Jan/22	UFN/LDN		Danny Smart, KES	Country Foods	Section 4.4.1		Please provide further clarification. In section 4.4 it states "water quality and fish tissue samples are a component of the CFMP". This should be addressed before Table 3-1 and highlighted that it is part of 'country foods' in the table	Text in Section 3.0 (paragraph before the table) has been revised to clearly indicate that fish, plants and berries are included within the Country Foods column of Table 3-1.

Blackwater Project									
ADMIN					COMMENTS				
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response
31	6/Dec/21	UFN/LDN			Country Foods	Section 4.4.1		<p>May 6 presentation lists the following parameters for aquatic sampling:</p> <ul style="list-style-type: none"> - in situ (pH, conductivity, DO) - total and dissolved metals - anions (sulphates, chloride, etc.) - nutrients (nitrogen and phosphorous compounds) - cyanides - general parameters <p>Ensure these are all included. Provide rationale for those not included.</p>	All of these parameters will be monitored in the aquatic environment under the AEMP (see Section 4.2 of the AEMP). However, the parameters identified for monitoring for the CFMP are a subset of the total suite of parameters (particularly for water). The suite for CFMP monitoring has been selected to be specific parameters of concern for human health. The process for selecting COPCs was described in the CSM, found in Appendix 5-1 of the Joint Mines Act/Environmental Management Act Application, and followed HHRA principles (guidance documents).
32	6/Dec/21	UFN/LDN			Country Foods	Section 4.4.2.1		Is Creek 705 a good reference site? It will be impacted by the project through the Lake 15-16 connector channel and will have an increase (theoretically) in the rainbow trout population as a result. Has this been considered?	Creek 705 is considered to be a reference site for water quality and fish tissue monitoring purposes. There could be changes to Creek 705 that are unrelated to water quality. In the event that Creek 705 is affected by the Project in ways that aren't anticipated (i.e., changes in water quality or fish tissue metals), an alternative reference site located in a tributary to Fawnie Creek has also been included.
33	6/Dec/21	UFN/LDN			Country Foods	Section 4.4.2.1		What parts of fish are being sampled? Parts that are commonly consumed and not (e.g., liver)? The need for unnecessary lethal sampling is acknowledged, but are tissue plug samples in adults sufficient to understand bioaccumulation in fish?	<p>The following fish tissues will be sampled as described in Section 4.4.2.3 - <i>Sampling Methods</i>, 5th bullet in the second list of bullets (for fish sampling): "When lethal sampling is used for adult fish, tissue samples for laboratory analysis will include liver, muscle, and carcass/viscera. When tissue plugs are used, samples will be collected from the dorsal muscle."</p> <p>Tissue plug samples are expected to be representative of muscle concentrations of metals. Before recommending lethal sampling of adult fish, BW Gold would like to receive information or input from Indigenous groups regarding the frequency that people consume non-muscle tissues from fish from waterways downstream of the Project (specifically Tatelukuz Lake, where adult fish are sampled).</p>
33	19/Jan/22	UFN/LDN		Danny Smart, KES	Country Foods	Section 4.4.2.1		Lethal sampling and tissue plugs have been addressed, but additional information/clarification required for 'are tissue plug samples in adults sufficient to understand bioaccumulation in fish?' as commented above. The response is included in the ITT but not documents in the plan.	The following text has been included in the 5th bullet under Section 4.4.2.3 Sampling methods "Tissue plug samples are expected to be representative of muscle concentrations of metals."
34	6/Dec/21	UFN/LDN			Country Foods	Section 4.4.2.2		Water quality and fish tissue sampling has to occur annually for much longer after the start of construction, as water quality impacts ramp up with operations. Sampling once every three years while the dams and TSFs are operational is insufficient - sampling should be decreased once the mine is operational and First Nations are confident that initial impacts are not being seen in fish or water quality.	<p>Sampling frequencies were increased from once every three years to once every year based on the earlier request from LDN/UFN to increase the sampling frequency to annually. BW Gold made this change with the understanding that the frequency would decrease if no significant changes were found. However, given the discussion at the December 9, 2021 meeting with UFN/LDN, BW Gold recommends and has updated the draft CFMP to reflect changing the sampling frequency back to once every three years. The CFMP has been updated throughout to reflect this change.</p> <p>Annual sampling of fish tissue, particularly lethal sampling of juvenile fish at creek sites close to the Project, is not recommended for a prolonged period of time. There is the potential that annual sampling of fish could ultimately cause adverse effects on fish populations due to cumulative loss of juveniles (or adults) over time.</p> <p>Given the water quality predictions during Operations phase, which remain below water quality guidelines during this phase, and that it takes time for potential changes to occur in the receiving environment, BW Gold recommends that sampling frequency be reverted to once every 3 years initially, with a decrease in frequency to once every 6 years if no significant changes are identified. This aligns with monitoring requirements under the <i>Metal and Diamond Mining Effluent Regulations</i> and is less likely to cause adverse effects to populations associated with lethal sampling.</p>
34	18/Feb/22	UFN/LDN			Country Foods	Section 4.4.2.2		<p>Request to discuss this further, our version of the meeting notes does not capture what is included in your response. See below from our meeting notes:</p> <p>Jess - I am concerned about the proposed sampling frequencies, sampling once every 3 years isn't enough. Sampling annual for the first 3 years isn't enough to get a good idea, by ending in year +1 of operations we are missing a lot.</p> <p>Leslie - it would only decrease to once every three years if there are no effects. Wondering if we should sample annually for X number of years - start at a lower rate and ramp it up when the effects are most likely to occur.</p> <p>Jess - Yes, and it should also depend on what media is being sampled.</p>	<p>In the meeting minutes from December 9, 2021, the next bullet on this discussion says "Travis - at a minimum, we should make sure that the entire program is run in 3-year intervals post Year 1 and ramping up/ramping down on certain media to help us understand those effects".</p> <p>To clarify, the previously submitted response pertained to fish tissue sampling only, which is different in frequency from water quality sampling. BW Gold maintains its recommendation from the previous response and stated at the December 9, 2021 meeting, that three years makes sense for fish tissue sampling, consistent with the requirements under the MDMER, as it takes time for potential changes to occur in the receiving environment and in fish tissues and no exceedance of water quality guidelines has been predicted for the Construction and Operation phases. Annual sampling of fish has the potential to cause loss of fish populations due to cumulative loss of fish over time and is unlikely to be supported by regulatory agencies. The adaptive management framework (Section 6.3 of the CFMP) allows for additional sampling to be adjusted or added (e.g., more frequent than once every three years), both in terms of sampling frequency and locations. It is likely that additional fish tissue sampling will be required later in the life of the Project (e.g., later in Operations or Closure phases) when water quality is predicted to change, as referred to in the December 9 meeting minutes "Lesley ...started at a slower rate initially and then ramp it up, when we think there's most likely to be effects".</p> <p>Water quality sampling will occur annually as described in the AEMP (Section 4.2) and in the CFMP in Section 4.4.2.2, which states: "Depending on the sampling site, frequency for surface water quality sampling will be either monthly or quarterly, with more intensive sampling (5 samples in 30 days) replacing the monthly sampling at a subset of sites during spring freshet, fall rains, and winter low flow periods." This annual sampling will be starting in Construction phase.</p>

Blackwater Project									
ADMIN					COMMENTS				
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response
35	6/Dec/21	UFN/LDN			Country Foods	Section 4.4.2.2		How will proposed WQG exceedances through post-closure be monitored for their impact on fish and water downstream of the mine?	Monitoring programs, guided by adaptive management, are expected to evolve over time as more is learned about the biogeochemistry of the Project area, effects of the Project, optimization of proposed mitigation measures, and implementation of new mitigation measures, as needed, throughout the mine life. Water quality predictions in Post-closure phase have higher uncertainty but will be further refined throughout Operations and Closure phases based on increased Project-specific data that will decrease model uncertainties and to reflect changes in best management practices and best available technologies. BW Gold is not applying for an effluent discharge permit for Closure and Post-closure phases at this time and water quality predictions during these phases have not influenced monitoring plan design for the near term (Construction and Operations phases). BW Gold is aware of EAC Condition 26 that requires that water quality must either meet water quality guidelines or science-based environmental benchmarks (SBEs) and will document in this EAC plan the steps towards addressing achieving compliance during these mine phases.
35	18/Feb/22	UFN/LDN			Country Foods	Section 4.4.2.2		Does this align with EAOs expectations?	BW Gold looks forward to continuing the discussion with the Nations and EAO.
36	6/Dec/21	UFN/LDN			Country Foods	Section 5		Please provide rationale for using "significant increase" in 1. and a "measurable increase" in 2.	Thank you for noting the inconsistency. Wording has been changed to be " <i>significant increase</i> " in both places.
37	6/Dec/21	UFN/LDN			Country Foods	Section 5		Why the following two periods: before the start of construction, and after the start of construction for the BACI analysis? Will this be repeated for each project phase? Arguably, construction phase has minor impacts to off-site receptors compared to operations phase.	It is agreed that the Construction phase likely has minor impacts to receptors of concern compared to the Operation phase of the Project. However, the objective of the CFMP is to identify whether the Project (as a whole) has an effect on the quality of country foods, not just the Construction or other individual phases of the Project. Thus, BACI analysis will consider the "before" as baseline data prior to commencement of the Project, i.e. prior to start of Construction, and the "after" as all phases of the Project after the start of Construction. Text was modified to state: " <i>For the period effect, data will be grouped into one of two periods: baseline data collected before the start of Construction phase and monitoring data collected after the start of Construction phase.</i> "
38	6/Dec/21	UFN/LDN			Country Foods	Section 5		What natural phenomenon is likely to increase metal concentrations? How will you determine that the parallel change is not still a result of the project - and that the impacts are farther reaching than anticipated?	There are a number of factors that could influence metal concentrations at control sites, particularly in the aquatic environment but also in the terrestrial environment. Factors such as inter-annual variability in water flows, flooding or other extreme weather events, fires, landslides, and influence from activities not associated with Blackwater (e.g., logging, agriculture, transportation, etc.) could all potentially affect metal concentrations in media or biota tissues at control sites. Interpretation of BACI data relies on some level of professional judgement in understanding the results and offering potential explanations for any observed changes. The reliance on multiple reference sites compared to near field sites in the initial BACI analysis will tend to identify Project-related effects on the adjacent environment. In the event that changes are noted in the near field environment, additional monitoring at mid field (aquatic and terrestrial) or far field (water only) will help to identify the extent of Project-related changes. If data analysis indicates that Project effects are occurring in ways that were not predicted, particularly if concentrations are approaching or higher than levels of concern, mitigation and monitoring plans will need to be adjusted, as described in the adaptive management plan.
38	19/Jan/22	UFN/LDN		Danny Smart, KES	Country Foods	Section 5		Response to comment is satisfactory, however it is not included in the plan. Please amend to provide additional information within the plan.	The text is now included in Section 5.2 of the CFMP (second to last paragraph).
39	6/Dec/21	UFN/LDN			Country Foods	Figure 6.1-1		What is the rationale for consulting environmental thresholds last in this flow chart? Beyond action level "none" a comparison against thresholds should be added as a route to accelerate the action level.	Environmental media concentrations will always be compared against environmental quality guidelines, such as drinking water guidelines (DWG) or soil quality guidelines (SQG), as outlined in the tables in Section 6.3 - Triggers and Management Responses for Exposure Media. The rationale for consulting environmental media guidelines last is that a number of COPCs have concentrations that naturally exceed guidelines under baseline conditions. Thus, comparison against guidelines as a first step would not trigger a management response for the Project as the guideline exceedance would not be due to the Project. Other questions are asked first to determine if there may be Project effects that are unexpected causing significant changes to the aquatic or terrestrial environment, and guideline exceedances are considered subsequently to determine whether the trigger level is medium (no guideline exceedance exceedance) or high (exceedance).
40	6/Dec/21	UFN/LDN			Country Foods	Section 6.2.2		How will baseline dustfall metals be reflective of baseline data when construction is proposed to start before summer 2022?	Although BC ENV no longer recognizes dustfall and metal deposition rates because the sampling methodology produces results that are not accurate nor reproducible (BC ENV 2020), baseline dustfall collection for metal analysis was planned to occur in 2021 prior to the start of Construction to support the HHRA Update. Due to supply chain interruptions and delays in receiving the sampling equipment, BW Gold was not able to carry out this sampling program in 2021 and dust sampling is now planned for the summer of 2022. While the timing of 2022 sampling may coincide with initial construction activity, this is the most suitable approach given the circumstances. If there is concern that data collected in summer 2022 is not representative of baseline conditions, a t-test (or similar analysis) can be done to determine if there are differences in metal concentrations between the near field and control sites. Alternatively, data can be collected at the control sites and assumed to apply across all sites as a surrogate for site-specific data. Our experience has been that baseline concentrations of metals in dustfall are very low and frequently undetectable, so use of control site data (from sites more than 5 km away from the mine site) is reasonable source of surrogate data to represent baseline conditions. BC ENV. 2020. <i>Technical Guidance: Dustfall Monitoring and Pollution Control Objectives</i> . GUI-TEC-04.1. BC Ministry of Environment and Climate Change Strategy: Victoria, BC.
40	18/Feb/22	UFN/LDN			Country Foods	Section 6.2.2		include commitment to do what is suggested here	Section 7.0 Implementation Schedule has been updated to include sampling planned in 2022.

Blackwater Project									
ADMIN					COMMENTS				
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response
41	6/Dec/21	UFN/LDN			Country Foods	Table 6.3-2		Management responses should be tailored to specific parameters (e.g., water quality and fish needing more regular monitoring not just in years 1 and 2 of construction and year 1 of operations)	<p>Proposed water quality monitoring for the CFMP is the same as that described in Section 4.2 of the AEMP. The proposed water quality monitoring is already quite frequent, particularly at near field and control sites where sampling is proposed on a monthly basis, with some sites also targeted for weekly sampling (5 samples in 30 days). Proposed monitoring at mid field and far field sites is generally quarterly, although some sites will also receive monthly sampling (details are in Table 4.2-2 of the AEMP).</p> <p>The medium and high action levels for surface water sampling include a response to "implement a water sampling program to define the magnitude, spatial extent, and reversibility of the effect", which could include increased sampling effort or frequency depending on the potential source of the unexpected effects on water quality. The frequency of water sampling is not proposed to decrease under the adaptive management plan as water sampling provides the most critical, timely, and least invasive method for monitoring for changes in environmental quality. Surface water is the likely the first environmental media where Project-related effects would be observed, should unexpected effects occur.</p> <p>Annual sampling of fish tissue, particularly lethal sampling of juvenile fish at creek sites close to the Project, is not recommended for a prolonged period of time. Although non-lethal sampling of adults is planned to the extent possible, some mortality may still occur in fish either during collection of tissue plugs or during their recovery after sampling. There is the potential that annual sampling of fish could ultimately cause adverse effects on fish populations due to cumulative loss of juveniles or adults over time. Causing adverse effects in populations due to over-sampling is not a desired outcome of monitoring programs.</p> <p>Given the water quality predictions during Construction and Operations phases, the results of the HHRA indicating that Project-related changes to human health are negligible during Construction and Operations phases (Appendix 6-A of the Joint Application), and that it takes time for potential changes to occur in the receiving environment, BW Gold recommends that sampling frequency be reverted to once every 3 years initially, with a decrease in frequency to once every 6 years if no significant changes are identified. This aligns with fish tissue monitoring requirements under the MDMER and is less likely to cause adverse effects to populations associated with lethal sampling.</p>
41	18/Feb/22	UFN/LDN		Danny Smart, KES	Country Foods	Table 6.3-4		Comment above has not been addressed in the plan: Management responses should be tailored to specific parameters (e.g., water quality and fish needing more regular monitoring not just in years 1 and 2 of construction and year 1 of operations)	The CFMP contains five tables (Table 6.3-1 to 6.3-5) that describe the triggers and management responses that are tailored to individual environmental media. Monitoring frequency is addressed for each medium, including water (in Table 6.3-4) and fish (in Table 6.3-5). In addition, Section 4.4.2.2 describes sampling timing and frequency for water quality and fish tissue monitoring.
42	6/Dec/21	UFN/LDN			Country Foods	Table 6.3-2		Medium row: fourth bullet is incomplete	Thank you. This bullet was deleted from Table 6.3-2.
43	6/Dec/21	UFN/LDN			Country Foods		General	What other sources (non-Project related) of COCs have been identified?	<p>A cumulative effects assessment was completed as part of the effects assessments in both the Application/EIS and in Chapter 6 of the Joint Application. The focus of monitoring plans, including the CFMP, is generally on identifying Project-related effects. Within the watersheds around the Project, there are no other significant industrial sources of parameters of potential concern. However, there are forestry, agricultural, transportation, and recreational activities that may occur that are not associated with the Project.</p> <p>The design of the monitoring program and data analysis (BACI) that focuses on the near field and control sites are most likely to identify Project-related effects. However, the inclusion of mid and far field sites may also provide some indication of the other activities occurring in the watershed, particularly in the aquatic environment. For example, if monitoring of surface water quality shows that there are no identifiable Project-related effects at the near field sites but there are changes at mid or far field sites, this would suggest that non-Project related changes are occurring from other projects or activities.</p>
44	6/Dec/21	UFN/LDN			Country Foods		General	How has bioconcentration and bioaccumulation potential for transfer and biomagnification along food chains been captured?	<p>In the aquatic environment, bioaccumulation is captured through the measurement of metal concentrations in surface water and fish tissue. Bioaccumulation factors can be calculated as the concentration of metals in fish tissue divided by the concentration in metals surface water.</p> <p>In the terrestrial environment, bioaccumulation is captured through the measurements of metal concentration in soil and plants or berries. Bioaccumulation factors can be calculated as the concentration of metals in plant or berry tissues divided by the concentration of metals in co-collected soil samples.</p> <p>In addition, a food chain model has been developed for representative terrestrial country foods the Project (moose, hare, and grouse), which is a standard method used in HHRA in cases where samples are not available. Data from donated samples could be used to calibrate the food chain model (as was done for moose, see the Human Health Risk Assessment Update report in Appendix 6-A of the Joint Application), or could be used to calculate bioaccumulation factors based on soil and plant/berry data collected within the study area.</p>
44	18/Feb/22	UFN/LDN		Danny Smart, KES	Country Foods			The above comment has been answered within the response, however it has not clearly expressed throughout the plan. Please edit as required to address concerns from comment 44	In the C.1 version of the CFMP, Section 5.3 has been added to address data analysis and includes a discussion of bioaccumulation through the food chain model. Calculation of bioaccumulation factors for plants and berries is described in Section 4.3 (end of first paragraph), and bioaccumulation and calculation of bioaccumulation factors in the aquatic environment is described in Section 4.4 (second paragraph).

Blackwater Project									
ADMIN					COMMENTS				
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response
45	6/Dec/21	UFN/LDN			Country Foods		General	Will the CSM be updated regularly to include additional environmental data, additional project information? Have gaps been identified?	<p>The CSM report is separate from the CFMP. Gaps were identified in Section 4.0 of the CSM report, which have either been addressed through additional sampling completed or initiated in 2021 or will be addressed through implementation of various management plans.</p> <p>If needed, the CSM could be updated and refined following additional baseline sampling prior to commencement of Project construction or throughout the life of mine, or to support closure and reclamation planning. However, the CSM is equivalent to the problem formulation component of an HHRA or HHERA. In the context of the CFMP, rather than updating the stand-alone CSM report provided in the Joint Mines Act/Environmental Management Act Application it is more likely that the information would be incorporated into the problem formulation section of a HHRA or HHERA, should one be triggered or recommended as part of the management responses at a medium or high action level.</p>
45	18/Feb/22	UFN/LDN			Country Foods			Resolved? I'm unsure if this is sufficient to answer the comment.	Please advise if comment is resolved.
46	6/Dec/21	UFN/LDN			Country Foods	Table 3.1		Add: identification of what parameters were previously sampled, and for which environmental media (i.e., in baseline studies).	Table 3.1 presents the COPCs and the exposure media in which they were identified. The stand-alone CSM report presents baseline studies and the selection process for the contaminants of potential concern for all exposure media and receptors of concern. As stated in the first paragraph of Section 3 of the CFMP, the CFMP is based on the CSM report. Thus, details are not repeated in the CFMP and a summary of the CSM and the final COPCs are presented in Section 3.
47	6/Dec/21	UFN/LDN			Country Foods	Table 3.1		Is the baseline (background) dataset sufficient to allow background concentrations to be distinguished from potential project related sources? How does changing species (2021 changes) impact this dataset and the subsequent comparisons that need to be drawn from this data?	<p>Additional baseline samples for soil, plants, berries, and fish tissue were collected as recommended in Section 4 - <i>Uncertainties and Recommended Follow Up</i> of the CSM Report. Baseline sampling was designed with the objective to collect sufficient data to enable a before-after analysis as part of BACI during future monitoring studies under the CFMP.</p> <p>Although more than one year of baseline data would be preferred for BACI analysis, a minimum of one year of data is all that is required. This minimum has been met for water, soil, plants, and berries. Up to 10 years of surface water quality data are available for some sites. Soil and plants were sampled in 2011 and 2012; however, no berry samples were collected in these years. An additional, more extensive baseline dataset for soil, plants, and berries were collected in 2021. Analysis has not yet been completed to compare these datasets for soil and plants between 2011/12 and 2021. This analysis will be completed in Q1 2022.</p> <p>As is typically done for many mining projects in BC, where site-specific data are not available (e.g., criteria air contaminants [CACs] at the mine site), surrogate data from other regional locations is typically used and is assumed to apply to baseline conditions at the Project. Since background concentrations are generally very low for CACs, this provides a conservative basis for identifying potential changes in their concentrations.</p>
47	18/Feb/22	UFN/LDN			Country Foods	Table 3.1		What are the potential implications of only having one year of data informing your "baseline"? While all that is required to run BACI analysis is one year - it is important the BW Gold identify this data gap and clearly illustrate the limitation of using the smallest possible sample size.	<p>The uncertainty related to having one year of baseline data is that inter-annual variation under current conditions will be unknown. However, because soil and tissue samples generally have relatively high heterogeneity, it is likely that this heterogeneity is equal to or larger than intra-annual variability. Pending analysis to confirm that 2021 soil and plant/berry tissue data are similar to older data, the 2021 data will supplement previous data collected in baseline programs in 2011 and 2012, which would expand the datasets for soil and willow to more than one year of baseline data.</p> <p>If 2021 and 2011/2012 data are not similar (e.g., due to differences in sampling and analysis methods), the issue of inter-annual variability can be addressed later during repeated monitoring of control sites, which will provide an estimate of inter-annual variability that is unrelated to potential Project effects.</p> <p>Baseline concentrations and any uncertainties associated with these concentrations will be considered in the separate <i>Human Health Triggers for Adaptive Management</i> report (see Section 6.2.2 of the CFMP), which will be produced after baseline data collection has been completed, and therefore this is not addressed in the CFMP.</p>
48	6/Dec/21	UFN/LDN			Country Foods	Section 4.2.2		Given the prevailing wind direction is from the west and southwest (Section 4.3.2.1), the PASS sampling locations proposed in Figure 4.2-1 do not provide good spatial coverage.	<p>The sampling location proposed at the camp site is immediately downwind of some of the key sources of SO₂ and NO₂ (e.g., equipment operating in and around the open pit) and is the location where key receptors of concern (i.e., off-duty workers) will be present much of the time. This location is also secure (e.g., less sensitive to potential for vandalism, theft, or wildlife interaction) and can be more readily accessed/monitored to ensure that equipment is functioning properly. BW Gold is of the opinion that this is the best location for PASS sampling as it will best represent the potential exposure risks of the closest group of human receptors (off-duty workers) in a location that is likely to receive direct influence from Project activities.</p> <p>BW Gold also notes that dustfall metal monitoring is proposed to the north and northeast of the mine site, at locations downwind of the prevailing wind direction.</p>

Blackwater Project									
ADMIN					COMMENTS				
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response
48	14/Jan/21	UFN/LDN		Danny Smart, KES	Country Foods	Section 4.2.2		No clarification given within the plan for the PASS sampling locations; does not address the concern from the above comment. This was discussed on December 9 and Artemis committed to look more into this as during construction and operations, when trucks are moving material to the TSF, a sampling locatin downwind of the TSF would capture emissions.	<p>BW Gold has looked into this further with air quality and human health risk assessment QPs and believes that the proposed monitoring locations for the PASS and Partisol sampling are appropriate as proposed.</p> <p>A statement was added to Section 4.2.2 of the C.1 version of the CFMP to explain that the PASS sampler location at the exploration camp (during Construction) and operations camp (once constructed) were chosen because they are "...immediately downwind of some of the key sources of air emissions (e.g., equipment operating in and around the open pit and TSF) and are the closest human receptor locations (off-duty workers) to Project sources...".</p> <p>The partisol and PASS samplers are both located at the operations camp, which is directly east of the TSF and Haul Road and would, thus, also receive any potential particulate matter from the TSF during prevailing winds from the west / southwest. Because the particulate sampling will be done every third day between May and October and PASS units collected every 30 days, winds will blow from the direction of the TSF (or other site infrastructure such as the Open Pit or stockpiles) towards the operations camp for multiple days during that period. This will provide the best estimate of the maximal level of risk for human receptors that are close to Project sources on a regular basis.</p> <p>Human receptors other than off-duty workers (i.e. residents or temporary land users) are likely present at a distance further away from mine site activities. If no issues are identified at the operations camp in close proximity to the emission sources then no issues would be expected at locations much further away. Results from partisol and PASS samplers at the operations camp can be compared to predictions from the air quality modelling to confirm the results of the modelling and human health effects assessments.</p>
49	6/Dec/21	UFN/LDN			Country Foods	Section 4.4.1		Are fish tissue samples being analyzed for the suite of metals listed for country foods?	Fish tissues are part of country foods (last column of Table 3-1). All COPCs listed in the first column of Table 3-1 will be analysed in each exposure medium, including fish tissues.
50	6/Dec/21	UFN/LDN			Country Foods	Table 6.3-1		Are dust impacts best captured in three years? What about once the TSF dams are in place? This sampling should be adjusted to capture potential impacts and three years is unlikely to be sufficient to do that. Same comments applies to all tables in this section.	<p>Sampling frequencies were increased from once every three years to once every year based on the earlier request from LDN/UFN to increase the sampling frequency to annually. BW Gold made this change with the understanding that the frequency would decrease if no significant changes were found. However, given the discussion at the December 9, 2021 meeting with UFN/LDN, BW Gold recommends changing the sampling frequency back to once every three years. The CFMP has been updated throughout to reflect this change.</p> <p>The purpose of monitoring dust and metal deposition at the Project is to estimate the percentage of different metals in the deposited dust and not to measure dustfall deposition rates. Monitoring for dustfall metal concentrations will begin in Construction. As stated in Section 4.2.2 of the CFMP, the need for continued monitoring through Operations will be evaluated after each monitoring cycle, in consultation with Indigenous groups and regulators, based on the results of the monitoring conducted in a monitoring cycle. Trends or changes in dustfall metal concentrations will be evaluated and if no significant changes are identified the monitoring frequency may be reduced, as described in Table 6.3-1.</p> <p>Based on modelling of soil and plant concentrations completed in the HHRA Update (Appendix 6-A of the Joint Application), changes in concentrations are predicted to be negligible (less than 5% change in the 95% upper confidence limit of the mean concentration) after considering 23 years of mine life. Changes in soil and plant metal concentrations are predicted to occur slowly, if at all, in areas outside of the Project footprint. A sampling frequency of once every 3 years is likely to be frequent enough to identify Project-related changes in the terrestrial environment.</p>

Exhibit 12
Final Transmission Line Routing Plan (ITT)

Blackwater			COMMENTS	
ADMIN				
ID	Comment Date	Reviewer Agency	Comment	Response
1	15/Nov/22	LDN/UFN	All acronyms are not listed in the section after the Table of Contents, e.g., IVMP and IIVMP. Ensure that all acronyms used in document are defined and listed in ACRONYMS AND ABBREVIATIONS Table states "Condition 23 states that a vegetation and access management plan must be created – these mitigation measures only mention an access management plan – please update". There is no mention of a TL specific access management plan. Concerns from other parties also mention access management concerns, which need to be addressed. Provide a TL Access Management plan.	All acronyms used in the document are now listed in the Acronyms and Abbreviations section of the revised plan, which will be re-submitted with this ITT. To address EAC Condition 23, BW Gold has prepared the "Transmission Line Vegetation and Access Management Plan". This plan has been provided to the MRC for review. BW Gold looks forward to reviewer comments on the Transmission Line Vegetation and Access Management Plan via the TL MRC.
2	15/Nov/22	LDN/UFN	Ensure tha all plans are referred to in this section are included in the References. Also provide a functional link to online versions of all plans so that content can be checked. Many assertions in document can not be verified without access to these plans.	The management plans listed in Section 3.3 were either submitted as part of the Major Works application, prepared to address EAC conditions, or have been developed specifically for the Transmission Line. The EAC plans can be found at BW Gold's website (https://blackwatergoldmine.com/eac-plans/). The EAC plans have undergone consultation with LDN and UFN previously. The Transmission Line specific permits have been provided to the MRC for review. Complete references have been added in Section 3.3 to a revised plan which will be submitted with this ITT. If there are any specific plans which the reviewer is unable to access, BW Gold would be happy to provide.
3	15/Nov/22	LDN/UFN	Table states "Add a commitment to invite Aboriginal Group monitors to be involved in the construction and maintenance activities". No written evidence of this in this document. Please include.	The Aboriginal Group Monitor and Monitoring Plan (to fulfil EAC Condition 17) and associated Terms of Engagement provides for LDN and UFN to develop monitoring plans for discussion and agreement with the Environmental Manager, including for transmission line construction and maintenance if of interest to the Nation and monitor. BW Gold consulted with LDN and UFN in developing this plan, and the plan was approved by EAO on February 18, 2022.
4	15/Nov/22	LDN/UFN	Table states "Provide a summary of how the Mitigation Table required by condition 43 has been/will be met through the implementation of a FTLRP". Again this is not clearly demonstrated by inclusion of a table in this document or specific reference to management plans that contain the specified mitigations. Please provide table in this document as there needs to be one central location where all mitigations can be seen.	In accordance with EAC Condition 39(e), Section 6 of the FTLRP includes mitigation measures for the Visual Resources (Table 6-1) and Non-Traditional Land Use (Table 6-2) valued components. A complete list of mitigation measures associated with the Project (including the Transmission Line), can be found in the Mitigation Table prepared in accordance with EAC Condition 43. The Mitigation Table is divided by VC and indicates which management plan(s) each mitigation measure has been assigned to. The last version of the Mitigation Table was submitted in July 2022 to LDN/UFN.
5	15/Nov/22	LDN/UFN	"Agreement to continue working with forest tenure holders to better understand the potential impacts to cut blocks and agreeing to discuss and provide reasonable compensation, where appropriate." Old growth forest that is part of provincial set asides will be affected. So not only tenure holders but FN's and Province need to be compensated for the loss of this VC. This needs to be detailed here	BW Gold followed the provincial mitigation policy in routing its transmission line, working closely with Indigenous nations and in particular the CSFNs due to their stated interest in the routing. BW Gold and the CSFNs re-routed portions of the transmission line as documented during the EA to avoid and minimize impacts to the Ecosystem Composition VC including Old Growth Forest. A guiding principle of the re-routing was avoid areas of intact forest wherever possible and to follow existing disturbance features such as roads, forestry cut-blocks and forest fire-damaged areas. The changes resulted in the transmission line following existing disturbance features for an additional 9% of its length. BW Gold also made strong commitments in terms of creation of new access roads (ie., no new transmission line access roads to be constructed outside of the TL cleared ROW resulting in a greater proportion of access roads over cleared land (23% versus 11% proposed in the Application/EIS), also to avoid impacts to Ecosystem Composition VC including Old Growth Forest. BW Gold is of the view that these strong commitments to the mitigation hierarchy reduce the magnitude of the residual effect to an acceptable level, consistent with the conclusions of the EA and that no compensation is required. LDN and UFN provided their unconditional support to issuance of the EAC and Decision Statement in 2019, including confirmation that they had been adequately consulted and accommodated with respect to their asserted Aboriginal Rights and title in respect of the Project.
6	15/Nov/22	LDN/UFN	While a listing of mitigations are given in Phase 1 report, no specific listing of VC's affected by the TL is provided anywhere and so it is impossible to ascertain whether all needed mitigations have been detailed. Produce a table that identifies all VCs and how they may be affected and mitigated/compensated.	This request is outside the scope of the FTLRP. Potential effects of the PNA and potential re-routes were identified in the consolidated effects assessments during the Application/EIS process. In accordance with EAC Condition 39(e), Section 6 of the FTLRP includes mitigation measures for the Visual Resources (Table 6-1) and Non-Traditional Land Use (Table 6-2) valued components. A complete list of mitigation measures associated with the Project (including the Transmission Line), can be found in the Mitigation Table prepared in accordance with EAC Condition 43. The Mitigation Table is divided by VC and indicates which management plan(s) each mitigation measure has been assigned to. The last version of the Mitigation Table was submitted in July 2022 to LDN/UFN.
7	15/Nov/22	LDN/UFN	you responded with "Vegetation will be maintained as required to ensure safe clearance limits." How or did you consider if the vegetation and reclaimed areas will match or be changed from the natural ecosystem?	The response is meant to reflect that as a design and safety requirement for transmission line operations, minimum clearance between vegetation and the conductors must be maintained. For information on transmission line reclamation, please refer to the TL Conceptual Reclamation and Closure Plan which was provided to the TL MRC for review on November 29, 2022.
8	Nov 22,2022	LDN/UFN	For Table 5-1 "Effects on sensitive habitat and wildlife" have you calculated a net 'disturbed areas' vs 'undisturbed areas' ratio? and how will sensitive habitat areas be offset?	The net 'disturbance area' vs 'undisturbed area' ratio has not been calculated. Maximizing alignment with pre-existing disturbed areas was a visual exercise. With respect to offsetting, offsetting requirements for the project are as set out in the EAC table of conditions and the DS. Those requirements include the impacts of the TL, including for fish habitat, wetlands and caribou habitat. BW Gold continues to discuss mitigation of TL effects on te Stellako WMA as described in section 5.2 of the FTLRP Phase 2.
9	Nov 22,2022	LDN/UFN	your response and "Extent to which Effects is Mitigated" does not address the commenter's concern for impacts to salmon spawning. Simply moving the impacts upstream or downstream out of this person's sight is not a mitigation of the habitat impact. This is not in line with LDN/UFN values, and the nations do not support a project that deals with environmental impacts in this manner.	The spawning habitat identified by the landowner was a specific pool crossed by the Proposed New Alignment (PNA). Ultimately the PNA alignment was not selected and the Stellako reroute (selected) does not interact with this pool. Potential effects to salmon spawning habitat at the final crossing site have been further mitigated through design and mitigation measures. Most significantly, the transmission line will cross the Stellako River aerially. In water work will be limited to stringing a pilot line across the river, which will be completed by boat. Some clearing is required on both banks to maintain safe clearance from the conductor spans in accordance with the TL Clearing Plan (see Riparian Prescription WC-8; Allnorth 2022), which has been provided to the TL MRC. Mature trees will be topped at approximately 4 to 6 m above ground and understorey left intact within a 50 m riparian reserve zone to maintain as much bank cover as safely possible. Mechanical clearing equipment will not be permitted within 5m of the stream bank.
10	Nov 22,2022	LDN/UFN	"BW Gold responded to LDN and UFN on April 17, 2021 and committed: "Your input will be carried forward and integrated into the final mitigation measures that will be developed for the selected route alignment and form part of Phase 2 for the FTLRP Phase 2)". We look forward to seeing our input fully integrated into final mitigation measures.	Please see attachment "R1_LDN UFN_Comment ID 11.docx"
11	Nov 22,2022	LDN/UFN		

Blackwater			COMMENTS	
ADMIN				
ID	Comment Date	Reviewer Agency	Comment	Response
			have you quantified this for each of the route options and does this chosen route destroy less area of intact forest/other vegetated ecosystem than the other options?	<p>For context, the first four bullet points in FTLRP Section 8.1 refer to key benefits of the Proposed New Alignment (PNA) when compared to the original the 2015 Application/EIS TL alignment. Realignment of the transmission line was undertaken in collaboration with the CSFNs to avoid and further reduce potential effects of the transmission line on the environment and on Aboriginal rights and interests. A comparative effects assessment was documented in the following report: "BLACKWATER GOLD PROJECT - Effects Assessment of Proposed Change to Transmission Line Alignment Addendum Report" (ERM 2017), a copy of which will be provided with this ITT. For the purposes of that assessment intact forests was defined as: areas with low levels of landscape disturbance. Existing disturbance included: roads (located within 50 m of the TL), forestry cut-blocks created since 2000, forest fires occurring since 2000, and mountain pine beetle (MPB) affected timber with greater than 75% mortality since 2000.</p> <p>The PNA utilizes 9% more land classified as existing disturbance, thus preserving 9% more intact forest, than the Application/EIS TL alignment.</p> <p>The "Blackwater Gold Project – Consolidated Ecosystem Composition and Plant Species and Ecosystems at Risk Valued Components Effects Assessment" (ERM 2017) provides an evaluation and effects assessment of the PNA and re-route options, and will also be provided with the ITT responses. "Previously disturbed area", "intact forest area" or "area required for clearing" were not specifically quantified in the consolidated EA, which only considered the same ecosystem loss indicators as the original Application/EIS.</p>
12	Nov 22,2022	LDN/UFN	Have you quantified this statement? (the statement in the comment theme column)	The basis for this statement was overall conclusions identified during the environmental assessment process (see Blackwater Gold Project – Consolidated Wildlife Effects Assessment; ERM 2017). Qualitative metrics by potential route are calculated in the Consolidated EA and the document will be provided with this ITT.
13	Nov 22,2022	LDN/UFN	Section 8.2 states: "On October 2, 2022, Ministry of Land, Water and Resource Stewardship (formerly FLNRORD) indicated a desire to discuss with BW Gold, StFN, and NTBC, prior to issuance of the LOO permit, the best approach for construction methods and protections in consideration of the Wildlife Management Area and others' interests." Please clarify if this meeting has already happened. If the meeting has yet to be scheduled, kindly reach out to the CSFNs representatives and their technical team from Source to arrange an appropriate time to meet.	This meeting has not yet occurred, and BW Gold will communicate with CSFNs representatives and their technical team in regards to setting up a meeting to discuss.
14	28/Nov/22	CSFN	CSFNs have conducted a mapping exercise using the Environmental Stewardship Initiative (ESI) Biodiversity Management Areas (BMAs) and Moose area data as overlays on the Final Transmission Line route. CSFNs would like to meet with BW Gold to discuss how the route may intersect with these BMAs and discuss avoidance and/or mitigation as needed. We note that these BMA maps will be presented to BW Gold at a planned meeting on November 29, 2022.	BW Gold has been meeting with the CSFNs in regards to this matter and looks forward to continuing these discussions.
15	28/Nov/22	CSFN	Section 3.3 lists Transmission Line-specific management plans, in addition to EAC condition plans that apply to the Transmission Line. It is unclear which of the management plans have been developed, what is outstanding, and when they will be provided. Recommendation: Please clarify which of the Transmission Line management plans are completed and identify where these plans can be accessed by the Indigenous Nations for review. Please ensure the mitigation measures described in the Transmission Line management plans align with those in the management plans submitted as part of the Joint Mines Act/Environmental Management Act permits application and the EAC plans.	<p>The last of the TL-specific management plans was submitted on November 29, 2022. The TL-specific plans (i.e., non-EAC plans) available for TL MRC review are: Construction Environmental MP, Clearing Plan, Surface Erosion Prevention and Sediment Control Plan, Integrated Vegetation MP, Fuel Management and Spill Control Plan, Industrial and Domestic Waste MP, Archaeological and Cultural Heritage Resource MP, Air Quality and Fugitive Dust MP, Noise and Vibration MP, Vegetation and Access MP, Conceptual Reclamation Plan, Wildfire MP, Agriculture and Range MP.</p> <p>The plans have been drafted to align the mitigation measures with those committed to during the EA and subsequently, and also to align with the plans developed for other processes. The intent is to have TL-focused plans to key in on the effects potentially resulting from TL construction, operation and closure as well as the associated mitigation measures.</p>
16	28/Nov/22	CSFN	Old growth forests have significant ecological, social, and cultural value to the CSFNs. During the EA, CSFNs requested avoidance of old growth and intact forests along the Transmission Line route. Can BW Gold clarify the extent (in hectares) to which old growth or old Interior forests will be lost as a result of the Transmission Line Right of Way? Please indicate the loss in hectares for each CSFN territory. While BW Gold is not a forest tenure holder and may not have authorization to apply silviculture treatments or Forest Practices, CSFNs recommend a meeting with BW Gold, and the Ministry of Forests to discuss what options exist to implement such a practice. CSFNs support a similar comment made by UFN/LDN that the removal of such stands requires a corporate and social responsibility to enhance other mature growth areas and support attainment of old growth. Recommendation: CSFNs would like to meet with BW Gold and the Ministry of Forests to discuss actions BW Gold might take to enhance mature forest stands as compensation for the loss of equivalent old growth forests due to the Transmission Line Right of Way construction. Please also provide any available maps/files illustrating any old-growth areas along the Transmission Line route.	Please refer to memo LDN-UFN_Comment ID 17 Memo
17	28/Nov/22	CSFN	CSFNs request that their respective Environmental Monitors be involved in any field work and surveys conducted along the Transmission Line route. This comment has been made on several occasions, most recently at the November 17 monthly EMC meeting, where Kasandra Turbide (Saik'uz representative) reiterated it would be beneficial for CSFNs' Environmental Monitors to join the field studies. The monitors were not informed of the 2022 aerial survey work presented to the EMC. Recommendation: Please notify CSFNs of any planned field work well in advance of when they are scheduled for, such that the appropriate arrangements can be made for the Environmental Monitors to participate in the work.	<p>The reviewer comment is noted.</p> <p>BW Gold has no further field work planned on the TL prior to the start of construction. If need should arise for field work, BW Gold will contact and invite CSFNs participation.</p> <p>By way of its Aboriginal Groups Monitoring (AGM) Plan (EAC condition 17), BW Gold committed to hiring CSFNs AGMs starting with the start of major works construction with some specific provisions during TL construction. As the next phase of 'field work' will be focused on construction, the commitments within the AGM Plan should form a strong basis for future environmental monitoring work on the project and BW Gold looks forward to engaging with the CSFNs in implementing this plan.</p>
18	28/Nov/22	CSFN		

Blackwater				
ADMIN	COMMENTS			
ID	Comment Date	Reviewer Agency	Comment	Response
19	28/Nov/22	CSFN	CSFNs third comment in Table 5-2 begins with "ing in summer and fall 2022..." Please correct the typo. All acronyms are not listed in the section after the Table of Contents, e.g., IVMP and IIVMP. Ensure that all acronyms used in document are defined and listed in ACRONYMS AND ABBREVIATIONS	The sentence in Table 5-2 has been revised, as follows: "During meetings in summer and fall 2022, StFN raised access management to the TL corridor in the area between the Stellako River and north of Francois Lake Road as being of particular concern." Please refer to response to comment ID #1.
20	Final TL Routing Plan Phase 2 Table 5-2, pg. 10	LDN/UFN (Tom Braumandl)	Table states "Condition 23 states that a vegetation and access management plan must be created – these mitigation measures only mention an access management plan – please update". There is no mention of a TL specific access management plan. Concerns from other parties also mention access management concerns, which need to be addressed. Provide a TL Access Management plan.	Please refer to response to comment ID #2.
21	Final Transmission Line Routing Plan (Phase 2) Table 5-2, pg. 12	LDN/UFN (Tom Braumandl)	Ensure that all plans are referred to in this section are included in the References. Also provide a functional link to online versions of all plans so that content can be checked. Many assertions in document can not be verified without access to these plans.	Please refer to response to comment ID #3.
22	Final Transmission Line Routing Plan (Phase 2) 3.3 Linkages to Other Management Plans	LDN/UFN (Tom Braumandl)	Table states "Add a commitment to invite Aboriginal Group monitors to be involved in the construction and maintenance activities". No written evidence of this in this document. Please include.	Please refer to response to comment ID #4.
23	Final Transmission Line Routing Plan (Phase 2) Table 5-2, pg. 12	LDN/UFN (Tom Braumandl)	Table states "Provide a summary of how the Mitigation Table required by condition 43 has been/will be met through the implementation of a FTLRP". Again this is not clearly demonstrated by inclusion of a table in this document or specific reference to management plans that contain the specified mitigations. Please provide table in this document as there needs to be one central location where all mitigations can be seen.	Please refer to response to comment ID #5.
24	Final Transmission Line Routing Plan (Phase 2) Table 5-2, pg. 12	LDN/UFN (Tom Braumandl)	"Agreement to continue working with forest tenure holders to better understand the potential impacts to cut blocks and agreeing to discuss and provide reasonable compensation, where appropriate." Old growth forest that is part of provincial set asides will be affected. So not only tenure holders but FN's and Province need to be compensated for the loss of this VC. This needs to be detailed here	Please refer to response to comment ID #6.
25	Final Transmission Line Routing Plan (Phase 2) 5.2 Mitigation Measures to Address Issues Identified, pg 14	LDN/UFN (Tom Braumandl)	While a listing of mitigations are given in Phase 1 report, no specific listing of VC's affected by the TL is provided anywhere and so it is impossible to ascertain whether all needed mitigations have been detailed. Produce a table that identifies all VCs and how they may be affected and mitigated/compensated.	Please refer to response to comment ID #7.
26	Final Transmission Line Routing Plan (Phase 2) 5.2 Mitigation Measures to Address Issues Identified	LDN/UFN (Tom Braumandl)	you responded with "Vegetation will be maintained as required to ensure safe clearance limits." How or did you consider if the vegetation and reclaimed areas will match or be changed from the natural ecosystem?	Please refer to response to comment ID #8.
27	Final Transmission Line Routing Plan (Phase 2) Table 5-1: Summary of Comments Raised and BW Gold's Responses	LDN/UFN (Christina Delaney)	For Table 5-1 "Effects on sensitive habitat and wildlife" have you calculated a net 'disturbed areas' vs 'undisturbed areas' ratio? and how will sensitive habitat areas be offset?	Please refer to response to comment ID #9.
28	Final Transmission Line Routing Plan (Phase 2) Table 5-1: Summary of Comments Raised and BW Gold's Responses and Section 8.1 p.25 "aligning the TL in	LDN/UFN (Christina Delaney)		

Blackwater				
ADMIN		COMMENTS		
ID	Comment Date	Reviewer Agency	Comment	Response
29	Final Transmission Line Routing Plan (Phase 2) Table 5-2: Mitigation Measures to Address Concerns and Comments, pg. 10	LDN/UFN (Christina Delaney)	your response and "Extent to which Effects is Mitigated" does not address the commenter's concern for impacts to salmon spawning. Simply moving the impacts upstream or downstream out of this person's sight is not a mitigation of the habitat impact. This is not in line with LDN/UFN values, and the nations do not support a project that deals with environmental impacts in this manner.	Please refer to response to comment ID #10.
30	Final Transmission Line Routing Plan (Phase 2) Table 5-2: Mitigation Measures to Address Concerns and Comments, pg. 12	LDN/UFN (Christina Delaney)	"BW Gold responded to LDN and UFN on April 17, 2021 and committed: "Your input will be carried forward and integrated into the final mitigation measures that will be developed for the selected route alignment and form part of Phase 2 for the FTLRP Phase 2)". We look forward to seeing our input fully integrated into final mitigation measures.	Please refer to response to comment ID #11.
31	Final Transmission Line Routing Plan (Phase 2) 8.1 Identified Potential Effects and Mitigations in the SRWMA	LDN/UFN (Christina Delaney)	have you quantified this for each of the route options and does this chosen route destroy less area of intact forest/other vegetated ecosystem than the other options?	Please refer to response to comment ID #12.
32	Routing Plan (Phase 2) 8.1 Identified Potential Effects and Mitigations in the SRWMA	LDN/UFN (Christina Delaney)	Have you quantified this statement? (the statement in the comment theme column)	Please refer to response to comment ID #13.

Exhibit 13
Appendix to Country Foods Monitoring Plan (ITT)

Blackwater										
ADMIN	COMMENTS									
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response (February 18, 2022)	Response (August 2, 2022)
1	14-Feb-22	LDN/UFN	Table	Jessica Lowey	EMB Draft Country Foods Follow-up Program: Access, Availability, and Quality 03-02-2022	Slide 5		Where do perceived impacts lie within access, availability, and quality? How are you going to recognize that there are perceived effects on country foods from the Nations that will affect Aboriginal rights within this framework? The way it is framed now, you are reacting to an issue but not being proactive. Nations will avoid hunting/fishing/gathering areas because they perceive contamination from the project, how are you planning to address that?	As part of the 2022 Country Foods and Socio-economic Conditions Study (CFSEC Study and/or Report), BW Gold planned to ask questions regarding perceived/anticipated impacts of the Project related to country foods access, availability and quality through workshops, focus groups, and other engagement methods. BW Gold planned to incorporate information gained into reviewing and updating mitigation measures. However, LDN and UFN have expressed that their availability for this type of engagement is limited. In consideration of current capacity, BW Gold will share the draft 2022 CFSEC Study by email for their review, and data and input will be incorporated into this FUP and ongoing monitoring. BW Gold continues to invite Indigenous groups to provide information regarding perceived impacts	The draft 2022 Country Foods and Socio-economic Conditions Study (CFSEC Study), has been prepared using secondary sources of information (e.g., traditional knowledge/traditional land use studies, the Environmental Assessment Report, and other baseline data collected by the Project) and includes information, where available, regarding perceived impacts of the Project on country foods and socio-economic conditions. BW Gold has been engaging with LDN and UFN (e.g., through EMB meetings, email invitations) to participate in data collection for the CFSEC Study, including the provision of information regarding perceived impacts. The CFSEC Study is being prepared based on secondary sources. A draft of the Study will be distributed to the Nations by email prior to the start of Major Works. BW Gold continues to invite engagement with LDN and UFN based on their capacity and desired approaches, including through workshops, focus groups and/or key information interviews.
2	14-Feb-22	LDN/UFN	Table	Jessica Lowey	EMB Draft Country Foods Follow-up Program: Access, Availability, and Quality 03-02-2022	Slide 6		Want studies shared with Nations for review. Also want species like muskrat and beaver included in the species list for monitoring.	Chan et al (2011) study provided on DATE (to be updated by BW Gold) Beaver and muskrat have been included in the list of species to be monitored in this FUP. Jessica's note: Travis said they will have an updated section in country foods around small mammal sampling, whatever they land on will be carried through to the follow up program.	The Chan study is referenced in the draft FUP and can be accessed here: FNFNES Report-BC.indd (https://www.fnfnes.ca/docs/FNFNES_Report_BC_FINAL_PRINT_v2-lo.pdf). Beaver has been included in the list of species to be monitored in this FUP, based on information provided through wildlife studies, the CFMP and publicly available information. Muskrat are not included as a species to be monitored as part of the FUP, as there is no consistent source of data to support monitoring. The CFMP may receive donated samples, and in this case, quantitative data may be available to consider and inform monitoring as part of the FUP.
3	14-Feb-22	LDN/UFN	Table	Jessica Lowey	EMB Draft Country Foods Follow-up Program: Access, Availability, and Quality 03-02-2022	Slide 7		What is the buffer around linear corridors?	The buffer is 1.5km on either side of linear corridors, for a total of 3km. This spatial information has been described in the FUP in Section 1.4.	No update to this response.
4	14-Feb-22	LDN/UFN	Table	Jessica Lowey	EMB Draft Country Foods Follow-up Program: Access, Availability, and Quality 03-02-2022	Slide 7		What level of baseline data do you have on each of the species in the preliminary list and how does it relate to these areas? Request a memo from ERM on what baseline data exists.	Appendix B provides a table that indicates what species are used, consumed or important for Indigenous groups based on information provided to BW Gold in traditional knowledge/land use or related studies. Building on this information, the 2022 Country Foods Conditions Study will compile the existing baseline information pertaining to access, availability and quality for the species that are being monitored as part of this FUP. The baseline data will be gathered from traditional knowledge/traditional land use studies, the Environmental Assessment Report, and other baseline data collected by the Project (e.g., moose studies). This information will be validated in discussion with Indigenous groups as part of the study.	Appendix B provides a table that indicates what species are used, consumed or important for Indigenous groups based on information provided to BW Gold in traditional knowledge/land use or related studies. Building on this information, the 2022 CFSEC study has compiled secondary information pertaining to access, availability and quality for the species that are being monitored as part of this FUP. The draft CFSEC will be shared with Indigenous groups for comment, and BW Gold continues to offer the opportunity for Indigenous group to discuss and update the Study.
5	14-Feb-22	LDN/UFN	Table	Jessica Lowey	EMB Draft Country Foods Follow-up Program: Access, Availability, and Quality 03-02-2022	Slide 9		How current will "existing information" be since it has been multiple years since it was collected?	Traditional Land Use/Traditional Knowledge studies prepared for the Project include: Ethnohistory of Lhoosk'uz Dene Nation Traditional Territory (Dewhirst 2013); Traditional Land Use and Ecological Knowledge of the Proposed New Gold Inc. Blackwater Project, Final Report (DM Cultural Services Ltd. 2013); Stellat'en First Nation Land and Resource Use Study Report for New Gold Inc., October 2014 (Triton 2014); Traditional Land and Occupancy Study for the New Gold Blackwater Project, (Thomas 2015); Skin Tyee Traditional Land Use Study for New Gold Inc.'s Proposed Blackwater Project (DM Cultural Services Ltd. 2015); Nadleh Whut'en First Nation Knowledge and Use Report Non Confidential Report (Firelight Group 16); Assessment of Impacts of New Gold's Proposed Blackwater Gold Project on the Aboriginal Title, Rights and Interests of the Nazko First Nations (Upper Fraser Fisheries Conservations Alliance, 2017), Skin Tyee First Nation Traditional Land Use Study for New Gold Inc' Proposed Blackwater Project (DN Cultural Services Ltd., 2015)	In addition to the secondary sources listed in the February 18, 2022 response, current data that has been incorporated into the CFSEC Study includes baseline data from the CFMP and Wildlife Management baseline programs. The CFSEC Study is being prepared based on secondary sources, including information /baseline data collected as part of the WMMP. A draft of the Study will be distributed to the Nations by email prior to the start of Major Works. BW Gold continues to invite engagement with LDN and UFN based on their capacity and desired approaches, including through workshops, focus groups and/or key information interviews.

Blackwater										
ADMIN		COMMENTS								
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response (February 18, 2022)	Response (August 2, 2022)
6	14-Feb-22	LDN/UFN	Table	Jessica Lowey	EMB Draft Country Foods Follow-up Program: Access, Availability, and Quality 03-02-2022	Slide 9		I don't see anywhere in your schedule a contingency for if your information isn't validated, what if Nations disagree that this information is relevant?	The schedule is provided as a guidance on development of the 2022 Country Foods Conditions Study. Where timelines are unable to be met due to disagreements or delays, BW Gold will work with the Indigenous communities to identify a path forward.	The CFSEC Study is being prepared based on secondary sources, including information /baseline data collected as part of the WMMP. A draft of the Study will be distributed to the Nations by email prior to the start of Major Works. BW Gold continues to invite engagement with LDN and UFN based on their capacity and desired approaches, including through workshops, focus groups and/or key information interviews.
7	14-Feb-22	LDN/UFN	Table	Jessica Lowey	EMB Draft Country Foods Follow-up Program: Access, Availability, and Quality 03-02-2022	Slide 9		With the preliminary species list, what if you don't have any data on it? What is BW Golds approach-would you drop that species or do more studies? Not sure how you would do more studies with construction starting this year.	BW Gold will commit to gathering additional baseline data on a case by case basis for identified species. BW Gold understands that the data collected as part of the early works was limited in scope.	Since the draft of the FUP was shared (February 2022), changes to the list of species includes removal of muskrat, blue huckleberry, and small mammals due to limited information within secondary sources. The CFSEC Study is being prepared based on secondary sources, including information /baseline data collected as part of the WMMP. A draft of the Study will be distributed to the Nations by email prior to the start of Major Works. BW Gold continues to invite engagement with LDN and UFN based on their capacity and desired approaches, including through workshops, focus groups and/or key information interviews.
8	14-Feb-22	LDN/UFN	Table	Jessica Lowey	EMB Draft Country Foods Follow-up Program: Access, Availability, and Quality 03-02-2022	Slide 9		What is your minimum expectation for consultation? Recommend starting booking/organizing those meetings as soon as possible-give the Nations as much lead time as you can.	BW Gold will schedule engagement activities with as much notice as possible.	BW Gold presented a PowerPoint overview of the draft plan to LDN and UFN on February 14, 2022. Discussion during the presentation addresses a range of comments including, but not limited to consideration for perceived effects, importance of proactively addressing impacts to country foods, preliminary list of species being monitored, and the importance of the different levels of risk presented by different impacts. BW Gold received LDN and UFN comments on the draft presentation on February 16, 2022. BW Gold circulated a draft version of this FUP to LDN and UFN on February 18, 2022 by email. LDN and UFN provided comments on the draft FUP on March 10, 2022. BW Gold discussed revisions to the FUP with LDN and UFN on an Environmental Monitoring Board call (April 14, 2022), with a particular focus on discussion of the proposed socioeconomic components, requested by the Nations following their initial review of their FUP, that would be monitored as part of the FUP. Input received through discussion as well as responses to comments have supported the revisions to this FUP. In June 2022, BW Gold engaged LDN and UFN to discuss workshops, focus groups and/or key information interviews proposed to review, update and validate country foods and socio-economic conditions to be documented in the Country Foods and Socio-Economics Conditions Study (CFSEC Study). This approach is, and continues to be, BW Gold's desired approach to implement the FUP, recognizing the importance of community lived experience and perspectives in shaping the understanding of current conditions.
9	14-Feb-22	LDN/UFN	Table	Jessica Lowey	EMB Draft Country Foods Follow-up Program: Access, Availability, and Quality 03-02-2022	Slide 10		Want to see methods description.	Data sources for preliminary indicators for Monitoring Country Food Access, Availability and Quality are provided in Table 4.2-1. Methodology for data collection is outlined in each of the identified data sources.	No update to this response.
10	14-Feb-22	LDN/UFN	Table	Terryn Kuzyk	EMB Draft Country Foods Follow-up Program: Access, Availability, and Quality 03-02-2022	Slide 10		When you ran through the monitored effects, was there any consideration of the consequence effects in part C? How do they tie into country foods, would like to see a risk matrix-with probabilities.	Slide 10 presented a preliminary approach to the adaptive management triggers. In response to the discussion with LDN and UFN, as well as comments on the draft FUP, the adaptive management measures were updated in the FUP. Section 5.1 (Table 5-1) shows the thresholds for the identification of metal concentrations in fish tissue, surface water and berry/plant tissues (per the CFMP). The FUP outlines an approach where changes in metal concentrations in fish tissue, surface water and berry/plant tissues are triggered to respond differently (and more sensitively) than had been presented in Slide 10.	No update to this response.
11	14-Feb-22	LDN/UFN	Table	Jessica Lowey	EMB Draft Country Foods Follow-up Program: Access, Availability, and Quality 03-02-2022	General		How would Indigenous groups be participating in carrying this work out- have you identified opportunities other than validation?	Section 4.2 of the Country Foods Follow-Up Program on Access, Availability and Quality identifies planned ongoing follow-up monitoring, including how monitoring data from plans such as the Country Foods Monitoring Plan, Community Effects Monitoring and Management Plan Aboriginal Group Monitor and Monitoring Plan and the Country will inform the FUP.	There is an opportunity for Indigenous groups to participate in the Country Foods Monitoring Plan (CFMP) through the donation of small mammals for sampling. Information from any donated species may be used to inform the FUP. BW Gold will also continue to provide the results of studies for Indigenous groups to review and to provide opportunities for members of Indigenous groups to participate on field programs. The CFSEC Study is being prepared based on secondary sources. A draft of the Study will be distributed to the Nations by email prior to the start of Major Works. BW Gold continues to invite engagement with LDN and UFN based on their capacity and desired approaches, including through workshops, focus groups and/or key information interviews.
12	14-Feb-22	LDN/UFN	Table	Jessica Lowey	EMB Draft Country Foods Follow-up Program: Access, Availability, and Quality 03-02-2022	General		Request that the 2022 country foods condition report come out before major works starts.	Section 6.1 of the Country Foods Follow-Up Program on Access, Availability and Quality commits to providing the 2022 Country Foods Conditions Study prior to start of Major Works construction.	No update to this response.

Blackwater										
ADMIN	COMMENTS									
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response (February 18, 2022)	Response (August 2, 2022)
13	09-Mar-22	Indigenous Communities	Table	Steve Ross	Country Foods MONITORING FOLLOW UP PROGRAM	4.2.1 BW Gold Management and Monitoring Plan Data Compilation	ability to understand changes in wildlife availability	You mention that the Wildlife MMP will be used to assess changes to availability of wildlife species, however there is no provision for monitoring muskrat, blackbear or grouse in the WMMP. Incidental observation by staff will not be suitable to monitor change in availability so some thought is needed on how you will monitor these species. Moose and caribou surveys will employ pellet counts (and these species are covered regarding availability). You could potentially do grouse surveys during these pellet count surveys but this needs to be specified somewhere so we know where the data are coming from. Camera trapping is not currently being employed to the extent that will inform actual changes in availability. Muskrat and beaver also need some specific survey work as they are not covered by any monitoring work currently scheduled. Please add text on how you will survey each species in a table so it can be assessed regarding your ability to detect changes in availability, otherwise adding all of these species is misleading.	Appendix D (Table D-1) identifies the monitoring approaches that will support understanding changes in availability per species monitored in this FUP. It describes planned monitoring activities described in the WMMP and CFMP (which includes incidental and donated sampling of small mammals). No additional surveys will be conducted in relation to the FUP. Notwithstanding, BW Gold also encourages input from First Nations to support monitoring of country foods, and input from First Nations will be solicited from the Aboriginal Group Monitor and through the Country Foods Data Verification and Updates, described in Section 4.2.3. Data and information provided by First Nations can be quantitative and qualitative in nature.	No update to this response.
14	09-Mar-22	Indigenous Communities	Table	Steve Ross	Country Foods MONITORING FOLLOW UP PROGRAM	4.2.1 BW Gold Management and Monitoring Plan Data Compilation	No mention of the largest change in availability due to restricted access to the mine footprint	I assume the largest change in CF availability will be the direct removal of country foods access to the mine footprint itself, resulting in a loss of c. 47 km2 of country foods habitat. one of the first assessments should be what this restriction of use of the area will cost local people in terms of food access. This could be estimated through baseline data for wildlife and vegetation and past utilisation patterns of the mine footprint area by local people.	The FUP baseline report includes a number of approaches to consolidate and update harvesting information from Indigenous groups. This includes consolidation of harvesting information from TK and land use studies submitted by Indigenous groups to the proponent. This information will be reviewed and updates in workshops with Indigenous groups, and questions, outlined in the draft Country Food Information Guide will be used to understand additional information related to costs of harvesting activities. It is through these mechanisms that BW Gold will understand the impacts of direct removal of access to harvesting areas as well as impacts of changes in access, availability and quality. The draft Country Food Information Guide has been updated to specify that the inquiry related to change in effort includes monetary spend/costs associated with access. At the same time, BW Gold has included a number of other questions to allow Indigenous Groups to provide information related to harvesting information while protecting their financial information, as they see appropriate.	The CFSEC Study is being prepared based on secondary sources, including information /baseline data collected as part of the WMMP. A draft of the Study will be distributed to the Nations by email prior to the start of Major Works. BW Gold continues to invite engagement with LDN and UFN based on their capacity and desired approaches, including through workshops, focus groups and/or key information interviews,
15	09-Mar-22	Indigenous Communities	Table	Steve Ross	Country Foods MONITORING FOLLOW UP PROGRAM	Table 4.2;1 country foods access	MITIGATION MEASURE FOR COUNTRY FOODS ACCESS	Promoting a community feedback mechanism does not mitigate access, please insert the mitigation measure that could result in the community feedback.	Additional measures have been added to Table 4.2-1 related to mitigating impacts to change of access. These measures are in alignment with measures described in the Project's CEMMP. The measures include: • Use defined transportation routes, to the extent possible, and will be publicly disclosed so that land and road users are aware of the Project's transportation activities • Notification (e.g., by letter, phone call or text message) to registered tenure holders, Aboriginal Groups and stakeholders who have registered on the Project's email-or-SMS system (EAC Condition 42), at least 30 days before the planned activity. Notification will include description of the extent, duration, and anticipated disturbance, as well as BW Gold contact information in case of questions. • Provision of a schedule and maps where Project activities will take place on the Project's website (EAC Condition 42), and will be posted at least 30 days prior to the planned activities. • Notification (e.g., by letter, phone call, text or discussion with the Environmental Monitoring Board [EMB]) on the locations of access roads in relation to the transmission line construction, maintenance and decommissioning	In addition to the mitigation measures listed in the February 18, 2022 response, the following mitigation measure has been included in the FUP. • Implement the Community Feedback Mechanism (EAC Condition 37), facilitating real-time understanding and response to concerns or comments related to changes in access to harvesting locations

Blackwater										
ADMIN	COMMENTS									
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response (February 18, 2022)	Response (August 2, 2022)
16	09-Mar-22	Indigenous Communities	Table	Steve Ross	Country Foods MONITORING FOLLOW UP PROGRAM	table 4.2;2 - country foods quality		Establish wildlife cameras at salmon spawning streams in the wildlife RSA, that may record the condition/quality of wildlife - This will enable monitoring of bears but is a very subjective way to monitor condition, particularly if you are trying to link it back to potential environmental pollutants? I don't think this is really worth the effort best to focus on actual pollution concentrations in fish, vegetation and small mammals as this provides information that can reassure local communities that foods are safe and unpolluted and actual measures of animal abundance i.e. like musk rat surveys to assess changes due to the mine site. The rest of the measures are good.	Metal concentrations in air, soil, fish tissue, surface water and plants/berries is being monitored as part of the Country Foods Monitoring Plan which is a distinct but related monitoring plan.	Metal concentrations in air, soil, fish tissue, surface water and plants/berries that are identified through the Country Foods Monitoring Plan. While this will not enable the identification of Project related effects on country foods quality, it will provide an understanding of the quality of country foods that are being consumed and can be used to provide calibration of site-specific food chain models used to predict tissue concentrations in country foods. For the purposes of the FUP, monitoring results of the CFMP related to vegetation, fish and wildlife will be reviewed. This information will be used to understand any changes to the quality of country foods, as monitored in this FUP Data from wildlife cameras will be reviewed, where available. BW Gold recognizes that this information may be sporadic and also the interpretation of the data is subjective.
17	09-Mar-22	Indigenous Communities	Table	Jessica Lowey	Country Foods MONITORING FOLLOW UP PROGRAM	General		What were the EA assumptions that need validation and how will this be achieved? This should be front and center in this report.		Section 1.1.1 has been amended (reference moved from footnote to body of text) and indicates that EA's conclusion, as follows: "Based on a conclusion of no significant adverse effects from the Project to moose, the EA did not find any residual effects to food security from changes in the ability to hunt moose." Section 1.1 has also elaborated on the conclusion of the EA and how it relates to this FUP.
18	09-Mar-22	Indigenous Communities	Table		Country Foods MONITORING FOLLOW UP PROGRAM	General		How does all this relate back to the socio-economic wellbeing of impacted First Nations? This is not discussed.		This has been added to the FUP. Please refer to new section 3.1 (socio-economic conditions), and related updates in Section 4, Table 4-1 and Appendix C.
19	09-Mar-22	Indigenous Communities	Table		Country Foods MONITORING FOLLOW UP PROGRAM	1.1.1		Thank you for including an acknowledgement of the differing opinions that exist between the proponent, government and Nations!		BW Gold acknowledges the comment.
20	09-Mar-22	Indigenous Communities	Table	Jessica Lowey	Country Foods MONITORING FOLLOW UP PROGRAM	3	Access definition	Expand definition to include areas that fall within (i.e., overlap) and that may intersect the monitoring area (this matches bullet 1 better)		The definition for change in access in Section 3 and Figure 3-1 has been adjusted as follows: Access to country foods pertains to the ability to reach locations that intersect or are located within the monitoring area (Figure 1), where hunting, trapping, fishing and gathering may occur, or may commence or end.
21	09-Mar-22	Indigenous Communities	Table	Jessica Lowey	Country Foods MONITORING FOLLOW UP PROGRAM	3	Access definition	Second bullet - change in effort (e.g., time and expense) - please also include risk, as access to an area may result in a river crossing (as an example) that was not required previously. The reviewer is concerned that people who may not access an area legally (e.g., with a valid drivers license, a registered vehicle, etc.) may take additional risks to avoid interaction with the project, including interactions that may occur along transportation corridors		The definition for change in effect has been adjusted to include risk, as follows: -Change in effort (e.g., time, expense and/or risk) to access alternate harvesting areas as a result of the Project. This may relate to Project-related traffic delay resulting in additional time to undertake harvesting. It may relate to a change in effort to access an alternate harvesting location due to real or perceived impacts to country foods. It may relate to measures taken to prepare for or avoid risks to access harvesting areas (e.g., risks related to new river crossings to access alternate harvesting areas).
22	09-Mar-22	Indigenous Communities	Table	Jessica Lowey	Country Foods MONITORING FOLLOW UP PROGRAM	3	Access definition	Third bullet - how will BW Gold ensure that its staff/contractors are not contributing to increased use of the landbase by non-Indigenous harvesters? Has this been included in any policy or training? This same comment applies to the second bullet under Availability		As described in the Wildlife Mitigation and Management Plan (WMMP), BW Gold has committed that: • Employees and contractors are prohibited from hunting, trapping, fishing and gathering for purposes not associated with the Project. Members of Aboriginal Groups exercising Aboriginal Interests are exempted where safe to do so; • Firearms are prohibited on the mine site; and • Personnel are prohibited from feeding and/or harassing wildlife This information will be included in mine safety training for the areas covered by the permit.
23	09-Mar-22	Indigenous Communities	Table	Jessica Lowey	Country Foods MONITORING FOLLOW UP PROGRAM	3	Availability definition	First bullet - does BW Gold have sufficient baseline data on wildlife species to be able to monitor for such changes? What variables will be monitored? What methods will be used? What triggers have been established?		Appendix D (Table D-1) identifies the monitoring approaches that will support understanding changes in availability per species monitored in this FUP. It describes planned monitoring activities described in the CFMP. No additional surveys will be conducted in relation to the FUP. BW Gold also encourages input from Indigenous groups to support monitoring of country foods, and input from Indigenous groups will be solicited from workshops, focus groups, and interviews (at the request of Indigenous groups), and the Aboriginal Group Monitor described in Section 4.2.3. Data and information provided by Indigenous groups can be quantitative and qualitative in nature.
24	09-Mar-22	Indigenous Communities	Table	Jessica Lowey	Country Foods MONITORING FOLLOW UP PROGRAM	3	Availability definition	Second bullet - see comment ID8 - how can this be measured? What mitigations can be implemented?		Changes in harvest success due to increased access by non-Indigenous harvesters will require input from First Nations. BW Gold will solicit input from Indigenous groups to support monitoring of country foods availability. This will include soliciting input from the Aboriginal Group Monitor and through country foods data verification and updates engagements requested by the Indigenous groups (Section 4.2.3). BW Gold has committed to implement a no fishing, no hunting (including no trapping), no gathering and no firearms policies for Project employees and contractors while traveling to and from the mine, residing on the mine site or while on company business to mitigate pressure on country foods harvesting.

Blackwater										
ADMIN	COMMENTS									
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response (February 18, 2022)	Response (August 2, 2022)
25	09-Mar-22	Indigenous Communities	Table	Jessica Lowey	Country Foods MONITORING FOLLOW UP PROGRAM	3	Availability definition	Third bullet - who is monitoring this? How is it being reported? How can this be tied back to the project?		Appendix D (Table D-1) identifies the monitoring approaches that will support understanding changes in availability per species monitored in this FUP. It describes planned monitoring activities described in the CFMP. No additional surveys will be conducted in relation to the FUP. Notwithstanding, BW Gold also encourages input from Indigenous groups to support monitoring of country foods, and input from Indigenous groups will be solicited from workshops, focus groups, and interviews (at the request of First Nations), and the Aboriginal Group Monitor described in Section 4.2.3. Data and information provided by Indigenous groups can be quantitative and qualitative in nature.
26	09-Mar-22	Indigenous Communities	Table	Jessica Lowey	Country Foods MONITORING FOLLOW UP PROGRAM	3	Quality definition	First bullet - this monitoring should be expanded to include other variables - this was discussed on Feb 14, 2022 - using coat quality (assuming visual monitoring) is not a reliable measure of quality of wildlife harvested		Section 3 of the FUP has been revised and the examples of potential changes to visual appearance of harvested wildlife includes: quality of coat such as length and thickness, observations of parasites on skin/coat, observations of patches of missing fur species girth, observation of any skeleton protrusions like ribs or spine.
27	09-Mar-22	Indigenous Communities	Table	Jessica Lowey	Country Foods MONITORING FOLLOW UP PROGRAM	3	Quality definition	Second bullet - likely a better indication than "quality of fish skin" would be presence/absence of abnormalities		Section 3 of the FUP has been revised. The example of change in fish quality has been adjusted to reference the presence or absence of abnormalities.
28	09-Mar-22	Indigenous Communities	Table	Jessica Lowey	Country Foods MONITORING FOLLOW UP PROGRAM	3	Quality definition	Third bullet - please add consideration of other impacts, including the potential for changes in hydrologic regimes along linear features (e.g., wilting, change in spatial extent of a species/change in plant community)		The FUP Section 3 has been revised, and the bullet related to change in visual appearance of vegetation states: "Change to visual appearance of vegetation (e.g., presence of dust, wilting, change in spatial extent of a species/change in plant community)"
29	09-Mar-22	Indigenous Communities	Table	Jessica Lowey	Country Foods MONITORING FOLLOW UP PROGRAM	4		Perhaps a better term than "pre-Project" would be pre-construction or pre-operation? Updates required throughout if changed.		The FUP has been revised from referencing "pre-Project" to "country foods harvesting conditions in 2022".
30	09-Mar-22	Indigenous Communities	Table	Jessica Lowey	Country Foods MONITORING FOLLOW UP PROGRAM	4.1		How can you accomplish so much before any additional changes occur at the site? A detailed workplan should be provided that indicates how BW Gold will solicit this information and when. There is mention on this page about Major Works as an important point in time (i.e., indicates the start of the project) but this is misleading. Impacts will begin with Early Works construction activities and this should be reflected		The CFSEC Study is being prepared based on secondary sources, including information /baseline data collected as part of the WMMP. A draft of the Study will be distributed to the Nations by email prior to the start of Major Works. BW Gold continues to invite engagement with LDN and UFN based on their capacity and desired approaches, including through workshops, focus groups and/or key information interviews.
31	09-Mar-22	Indigenous Communities	Table	Jessica Lowey	Country Foods MONITORING FOLLOW UP PROGRAM	4.1		Fifth bullet - as discussed on Feb 14, 2022, "how much" will be very difficult to collect - BW Gold should consider why this information is important and how it would be used before committing to using this as a measurable variable in the plan. The reviewer believes that this level of detail is unnecessary, and to focus on the reasons why harvesting levels may drop off in the areas surrounding the Project instead		The development of the CFSEC Study aims to identify environmental changes over time, as required by DS 2.5.4. Information and perceptions of Indigenous groups will be used to understand current conditions, when and if such information is provided. Section 4.1 has been revised since comments were received (March) and the bullets/approach has been modified. The modifications reflect, in part, considerations by the LDN and UFN regarding current capacity limitations to participate in workshops, focus groups and/or key information interviews. A draft of the Study will be distributed to the Indigenous groups by email prior to the start of Major Works. BW Gold continues to invite engagement and is open to participating in workshops, focus groups, and other engagement activities by request.
32	09-Mar-22	Indigenous Communities	Table	Jessica Lowey	Country Foods MONITORING FOLLOW UP PROGRAM	4.1		Seventh bullet - how?		The development of the CFSEC Study aims to identify environmental changes over time, as required by DS 2.5.4. Information and perceptions of Indigenous groups will be used to understand current conditions, when and if such information is provided. Section 4.1 has been revised since comments were received (March) and the bullets/approach has been modified. The modifications reflect, in part, considerations by the LDN and UFN regarding current capacity limitations to participate in workshops, focus groups and/or key information interviews. A draft of the Study will be distributed to the Indigenous groups by email prior to the start of Major Works. BW Gold continues to invite engagement and is open to participating in workshops, focus groups, and other engagement activities by request.
33	09-Mar-22	Indigenous Communities	Table	Jessica Lowey	Country Foods MONITORING FOLLOW UP PROGRAM	Page 10		BW Gold and Indigenous groups may choose to refine the families or households that are engaged... consider using culturally appropriate wording for these groups (e.g., keyohs/keyahs)?		The FUP has been revised and references keyoh and keyah holders throughout the FUP with respect to those people or groups that may be involved in focus groups or workshops for the CFSEC Study and monitoring associated with this FUP
34	09-Mar-22	Indigenous Communities	Table	Jessica Lowey	Country Foods MONITORING FOLLOW UP PROGRAM	Page 10		Reconsider the term "leverage the knowledge of land users..."		Section 4 of the FUP has been revised as follows: As part of the discussion, BW Gold and Indigenous groups may choose to refine the families, keyoh/keyah holders, land users that are engaged in data validation and update in an effort to incorporate the knowledge of land users that frequent areas in and around the FUP monitoring area.

Blackwater										
ADMIN	COMMENTS									
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response (February 18, 2022)	Response (August 2, 2022)
35	09-Mar-22	Indigenous Communities	Table	Jessica Lowey	Country Foods MONITORING FOLLOW UP PROGRAM	Table 4-1		General comment - have the Nations provided input on use of species to inform this table? Why would this information not be coming from the Nations directly? You have had time to make the effort to reach out on this. This table needs to be totally revamped in the reviewer's opinion.		The information included in Table 4-1 was prepared based on information presented in Tables B-1, B-2, and B-3. Tables B-1, B-2 and B-3 was presented during the EA as part of the assessment on Current Use of Land and Resources for Traditional Purposes (ERM 2016), and were developed based on information presented by Indigenous groups in their traditional knowledge, land use and ethnography studies presented for the Project, as well as the "Part C" report authored by Keefer. As such, information from these tables has been provided directly by the Indigenous groups, although the intent of the traditional knowledge, land use and ethnography studies was not focused specifically on country foods.
36	09-Mar-22	Indigenous Communities	Table	Jessica Lowey	Country Foods MONITORING FOLLOW UP PROGRAM	Table 4-1		Why does LDN not use black huckleberry? Mushrooms? This doesn't seem correct...		A footnote has been included in the FUP as follows: Information presented in Table 4-1 focuses on the species proposed for monitoring in this FUP. The information in Table 4-1 has been taken from the tables in Appendix B, which were prepared during the EA as part of the assessment on Current Use of Land and Resources for Traditional Purposes (ERM 2016). The absence of information about species use presented in Table 4-1 is not intended to mean there is no use of the species by a First Nation. The CFSEC Study intends to validate and update information presented in Table 4-1
37	09-Mar-22	Indigenous Communities	Table	Jessica Lowey	Country Foods MONITORING FOLLOW UP PROGRAM	Table 4-1		Consider removing blue huckleberry if not used?		A footnote has been included in the FUP as follows: Information presented in Table 4-1 focuses on the species proposed for monitoring in this FUP. The information in Table 4-1 has been taken from the tables in Appendix B, which were prepared during the EA as part of the assessment on Current Use of Land and Resources for Traditional Purposes (ERM 2016). The absence of information about species use presented in Table 4-1 is not intended to mean there is no use of the species by a First Nation. The CFSEC Study intends to validate and update information presented in Table 4-1
38	09-Mar-22	Indigenous Communities	Table	Jessica Lowey	Country Foods MONITORING FOLLOW UP PROGRAM	Table 4-1		Has this plan been updated to include recent updates to the CFMP to include small mammal sampling?		One aspect of the CFMP small mammal sampling is focused on rodents and is not relevant to this plan as it does not involve species that are consumed. The other component of the CFMP small mammal program is the analysis of donated tissue samples. This could be small or large mammals hunted or trapped within the CFMP study area. Given there is no baseline data collection effort associated with the donated sample program, data and trends related to changes in metal level in small mammals will not be included in the FUP or CFSEC Study.
39	09-Mar-22	Indigenous Communities	Table	Jessica Lowey	Country Foods MONITORING FOLLOW UP PROGRAM	4.1.1		Please add relevant documents like the Ulkatcho First Nation Medicinal and Plant Foods book, TUS, TEK, etc.		Section 4.1.1 has been revised as follows: Information from additional resources provided by Indigenous groups (e.g., a digital copy of the Ulkatcho Food and Medicine Plants Book) will be reviewed and collated as part of this current conditions study. Available TUS/TEK studies, as well as the Part C report authored by Keefer have informed the CFSEC Study as well. The CFSEC Study will be used to inform future iterations of the FUP.
40	09-Mar-22	Indigenous Communities	Table	Jessica Lowey	Country Foods MONITORING FOLLOW UP PROGRAM	4.2.1		Include reference to the CMMP in addition to the WMMP		Section 4.2.1 references several BW Gold plans including Country Foods Monitoring Plan, Wildlife Management and Monitoring Plan, Aboring Group Mitigation and Monitoring Plan, Community Effects Mitigation and Monitoring Plan
41	09-Mar-22	Indigenous Communities	Table	Jessica Lowey	Country Foods MONITORING FOLLOW UP PROGRAM	4.2.3		The workshops and/or focus groups will include a spatial component of data collection where Indigenous group members can identify and detail country foods access, availability and quality please clarify what this means. How can visual quality (for example) be assessed this way?		The CFSEC Study is being prepared based on secondary sources, including information /baseline data collected as part of the WMMP. A draft of the Study will be distributed to the Nations by email prior to the start of Major Works. BW Gold continues to invite engagement with LDN and UFN based on their capacity and desired approaches, including through workshops, focus groups and/or key information interviews.
42	09-Mar-22	Indigenous Communities	Table	Jessica Lowey	Country Foods MONITORING FOLLOW UP PROGRAM	4.2.3		Use of "family units" see comment ID21		Section 4.2.3 of the FUP has been revised and references keyoh and keyah holders throughout the FUP with respect to those people or groups.
43	09-Mar-22	Indigenous Communities	Table	Jessica Lowey	Country Foods MONITORING FOLLOW UP PROGRAM	Table 4.2-1		What is the Community Feedback Mechanism intended to mitigate exactly, with respect to access?		The Community Feedback Mechanism provides BW Gold with a lens on concerns and complaints in real-time. As such, in the case that a complaint arises around access to harvesting location (e.g., obstructed access due to construction), BW Gold is able to respond to and work with affected individuals in a timely manner.
44	09-Mar-22	Indigenous Communities	Table	Jessica Lowey	Country Foods MONITORING FOLLOW UP PROGRAM	Table 4.2-1		What is the purpose of identifying alternative harvesting/fishing areas?		Information about alternative locations accessed for harvesting activities supports an understanding of the change in effort (e.g., time, resources, risk) to undertake harvesting activities. For example if a berry picking location is avoided due to the project, it is useful to understand the effort required of harvesters to access alternate country foods.
45	09-Mar-22	Indigenous Communities	Table	Jessica Lowey	Country Foods MONITORING FOLLOW UP PROGRAM	Table 4.2-1		Implement wildlife sighting reporting		Table 4-2 has been updated to include wildlife sighting reporting as part of monitoring country food availability. In accordance with the WMMP, wildlife sightings will be reported and tracked, and these incidental data are often valuable for indicating general trends or patterns over time.

Blackwater										
ADMIN	COMMENTS									
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response (February 18, 2022)	Response (August 2, 2022)
46	09-Mar-22	Indigenous Communities	Table	Jessica Lowey	Country Foods MONITORING FOLLOW UP PROGRAM	Table 5-1	Invasive species	Do you have baseline data for invasive species (plants especially) - this might be an important consideration when committing to "presence of one (1) invasive species identified in the monitoring area" - especially along roads - this may also mean that there is a sliding scale for invasives (e.g., invasive plants are not increasing in distribution, no new plants identified, no plants on the provincial EDRR list - versus - presence of one invasive animal species)		Section 7 of the Invasive Species Management Plan provides a baseline summary of invasive plants. The baseline indicates that "Field surveys found one invasive plant species, yellow salsify (<i>Tragopogon dubius</i>), on the southern boundary of the mine site and orange hawkweed (<i>Hieracium aurantiacum</i>) was identified just outside the LSA along the Klusus FSR northeast of the junction of the Mine Access Road (AMEC 2013), and at the northern end of the TL." Table 5-1 of the FUP has been revised as suggested to account for a sliding scale of change in relation to invasive plant species.
47	09-Mar-22	Indigenous Communities	Table	Jessica Lowey	Country Foods MONITORING FOLLOW UP PROGRAM	Table 5-1	Collisions	What about vehicle collisions with other species? Just reporting on moose may result in a gross under-reporting of wildlife incidents and may result in unexpected impacts to other species that are otherwise not monitored. Consider updating this commitment		Section 2.2 of the WMMP notes that the WMMP annual report will report on wildlife compliance measures undertaken in a calendar year. The report will be compiled during the Construction and Operations phases of the Project as described in Section 5.2. Moose vehicle collision monitoring is described in Section 4.4.3.2 of the WMMP. Grizzly Bear-vehicle collision monitoring is described in Section 4.6.3.2 of the WMMP. Sections 3.6.2 and 5.1.1 describe wildlife activity on roadways and reporting incident response records respectively.
48	09-Mar-22	Indigenous Communities	Table	Jessica Lowey	Country Foods MONITORING FOLLOW UP PROGRAM	6		How will information be shared with the Nations? Email? What does the AGEP say about disseminating information?		Section 2 of the FUP outlines the approach to engagement, and has been developed in concordance with requirements of Condition 2.4 of the DS. Section 6 of the FUP has been revised to indicate that materials will be provided by email to Indigenous groups for review and that each Indigenous group will be canvassed by email for potential meeting dates to discuss reports (including the draft CFSEC Report). The approach to consultation and information dissemination aligns with requirements of the AGEP (a requirement of the EAC) which outlines that BW Gold will invite Aboriginal Groups by email to participate in an annual review of updates to EAC plans, programs or other documents (e.g., FUP as required by the DS 6.13) and to seek their view on the implementation of the requirements of the Certificate generally. BW Gold will prepare separate tables to track comments submitted by each Aboriginal Group and provide responses to each comment. BW Gold will canvas each Aboriginal Group by email for potential meeting dates to discuss the BW Gold responses. BW Gold will seek to circulate a meeting agenda and the completed tracking table to Aboriginal Groups in advance of the meeting. BW Gold will take meeting summaries, and share draft summaries with nations, in order to seek consensus on the meeting summary before finalizing. The summaries will clearly and impartially capture the matters discussed, responses, what decisions were taken, recommendations identified, action items agreed upon, and to whom they were assigned. Where consensus is not reached on a summary's characterization of the discussion or outcome, BW Gold will include non-consensus comments as part of the summary and consultation record. Updated EAC plans, programs and documents will be provided to each Aboriginal Group and the EAO along with completed tracking tables.

Exhibit 14
Cultural and Spiritual Resources Management Plan (ITT)

Round 1 Comments
Round 2 Comments

Blackwater										
ADMIN										
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response	Author
1	12/Nov/21	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 7	General	"Pursuant to Heritage Inspection Permit 2021-0322, an AIA is being undertaken on the portion of the transmission line alignment that has not yet been surveyed due to changes made to the alignment during the environmental assessment in response to Indigenous concerns." Change wording.	Changed to "for" in section 7.2.	ERM
1	12/Jan/22	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 7	General	Resolved	BW acknowledges the comment.	ERM
2	12/Nov/21	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 7.3.3	General	"Kuyakuz (also referred to as K'ai k'uz) Mountain and Kuyakuz Lake are located to the west of the mine site. Kuyakuz Mountain is located to the east of the mine site." Is Kuyakuz mountain east or west of the mine site?	Text has been changed in section 6.3.3 as follows: Kuyakuz (also referred to as K'ai k'uz) Mountain and Kuyakuz Lake are located to the east of the mine site.	ERM
2	12/Jan/22	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 7.3.3	General	Resolved		ERM
3	12/Nov/21	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 8.1.1	Cultural & Social	What is the justification for the 30 m buffer?	The buffer in 7.1.1 has been changed to 50 m to align with Archaeology Branch mapping (Remote Access to Archaeological Data System).	ERM
3	12/Jan/22	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 8.1.1	Cultural & Social	Resolved		ERM
4	12/Nov/21	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 8.1.1	General	"Annual monitoring (Section 10.2) of the site." Should be Section 10.1.2	Annual monitoring is now discussed in section 10.2.2.	ERM
4	12/Jan/22	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 8.1.1	General	Resolved		ERM
5	12/Nov/21	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 8.1.1	Cultural & Social	"If impacts on archaeological sites have occurred mitigation measures will be required." Provide more specific detail on steps taken/people involved if archaeological sites are impacted.	The steps to be taken and people involved will depend on the site location and level of impact (Note now section 7.1.1).	ERM
5	12/Jan/22	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 8.1.1	Cultural & Social	Section 7.1.1 does not exist - no elaboration on this	The bullet "If impacts on archaeological sites have occurred mitigation measures will be required." has been removed from the text. The intent of this measure is covered by the third bullet in Section 8.1.1: "If the impacts to the site will occur then mitigation must be conducted prior to impact. Procedures to record, analyse and mitigate effects on a site will be determined in consultation with the BC Archaeology Branch and affected Indigenous groups as per the Heritage Conservation Act permit and carried out by an archaeologist under a Heritage Conservation Act (Section 12.2 heritage investigation and/or Section 12.4 site alteration permits). Mitigation measures will be dependent on the specifics of the archaeological site and the levels of impact. Mitigations generally involve detailed mapping, photography, and systematic data recovery through surface collection and controlled excavations of evaluative units if subsurface deposits are present."	ERM
6	12/Nov/21	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 8.2	General	"Indigenous representatives and/or Indigenous Knowledge Holders from will be invited to be involved, and/or, identify representatives who will be involved, in the assessment." Change wording for more clarity.	The first paragraph in section 7.2 includes the following statement: "Indigenous representatives and/or Indigenous Knowledge Holders from the affected Aboriginal Groups will be invited to be involved, and/or, identify representatives who will be involved, in the assessment."	ERM
6	12/Jan/22	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 8.2	General	Resolved		ERM
7	12/Nov/21	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 10.1.1	Cultural & Social	What types of barriers will be used to delineate no work zones?	Following text added to section 9.2.1: "Sites that are identified by Indigenous groups as confidential will be depicted as polygons, including an area of at least 50 m around the site, on Project maps and marked as a "No Work Zones" around the site but will not be delineated on the ground. These sites will be monitored by the EM and Aboriginal Monitors during construction in the vicinity of the site, including construction during the phased increases to the mill nameplate throughput."	ERM
7	12/Jan/22	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 10.1.1	Cultural & Social	Resolved		ERM
8	12/Nov/21	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 11.1	Cultural & Social	"Reporting will comply with the Heritage Conservation Act permitting conditions and the Chance Find Procedure (Appendix C)." Provide more detail on scope, timing, etc. of reporting/record keeping (for reporting other than the Chance find report form).	Section 10.1 now reads: "Reporting will comply with Heritage Conservation Act permitting conditions and the Chance Find Procedure (Appendix C). Final permit reporting required under the Act will be submitted to the Archaeology Branch and Aboriginal Groups by the Project Archaeologist on, or before, the permit expiry. Site forms will be submitted by the Project Archaeologist within six (6) weeks of the completion of site investigations. Interim reports will be submitted to the Archaeology Branch on an as required basis to provide management recommendations. The process for reporting information related to archaeological and cultural heritage resources to impacted Indigenous communities will be informed by agreements with Aboriginal Groups, where they are in place. Reports will be provided in electronic format (MS Word or PDF) and via email. Records will be kept on file with the BW Gold EM as described in Section 10.2."	ERM
8	12/Jan/22	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 11.1	Cultural & Social	Resolved		ERM
9	12/Nov/21	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 11.1.3	General	"A record of monitoring activities will be kept taken as this information will be summarized in a Heritage Site Monitoring Report to be provided to the Project Archaeologist and affected Indigenous groups, as well as the Archaeology Branch if an archaeological site is impacted." Adjust wording for more clarity.	Text in section 10.1.3 (Annual Monitoring Report) adjusted to clarify the wording.	ERM
9	12/Jan/22	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 11.1.3	General	Resolved		ERM
10	12/Nov/21	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 11.2	Cultural & Social	"The EM is responsible for data management and reporting related to heritage resources. The data management system will include conducting routine inspections and monitoring, and providing these results to appropriate parties as required." Define "routine" for inspections/monitoring - timing and frequency?	The first paragraph in section 10.2 now as follows: "The BW Gold EM is responsible for data management and reporting related to heritage resources. The data management system will include the results from monitoring activities (Section 9.2), including chance finds, AIAs, No Work Zones that were established, and consultation with Indigenous groups. The data management system will also record when monitoring results have been provided to relevant parties as required by EAC and DS conditions. The EM will also report chance finds to the Project Archaeologist and Indigenous groups within 24 hours of a discovery. The Project Archaeologist will report chance finds to the BC Archaeology Branch."	ERM
10	12/Jan/22	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 11.2	Cultural & Social	Resolved		ERM
11	12/Nov/21	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	General	Compliance	Condition 2.2: "If unable to minimize the adverse effect, the Proponent shall compensate for the adverse environmental effect of the Designated Project." Explain/provide detail on how impacts will be compensated for if unable to minimise the adverse effect.	Heritage sites cannot be altered or changed without a permit under the BC Heritage Conservation Act. Offences penalties (fines or imprisonment) are identified under Section 36 of the Act.	ERM

Blackwater										
ADMIN										
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response	Author
11	12/Jan/22	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	General	Compliance	Resolved		ERM
12	12/Nov/21	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 10	Compliance	Condition 2.3 "invites the party to provide its views on the content of such plan, program or other document; and indicates if there is a timeframe for providing their views so that the party may provide such views to the Holder within such time frame (the timeframe for providing such views will be a reasonable period)." Should be no less than 15 days.	Bullet revised in section 10.1 as follows: "invites the party to provide its views on the content of such plan, program or other document; and indicates if there is a timeframe (no less than 15 days) for providing their views so that the party may provide such views to the Holder within such time frame;"	ERM
12	12/Jan/22	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 10	Compliance	Resolved		ERM
13	12/Nov/21	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 10	Cultural & Social	DS 2.3.4 "strive to reach consensus with Indigenous groups" include in plan implementation.	The following text has been added to section 10.1: "Where views diverge, BW Gold will strive to reach consensus with Indigenous groups on implementation of the plan."	ERM
13	12/Jan/22	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 10	Cultural & Social	Resolved		ERM
14	12/Nov/21	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 10	Cultural & Social	"provide a written explanation of how the views and information provided have been considered and addressed in a revised version of the plan, program or other document" Include: "Proponent shall advise the party or parties in a time period that does not exceed the period of time taken in 2.3.2 (time period for parties to prepare their views and information).	Bullet in section 10.1 revised to include time period as follows: "Where views diverge, BW Gold will strive to reach consensus with Indigenous groups on implementation of the plan. The written explanation will be provided within 15 days unless otherwise agreed between BW Gold and the Indigenous groups;"	ERM
14	12/Jan/22	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 10	Cultural & Social	Resolved		ERM
15	12/Nov/21	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	General	Compliance	Condition 2.4: Include information regarding: the methods of notification, the type of information and the period of time to be provided when seeking input, the process to be used by the Proponent to undertake impartial consideration of all views and the information presented on the subject of the consultation, and the period of time and the means by which to advise Indigenous groups of how their views and information were considered by the Proponent.	Section 10.1 has been revised to document the procedure to be followed when seeking comments on written reports.	ERM
15	12/Jan/22	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	General	Compliance	Resolved		ERM
16	12/Nov/21	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 11.1.1	Compliance	Provide more detail on the scope/requirements of what will be included in the annual report: Condition 2.11.1 - 2.11.8	Section 10.1.1 has been revised to provide additional information on the annual report.	ERM
16	12/Jan/22	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 11.1.1	Compliance	Resolved		ERM
17	12/Nov/21	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 11.1.1	Compliance	Include detail on Condition 2.14 Information Sharing - "The Proponent shall publish on the internet, or any medium which is publicly available, the annual reports and the executive summaries...The Proponent shall notify the Agency and Indigenous groups of the availability of these documents within 48 hours of their publication".	DS Condition 2.14 requirement is included in section 10.1.1.	ERM
17	12/Jan/22	LDN/UFN			Cultural and Spiritual Resources Management Plan	Section 11.1.1	Compliance	Section 10.1.1 is "Construction Monitoring" and thus does not provide any details on information sharing.	The management plan has been updated to include the following in Section 11: "Reporting is required under the Heritage Conservation Act, DS Condition 2.11-2.14, and EAC Conditions 5 and 18h. In addition, reporting will be completed in accordance with the reporting outlined in the Aboriginal Group Engagement Plan and Aboriginal Group Monitor and Monitoring Plan." The following has been added to Section 11.1.1: DS Condition 2.14 requires: "The Proponent [BW Gold] shall publish on the internet, or any medium which is publicly available, the annual reports and the executive summaries referred to in conditions 2.11 and 2.13. The Proponent shall keep these documents publicly available for 25 years following the end of decommissioning of the Designated Project. The Proponent shall notify the Agency and Indigenous groups of the availability of these documents within 48 hours of their publication."	ERM
18	12/Nov/21	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 11.1.1	Compliance	Condition 2.15 - "When the development of any plan is a requirement of a condition set out in this Decision Statement, the Proponent shall submit the plan to the Agency and to Indigenous groups prior to construction, unless otherwise required through the condition." Not outlined in section 11.1.1.	DS Condition 2.15 requirement is included in section 10.1.1 and section 9 includes the following statement: "The CSMP will be provided to the EAO, IAAC, EMLI, ENV, Indigenous groups and FLNRORD prior to commencement of construction."	ERM
18	12/Jan/22	LDN/UFN		Danny Smart	Cultural and Spiritual Resources Management Plan	Section 11.1.1	Compliance	As per comment ID 18, this response is not found in the document. Please review and add. The CSMP will be provided to the EAO, IAAC, EMLI, ENV, Indigenous groups and FLNRORD prior to commencement of construction.	The management plan has been updated to include the following in Section 11.1.1. DS Condition 2.15 requires: "When the development of any plan is a requirement of a condition set out in this Decision Statement, the Proponent [BW Gold] shall submit the plan to the Agency and to Indigenous groups prior to construction, unless otherwise required through the condition." Section 10 includes the following statement: "The CSMP will be provided to the EAO, IAAC, EMLI, ENV, Indigenous groups and FLNRORD prior to commencement of construction." Section 12 includes the statement: "BW Gold will provide revised drafts of the CSMP to Indigenous groups, EMPR, ENV and FLNRORD for review and comment a minimum of 30 days prior to submitting the revised CSMP to the EAO and IAAC. Revised copies of the plan will be provided to Indigenous groups, EMLI, ENV and FLNRORD."	ERM
19	12/Nov/21	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 8.3 and 9	Compliance	Condition 7.2: "The Proponent shall have a QP develop an archaeological and heritage management plan for any structures, sites, or things of historical, archaeological, paleontological, or architectural significance within the Project Area" Should this be a separate, stand-alone plan?	The CSMP addresses the requirements in DS Condition 7 as stated in section 4.2 of the plan.	ERM
19	12/Jan/22	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 8.3 and 9	Compliance	Resolved		ERM
20	12/Nov/21	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 8.3 and 9	Compliance	Condition 7.2.1: "Protocols to respect the discovery, handling, recognition, recording, transferring and safekeeping of structures, sites or things of historical, archaeological, paleontological or architectural significance" Provide more detail on these protocols. Within Section 8.3 and 9 (as noted in Concordance table), only process of identification and confidentiality are covered.	Text to section 7 regarding repositories for housing artifacts and material recovered from archaeological and paleontological sites.	ERM
20	12/Jan/22	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 8.3 and 9	Compliance	Resolved		ERM
21	12/Nov/21	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 11.2	Compliance	Condition 7.2.2: Concordance table notes that Condition 7.2.2 is addressed in Section 11.2. However, Section 11.2 does not cover procedures to analyze or mitigate the effects on cultural heritage resources and historic heritage sites, etc. in sufficient detail. Only outlines record keeping procedures vaguely.	Details are provided in sections 7 (Protection Measures), 8 (Process For Identification Of Cultural and Spiritual Areas of Importance), and 9 (Implementation).	ERM

Blackwater										
ADMIN										
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response	Author
21	12/Jan/22	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 11.2	Compliance	Resolved		ERM
22	12/Nov/21	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 6	Compliance	Condition 7.2.4: Provide more detail for ongoing processes for informing workers of sensitive cultural areas e.g. (where workers can stay updated on no work zones, etc.)	Section 5 updated to identify the process for informing workers of sensitive cultural areas.	ERM
22	12/Jan/22	LDN/UFN			Cultural and Spiritual Resources Management Plan	Section 6	Compliance	Section 5 just states "Implement training" - more detail needed on specifics (e.g., ongoing communication regarding no work zones, the process of informing workers).	The management plan has been updated to include the following in Section 6 on training: Employees and contractors will receive information related to heritage resources previously identified on site as well as cross-cultural training on the history of local Indigenous nations and training on the Chance Find Procedure on their arrival on site through an environmental on-boarding training session and prior to the start of work as part of the Site Orientation. The purpose of this training is to provide site personnel with a basic level of awareness related to heritage, spiritual and archaeological resources and an understanding of their obligations regarding compliance with plan, regulatory requirements, commitments and best practices. Site supervisors will be provided with a copy of the CSMP and will receive additional training with respect to the Chance Find Procedure (Appendix C). BW Gold will regularly review and update the training and awareness related to the plan based on changes in training needs and regulatory requirements. If additional No Work Zones are identified during the course of the Project, this information will be provided to employees and contractors and maps will be updated accordingly. If there is an immediate potential for impact then work in the area will stop until the No Work Zones have been provided and delineated. Information on additional No Work Zones will be communicated through the BW Gold EM to the Departmental Manager and Indigenous Relations Manager.	ERM
23	12/Nov/21	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 10.3	Compliance	Condition 7.3: "The Proponent shall provide access, during all phases of the Designated Project and within 24 hours of an access request being received, to Indigenous groups to the mine site for cultural purposes or for exercising Aboriginal rights, to the extent that such access and exercise of rights are safe. The Proponent shall notify Indigenous groups in a timely manner if access to the mine site, or any part thereof, must be prohibited for safety reasons." Concordance table notes that this is outlined in Section 10.3, however Section 10,3 does not exist in this document and there is no mention of this elsewhere. Please include.	Addressed in section 8 (Site Access for Cultural and Spiritual Purposes).	ERM
23	12/Jan/22	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 10.3	Compliance	Resolved	Now addressed in section 10.3 (Site Access for Cultural and Spiritual Purposes).	ERM
25	12/Nov/21	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Appendix C	Compliance	Condition 18dii: Include "training for Employees" as part of the chance find procedure	Information requested by the reviewer has been added to the Chance Find Procedure in Appendix C.	ERM
25	12/Jan/22	LDN/UFN		Danny Smart	Cultural and Spiritual Resources Management Plan	Appendix C	Compliance	Statement only says "received training on the use of this procedure". What type of training? Further details required.	The CFP has been updated to include the following in Appendix C. Employees and contractors will receive information related to heritage resources previously identified on site as well as cross-cultural training on the history of local Indigenous nations and training on the Chance Find Procedure on their arrival on site through an environmental on-boarding training session and prior to the start of work as part of the Site Orientation. The purpose of this training is to provide site personnel with a basic level of awareness related to heritage, spiritual and archaeological resources and an understanding of their obligations regarding compliance with plan, regulatory requirements, commitments and best practices. Site supervisors will be provided with a copy of the CSMP and will receive additional training with respect to the Chance Find Procedure. BW Gold will regularly review and update the training and awareness related to the plan based on changes in training needs and regulatory requirements. All those responsible for the management, implementation, and operation of any aspect of this procedure will be adequately trained for their role. Prior to the commencement of Project work, all workers will: 1. Have received training on the use of this procedure; 2. Have been provided information on typical identifiers for archaeological and cultural use sites; 3. Have reviewed and be aware of the requirements of this procedure; 4. Have reviewed and understood information pertaining to Chance Find Procedures appropriate for the work activity being undertaken.	ERM
26	12/Nov/21	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	General	Compliance	Condition 18dv: include more detail on "the means by which the Holder will document and make available to the relevant authorities any information the Holder has received from Aboriginal Groups on handling and storage of finds in consideration of any laws, customs or protocols identified by the Aboriginal Groups"	Section 7.2 includes the following: "Agreements respecting Indigenous customs and protocols for the identification, handling, recognition, recording, and safekeeping of as-yet unknown intangible cultural and spiritual heritage sites and confidentiality will be developed and in place prior to the commencement of Project construction." Section 10.1.3 includes the following: "It is imperative that the following data be collected during Construction and Annual monitoring as information gathered may be required for inclusion in compliance reports: site photographs; coordinates for any disturbances; details of any actions taken to protect the sites; information received from Aboriginal Groups on handling and storage of finds in consideration of any laws, customs or protocols; and recommendations for any changes to the protective measures, if required."	ERM
26	12/Jan/22	LDN/UFN			Cultural and Spiritual Resources Management Plan	General	Compliance	Need to include how any information received from Aboriginal groups will be made available to the relevant authorities	Include in section 8.2 "information received from Aboriginal Groups on handling and storage of finds in consideration of any laws, customs or protocols; and recommendations for any changes to the protective measures, if required." and Section 11.1 - Following receipt of views or comment on the provided document a response will be prepared to: - provide a written explanation of how the views and information provided have been considered and addressed in a revised version of the plan, program or other document; or why the views and/or information provided have not been addressed in a revised version of the plan, program, or other document. Where views diverge, BW Gold will strive to reach consensus with Indigenous groups on implementation of the plan. The written explanation will be provided within 15 days unless otherwise agreed between BW Gold and the Indigenous groups; - maintain a record of consultation with each such party regarding the plan, program, or other document; and - provide a copy of consultation record to the EAO, IAAC and the relevant party, or both, promptly upon written request. The copy of such consultation record will be provided to the EAO, relevant party, or both, no later than 15 days after the Holder receives the request for a copy of the consultation record, unless otherwise authorized by the EAO. Confidential information is discussed in Section 8.3 BW Gold will consult Indigenous groups on the manner by which to protect the confidentiality of a discovery, consistent with provincial laws. Confidentiality will be assessed in consultation with Indigenous groups on a case-by-case basis, and contents of discoveries will be treated as confidential among BW Gold, the Indigenous group(s) within whose traditional territory the find is made, the Archaeology Branch and the archaeologist until agreed otherwise. BW Gold understands that Indigenous groups retain rights to their knowledge, practices, and traditions, and how it is shared with others. Therefore, Indigenous Knowledge information will be gathered under confidentiality agreements which address the following:	ERM

Blackwater										
ADMIN										
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response	Author
26									<ul style="list-style-type: none"> - the roles and responsibilities of each party; - conditions on sharing confidential Indigenous knowledge with other parties; - limitations on who can access the Indigenous knowledge provided; - how, where, and by whom the Indigenous knowledge would be stored, and for how long; - any disposal procedures, including timing considerations for disposal; - whether a non-confidential summary or redacted version of the Indigenous knowledge could be created and shared with the public; - how the Indigenous knowledge should be reflected in reporting; and - whether and how Indigenous knowledge could be used in monitoring and follow-up programs. <p>If a cultural or spiritual site is identified as confidential by Indigenous groups, an area of at least 50 metres around the site from the site boundary will be flagged and depicted on Project maps and marked as a "No Work Zone".</p>	ERM
27	12/Nov/21	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 11	Compliance	Condition 18f: Provide more detail on the means by which consultation with Aboriginal Groups will be documented.	Documentation on engagement with Indigenous groups is discussed in sections 10.1 and 10.2.	ERM
27	12/Jan/22	LDN/UFN			Cultural and Spiritual Resources Management Plan	Section 11	Compliance	Means by which consultation will be documented is not explained in sections 10.1 and 10.2 as stated.	<p>Documentation on engagement with Indigenous groups is discussed in sections 11.1</p> <ul style="list-style-type: none"> - Following receipt of views or comment on the provided document a response will be prepared to: <ul style="list-style-type: none"> - provide a written explanation of how the views and information provided have been considered and addressed in a revised version of the plan, program or other document; or why the views and/or information provided have not been addressed in a revised version of the plan, program, or other document. Where views diverge, BW Gold will strive to reach consensus with Indigenous groups on implementation of the plan. The written explanation will be provided within 15 days unless otherwise agreed between BW Gold and the Indigenous groups; - maintain a record of consultation with each such party regarding the plan, program, or other document; and - provide a copy of consultation record to the EAO, IAAC and the relevant party, or both, promptly upon written request. The copy of such consultation record will be provided to the EAO, relevant party, or both, no later than 15 days after the Holder receives the request for a copy of the consultation record, unless otherwise authorized by the EAO. <p>and in Section 11.1.1</p> <p>DS Condition 2.12 requires: "The Proponent [BW Gold] will provide the draft annual report to Indigenous groups, no later than June 30 following the reporting year to which the annual report applies. BW Gold will consult Indigenous groups on the content and findings in the draft annual report."</p> <p>DS Condition 2.13 requires: "The Proponent [BW Gold], in consideration of any comments received from Indigenous groups pursuant to condition 2.12 shall revise and submit to the Agency [Impact Assessment Agency of Canada] and Indigenous groups a final annual report, including an executive summary in both official languages, no later than September 30 following the reporting year to which the annual report applies."</p> <p>and in Section 11.2</p>	ERM
27									The BW Gold EM is responsible for data management and reporting related to heritage resources. The data management system will include the results from monitoring activities (Section 10.2), including chance finds, AIAs, No Work Zones that were established, and records documenting consultation with Indigenous groups related to cultural heritage. The data management system will also record when monitoring results were provided to relevant parties as required by EAC and DS conditions. The EM will also report chance finds to the Project Archaeologist and Indigenous groups within 24 hours of a discovery. The Project Archaeologist will report chance finds to the BC Archaeology Branch. Monitoring data will be entered into an electronic database and have quality control checks completed upon receipt of results. Data will be entered into a standard format that allows for data reporting and analyses. Data and data comparisons will be stored in a single file format for each type of survey or monitoring activity. Monitoring data will be stored for the life of the mine and will be made available for review upon request.	ERM
28	12/Nov/21	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 8	Compliance	Condition 2e: Provide detail on the means by which the effectiveness of the mitigation measures will be evaluated including the schedule for evaluating effectiveness.	Evaluation of the effectiveness of mitigation measures is discussed in section 9.	ERM
28	12/Jan/22	LDN/UFN			Cultural and Spiritual Resources Management Plan	Section 8	Compliance	The effectiveness of mitigation measures id not discussed in section 9 as stated. Include schedule for evaluating effectiveness as well.	Evaluation of the effectiveness of mitigation measures is discussed in section 10 Implementation. Monitoring will assess the effectiveness of the protection measures for known resources and the implementation of the Chance Find Procedure. If unforeseen impacts to heritage sites occur they will be immediately reported to the Project archaeologist and Indigenous groups and reviewed. Unforeseen impacts to heritage sites will be indicative of a lack of effectiveness of the protection measures. Based on the review, protection measures will be modified within 4 weeks. The CSMP will be updated to reflect the changes and communicated as per Section 12. Monitoring identified in Section 10.2.1 and 10.2.2 will be used to determine if altered or new mitigation measures are effectively mitigating effects or avoiding potential effects.	ERM
29	12/Nov/21	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 11	Compliance	Condition 2g: "Schedules and methods for the submission of reporting to specific agencies, Aboriginal Groups and the public and the required form and content of those reports" Provide more detail on "the required form and content of those reports".	Reporting is described in section 10.1.	ERM
29	12/Jan/22	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 11	Compliance	Resolved	Now Section 11.1	ERM
30	12/Nov/21	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 13	Compliance	Condition 2h: Provide more detail on the process and timing for updating/revising the plan, including any consultation with agencies and Aboriginal Groups that would occur in connection with such updates and revisions. Currently just states "Update the CSMP as required." in Section 5.	Section 11 (Plan Revision) has been added as follows: "The CSMP is a living document that will evolve over time in response to monitoring results, chance finds, and the results of AIAs. Comments provided by Indigenous groups, EMLI, ENV and FLNRORD on the CSMP will be considered for inclusion and incorporation and addressed in future versions of the CSMP as they become available. BW Gold will provide revised drafts of the CSMP to Indigenous groups, EMPRI, ENV and FLNRORD for review and comment a minimum of 30 days prior to submitting the revised CSMP to the EAO and IAAC. Revised copies of the plan will be provided to Indigenous groups, EMLI, ENV and FLNRORD. "	ERM
30	12/Jan/22	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 13	Compliance	Resolved	Plan Revision now Section 12	ERM
31	12/Nov/21	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 12	Compliance	Condition 3d: "Adaptive management must include: the monitoring program that will be used including methods, timing and duration of the monitoring" - please provide more detail on these specifics of monitoring program.	EAC Condition 3 requires: "Where a condition of this Certificate requires the Holder to develop a plan, program or other document that includes monitoring, including monitoring of mitigation measures or monitoring to determine the effectiveness of the mitigation measures, the Holder must include adaptive management in that plan." No monitoring is required in the Cultural and Spiritual Resources Management Plan.	ERM
31	12/Jan/22	LDN/UFN			Cultural and Spiritual Resources Management Plan	Section 12	Compliance	Isn't monitoring discussed throughout the plan? E.g., Section 10.1	Monitoring is addressed specifically in Sections 8.1.1, 8.3, 10, 10.2, 10.4, 11.1.3, 11.2, and 12	ERM
32	12/Nov/21	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 12	Compliance	Condition 3g: Provide detail on "the identification of qualitative and quantitative triggers, which, when observed through monitoring will require the Holder to alter existing, or develop new mitigation measures to avoid, reduce and or remediate effects." No current mention of triggers in monitoring sections.	EAC Condition 3 requires: "Where a condition of this Certificate requires the Holder to develop a plan, program or other document that includes monitoring, including monitoring of mitigation measures or monitoring to determine the effectiveness of the mitigation measures, the Holder must include adaptive management in that plan." No monitoring is required in the Cultural and Spiritual Resources Management Plan.	ERM
32	12/Jan/22	LDN/UFN			Cultural and Spiritual Resources Management Plan	Section 12	Compliance	Isn't monitoring discussed throughout the plan? E.g., Section 10.1	Monitoring is addressed specifically in Sections 8.1.1, 8.3, 10, 10.2, 10.4, 11.1.3, 11.2, and 12	ERM

Blackwater										
ADMIN	COMMENTS									
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response	Author
33	12/Nov/21	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 12	Compliance	Condition 3h: Provide detail on "the methods that will be applied to detect when a numeric trigger, or type or level of change has occurred".	EAC Condition 3 requires: "Where a condition of this Certificate requires the Holder to develop a plan, program or other document that includes monitoring, including monitoring of mitigation measures or monitoring to determine the effectiveness of the mitigation measures, the Holder must include adaptive management in that plan." No monitoring is required in the Cultural and Spiritual Resources Management Plan.	ERM
33	12/Jan/22	LDN/UFN			Cultural and Spiritual Resources Management Plan	Section 12	Compliance	Isn't monitoring discussed throughout the plan? E.g., Section 10.1	Monitoring is addressed specifically in Sections 8.1.1, 8.3, 10, 10.2, 10.4, 11.1.3, 11.2, and 12	ERM
34	12/Nov/21	LDN/UFN		Emma Cooke	Cultural and Spiritual Resources Management Plan	Section 12	Compliance	Condition 3(i)/k/l: Provide detail on "the process for and timing to alter existing mitigation measure or develop new ones" and the monitoring program/reporting for these new/changed measures	EAC Condition 3 requires: "Where a condition of this Certificate requires the Holder to develop a plan, program or other document that includes monitoring, including monitoring of mitigation measures or monitoring to determine the effectiveness of the mitigation measures, the Holder must include adaptive management in that plan." No monitoring is required in the Cultural and Spiritual Resources Management Plan.	ERM
34	12/Jan/22	LDN/UFN			Cultural and Spiritual Resources Management Plan	Section 12	Compliance	Isn't monitoring discussed throughout the plan? E.g., Section 10.1	Monitoring is addressed specifically in Sections 8.1.1, 8.3, 10, 10.2, 10.4, 11.1.3, 11.2, and 12	ERM
35	17/Nov/21	LDN/UFN		William Popov	Cultural and Spiritual Resources Management Plan	General	Compliance	The Cultural Heritage Management Plan must be developed in consultation with Aboriginal Groups, EMPR, ENV and FLNRORD. This plan was developed unilaterally by Artemis and then provided to the Nations for review, not developed in a collaborative way with the mentioned parties. In order to meet the requirement of the condition, Artemis must address this with revisions and other input from Aboriginal Groups, EMPR, ENV and FLNRORD.	Drafts of the CSMP were provided to Indigenous groups for review and comment. The plan was updated to address the comments and this ITT sets out how comments from LDN and UFN have been addressed. This process that has been followed has been agreed to by LDN, UFN and BW Gold.	ERM
35	12/Jan/22	LDN/UFN		William Popov	Cultural and Spiritual Resources Management Plan	General	Compliance	Resolved		ERM
36	8/Dec/21	LDN/UFN			Cultural and Spiritual Resources Management Plan	Section 7.2		No mention of infrastructure associated with Baptiste family caribou hunting identified by family members through the EA - has this been followed up on?	The following has been added to section 6.3.1: "Another member of the Baptiste family has recounted stories of her family hunting whudzih (caribou) at Mount Davidson, describing a rock feature that was intentionally built to aid in the corralling of whudzih (caribou), as part of her family's hunting strategy. Her mother's knowledge of the location of this significant cultural feature within their keyoh (the Baptiste-Cassam keyoh; Figure 4) puts it close to the proposed pit location for the Project."	ERM
36		LDN/UFN			Cultural and Spiritual Resources Management Plan	Section 7.2		This information has not been added to section 6.3.1. There is a typo in this response, as 6.3.1 does not exist, it should say 7.3.1.	Yes. Text is included in Section 7.3.1	ERM
37	8/Dec/21	LDN/UFN			Cultural and Spiritual Resources Management Plan	Section 7.3/7.3.1		Regarding Mount Davidson - these statements are unacceptable. Because you are not removing "Mount Davidson" (as in the peak) does not mean you are not compromising and limiting use of the mountain by First Nations. Both LDN and UFN have expressed numerous uses of this mountain for cultural and spiritual purposes throughout their history (e.g., hunting, gathering, ceremony). This section needs major work, and needs to be informed by the Nations - provided they are willing to provide you with details. Either way, you are impacting Mount Davidson and this should be acknowledged here. There are details in Part C you can reference.	Further information related to the importance of Mount Davidson to LDN and UFN has been added to section 6.1.3 from Keefer Ecological Services (2019). BW Gold is interested in receiving additional information as indicated by the reviewer and our December 17, 2021 letter to LDN and UFN proposes some next steps, including some meetings/workshops early in the new year. BW Gold does not view these meetings as a precondition to finalizing this plan, rather we view this plan as a living document and that our continued engagement will inform future iterations of this plan.	ERM
37	12/Jan/21	LDN/UFN			Cultural and Spiritual Resources Management Plan	Section 7.3/7.3.1		Preference would be given to acknowledging this information gap (BW Gold has had opportunities to learn this) and the sensitivity of this information. This section could begin outlining Artemis's commitment to working with the Nations to ensure that the cultural importance and spiritual properties of the mountain are acknowledged through ceremony and preserved to the extent possible, or at a minimum reference the spot in the plan where this will be addressed. This is not a "to be drafted" matter, it is important and should be updated.	The management plan has been updated to include the following in Section 7.3: Subject to further consultation with Indigenous groups, there are three known spiritual resources near the Project area with cultural importance and spiritual properties. No impacts are currently anticipated at the known spiritual sites. Indigenous representatives and/or Indigenous Knowledge Holders from the affected Indigenous groups will be also be invited to identify any impacts to these spiritual resources that by the Project. If potential impacts are identified the cultural importance and spiritual properties of these resources will be acknowledged through ceremony and preserved to the extent possible. Additional Text has been included in Section 7.3.1: The following information is from Keefer Ecological Services (2019): "Mount Davidson is highly respected by our communities for the food it provides and the healing ceremonies that occur at the mountain. Members of the Baptiste family (with rights to the BaptisteCassam keyoh; Figure 4) recount times when an Elder would guide them to a place on the mountain to sit for 3-4 days under a ts'oo (spruce) tree to fast. There is concern within our communities that the protocols for visiting these sacred places will not be followed by newcomers (personal communication, community meeting notes, March, 2017). Mount Davidson is also an important gathering area for certain higher-elevation medicinal plants (personal communication, community meeting notes, April 2017). Mount Davidson and Tsacha Mountain, which is found just south of Mount Davidson, are collectively referred to as Ts'oodenla; meaning "sounds like two mountains together" or "something piled up like a mountain" as there is not a separate traditional name for each individual mountain (personal communication, LDN Band member, May, 2017; Dewhirst, 1995). An LDN community member recounts times when his family would camp at Mount Davidson to hunt and gather food and medicinal plants. When asked about the potential environmental effects of the mine, he indicated that his family is unlikely to return to Mount Davidson, Salmon House Falls, Takia Creek, or Dean River to participate in these traditional practices following the development of the Project (LDN Band member, personal communication, May, 2017). Another member of the Baptiste family has recounted stories of her family hunting whudzih (caribou) at Mount Davidson, describing a rock feature that was intentionally built to aid in the corralling of whudzih (caribou), as part of her family's hunting strategy. Her mother's knowledge of the location of this significant cultural feature within their keyoh (the Baptiste-Cassam keyoh; Figure 4) puts it close to the proposed pit location for the Project."	ERM
37									(Response 37 continued) Additional text has been included in Section 10.3 Access will be provided to Indigenous groups during all phases of the Project to the mine site for cultural purposes or for exercising Aboriginal rights, to the extent that such access and exercise of rights are safe. In accordance with DS Condition 7.3, access will be provided within 24 hours of an access request being received by the Indigenous Relations Manager, unless access is not possible for safety reasons, BW Gold will respond to all requests for access within 12 hours of receipt. Access requests must be provided to BW Gold in writing, and must include the date and time of requested access, location(s) to be visited, support requested while on site, duration of requested access, number of people accessing the site and any other information that would support BW in determining whether access can be safely provided. BW Gold may be unable to provide access within 24 hours where incomplete access requests are received. Providing BW Gold with advanced warning of access requests (i.e., 7 days) will allow BW Gold to consider the request, plan, and increase the likelihood that access can be granted.	ERM
38	8/Dec/21	LDN/UFN			Cultural and Spiritual Resources Management Plan	Section 7.3.2		These sites should be identified, buffered for protection, and then included on maps (e.g., Figure 7.2). This must be done with support from the Nations. It needs to be shown that impacts from the FWSS are not infringing on these areas.	There are no known heritage sites with 150 m of the FWSS and a process for identifying as-yet-unknown sites is provided in Section 7.2	ERM
38	12/Jan/21	LDN/UFN			Cultural and Spiritual Resources Management Plan	Section 7.3.2		First sentence: "These sites should be identified, buffered for protection, and then included on maps not addressed.	Additional text has been added to Section 9 (underlined) "If additional cultural or spiritual sites are identified as potentially affected by the annual construction program, ask the Indigenous groups to: - identify and describe the cultural or spiritual site; - if feasible locate the resource on a map and include an appropriate buffer (at least 50 m); - if impacted by the Project, discuss mitigation(s); and - provide opportunities for Indigenous Knowledge Holders to communicate on the site(s) and potential mitigation, if requested by the Indigenous group."	ERM

Blackwater										
ADMIN					COMMENTS					
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response	Author
39	8/Dec/21	LDN/UFN			Cultural and Spiritual Resources Management Plan	Section 8.2		Add: additional consultation with First Nations specifically relating to the location and identification of cultural and spiritual resources within the mine footprint (including MAR, airstrip, TL) prior to any further disturbance.	Section 7.2 includes the following paragraph: "Archaeological assessments will be conducted in areas that fall outside of areas covered by AIAs prior to construction in these areas. Indigenous representatives and/or Indigenous Knowledge Holders from the affected Indigenous groups will be invited to be involved, and/or, identify representatives who will be involved, in the assessment. Additional consultation with Indigenous groups specifically relating to the location and identification of cultural and spiritual resources within the Project footprint prior to any further disturbance."	ERM
39	12/Jan/21	LDN/UFN			Cultural and Spiritual Resources Management Plan	Section 8.2		The following sentence: "Additional consultation with Indigenous groups specifically relating to the location and identification of cultural and spiritual resources within the Project footprint prior to any further disturbance" is not found in plan.	The management plan has been updated to include the following in Section 8.2: Additional consultation with Indigenous groups specifically relating to the location and identification of cultural and spiritual resources within the Project footprint will be conducted prior to any further disturbance. Indigenous representatives and/or Indigenous Knowledge Holders from the affected Indigenous groups will be invited to identify an as-yet unknown cultural or spiritual resources that may be impacted by the Project (Section 9). If resources are identified the cultural importance and spiritual properties of these resources will be acknowledged through ceremony and preserved to the extent possible.	ERM
40	8/Dec/21	LDN/UFN			Cultural and Spiritual Resources Management Plan	Section 9		Some sites identified in the EA are missing. Please update (see row 41).	Information from site 41 has been added to Table 7.2-2: Historic Cultural Heritage Resources (CHRs) within 150 m of Proposed Transmission Line Routes Centreline	ERM
40	12/Jan/21	LDN/UFN			Cultural and Spiritual Resources Management Plan	Section 9		Resolved		ERM
41	8/Dec/21	LDN/UFN			Cultural and Spiritual Resources Management Plan	Section 9		Timing - when is this expected to happen/be carried out? There is a considerable amount of information to be gathered and not much time remaining to do it. LDN and UFN strongly recommend Artemis begin implementing the commitments outlined in this section ASAP. This process should be carried out with appropriate Nation-identified knowledge holders in a manner and timeframe that is acceptable to the Nations - prior to any further disturbance at the site.	BW Gold is committed to work with LDN and UFN to implement the commitments in the plan. Our December 17, 2021 letter to LDN and UFN proposes some next steps, including some meetings/workshops early in the new year. The meetings/workshops will provide an opportunity to discuss the process and timing to engage with appropriate Nation-identified knowledge holders.	ERM
41	12/Jan/21	LDN/UFN			Cultural and Spiritual Resources Management Plan	Section 9		Resolved		ERM
42	8/Dec/21	LDN/UFN			Cultural and Spiritual Resources Management Plan	Section 9		The Nations may have additional/different thoughts on how/when/if these sites can be visited. Artemis should seek to be informed about required ceremony or practices prior to visiting any cultural or spiritual sites. Artemis should be accompanied by an appropriate Nation-identified person.	The management plan has been updated to include the following in Section 8 which now reads: "With the consent of the respective Indigenous group and participation of Indigenous Knowledge Holders, BW Gold will seek to be informed about required ceremony or practices prior to visiting any cultural or spiritual sites."	ERM
42	12/Jan/21	LDN/UFN		Danny Smart	Cultural and Spiritual Resources Management Plan	9		Although it has been addressed that ""With the consent of the respective Indigenous group and participation of Indigenous Knowledge Holders, BW Gold will seek to be informed about required ceremony or practices prior to visiting any cultural or spiritual sites." It has not been addressed if consent is not approved by LDN/UFN. Or, what protocols and procedures will take place when visiting the site (if approved). Further clarity required.	The management plan has been updated to include the following in Section 9 - With the consent of the respective Indigenous Group and participation of Indigenous Knowledge Holders, BW Gold will seek to be informed about required ceremony or practices prior to visiting any cultural or spiritual sites and what protocols and procedures will take place when visiting the site. If consent is not approved then Bagnold will work with the Indigenous groups to identify a resolution or work together to develop mitigation measure that can be implemented.	ERM
43	8/Dec/21	LDN/UFN			Cultural and Spiritual Resources Management Plan	Section 10.1.1		How will this monitoring occur - is there a standard procedure? What are you looking for? When and how often will these sites be monitored? If a confidential site exists, are LDN and UFN ok with having the EM know their location?	Sections 9.2 describes construction and annual monitoring. Section 9.2.1 describes the treatment of confidential sites. These sites will be monitored by the EM and Aboriginal Monitors during construction in the vicinity of the site, including construction during the phased increases to the mill nameplate throughput. Monitoring procedures and frequency will be described in a standard operating procedure.	ERM
43	12/Jan/21	LDN/UFN		Danny Smart	Cultural and Spiritual Resources Management Plan	10.1.1		As per ID 43, these questions have not been addressed, only the timing comment has been included. How will this monitoring occur - is there a standard procedure? What are you looking for? If a confidential site exists, are LDN and UFN ok with having the EM know their location?	Section 10.2 has been revised: "Heritage sites within 150 m of the Project footprint will be marked on Project site maps as a "No Work Zone" and an area of 50 m flagged or delineated around the site boundary (Section 8.1). Project activities within 50 m sites of will be subject to construction monitoring and sites located 50 to 150 m will be subject to annual monitoring. If sites are confidential they will be represented, including an appropriate buffer in consultation with the Indigenous groups and the Project Archaeologist, by only the "No Work Zone" designation on Project maps and documents."	ERM
44	8/Dec/21	LDN/UFN			Cultural and Spiritual Resources Management Plan	Section 10.2		How do the Nations request access? Is there a procedure, or can anyone request access? Contact info?	Section 9.3 has been revised to indicate the request will be made to the Indigenous Relations Manager.	ERM
44	12/Jan/21	LDN/UFN		Danny Smart	Cultural and Spiritual Resources Management Plan	10.2		As per ID 44, information has been provided on what needs to be submitted. But it does not provide contact information, or any indication that the request will be made to the Indigenous Relations Manager as per the response. Please clarify and provide more details of the procedure and contact information.	Please see Section 10.3 - Access will be provided to Indigenous groups during all phases of the Project to the mine site for cultural purposes or for exercising Aboriginal rights, to the extent that such access and exercise of rights are safe. In accordance with DS Condition 7.3, access will be provided within 24 hours of an access request being received by the Indigenous Relations Manager, unless access is not possible for safety reasons, BW Gold will respond to all requests for access within 12 hours of receipt. Access requests must be provided to BW Gold in writing, and must include the date and time of requested access, location(s) to be visited, support requested while on site, duration of requested access, number of people accessing the site and any other information that would support BW in determining whether access can be safely provided. BW Gold may be unable to provide access within 24 hours where incomplete access requests are received. Providing BW Gold with advanced warning of access requests (i.e., 7 days) will allow BW Gold to consider the request, plan, and increase the likelihood that access can be granted. BW Gold Contacts: Travis Desormeaux: Environmental Manager, 250-278-7788, tdesormeaux@artemisgoldinc.com Don Thelston: Indigenous Relations Manager, dethelston@artemisgoldinc.com	ERM
45	8/Dec/21	LDN/UFN			Cultural and Spiritual Resources Management Plan	Section 11.1.1		When will these details be provided?	Reporting requirements related to the federal Decision Statement have been added to Section 10.1.1.	ERM
45	12/Jan/21	LDN/UFN			Cultural and Spiritual Resources Management Plan	Section 11.1.1		Resolved	Now Section 11.1.1	ERM
46	8/Dec/21	LDN/UFN			Cultural and Spiritual Resources Management Plan	Section 12		As usual (unfortunately), this section is not compliant with the EAC condition (#3 Adaptive Management) - please update to include details that address the alphabetized list in the condition about what is required at a minimum. For example, Appendix A says that d) the monitoring program.... is provided in Sections 10.1.1 and 10.1.2 - what is missing is the method, frequency, timing (simply stated as construction), and duration of the monitoring	EAC Condition 3 requires: "Where a condition of this Certificate requires the Holder to develop a plan, program or other document that includes monitoring, including monitoring of mitigation measures or monitoring to determine the effectiveness of the mitigation measures, the Holder must include adaptive management in that plan." No monitoring is required in the Cultural and Spiritual Resources Management Plan.	ERM
46	12/Jan/21	LDN/UFN			Cultural and Spiritual Resources Management Plan	Section 12		Resolved		ERM
47	8/Dec/21	LDN/UFN			Cultural and Spiritual Resources Management Plan		General	Please add reference to other similar conditions (e.g., 15, 16, 17) and demonstrate how they will interact	Section 2.2 (Linkages to Other Management and Monitoring Plans) has been added. It references EAC conditions 15, 16 and 17 and describes their relationship with cultural heritage and the CSMP.	ERM
47	12/Jan/21	LDN/UFN		Danny Smart	Cultural and Spiritual Resources Management Plan		General	References only to condition 17. No additions or linkages to other management and monitoring plans	Section 2.2 has been updated to reference EAC Conditions 15 and 16.	ERM

Blackwater						COMMENTS		Response	Author	
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response	Author
48	10/Dec/21	CSFN		Source	Cultural and Spiritual Resources Management Plan	Section 7.2	Determining the Age of Culturally Modified Trees (CMTs)	<p>The second footnote under Table 7.2-1 states that "professional judgement may have been used to determine if the tree pre-dated 1846." It is unclear what formed the basis for these judgements on the age of the CMTs. Have alternative methods been considered to determine the age of trees that were not cored during the Archaeological Impact Assessment? The Aboriginal Groups must be consulted on all CMTs, regardless of whether they are pre- or post-1846, as these trees require protection and conservation.</p> <p>Recommendation: Include a brief description of how CMTs were determined to be dated pre-1846, in instances where the Year Modified is noted as 'Unknown.' Please clarify whether methods aside from professional judgement were used to determine the age of CMTs. Also provide a rationale for the significance of the year 1846 and why post-1846 CMTs are not protected.</p>	<p>Pre-1846 CMTs are protected under the HCA and fall under the mitigations provided in Section 7.1.1. Post 1846 CMTs are not protected by the HCA and are discussed in Section 8.1.3 and includes statement "Prior to alteration to post 1846 CMTs, the relevant/affected indigenous groups will be consulted to determine the preferred mitigation measures. Common mitigation measures for post-1846 CMTs with cultural significance include: detailed measurements and photography, removing and preserving the modified portion of the tree, or removing a cross-section (cookie) of the modified portion of the tree. These measures allow for the preservation of some or all of the information about the modification(s) made to the tree."</p> <p>Additional text has been added to notes for Table 7.2-1 :</p> <p>"2 The CMTs referenced in the table were identified in the EA submission as post-1846. The Year Modified is noted as 'Unknown' if the tree was not cored during the AIA and therefore the date is unknown. In these instances, professional judgement may have been used to determine if the tree pre-dated 1846.</p> <p>3 It is difficult to determine the exact date of the CMT if the tree is too rotten or if in the professional opinion of archaeologist, the scar obviously post-dates 1846. This determination is often made based on the age of the tree or the nature of the modification."</p>	ERM
49	10/Dec/21	CSFN		Source	Cultural and Spiritual Resources Management Plan	Section 7.3	Documentation of Consultation with Aboriginal Groups	<p>Section 7.3 states that there are currently "no known spiritual resources within the mine site. Where have consultations with Aboriginal Groups on the presence of these resources been documented?</p> <p>Recommendation: Identify the means by which consultation with Aboriginal Groups on cultural and spiritual resources will occur, how these discussions will be documented, and include references to the resource(s) where records of past engagement on this topic can be located.</p>	<p>References and additional information have been added to Section 7.3 including: Keefe Ecological Services Ltd. 2019. Ulkatcho First Nation and Lhoosk'uz Dené Nation: Part C Blackwater Gold Mine Project. BC EAO. 2019a. Assessment Report for Blackwater Gold Mine Project (Blackwater) With respect to the Application by New Gold Inc. for an Environmental Assessment Certificate pursuant to the Environmental Assessment Act, S.B.C. 2002, 43. Prepared by the Environmental Assessment Office. May 17, 2019. ERM. 2016. Blackwater Gold Project: Further Assessment of Potential Effects on Current Aboriginal Use. Prepared for New Gold Inc. by ERM Consultants Canada Ltd.: Vancouver, BC.</p>	ERM
50	10/Dec/21	CSFN		Source	Cultural and Spiritual Resources Management Plan	Sections 8.1.1 and 10.1	50 Meter Buffer Zone	<p>Sections 8.1.1 and 10.1 state that the "No Work Zones" for archaeological and heritage sites will be delineated by an area of at least 50 m around the site. Please provide justification for the 50 m buffer zone. It is unclear whether this is part of standard protection practice or otherwise. In the previous version of the CSMP (October 2021), the buffer zone was stated to be 30 m. What is the rationale for this change?</p> <p>Recommendation: Please provide the rationale for delineating a 50 m area around archaeological and heritage sites as "No Work Zones," or reference the standards that support this proposal</p>	<p>Please see Section 7.1.1 - "-" Flag or delineate an area of at least 50 m around the site and mark as a "No Work Zone" from the site boundary to align with Archaeology Branch's Remote Access to Archaeological Data areas of high archaeological potential. "</p>	ERM
51	10/Dec/21	CSFN		Source	Cultural and Spiritual Resources Management Plan	General	Integration of Other EA Conditions and Management Plans	<p>Please reference in the Plan other EA Conditions that either influence or are influenced by the CSMP and specify how they interact with each other.</p>	<p>Section 2.2 (Linkages to Other Management and Monitoring Plans) has been added. It references EAC conditions 15, 16 and 17 and describes their relationship with cultural heritage and the CSMP.</p>	ERM
52	10/Dec/21	CSFN		Source	Cultural and Spiritual Resources Management Plan	Section 9	Visitation of Cultural and Spiritual Areas	<p>Section 9 states: "With the consent of the respective Aboriginal Group and participation of Indigenous Knowledge Holders, BW Gold will visit and document the cultural or spiritual area(s)." To be respectful of the Indigenous Nations' practices, BW Gold should indicate that the Aboriginal Groups will also be consulted on ceremonies or practices that may need to be performed prior to/upon visiting these sites.</p> <p>Recommendation: Please clarify that BW Gold will engage with the Aboriginal Groups on appropriate customs to be followed when visiting sites of cultural or spiritual importance. The CSMP must also identify the means by which the relevant Aboriginal Groups will be engaged in these discussions. Additionally, BW Gold representatives should seek to be accompanied by a member of the appropriate Aboriginal Group(s) at all visitations.</p>	<p>Section 8 includes the following statements</p> <p>- With the consent of the respective Indigenous Group and participation of Indigenous Knowledge Holders, BW Gold will seek to be informed about required ceremony or practices prior to visiting any cultural or spiritual sites.</p>	ERM
53	10/Dec/21	CSFN		Source	Cultural and Spiritual Resources Management Plan	Sections 10.1.1 and 10.1.2	Construction and Annual Monitoring Activities	<p>Sections 10.1.1 and 10.1.2 mention that mitigation measures will be determined should impacts be anticipated or observed at important sites. There are no details provided on any planned mitigation efforts, nor the expected frequency, timing, or duration of these activities. Additionally, the Annual Monitoring section states that annually, the EM and Aboriginal Monitors will "verify that known heritage sites remain intact and are not impacted by the Project." Information is lacking on the methods that will be used to evaluate whether these sites are intact and, if impacted, the extent to which they have been affected.</p> <p>Recommendation: Please include details pertaining to the methods, frequency, timing, and duration of construction and annual monitoring activities that are expected as part of mitigation efforts for the archaeological and heritage sites. Include as part of the Annual Monitoring, a description of the method(s) that will be used to verify that heritage sites are intact and remain unimpacted by Project activities.</p>	<p>Section 10.2.2 updated "Should impacts to the vegetation or ground surface since the previous observation be observed at sites, the Project Archaeologist and the Archaeology Branch will be contacted to determine mitigation measures" Section 11.1.3 bullet added</p> <p>A record of monitoring activities will be kept and the information will be summarized in an annual monitoring report. This report will include the monitoring results from the preceding year, any new sites identified, incidents where mitigation measures failed to protect heritage sites, and any resulting actions or mitigations undertaken and the results of those actions or mitigations. This report will be provided to the Project Archaeologist and Indigenous groups. The relevant information including chance finds will also be provided to the Archaeology Branch in reports required under Sections 12.2 and/or 12.4 of the Heritage Conservation Act. The EM, Project Archaeologist and/or Aboriginal Monitors will document by means of photographs and field notes, the type of construction and disturbance occurring near a site, weather conditions, personnel present, and/or other details. It is imperative that the following data be collected during construction and annual monitoring as information gathered may be required for inclusion in compliance reports:</p> <ul style="list-style-type: none"> - site photographs; - coordinates for any disturbances; - extent and type of disturbances - details of any actions taken to protect the sites; - information received from Indigenous groups on handling and storage of finds in consideration of any laws, customs or protocols; and - recommendations for any changes to the protective measures, if required. 	ERM
54	10/Dec/21	CSFN		Source	Cultural and Spiritual Resources Management Plan	General	Details Required by EA Conditions 2, 3, and 18	<p>Information is lacking to fulfill the details listed under EA Condition 18, specifically those under subsection (c) requiring BW Gold to determine whether sites "can be protected from impacts, or whether relocation features of importance...are needed to address effects." The Reporting section of the Plan also misses details required by subsection (d) for the Chance Find Procedure (Appendix C) to identify the "means by which the Holder will document and make available to the relevant authorities any information...received from the Aboriginal Groups." Please make the appropriate revisions to the CSMP to ensure these missing details are present in the next iteration of the CSMP. Regarding Conditions 2 (Plan Development) and 3 (Adaptive Management), the CSMP lacks sufficient detail on the methods, frequency, timing, and duration of monitoring and mitigation activities and the methods for reporting their results, as well as the development of methods to evaluate the effectiveness of these mitigation measures. The identification of triggers and methods that will be applied to detect when a trigger has occurred are also absent from the Plan. Please ensure that the EA Conditions listed in Appendix A of the Plan are addressed in adequate detail.</p> <p>Recommendation: Include additional details to cover the missing information identified above and ensure that the CSMP fully addresses EA Conditions 2, 3, and 18. Specifically, ensure that Adaptive Management sections on monitoring, mitigation, and triggers are more complete.</p>	<p>Adaptive Management is included in Section 5; Monitoring is included in Section 10.2; Reporting is included in Section 11.1; Plan Revision is included in Section 12</p>	ERM

Blackwater										
ADMIN	COMMENTS									
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section or Page	Comment Theme	Comment	Response	Author
55	10/Dec/21	CSFN		Source	Cultural and Spiritual Resources Management Plan	Section 8.1.3 and 8.1.4	Consultation on Alterations to CMTs and Trails	Section 8.1.3 and 8.1.4 state that relevant Aboriginal Groups will be consulted prior to alterations to CMTs and trails "if necessary." Is it not expected that any disturbances to areas of significance to Aboriginal Groups should require consultation? Recommendation: Remove the phrase "if necessary" from the following sentences. Section 8.1.3: "Prior to alteration to post-1846 CMTs the relevant/affected Aboriginal Groups will be consulted to determine, if necessary, the preferred mitigation measures." Section 8.1.4: "Prior to the alteration of a trail the relevant/affected Aboriginal Groups will be consulted to determine, if necessary, the preferred mitigation measures."	Removed 'if necessary' from the sentences.	ERM
56	10/Dec/21	CSFN		Source	Cultural and Spiritual Resources Management Plan	Section 8.1.1	Language and Grammar	Incomplete Sentence: Section 8.1.1: "Mitigation measures will dependent on the specifics of the archaeological site and the levels of impact." Please correct the language in the sentence.	Revised to - Mitigation measures will be dependent on the specifics of the archaeological site and the levels of impact.	ERM
57	10/Dec/21	CSFN		Source	Cultural and Spiritual Resources Management Plan	Sections 8.1.3, 8.1.4, and 8.1.5	Language and Grammar	Missing Commas: Please add commas following the words CMTs, trail, and recovered, in the following sentences. Section 8.1.3: "Prior to alteration to post-1846 CMTs the relevant/affected Aboriginal Groups will be consulted to determine, if necessary, the preferred mitigation measures." Section 8.1.4: "Prior to the alteration of a trail the relevant/affected Aboriginal Groups will be consulted to determine, if necessary, the preferred mitigation measures." Section 8.1.5: "If palaeontological materials are recovered the BC Fossil Management Office will be consulted to determine an appropriate repository."	Revised	ERM
58	26/Jan/22	LDN/UFN	Memo	Jessica Lowey, Brett Watson	Cultural and Spiritual Resources Management Plan		General Comment to EAO regarding the Plan	LDN, UFN and their technical team believe the archaeology baseline work was generally well done. The Plan, however, portrays a lack of understanding of the relevant legislation -including outdated references throughout	All references are provided in Section 14. All references will be reviewed for relevance and accuracy.	ERM
59	26/Jan/22	LDN/UFN	Memo	Jessica Lowey, Brett Watson	Cultural and Spiritual Resources Management Plan		General Comment to EAO regarding the Plan	It is concerning to LDN, UFN and their technical team that the authors of the Plan, although permitted archaeologists, were not directly involved in the baseline work -including the efforts undertaken to understand LDN and UFN cultural and spiritual resources that may be impacted by the project (there is little consideration of what was learned through the baseline work included in the Plan)	Information from the baseline studies is provided in Section 7. BWGold have scheduled or attended meetings with LDN/UFN specifically to discuss the plan and to understand their cultural and spiritual resources. Meetings to review the draft plan are ongoing and information provided at those meetings will be used to confirm and supplement the baseline data and confirm that it has been interpreted correctly. This information will then be used to update the plan. Section 12 includes the statement "Comments provided by Indigenous groups, EMLI, ENV and FLNRORD on the CSMP will also be considered for inclusion and incorporation and addressed in future versions of the CSMP as they become available."	ERM
60	26/Jan/22	LDN/UFN	Memo	Jessica Lowey, Brett Watson	Cultural and Spiritual Resources Management Plan		General Comment to EAO regarding the Plan	There are assumptions in the Plan (i.e., Section 7) that require validation	Assumptions in the document will be validated or revised through ongoing consultation.	ERM
61	26/Jan/22	LDN/UFN	Memo	Jessica Lowey, Brett Watson	Cultural and Spiritual Resources Management Plan		Required Edits and Commitments	Name of the Project archaeologist (must be an approved QP)	The following text has been added to Section 2.1 Implementation of the CSMP will require a Professional Archaeologist authorized by the Archaeology Branch to hold HCA Section 12.2 and Section 12.4 Permits in the Project area. A qualified archaeologist will be retained through the life of the Project to hold the necessary HCA permits, oversee archaeological assessments, including monitoring, and assist with assessing potential Chance Finds. They will also be involved in on-going consultation with the Indigenous groups on matters of archaeology and cultural heritage.	ERM
62	26/Jan/22	LDN/UFN	Memo	Jessica Lowey, Brett Watson	Cultural and Spiritual Resources Management Plan		Required Edits and Commitments	Commitment that this person will be retained for the life of the mine	The following text has been added to Section 2.1 Implementation of the CSMP will require a Professional Archaeologist authorized by the Archaeology Branch to hold HCA Section 12.2 and Section 12.4 Permits in the Project area. A qualified archaeologist will be retained through the life of the Project to hold the necessary HCA permits, oversee archaeological assessments, including monitoring, and assist with assessing potential Chance Finds. They will also be involved in on-going consultation with the Indigenous groups on matters of archaeology and cultural heritage.	ERM
63	26/Jan/22	LDN/UFN	Memo	Jessica Lowey, Brett Watson	Cultural and Spiritual Resources Management Plan		Required Edits and Commitments	Commitment that this person will engage and consult with the Nations on an ongoing basis	The following text has been added to Section 2.1 Implementation of the CSMP will require a Professional Archaeologist authorized by the Archaeology Branch to hold HCA Section 12.2 and Section 12.4 Permits in the Project area. A qualified archaeologist will be retained through the life of the Project to hold the necessary HCA permits, oversee archaeological assessments, including monitoring, and assist with assessing potential Chance Finds. They will also be involved in on-going consultation with the Indigenous groups on matters of archaeology and cultural heritage.	ERM
64	26/Jan/22	LDN/UFN	Memo	Jessica Lowey, Brett Watson	Cultural and Spiritual Resources Management Plan		Required Edits and Commitments	Commitment that this person will be involved in the identification and determination of protection status for catalogued or new archaeology finds, including the securing of permits (as necessary) and securing LDN and/or UFN participation (as needed)	The following text has been added to Section 2.1 Implementation of the CSMP will require a Professional Archaeologist authorized by the Archaeology Branch to hold HCA Section 12.2 and Section 12.4 Permits in the Project area. A qualified archaeologist will be retained through the life of the Project to hold the necessary HCA permits, oversee archaeological assessments, including monitoring, and assist with assessing potential Chance Finds. They will also be involved in on-going consultation with the Indigenous groups on matters of archaeology and cultural heritage.	ERM
65	26/Jan/22	LDN/UFN	Memo	Jessica Lowey, Brett Watson	Cultural and Spiritual Resources Management Plan		Required Edits and Commitments	Name and qualifications of person delivering training, and the role of the Project archaeologist in this training	The following text has been added to Section 2.1 Implementation of the CSMP will require a Professional Archaeologist authorized by the Archaeology Branch to hold HCA Section 12.2 and Section 12.4 Permits in the Project area. A qualified archaeologist will be retained through the life of the Project to hold the necessary HCA permits, oversee archaeological assessments, including monitoring, and assist with assessing potential Chance Finds. They will also be involved in on-going consultation with the Indigenous groups on matters of archaeology and cultural heritage.	ERM
66	26/Jan/22	LDN/UFN	Memo	Jessica Lowey, Brett Watson	Cultural and Spiritual Resources Management Plan		Required Edits and Commitments	Field work to confirm assumptions (see Section 7 comments about blazed trees)	Additional fieldwork for post 1846 CMTs, if requested, is provided in Section 8.1.3	ERM
67	28/Jan/22	EAO	Email	Tracey Janes	Cultural and Spiritual Resources Management Plan		Additional Point of Clarity	Comments include a request for continuity of the Project archeologist (QP) during the life of mine. This refers to the position as QP, not necessarily the same person throughout (acknowledging there could be a change in person). The intent here is for a continuity of approach and connection to Aboriginal groups.	The following text has been added to Section 2.1 Implementation of the CSMP will require a Professional Archaeologist authorized by the Archaeology Branch to hold HCA Section 12.2 and Section 12.4 Permits in the Project area. A qualified archaeologist will be retained through the life of the Project to hold the necessary HCA permits, oversee archaeological assessments, including monitoring, and assist with assessing potential Chance Finds. They will also be involved in on-going consultation with the Indigenous groups on matters of archaeology and cultural heritage.	ERM
68	28/Jan/22	EAO	Email	Tracey Janes	Cultural and Spiritual Resources Management Plan		Additional Point of Clarity	In our review of the draft plan, we noted there was no detail on the process by which the QP was selected, only the considerations used by BW Gold. A greater connection between Aboriginal groups and the QP would be valuable to address the intent of this plan and make improvements.	The following text has been added to Section 2.1 Implementation of the CSMP will require a Professional Archaeologist authorized by the Archaeology Branch to hold HCA Section 12.2 and Section 12.4 Permits in the Project area. A qualified archaeologist will be retained through the life of the Project to hold the necessary HCA permits, oversee archaeological assessments, including monitoring, and assist with assessing potential Chance Finds. They will also be involved in on-going consultation with the Indigenous groups on matters of archaeology and cultural heritage.	ERM

Exhibit 15 Caribou Mitigation and Monitoring Plan (ITT)

Blackwater Mine DRAFT CMMP August 2021:										
ADMIN	COMMENTS									
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section	Page	Comment Theme	Comment	Response
1	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 1-1		Re: the mine site is outside of an area currently used by Tweedsmuir caribou based on collar data. This statement is inaccurate and should be revised. GPS collar data indicate that caribou still use the area around the mine site area (Indicated by recent locations, last 3 years, around the mine site) as there are only few collared caribou there will be more use in the area than is indicated by GPS collars alone. Traditional knowledge from UFN and LDN has also confirmed caribou use this area and that the mine site was used for traditional hunting in the past. It is fair to say the mine site is not within the caribou's main utilisation area but any area used by caribou can be described as caribou habitat and so the mine site should be described as caribou habitat.	The CMMP has been updated in response to this comment: Changed to state that the mine is outside of the herd range, measured as 95% kernel density of collar locations.
1	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 1-1		This and a number of other comments were addressed by Artemis stating that the mine is outside of the core herd range, measured as 95% kernel density of collar locations, we understand that this was approved by the province. With respect we are not in agreement of this, to preserve the herd the full range needs to be managed appropriately, it is not only core areas that are important for the species recovery. In addition, as the herd has been impacted over time their range area has decreased, cumulative effects have increased and their use of isolated habitats (such as the Blackwater mine) as decreased due to lack of connectivity. However this lack of use does not mean intact habitat, outside the core 95% range, are of less value as is indicated throughout the CMMP. If anything due to cumulative effects, these remaining intact habitats are of more value as they are the key to restoration. We have also seen no justification for using a 95% kernel home-range to represent the Tweedsmuir population, this is a very unusual use of a home range area. Please revise and use plain language that describes the mine within the herds range.	The text of the CMMP (Version 4) has been updated to reflect that caribou are sometimes seen in the Project area, and the project is in the historic range of the herd. However, the 95% kernel density cannot be removed entirely from the document since it was used by FLNRORD to determine the difference between LEWR and Matrix 1 habitat at the Project site. The text in Sections 1.1 and 2.2 has been updated to read: The Project is on the eastern edge of the Tweedsmuir Local Population Unit (LPU) of southern mountain caribou (Rangifer tarandus caribou); with approximately half of the mine site falling inside the LPU. The mine site is within the historic range of the Tweedsmuir caribou based on Traditional Knowledge from UFN and LDN and includes areas mapped as winter caribou habitat (Figure 1.1-1). The mine site is outside of the annual range (1980-2020) used by collared female caribou, but is still used intermittently by caribou based on aerial surveys, snow track surveys and incidental observation.
2	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 1-1		Re: the construction of the Project will result in the removal and disturbance of three types of Type 1 Matrix habitat (high elevation, low elevation and general) and potential disturbance by noise of High Elevation Winter Range habitat (suitable habitat, but not currently used). The last statement - suitable habitat but not currently used is incorrect. Recent GPS collar data indicate the matrix low elevation and high elevation habitat are currently used by caribou (Data from last 3 years), though these areas are not currently intensely used by caribou they are used and are caribou habitat.	The CMMP has been updated in response to this comment: Updated to refer to the HEWR being outside of the herd range (measured as 95% kernel density of collar locations).
2	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 1-1		Resolved	Acknowledged
3	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 1-1		Re: the Project is on the eastern edge of the range of the Tweedsmuir Local Population Unit (LPU). This statements makes it unclear that the project is within LPU boundary. Better to rephrase "The Project falls within the eastern-edge of the range of the Tweedsmuir Local Population Unit (LPU)."	The CMMP has been updated in response to this comment: Updated to be specific that approximately half of the project is inside the LPU.
3	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 1-1		Resolved	Acknowledged
4	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 2-1		Re: 95 utilization distributions Figure 2-1 and figure 2-2 are misleading and should be revised. Showing the 95% utilization distributions from the last 30 years is very misleading. Caribou movements have changed over this time and the landscape they use has also changed. Showing the 95% UD from the last 5 years or even the last 2 years would allow the reader to actually see where the caribou are currently spending most time in relation to the mine area. Adding the GPS collar points to the 95% UD map (if possible) will also allow the reader to see the actual overlap of collared locations in the mining site, this would also provide a better understanding of the situation.	BW Gold calculated the kernel UD for 1) the last 30 years, 2) 2010-2017, and 3) 2018-2020. The herd range may have changed elsewhere in it's distribution, but the eastern edge has not changed significantly. Importantly, the Blackwater project site has remained outside of the 95% kernel density and the 2 proposed offset locations have remained inside the 95% kernel density. Given this, BW Gold chose to provide a single map showing the past 30 year distribution to focus the discussion in the CMMP to the offset locations and plan. BW Gold is open to discussing the historical distribution of caribou. Following the data sharing agreement for collar data between BW Gold and FLNRORD, BW Gold can not display the individual collar locations on maps.
4	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 2-1		Resolved	Acknowledged
5	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Figure 2-1		Re: use of 95% UD. I would advise not implying that only the area within the 95% UD is caribou suitable habitat, naturally all areas used by caribou are required for the herd but used for different purposes and under different environmental conditions. Using the Tweedsmuir-Entiako Herd boundary is a more suitable delineation and looking at recent GPS points the boundary appears to be up to date.	Figure 2.2-1 displays the habitat mapping conducted at the direction of ECCC and FLNRORD in 2018. It shows HEWR and LEWR within the 95% kernel density polygon and high and low elevation matrix 1 within the Local Population Unit boundary, but outside of the 95% kernel density polygon. The direction provided by ECCC and FLNRORD to define these habitat types is described in CMMP Section 2.2 and in the 2018 Response to IR on caribou.
5	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Figure 2-1		Resolved	Acknowledged
6	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 3-2		Re: Minimize. Aerial surveys used as pre-construction surveys are insufficient and do not meet the requirements of pre-construction surveys in EAC condition 23. Field surveys must be conducted by staff and Indigenous community members in order to identify such important features as game trails, scat counts/ID for species present, mineral licks and wallows, areas of high browse, etc.	The CMMP has been updated in response to this comment: Additional detail has been added to describe the pre-construction surveys for the Project in Section 6, Follow-up and Adaptive Management.
6	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 3-2		Resolved	Acknowledged
7	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 3-2		Re: Minimize. Add installation of known wildlife crossing points. These cannot be determined via aerial survey either.	The CMMP has been updated in response to this comment: Additional detail has been added to describe that wildlife trails will be identified during pre-construction surveys through ground searches.
7	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 3-2		Resolved	Acknowledged
8	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 3-2		Re: Minimize. Add review of stand down procedure for caribou observations on/near project site.	The CMMP has been updated in response to this comment: A reference has been added to Section 6.6, in the adaptive management section, that describes in more detail the management when caribou are observed.
8	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 3-2		Resolved	Acknowledged
9	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 3-2		Re: Minimize. Define "regularly during employment"	Training would be provided to all project personnel working at the mine site as part of onboarding, with a refresher provided annually.
9	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 3-2		Resolved	Acknowledged
10	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 3-3		Re: Aircraft will be managed... Maintaining a minimum distance of 400 m above Mt Davidson. Other best practice that has been implemented (e.g., MOU for heli-ski operators "maintaining minimum encounter distance") stipulates a minimum distance of 500 m. A compliance review of this policy showed that this requirement was almost never followed in practice. Update distance to a minimum of 500 m and define how BW Gold will implement and enforce this policy. How often will it be reviewed? Will observations of caribou response be recorded when seen?	The Compendium of Wildlife Guidelines for Industrial Developments in Northern British Columbia (FLNRO 2014) specifies 400 m vertical above winter range and mineral licks for caribou. Section 6.7 describes how mitigation measures will be monitored and specifies that helicopters will be monitored annually using track logs.
10	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 3-3		Resolved	Acknowledged

Blackwater Mine DRAFT CMMP August 2021:										
ADMIN	COMMENTS									
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section	Page	Comment Theme	Comment	Response
11	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 3-3		Re: maintain vegetation buffers adjacent mine roads Please clarify what is meant by "maintain" and provide link to the section in the VMP where this is stated. The only buffers mentioned in the VMP are around riparian areas. No mention of roads.	Additional detail will be added to the VMP describing vegetation buffers adjacent to mine roads.
11	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 3-3		Resolved	Acknowledged
12	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 3-3		Re: choosing plant species in consultation with Indigenous groups. Where is this explicitly stated in the VMP? Provide link to the section. To date Indigenous groups have requested greater detail on what plant species will be used in restoration (e.g., in riparian areas vs. roadsides) and have not been satisfied that this "consultation" requirement has truly been met.	Additional detail to be added to the VMP. Additionally, BW Gold expects to have more detailed discussions on plant species to be used in restoration as part of discussions on the reclamation and closure plan for the mine
12	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 3-3		This comment has been placemarked as we were unable to check if this requirement is being met yet.	The Reclamation and Closure Plan includes a list of suggested species for restoration (see section 4.2.3 of the Reclamation and Closure Plan (RCP)) and proposed research trials to demonstrate the feasibility of using these species (see section 4.2.5 of the RCP). One of the reclamation trials proposed (item 4 in Table 4.2-8 of the RCP) is specific to reclaiming habitat suitable for caribou. BW Gold will continue to engage with UFN and LDN on the Reclamation and Closure Plan throughout the initial permitting process and subsequent reviews during the life of mine.
13	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 3-3		Re: Restoration. Include reference to whitebark pine planting requirements. This is also not included in the VMP. The VMP references a separate Whitebark Pine Management Plan.	The CMMP has been updated in response to this comment: Reference to the WBPMP added.
13	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 3-3		This comment has been placemarked as we were unable to verify if this requirement is being met yet.	The CMMP was updated in response to this original comment with references to the White Bark Pine Management Plan (WBPMP) added to section 3.3 (list of restoration activities from the EA) and 5.3.5.1 (draft restoration activities proposed for the offset area). A Whitebark Pine Management Plan has been drafted and released for review during February 2022 to ECCC, FLNRORD and Indigenous groups. In addition, BW Gold is committed to ongoing reclamation research on whitebark pine (see Section 4.2.5 of the Reclamation and Closure Plan).
14	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 3-3		Re: restoration - exploration and access roads. LDN and UFN addressed this issue through the EA process. Disturbances which have revegetated naturally should not be included. LDN/UFN also have concerns about using the word reclamation for road removal. These sites were not planted, simply torn up (i.e., deactivated). This is not the definition of reclamation and does not meet the requirements of the Code.	Depending on the exploration trail being restored, revegetation has included site preparation (ripping and mounding soil), vegetation management (felling, piling and bending trees) and in some cases planting trees. BW Gold will be developing detailed prescriptions for road reclamation and is open to discussing whether planting seedlings or natural re-seeding with a success monitoring program is preferred.
14	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 3-3		Resolved	Acknowledged
15	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 4-1		Re: therefore, this area was considered Critical Habitat, despite not being currently occupied by caribou. Rather than not currently occupied you should say not intensely used by caribou as this area is used as indicated by GPS collar positions.	Updated to state that the mine is outside of the current caribou range, previously defined as the 95% kernel area.
15	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 4-1		Resolved	Acknowledged
16	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 4-2		Re: habitat loss table. The calculations of habitat loss do not take into account the fact that the mine is stopping caribou moving through the area. As a result of the mine footprint caribou are unable to travel in lower elevation habitat around the north and north east of Mount Davidson to the southern area and vice versa. The loss of 'Travel habitat' will be approximately the same as the footprint (c. 3000 - 4000 ha), this loss of habitat needs to be measured and acknowledged in the document.	The EAC Application evaluated the potential for the mine site to disrupt caribou movement; but it was not rated as a residual effect. The mine site is located on the edge of the Local Population Unit. Beyond the mine is Matrix 2 habitat, which is not considered Critical Habitat. Caribou can freely move around the mine site. The EAC Application evaluated the potential for habitat loss and alteration as a residual, but not significant effect. The proposed offset is for this residual effect.
16	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 4-2		Resolved	Acknowledged
17	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 4-6		Re: equivalency calculations. Although the calculations are clear they are completely arbitrary and cannot be justified the way it has been calculated. Although capoose is better habitat saying the area within the project footprint = a habitat quality of 1 whereas capoose = 4 is an opinionated statement without any justification. According to the precautionary principal, which should be used when dealing with threatened species such as caribou, it would be more justified to provide the footprint with a higher habitat value of 2. The authors are currently minimising the potential of the habitat being lost, the area should rightly be treated as caribou habitat and should not be devalued in the way it is being devalued. This should be revised.	We respectfully disagree. The process of assigning habitat values, or ecological equivalency factors, was discussed at length during the EA and accepted by the EA reviewers. BW Gold also worked with LDN and UFN and their consultants during the winter of 2021 to identify selection criteria to determine which of the two final offset options would be used, as described in the CMMP. BW Gold undertook a transparent quantitative approach and stands behind the work done to date.
17	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 4-6		This was answered saying 'this went through EA' and we disagree. Having looked into this further using ECCC capability maps and surveys the habitat equivalency calculations are further off than we first assumed, the project site has very equivalent habitat to Capoose, in addition a risk needs to be factored into the Capoose securement as there is a high probability that Capoose could burn due to forest fires in the near future. There are a number of other important issues with the calculations, including the sensory buffer size, this is a major issue with mitigation and the CMMP.	BW Gold updated the CMMP to address the direction given by ECCC, UFN, LDN, and FLNRORD in 30 Nov 2021, and subsequent communications from ECCC on the use of the BC draft offsetting Decision Support Tool (DST) in January 2022. The updated CMMP includes habitat restoration in the Tweedsmuir Local Population Unit following the advice of ECCC, at an offsetting ratio identified by the DST in the examples provided by ECCC. Following a letter on December 1, 2021, the CMMP was updated to indicate that the UFN and LDN are leading this offsetting habitat restoration work. With these updates to the CMMP BW Gold believes that this comment is resolved
18	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 4-8		Re: proposed duration of offset. More details are required for the portion of the offset may extend beyond 40 years. What are the measures that will be considered? They need to be part of this plan.	The approach to securing an offset beyond 50 years must be discussed with the Province in detail and as such is not described in this plan at this time.
18	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 4-8		This comment has been placemarked as these details remain unresolved.	BW Gold updated the CMMP to address the direction given by ECCC, UFN, LDN, and FLNRORD in November 2021 communications and subsequent communications from ECCC on the use of the BC draft offsetting Decision Support Tool (DST) in January 2022. The updated CMMP includes securement of the Capoose High Elevation Ungulate Winter Range for 50 years, as well as habitat restoration in the Tweedsmuir Local Population Unit following the advice of ECCC, at an offsetting ratio identified by the DST in the examples provided by ECCC. Following a letter on December 1, 2021, the CMMP was updated to indicate that the UFN and LDN are leading this offsetting habitat restoration work. With these updates to the CMMP BW Gold believes that this comment is resolved
19	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 4-8		Re: Medium term impacts. Light (maybe?) and noise will continue as reclamation work is ongoing in the closure phase. Please update.	The majority of reclamation work will be well within the Project footprint. Therefore any effects of light or noise will be contained within the overall Project footprint and a buffer outside of the footprint is not expected. During discussions with the caribou working group in 2018 that included First Nations, ECCC, FLNRORD and the EAO, the mechanism of a larger (3 km) buffer was discussed as being due to blasting in the open pit, which will end prior to closure.
19	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 4-8		Resolved	Acknowledged

Blackwater Mine DRAFT CMMP August 2021:										
ADMIN	COMMENTS									
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section	Page	Comment Theme	Comment	Response
20	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 4-9		Re: long term impacts. How will reclamation activities be deemed successful at recreating acrobou habitat? What would this look like? How is it measured?	Monitoring or reclamation activities will be developed as part of the reclamation plan.
20	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 4-9		This comment has been placemarked as these details remain unresolved.	The approach for reclamation, including research studies on developing caribou habitat and proposed reclamation monitoring at the mine site, are described in section 4.2.3 4.2.5, and 4.2.6 of the Reclamation and Closure Plan. BW Gold will continue to engage with UFN and LDN on the Reclamation and Closure Plan throughout the initial permitting process and subsequent reviews during the life of mine.
21	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 4-9		Re: long term impacts. How, when, for how long will these activities be monitored? This is a requirement of the condition, please add details.	Monitoring or reclamation activities will be developed as part of the reclamation plan.
21	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 4-9		This comment has been placemarked as these details remain unresolved.	The approach for reclamation, including research studies on developing caribou habitat and proposed reclamation monitoring at the mine site, are described in section 4.2.3 4.2.5, and 4.2.6 of the Reclamation and Closure Plan. BW Gold will continue to engage with UFN and LDN on the Reclamation and Closure Plan throughout the initial permitting process and subsequent reviews during the life of mine.
22	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 4-10		Re: Table 4.3-1. See comment in row 21. This calculation should be adjusted to consider more than direct habitat loss (e.g., loss of connectivity) in order to accurately reflect impacts to caribou.	Please see response to Comment 16.
22	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 4-10		Resolved	Acknowledged
23	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 5-1		Re: draft restoration objectives. How does this plan decrease early seral habitat? This area is already protected from becoming early seral habitat through the HE UWR GAR order. In order to decrease early seral habitat you need to protect a piece of habitat from being disturbed and losing its old growth or mature forest status/structure.	The restoration objectives in the CMMP have been updated following this comment to remove "decrease early seral habitat" to "Improve caribou habitat".
23	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 5-1		Resolved	Acknowledged
24	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 5-1		Re: draft restoration objectives. How does decreasing human activity benefit caribou? How does this differ substantially from reducing predation? I suspect these two objectives are accomplishing the same thing - humans use the same roads, or make those roads more accessible to predators (e.g., winter access), thereby contributing to predation. May need to reconsider.	The two objectives are complimentary, but not the same. Decreasing human access decreases disturbance to caribou and is accomplished through blocking roads. This objective can be met by managing only the entrance to the road. Decreasing predator sight lines is accomplished through tree bending, tree planting and mounding to reduce sight lines along the length of the road. A road deactivated for 4x4 vehicles can still have sight lines for predators, and a road with poor sight lines can still be accessible to 4x4 vehicles.
24	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 5-1		Resolved	Acknowledged
25	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 5-1		Re: ecological restoration. How is this plan accomplishing ecological restoration if the habitat in the Capoose area is already established? Actual restoration is required - how much area (in ha) is being restored?	During discussions in March and April, 2021, biologists with UFN and LDN indicated that establishing offsets in areas of already high quality habitat was preferred. See Table 4.3-3.
25	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 5-1		Resolved	Acknowledged
26	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 5-2		Another reference to southern mountain caribou in the first paragraph (see comment in row 8). This is part of the Northern Mountain caribou population, please go through the document and ensure the correct population is referred to.	The 2014 Recovery Strategy defines the Tweedsmuir caribou as part of the northern group of the Southern Mountain Caribou.
26	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 5-2		Resolved	Acknowledged
27	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 5-2		Re: section 5.2, paragraph 4. Has the area been searched for other access points that avoid this blockade?	The field crew identified that access was along the reclaimed road route and implemented mitigation there to install the blockade. Subsequent checks of the site indicated no access to the site.
27	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 5-2		Resolved	Acknowledged
28	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 5-2		Re: section 5.3. Provide references for standard practices.	BW Gold will be developing specific reclamation prescriptions for reclaiming roads in the offset area and is open to discussing the standards and methods for these prescriptions including which standard methods will be used. Detailed, site-specific prescriptions for road removal and restoration will be developed following field studies in 2021 in collaboration with LDN and UFN.
47	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 5-2		This comment has been placemarked as these details remain unresolved.	BW Gold has outlined reclamation prescriptions for roads in Section 4.2 of the Reclamation and Closure Plan (RCP). Proposed cover and vegetation prescriptions are presented in Table 4.2-7 of the RCP. BW Gold intends to develop specific reclamation prescriptions for reclaiming roads in the offset area and is open to discussing the standards and methods for these prescriptions including which standard methods will be used. As per the plan and consistent with discussions with LDN and UFN, detailed, site-specific prescriptions for road removal and restoration will be based on the field studies completed in 2021 in collaboration with LDN and UFN. On December 1, 2021, BW Gold received a letter from the UFN and LDN indicating that they would like to lead the habitat restoration work and the CMMP has been updated to reflect this. Methods for restoration will be determined by UFN and LDN in collaboration with FLNRORD. With these updates to the CMMP BW Gold believes that this comment is resolved
29	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 5-5		Re: blocking access. How does this seed mix ensure that native plant and tree species are able to establish long-term? What seed mix? Please provide a name and species composition. What contingency planning will be in place if this is ineffective? How will ungulate browse of these species be monitored to ensure use by deer and moose is not occurring?	BW Gold will be developing specific reclamation prescriptions for reclaiming roads in the offset area and is open to discussing the standards and methods for these prescriptions including which standard methods will be used. Detailed, site-specific prescriptions for road removal and restoration will be developed following field studies in 2021 in collaboration with LDN and UFN.
48	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 5-5		This comment has been placemarked as these details remain unresolved.	BW Gold will be developing specific reclamation prescriptions for reclaiming roads in the offset area and is open to discussing the standards and methods for these prescriptions including which standard methods will be used. As per the plan and consistent with discussions with LDN and UFN, detailed, site-specific prescriptions for road removal and restoration will be based on the field studies completed in 2021 in collaboration with LDN and UFN. On December 1, 2021, BW Gold received a letter from the UFN and LDN indicating that they would like to lead the habitat restoration work and the CMMP has been updated to reflect this. Methods for restoration will be determined by UFN and LDN in collaboration with FLNRORD. With these updates to the CMMP BW Gold believes that this comment is resolved

Blackwater Mine DRAFT CMMP August 2021:											
ADMIN	COMMENTS										
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section	Page	Comment Theme	Comment	Response	
30	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 5-7		Re: revegetation. How will whitebark pine be incorporated at Capoose? What BEC zones do the roads fall within? Is it applicable?	The Whitebark Pine Management Plan will include planting of whitebark pine on Mt Davidson. There is no plan to plant whitebark pine at Capoose.	
30	8-Sep-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 5-7		Resolved	Acknowledged	
31	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 5-7		Re: revegetation. Great examples - how will they be implemented? More detail is required. Include details of monitoring, measuring success and adaptive management (including triggers).	The CMMP has been updated in response to this comment: Additional detail has been added to Section 6, Follow-up and Adaptive Management.	
31	8-Sep-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 5-7		Resolved	Acknowledged	
32	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 5-10		Re: soils. Include assessment of %CF and surface stoniness. This can be a major barrier to re-establishing vegetation. Native soil profiles typically do not include stones to the surface, how can this be mitigated? All examples of reclamation provided show very clearly how surface stoniness and CFs have changed through site activities.	The CMMP has been updated in response to this comment: %CF and surface stoniness will be added to the soils assessment of roads in the caribou offset area. Mitigation will be developed following assessment of conditions at the site.	
32	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 5-10		Resolved	Acknowledged	
33	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 5-10		Re: inadequacy of this mitigation and monitoring plan to make a difference to caribou. So far this plan does not use the precautionary principal. The mine is not committing resources or making effort to restore and recover habitat for caribou in place of habitat that is being destroyed, fragmented and compromised. There is no question that the mine will remove habitat and increase threats to caribou in the area through the process of its operations, yet the project has outlined no changes that mitigate these losses, other than not to operate in 'Capoose' which is already a protected UWR. It is very much in the interests of the Project to put back in kind commitment to offset what they are taking. The project is missing an opportunity to make the project more sustainable by making a commitment to improving the situation for caribou in the area. These simple actions will improve the companies operational sustainability and make a place in the future for such extractive industries.	Additional information, which considers the proposal shared by UFN and LDN on June 28, is presented in Section 4.5 of the CMMP.	
33	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 5-10		This comment has been placemarked as these details remain unresolved.	As described in the CMMP, BW Gold updated the CMMP in response to direction from ECCC, FLNRORD, UFN and LDN in November 2021 through January 2022 on a land securement of Capoose HE-UWR, calculation of offset ratios, costs and locations for offsetting, and that UFN and LDN would be leading restoration activities. BW Gold has accepted this direction, updated CMMP accordingly. With these updates to the CMMP BW Gold believes that this comment is resolved.	
34	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 6-1		Re: adaptive management. This section is too vague. What will be measured, how and when, are all details that are missing that are required by the condition.	The CMMP has been updated in response to this comment: Additional detail has been added to Section 6, Follow-up and Adaptive Management.	
34	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 6-1		Resolved	Acknowledged	
35	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 6-2		Re: specific triggers and actions for the offset area and restoration efforts will be determined once the restoration prescriptions are finalized post field visit with LDN and UFN. These restoration efforts that 'will be determined' are required in this caribou monitoring and management plan per the provincial condition. This needs to be added.	The CMMP has been updated in response to this comment: Additional detail has been added to Section 6, Follow-up and Adaptive Management.	
35	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 6-2		Resolved	Acknowledged	
36	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 6-2		Re: Table 6-1: Adaptive Management Triggers. It is mentioned several times that statistical significance will be used as a trigger point. This is unlikely to be suitable for wildlife as we are talking about small populations and so population effects (numbers), movement effects and other wildlife responses are unlikely to be significant in a statistical way. I recommend removing statistical significance from triggers involving large mammals with relatively small populations.	The CMMP has been updated in response to this comment: Additional detail has been added to Section 6, Follow-up and Adaptive Management.	
36	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 6-2		This comment has been placemarked as these details remain unresolved.	Following comments from FLNRORD and UFN/LDN, the use of statistical significance as a trigger for adaptive management has been removed and replaced with specific management triggers in Section 6.	
37	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 6-2		Re: monitoring details not available. Monitoring details are yet to be decided and so can't actually be reviewed, all monitoring details need to be added to this plan.	The CMMP has been updated in response to this comment: Additional detail has been added to Section 6, Follow-up and Adaptive Management.	
37	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 6-2		Resolved	Acknowledged	
38	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 6-3		Re: monitoring details not available. "BW Gold will monitor conduct a wide variety of monitoring during the life of the Project. For caribou, monitoring will be conducted to evaluate: - potential effects of the Project against predictions made in the EIS Application and supplemental Information Requests - success of mitigation measures - success of offsetting measures." I have copied these monitoring goals to demonstrate that there is no information provided in this section regarding what monitoring will be done. The methods of how goals will be assessed need to be added.	The CMMP has been updated in response to this comment: Additional detail has been added to Section 6, Follow-up and Adaptive Management.	
38	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 6-3		Resolved	Acknowledged	
39	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 6-3		Re: monitoring details not available. "Monitoring for predicted Project effects is described in Section 6.1, monitoring for mitigation measures is described in Section 6.2, and monitoring for the offsetting program is described in Section 6.3." Again I have copied this text which refers to how the monitoring will be conducted, however the sections it refers to do not contain any monitoring methods or information.	The CMMP has been updated in response to this comment: Additional detail has been added to Section 6, Follow-up and Adaptive Management.	
39	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 6-3		Resolved	Acknowledged	
40	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 6-3		Re: monitoring details not available. "A Caribou Monitoring Plan will also be produced that focuses on monitoring of the effectiveness of the offsetting activities for caribou." This document is meant to be the mitigation and monitoring plan but here it says that another document will be produced to detail the monitoring. This Caribou Mitigation and monitoring plan needs to be revised to include all the information required to assess the adequacy of a mitigation and monitoring program, subsequent documents may be a good idea but at this stage the monitoring plan should be contained within this document, unfortunately there is nothing at this stage. This information needs to be added.	The CMMP has been updated in response to this comment: Additional detail has been added to Section 6, Follow-up and Adaptive Management.	
40	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 6-3		Resolved	Acknowledged	

Blackwater Mine DRAFT CMMP August 2021:										
ADMIN	COMMENTS									
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section	Page	Comment Theme	Comment	Response
41	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 6-4		Re: statement not accurate. The section says there will be no changes in caribou movement patterns, this is not true. It should be acknowledged that the project will block low elevation travel North and north-east of Mount Davidson, the project site will therefore cause a change in caribou movement patterns, as well as loss of habitat.	Please see response to Comment 16.
41	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 6-4		This comment has been placemarked as these details remain unresolved.	The EAC Application evaluated the potential for the mine site to disrupt caribou movement and it was not rated as a residual effect. The EAC Application evaluated the potential for habitat loss and alteration as a residual, but not significant effect. The proposed offset is for this residual effect from habitat loss and alteration.
42	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 6-4		Re: lack of caribou monitoring in plan. So far the plan has only suggested that the extent of Blackwater infrastructure and controlling activities in in caribou habitat will be the only form of caribou monitoring e.g. Table 6.3-1. This needs to be updated and reviewed to have some actual work which monitors how caribou are responding to the development.	The CMMP hs been updated in response to this comment: Additional detail has been added to Section 6, Follow-up and Adaptive Management.
42	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 6-4		Resolved	Acknowledged
43	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Page 6-6		Re: Table 6.4-1. This table shows the first biological monitoring blackwater is committing too, it would be better to put this into the start of the section so that all monitoring, including the additional biological monitoring you will commit to is in one place. However stating you will do an aerial survey does not provide the necessary detail that would allow the procedures to be assessed and reviewed.	The CMMP hs been updated in response to this comment: Additional detail has been added to Section 6, Follow-up and Adaptive Management.
43	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Page 6-6		Resolved	Acknowledged
44	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Overall document		Re: items within SCHEDULE B - table of conditions that were not met. The following conditions in the Provincial conditions document were not met: a) the means by which the mitigation measures identified in the Mitigation Table required under Condition 43 for the valued component Caribou will be implemented; There is not detail of the caribou monitoring and restoration that will be implemented these details are required to meet the conditions.	The CMMP hs been updated in response to this comment: Additional detail has been added to Section 6, Follow-up and Adaptive Management.
44	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Overall document		Resolved	Acknowledged
45	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Overall document		Re: items within SCHEDULE B - table of conditions that were not met. The following conditions in the Provincial conditions document were not met: c) the type, timing and frequency for undertaking caribou surveys prior to commencement of Construction, as well as during Operations, and how that information will inform development and implementation of monitoring and mitigation measures during Construction and Operations; These details were also completely lacking and need to be added.	The CMMP hs been updated in response to this comment: Additional detail has been added to Section 6, Follow-up and Adaptive Management.
45	8-Sep-21	Indigenous Communities	Table	Draft CMMP	Draft CMMP		Overall document		Resolved	Acknowledged
46	1-Jun-21	Indigenous Communities		LDN/UFN	Draft CMMP		Overall document		Re: items within SCHEDULE B - table of conditions that were not met. See condition 3 - Adaptive management - details provided are insufficient to meet the requirements of this condition, including: d, f, g, h, i, j, k, l	The CMMP hs been updated in response to this comment: Additional detail has been added to Section 6, Follow-up and Adaptive Management.
46	8-Sep-21	Indigenous Communities	Table	LDN/UFN	Draft CMMP		Overall document		Resolved	Acknowledged
47	1-Jun-21	Indigenous Communities		LDN/UFN	A.1_2-N Updated Assessment of Impacts to Southern Mountain Caribou....		Page 94		Re: Figure 3. Winter habitat capability. The mine site is covered in the highest quality caibou habitat. Yet for the offsetting, you have classified this area as the lowest quality (e.g., ecological equivalency of 1). Please explain how your mapping and assessment differs from the Ministry's map provided here. Again we are concerned that the 95% utilisation polygons for caribou collared very far away are being used to define habitats for caribou more associated with the mine area.	As described in Section 2.2, the habitat mapping for the LPU was carried out under the direction of, and in collaboration with, ECCC and FLNRORD.
47	8-Sep-21	Indigenous Communities		LDN/UFN	A.1_2-N Updated Assessment of Impacts to Southern Mountain Caribou....		Page 94		Re: Figure 3. Winter habitat capability. The mine site is covered in the highest quality caibou habitat acording to ECCC capability mapping in document A.1_2-N - P94. Yet for the offsetting, you have classified this area as the lowest quality (e.g., ecological equivalency of 1). Please explain how your mapping and assessment differs from the Ministry's map provided here. Again we are concerned that the 95% utilisation polygons for caribou collared very far away are being used to define habitats for caribou more associated with the mine area. This comment has been placemarked as these details remain unresolved.	BW Gold updated the CMMP to address the direction given by ECCC, UFN, LDN, and FLNRORD in the 30 Nov 2021, and subsequent communications from ECCC on the use of the BC draft offsetting Decision Support Tool (DST) in January 2022. The updated CMMP includes habitat restoration in the Tweedsmuir Local Population Unit following the advice of ECCC, at an offsetting ratio identified by the DST in the examples provided by ECCC. ECCC provided inputs to the DST, which included habitat values agreed upon by FLNRORD, ECCC, UFN and LDN in January 2022. With these updates to the CMMP BW Gold believes that this comment is resolved
48	1-Jun-21	Indigenous Communities		LDN/UFN	A.1_2-N Updated Assessment of Impacts to Southern Mountain Caribou....		P51 (7-2)		Re: Non-habitat offsets offered in previous documents are missing from the CMMP: The actual non-habitat offsets the project are going to commit to need to be stated in the CMMP. Based on discussions we feel at least part of this program/commitment should be a first nations led caribou habitat restoration project.	Additional information, which considers the proposal shared by UFN and LDN on June 28, is presented in Section 4.5 of the CMMP.
48	8-Sep-21	Indigenous Communities		LDN/UFN	A.1_2-N Updated Assessment of Impacts to Southern Mountain Caribou....		P51 (7-2)		This comment has been placemarked as these details remain unresolved despite extended discussions on this topic.	Non-habitat based measures are discussed in Section 5.4 of the updated CMMP.
49	1-Jun-21	Indigenous Communities		LDN/UFN	A.1_2-N Updated Assessment of Impacts to Southern Mountain Caribou....		P51 (7-2)		Re: Committing to non - habitat offsets in the CMMP - We suggest this section should contain a commitment to partially fund 1) first nations led restoration of c. 100 km of roads; 2) training of first nations caribou guardians for population monitoring and conservation work; 3) a new quantitative habitat suitability map of caribou (resource selection function) to assist in targeting habitats to be restored, roads to be removed and to facilitate better assessment and monitoring of the caribou population.	Additional information, which considers the proposal shared by UFN and LDN on June 28, is presented in Section 4.5 of the CMMP.
50	22-Sep-21	Indigenous Communities	Draft CMMP (August 2021)	NWFFN/STFN/SFN	Draft CMMP August 2021		Page 1-6	Wildlife and Habitat	Re: First Nations input on the Tweedsmuir-Entiako Caribou (Rangifer tarandus) Tactical Restoration Plan Only Saik'uz First Nation (SFN) provided input on the Tweedsmuir-Entiako Caribou (Rangifer tarandus) Tactical Restoration Plan—NWFFN and STFN did not. Considering this and the fact that BW Gold is using this document to inform the draft CMMP, there is a stronger need for BW Gold to confirm that priorities for range restoration carried forward into this Draft CMMP are informed by the Indigenous Knowledge, values, and priorities of NWFFN and STFN.	BW Gold will continue to engage with NWFFN, STFN, and Saik'uz on the CMMP and associated restoration works. BW Gold welcomes any Indigenous Knowledge from these nations that could inform its offset for the Tweedsmuir-Entiako caribou herd.

Blackwater Mine DRAFT CMMP August 2021:										
ADMIN	COMMENTS									
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section	Page	Comment Theme	Comment	Response
51	22-Sep-21	Indigenous Communities	Draft CMMP (August 2021)	NWFFN/STFN/SFN	Draft CMMP August 2021		Page 1-6 and 2-8	Wildlife and Habitat	Re: Use of telemetry data (and 95% kernel density estimate) to make conclusions regarding impacts to the Tweedsmuir-Entiako subpopulation. We disagree with BW Gold's approach of using the annual range of collared caribou to make conclusions regarding the potential impacts of the project on the Tweedsmuir-Entiako subpopulation and their habitat. At the federal-level, critical habitat for the northern group of southern mountain is defined according to the Local Population Unit (LPU) boundaries and therefore BW Gold should evaluate the impacts of the mine on caribou and their habitat according to this federal requirement. In addition, using a 99% kernel density estimate is a standard (and more conservative) best practice when dealing with threatened species, such as caribou. We therefore recommend that BW Gold use this value whenever referred to the annual range of a subset of collared caribou within the Tweedsmuir LPU.	The text of the CMMP (Version 4) has been updated to reflect that caribou are sometimes seen in the Project area, and the project is in the historic range of the herd. However, the 95% kernel density cannot be removed entirely from the document since it was used by FLNRORD to determine the difference between LEWR and Matrix 1 habitat at the Project site. BW Gold updated the CMMP to address the direction given by ECCC, UFN, LDN, and FLNRORD in the 30 Nov 2021, and subsequent communications from ECCC on the use of the BC draft offsetting Decision Support Tool (DST) in January 2022. The updated CMMP includes habitat restoration in the Tweedsmuir Local Population Unit following the advice of ECCC, at an offsetting ratio identified by the DST in the examples provided by ECCC. ECCC included habitat values as inputs to the DST, including for the impact site and various offset sites. Note that these inputs consider the area inside the LPU (not within the Kernel) as Critical Habitat, as requested by the reviewer. With these updates to the CMMP BW Gold believes that this comment is resolved
52	22-Sep-21	Indigenous Communities	Draft CMMP (August 2021)	NWFFN/STFN/SFN	Draft CMMP August 2021		Page 1-8	Wildlife and Habitat	Re: Little guidance or example on habitat offsetting in other jurisdictions BW Gold states that there is little guidance on caribou habitat offsetting in other jurisdictions, including Alberta. This is a misleading statement as ECCC recently set a precedent regarding caribou habitat offsetting ratio for the Little Smoky Herd on the NGTL 2021 System Expansion Project. In this case, the Proponent was ultimately required to restore 3,840 hectares of caribou habitat, which was 30 times the size of the area impacted by the project. While habitat disturbance in the Little Smoky range is higher than that of the Tweedsmuir LPU, their population decline trajectories are comparable. This present should inform BW Gold's approach to habitat offsetting for this project. More information on this precedent can be found here: 1) NGTL 2021 - Revised Caribou Habitat Restoration and Offset Measures Plan (CHROMP): https://docs2.cer-rec.gc.ca/ll-eng/llisapi.dll/fetch/2000/90464/90550/554112/3422050/3575553/3950124/4012808/CO9519-1_2021_NGTL_System_Expansion_-_Certificate_Condition_6_CHROMP_-_A7K4K2.pdf?nodeid=4013548&vernum=2 2) NGTL 2021 Certificate and Conditions, including final offsetting values: https://docs2.cer-rec.gc.ca/ll-eng/llisapi.dll/fetch/2000/90464/90550/554112/3422050/3575553/3950124/4003838/CO9098-3_Certificate_of_Public_Convenience_and_Necessity_GC-129_-_A7J7T3.pdf?nodeid=4003840&vernum=2	BW Gold appreciates the additional offsetting information. BW Gold's approach to the offset was rooted in the work completed, and direction given, during the EA. This incorporated feedback from FLNRORD, ECCC, and Indigenous Nations in November 2021. Following feedback from FLNRORD, ECCC, and Indigenous Nations in November 2021 the offsetting plan was revised to reflect feedback that the long-term securement of the Capoose HE-UWR could represent an incremental benefit to caribou and thus contribute to the overall offsetting package when combined with meaningful amounts of habitat restoration. A new offsetting plan has been updated in CMMP (V4) Section 4. This updated plan addresses the concepts of additionality and equivalency by proposing to offset habitat loss through habitat restoration - through a land securement in Capoose UWR and the removal of forestry roads within the LPU.
53	22-Sep-21	Indigenous Communities	Draft CMMP (August 2021)	NWFFN/STFN/SFN	Draft CMMP August 2021		Page 2-1	Wildlife and Habitat	Re: ECCC 65% undisturbed threshold objective for the Southern Mountain Caribou range Note that the total anthropogenic disturbance (including a 500m buffer) is 32% for the total range of the Tweedsmuir-Entiako subpopulation, much of which is concentrated in the winter matrix range (73% disturbed). The Blackwater Gold Project will result in the loss of high and low elevation Matrix 1 range, which will further contribute to the disturbance to this habitat type within the Tweedsmuir-Entiako subpopulation's range. This points to the requirement for the proponent to consider exceedance of disturbance thresholds at the habitat zone level (vs. the range level). Considering this approach, and the declining population of the Tweedsmuir herd (and the need for additional caution), this justifies the need for a much higher offsetting ratio what BW Gold has proposed.	Please see response to Comment 51.
54	22-Sep-21	Indigenous Communities	Draft CMMP (August 2021)	NWFFN/STFN/SFN	Draft CMMP August 2021		Page 2-2	Wildlife and Habitat	Re: Project interacting with winter range in some years BW Gold states that the Project interacts in some years with the winter range of the Tweedsmuir herd, but does not interact with the summer range of the herd. We note two key concerns regarding this statement: 1) The specification that the Project interacts with the winter ranges in some years is an unnecessary qualifier. The herd depends upon its entire winter range and will rotate between locations within it based on conditions (e.g. snow). This statement should not be used to minimize the potential impacts of the Project. 2) The specification that the Project does not interact with the summer range of the herd is based on kernel density estimate data with limitations (e.g. small sample size, high collar failure rates, etc.), which is a concern that NWFFN, STFN, and SFN previous raised. We continue to be concerned that these data are informing the draft CMMP.	The statement "the Project interacts in some years with the winter range of the Tweedsmuir herd..." and that the herd "does not interact with the summer range" were explicit understandings reached during the EA. The CMMP is founded on the work completed during the EA and on comments and direction received from Indigenous Nations, ECCC, FLNRORD and BC EAO in response to the CMMP (V2; August 2021) during the fall of 2021. Please see the response to Comment 51 for the updated offsetting calculations using the BC provincial draft offsetting Decision Support Tool that uses inputs provided by ECCC that consider the mine site inside the LPU to be Critical Habitat.
55	22-Sep-21	Indigenous Communities	Draft CMMP (August 2021)	NWFFN/STFN/SFN	Draft CMMP August 2021		Page 2-2	Wildlife and Habitat	Re: Analysis assumptions To conduct analysis for the Draft CMMP, BW Gold accounted for the fact that HE-Matrix 1 (and LE-Matrix 1) outside the 95% UD kernel would be classified as HEWR (or LEWR) if it were inside, instead. We recommend that BW Gold subject these areas to higher offsetting ratios because they present potentially suitable habitat where caribou use could be expanded if the herd population increased. This approach would be more considerate of recovery objective to "strive for population increase" for the Tweedsmuir LPU.	Please see the response to Comment 51 for the updated offsetting calculations using the BC provincial draft offsetting Decision Support Tool that uses inputs provided by ECCC and considers the mine site inside the LPU to be Critical Habitat.
56	22-Sep-21	Indigenous Communities	Draft CMMP (August 2021)	NWFFN/STFN/SFN	Draft CMMP August 2021		Figure 2-1 and 2-2	Wildlife and Habitat	Re: High elevation ungulate winter range outside of the 95% UD kernel boundary We note that Figures 2-1 and 2-2 show high elevation ungulate winter ranges outside of the 95% UD kernel boundary. This is seemingly contradictory to the previous statement that HE-Matrix 1 would be classified as HEWR outside the boundary. Please clarify how the HE-UWR features located outside the kernel boundary were established.	Ungulate Winter Ranges (UWRs) are identified by the province of BC, not BW Gold. The direction provided to BW Gold by FLNRORD and ECCC in 2018 indicated that areas of HEWR would be classified above 1,300 m elevation both inside and outside the 95% kernel. These agencies also advised that areas with attributes of LEWR and Matrix 1 would be considered as such within the 95% kernel, but would be considered Matrix 1 outside of the 95% kernel. Please see CMMP Section 2.2 for a full description of habitat classification from the EA review period in 2018.
57	22-Sep-21	Indigenous Communities	Draft CMMP (August 2021)	NWFFN/STFN/SFN	Draft CMMP August 2021		Page 2-8	Wildlife and Habitat	Re: Level of protection provided by UWR designations. BW Gold notes that provincially designated high elevation ungulate winter range orders (HE-UWRs) offer protection from commercial harvesting (but not other tenures such as mineral tenures). We note that UWRs have been shown to provide weak protections per ECCC, 2017 (found here: https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/consultation-documents/canada-british-columbia-caribou-protection-study.html#_06). We request that BW Gold include this consideration in the CMMP and approach offsetting in a way that is considerate of this.	Please see the response to Comment 51 for the updated offsetting calculations using the BC provincial draft offsetting Decision Support Tool. The updated offsetting plan does not rely on UWRs for preventing forestry operations.
58	22-Sep-21	Indigenous Communities	Draft CMMP (August 2021)	NWFFN/STFN/SFN	Draft CMMP August 2021		Page 3-1	Wildlife and Habitat	Re: Pre-construction surveys for mineral licks and management. BW Gold will conduct a pre-construction survey for mineral licks, and in consultation with Indigenous groups manage any mineral licks outside the footprint to maintain them in their natural state. Please define a spatial boundary for how far outside the mine site mineral licks will be managed/maintained.	Pre-construction surveys were conducted during the summer and fall of 2021 using a combination of landusers and knowledge holders from Indigenous groups and biologists from ERM. Surveys were conducted in the project footprint and an area generally within 1 km of the project footprint. Note that should any salt licks be found during subsequent field surveys in 2022, during construction or long-term monitoring that these salt licks can have mitigation and monitoring applied.
59	22-Sep-21	Indigenous Communities	Draft CMMP (August 2021)	NWFFN/STFN/SFN	Draft CMMP August 2021		Page 3-2	Wildlife and Habitat	Re: Minimize BW Gold will identify wildlife corridors that intersect Project roads and install wildlife crossings signs in these areas. We recommend that BW Gold also identify wildlife corridors that intersect the transmission line ROW to help information locations where woody debris can be deposited to minimize predatory sightlines and act as a barrier to predator movement	Pre-construction surveys were conducted during the summer and fall of 2021 using a combination of landusers and knowledge holders from Indigenous groups biologists from ERM. Surveys were conducted in the mine site footprint and transmission line for wildlife corridors. The use of woody debris to manage sight lines within the transmission line right of way is discussed in the WMMP. The use of woody debris to manage sight lines at naturally-occurring movement corridors is a new mitigation. This mitigation will be added to the WMMP when it is updated with the results of 2021 baseline surveys during 2022.

Blackwater Mine DRAFT CMMP August 2021:										
ADMIN		COMMENTS								
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section	Page	Comment Theme	Comment	Response
60	22-Sep-21	Indigenous Communities	Draft CMMP (August 2021)	NWFFN/STFN/SFN	Draft CMMP August 2021		Page 3-2	Wildlife and Habitat	Re: Minimize. BW Gold has not described a work stoppage protocol that will be implemented in the event that caribou are observed on, or within a buffer zone, of the mine footprint. This is a requirement of Condition 22 F, but has not been outlined in the draft CMMP.	Section 3.2 of the CMMP (V4) has been updated with a detailed work stoppage protocol.
61	22-Sep-21	Indigenous Communities	Draft CMMP (August 2021)	NWFFN/STFN/SFN	Draft CMMP August 2021		Page 3-2	Wildlife and Habitat	Re: Minimize BW Gold will manage snow banks on roads so wildlife can cross. Please ensure that animals will be given the right of way by drivers and that breaks in the snow banks allowing wildlife to escape are established at appropriate intervals and considering the locations of game trails identified during pre-construction surveys.	Section 3.2 of the CMMP lists that wildlife have the right of way on all project roads. Text has been added to Section 3.2 to highlight that snowbank management will focus on areas where trails have been identified during pre-construction surveys.
62	22-Sep-21	Indigenous Communities	Draft CMMP (August 2021)	NWFFN/STFN/SFN	Draft CMMP August 2021		Page 3-3	Wildlife and Habitat	Re: Maintaining a minimum vertical distance of 400 m above Mt Davidson. BW Gold states that aircrafts will be required to maintain a minimum vertical distance of 400m above Mt. Davidson. However, it is our understanding that a minimum 500 m vertical distance is best practice for other operations (e.g. heli-skiing). We also request adding a horizontal minimum distance, and requiring a minimum 600m vertical distance during sensitive periods (calving, post-calving, rutting) (https://yukon.ca/sites/yukon.ca/files/env/env-flying-caribou-country.pdf). In addition, BW Gold should be required to report on compliance with this restriction.	BW Gold has followed the Compendium of Wildlife Guidelines for Industrial Developments in Northern British Columbia (FLNRO 2014), which specifies 400 m vertical above winter range and mineral licks for caribou. We are open to discussing this distance during review of the draft CMMP.
63	22-Sep-21	Indigenous Communities	Draft CMMP (August 2021)	NWFFN/STFN/SFN	Draft CMMP August 2021		Page 3-3	Wildlife and Habitat	Re: Minimize BW Gold will minimize sensory disturbance from dust by implementing measures to management fugitive dust, per the Air Quality and Dust Management Plan. We request that BW Gold also monitor dustfall impacts on caribou habitat to determine if additional mitigation measures or additional offsetting is required.	The Air Quality and Dust Management Plan includes dust monitoring at a variety of distances downwind and upwind from the Project site, including caribou habitat. BW Gold will ensure that dust monitoring considers wildlife habitat when designing the program.
64	22-Sep-21	Indigenous Communities	Draft CMMP (August 2021)	NWFFN/STFN/SFN	Draft CMMP August 2021		Page 3-3	Wildlife and Habitat	Re: Minimize BW Gold will minimize disturbance due to noise through noise abatement technology, equipment placement and maintenance and enforcing speed limits. It is not clear how BW Gold intends to minimize disturbance from blasting in the open pit. We request that BW Gold prohibit blasting during sensitive periods for caribou (e.g. calving, post-calving, rutting).	The sensitive periods for caribou listed by FLNRO (2014) in the Compendium of Wildlife Guidelines for Northern BC extent from January 15 to July 15. Prohibiting blasting during more than half the year is not possible. Colar data indicates that the Tweedsmuir herd uses the western half of Entiako Park during summer when calving occurs. Therefore, caribou are not expected to occur on Mt. Davidson at that time. To manage disturbance to caribou who may approach the mine site, a detailed work-stoppage protocol has been added to the CMMP.
65	22-Sep-21	Indigenous Communities	Draft CMMP (August 2021)	NWFFN/STFN/SFN	Draft CMMP August 2021		Page 3-3	Wildlife and Habitat	Re: maintain vegetation buffers adjacent mine roads It is not clear how BW Gold will maintain vegetation buffers along roads and riparian areas. Please provide more detailed information on how these buffers will be maintained and specify the minimum distance.	Vegetation buffers (strips of intact vegetation) will be left in place adjacent to the mine and Project roads wherever possible. The depth of this vegetation buffer will be location -specific based on the location of other infrastructure and features such as lakes.
66	22-Sep-21	Indigenous Communities	Draft CMMP (August 2021)	NWFFN/STFN/SFN	Draft CMMP August 2021		Page 3-3	Wildlife and Habitat	Re: Restoration Please provide an overview of how plans for progressive reclamation have changed to account for the potential increase in LOM from 17 to 23 years. There are potential implications for the length of time that caribou habitat will be impacted and this should be accounted for in offsetting measures.	BW Gold respectfully points out that progressive reclamation on the mine site and offsetting measures are two separate processes. The CMMP (V4) Section 4 has been updated with a new offsetting plan for the loss of caribou habitat on and surrounding the mine site. This includes a 50 year land securement of mineral tenures in the Capoose Ungulate Winter Range (UWR) and restoration of forestry roads within the Local Population Unit (LPU). This restoration is expected to provide a long term benefit to caribou by providing new habitat for caribou.
67	22-Sep-21	Indigenous Communities	Draft CMMP (August 2021)	NWFFN/STFN/SFN	Draft CMMP August 2021		Page 3-3	Wildlife and Habitat	Re: Restoration BW Gold states that they have experience restoring exploration trails in both low and high elevation environmental and will use established best practice to restore these roads. Please provide more detailed information on this experience, so NWFFN/STFN/SFN can adequately review, as we are concerned that these activities are more in line with road de-activation than habitat restoration. In addition, NWFFN/STFN/SFN should be involved in identifying what constitutes restored caribou habitat and developing the restoration methods for the Blackwater Gold project.	Section 5 of the CMMP describes that road restoration is a form of "functional restoration". BW Gold has experience in the functional restoration of exploration trails, which is described in CMMP Section 5.2. In December 01, 2021, both the Ulkatcho and Lhoosk'uz Dené Nations indicated to BW Gold that they expect to lead the caribou habitat restoration activities. BW Gold understands that the restoration priorities will be determined and led by the UFN/LDN in conjunction with FLNRORD.
68	22-Sep-21	Indigenous Communities	Draft CMMP (August 2021)	NWFFN/STFN/SFN	Draft CMMP August 2021		Page 3-4	Wildlife and Habitat	Re: Mitigation-related plans and activities BW Gold notes that project mitigation and monitoring will be guided by a TK/TLU Committee and an Access Management Working Group. Please provide more specific information on how many representatives from NWFFN/STFN/SFN will be on these committees, their rate of compensation for participation, proposed meeting frequencies and provide a terms of reference that outlines how BW Gold will take action on committee recommendations. We request that the proponent develop appropriate decision-making mechanisms with the participant Indigenous groups. Please also identify whether the TK/TLU Committee will rely only on existing data, or if there will be opportunities to collect new data as needed.	Regarding the TK/TLU Committee, BW Gold intends to invite participation of NWFFN, Stefan and SFN through established contacts but does not intend on limiting participation at this stage. BW Gold will revisit this position should the committee lose functionality and effectiveness. BW Gold is not proposing to compensate committee participants. BW Gold intends to discuss committee governance when the committee is struck. BW Gold intends to rely on existing data and augment that data with information as it is brought forward to the committee for consideration. Regarding the Access Management Working Group, BW Gold intends to invite participation of NWFFN, Stefan and SFN through established contacts but does not intend on limiting participation at this stage. BW Gold will revisit this position should the committee lose functionality and effectiveness. BW Gold is not proposing to compensate committee participants. BW Gold intends to discuss committee governance when the committee is struck.
69	22-Sep-21	Indigenous Communities	Draft CMMP (August 2021)	NWFFN/STFN/SFN	Draft CMMP August 2021		Page 4-1	Wildlife and Habitat	Re: Basis for habitat offsetting - UWRs as boundaries We disagree with BW Gold's approach of using existing UWRs as boundaries for determining candidate offsetting locations. While we agree that these areas need to be protected, it is a short-sighted approach as new UWRs or WHAs can be established or other measures used to protect habitat.	The CMMP (V4) includes an updated offsetting plan (Section 4) which describes offsetting both inside and outside of UWR polygons. During a meeting in October, 2021, FLNRORD made it clear that BW Gold should not rely on UWRs or WHAs being amended or updated to facilitate offsetting actions. Therefore, BW Gold is working with the landscape of existing forestry roads available for restoration both within and outside of UWRs. On January 25, 2022 UFN and LDN provided comments on the Dec 2021 draft CMMP and a report that described five priority areas for restoration in the Tweedsmuir LPU and surrounding area, which was discussed at a meeting with UFN, LDN, ECCC, EMLJ, and FLNRORD on January 26, 2022, along with further discussion on monitoring, adaptive management, and inputs to the DST.
70	22-Sep-21	Indigenous Communities	Draft CMMP (August 2021)	NWFFN/STFN/SFN	Draft CMMP August 2021		Page 4-2	Wildlife and Habitat	Re: habitat loss table. The habitat loss calculations do not account for the fact that the mine footprint will impede caribou movement and travel. As a result of the mine footprint caribou are unable to travel in lower elevation habitat around the north and north east of Mount Davidson to the southern area and vice versa. The area of travel corridors lost will be proportionate to the mine footprint, this loss of habitat needs to be measured and accounted for in habitat offsetting.	The habitat calculations account for the entire portion of the mine site within the LPU as well as a hybrid 3 km / 500 m disturbance buffer around the mine site. As discussed during the EA, offsets are not required for potential impacts outside the LPU which were characterized as non-critical Matrix 2 habitat. The EAC Application evaluated the potential for the mine site to disrupt caribou movement and it was not rated as a residual effect. The EAC Application evaluated the potential for habitat loss and alteration as a residual, but not significant effect. The proposed offset is for this residual effect from habitat loss and alteration. Please see the response to Comment 51 for the updated offsetting calculations using the BC provincial draft offsetting Decision Support Tool.

Blackwater Mine DRAFT CMMP August 2021:											
ADMIN		COMMENTS									
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section	Page	Comment Theme	Comment	Response	
71	22-Sep-21	Indigenous Communities	Draft CMMP (August 2021)	NWFFN/STFN/SFN	Draft CMMP August 2021		Page 4-2	Wildlife and Habitat	Re: First Nations disagree with disturbance buffer used to calculate indirect habitat loss BW Gold states that they understand that the Nations are of the view that a larger disturbance buffer should be considered for calculating indirect habitat loss. NWFFN, STFN, SFN maintain this position that a larger disturbance buffer must be considered in calculating indirect habitat loss. Specifically, we request that indirect habitat loss is calculated based on a minimum 3km zone of influence around all mine components and the airstrip, and that this zone of influence be confirmed through follow-up monitoring to determine whether additional offsetting measures are required.	BW Gold's approach to mapping habitat alteration in a disturbance buffer was based on the direction provided during the EA from FLRNORD and ECCC in 2018 and 2021. The disturbance buffer used for calculating the size of impacts and resulting offset was the "hybrid buffer". The hybrid buffer extends 3 km from the open pit, and 500 m from other types of infrastructure such as roads, the tailings impoundment, buildings, etc. This hybrid buffer was presented in 2018, and agreed upon by ECCC and FLRNORD in their November 2021 comments to BW Gold.	
72	22-Sep-21	Indigenous Communities	Draft CMMP (August 2021)	NWFFN/STFN/SFN	Draft CMMP August 2021		Page 4-2	Wildlife and Habitat	Re: First Nations disagree with BW Gold's view of habitat types NWFFN, STFN, and SFN also disagree with BW Gold's view of habitat types at the Project site. Considering the goal of striving to increase the population size of the Tweedsmuir-Entiako herd, all habitat (including currently suitable habitat and habitat that may become suitable in the future) must be included in the offsetting planning and calculations.	BW Gold's approach to mapping was based on the direction provided during the EA from FLRNORD and ECCC. The mapping used Habitat Capability Mapping (see section 2.2, bullet 3) to evaluate the effects and Habitat Suitability Mapping to evaluate the cumulative effects (see section 2.2, bullet 4). The direction from the EA resulted in characterizing habitat as HEWR both inside an outside of the 95% kernel density polygon (95% kernel). LEWR was identified within the 95% kernel density polygon, with the same habitat identified as high and low elevation Matrix 1 outside the 95% kernel, but within the Local Population Unit (LPU) boundary. The LPU was used to define the area of caribou habitat lost, as well as the area of habitat to be offset. Within the LPU, HEWR and Matrix 1 (plus a hybrid 3 km/ 500 m buffer) was used to identify lost and disturbed habitat to be offset. The CMMP (V3) has been updated to describe this offset. Please see the response to Comment 51 for the updated offsetting calculations using the BC provincial draft offsetting Decision Support Tool.	
73	22-Sep-21	Indigenous Communities	Draft CMMP (August 2021)	NWFFN/STFN/SFN	Draft CMMP August 2021		Page 4-2	Wildlife and Habitat	Re: Project area is not consistently used by caribou. We disagree with this position for several reasons, including telemetry data limitations (small sample size, high rate of collar failures), lack of Indigenous knowledge consideration, and the fact the existing mining exploration activities in the area are likely influencing these findings. We are concerned that BW Gold is continually citing this to justify minimizing the impact of the project. Habitat capability (vs. telemetry data) is the important factor to consider in offsetting and this is the approach BW Gold should take.	BW Gold's assessment and characterization was based on the direction provided during the EA. The mapping considered telemetry data and habitat capability. Note that for the purposes of calculating the amount of habitat to be offset, all of the area of the Project footprint plus the hybrid buffer within the LPU is used irrespective of whether caribou are currently or consistently using the area. The CMMP (V4) has been updated to describe this offset. Please see the response to Comment 51 for the updated offsetting calculations using the BC provincial draft offsetting Decision Support Tool that uses inputs provided by ECCC that consider the mine site inside the LPU to be Critical Habitat.	
74	22-Sep-21	Indigenous Communities	Draft CMMP (August 2021)	NWFFN/STFN/SFN	Draft CMMP August 2021		Page 4-6	Wildlife and Habitat	Re: Level of certainty in offset planning BW Gold's view is that the project offsetting ratio can be less than 4:1 due to the level of certainty of the offset. We strongly disagree with this view, considering the Tweedsmuir herd population is currently in decline and there are few successful examples of habitat offsetting within the LPU range.	Please see the response to Comment 51 for the updated offsetting calculations using the BC provincial draft offsetting Decision Support Tool.	
75	22-Sep-21	Indigenous Communities	Draft CMMP (August 2021)	NWFFN/STFN/SFN	Draft CMMP August 2021		Page 4-6	Wildlife and Habitat	Re: Equivalency calculations. We completely disagree with BW Gold's approach to calculating ecological equivalency for the candidate offsetting locations and the mine footprint. While it is reasonable to say that the Capoose HE-UWR and Johnny Lake LE-UWR currently provide better habitat than the mine footprint, we strongly disagree with BW Gold devaluing the mine site based on its current disturbed state. Instead, the baseline against which offsetting is determined must be the baseline of Indigenous groups who used to hunt caribou in the area and their knowledge of the habitat quality and capability. This approach would align better with Indigenous approaches to conservation offsetting. It would also be a more conservative approach, which is necessary considering the long-term decreasing population trend of the Tweedsmuir-Entiako herd.	Please see the response to Comment 51 for the updated offsetting calculations using the BC provincial draft offsetting Decision Support Tool.	
76	22-Sep-21	Indigenous Communities	Draft CMMP (August 2021)	NWFFN/STFN/SFN	Draft CMMP August 2021		Page 4-14	Wildlife and Habitat	Re: Evaluation of Capoose North and Johnny-Fawnie as offset areas NWFFN, STFN, SFN are concerned that BWGold's decision to select habitat that is already good quality for caribou (e.g. HV of 3.5 and higher) will result in meaningless outcomes for the Tweedsmuir-Entiako subpopulation. NWFFN, STFN, and SFN request that BW Gold take a more strategic approach to choosing offset locations by selecting locations that are just above the level of disturbance that make them currently unsuitable for caribou. This will strike a better balance between aiming to maximize successful outcomes and providing meaningful benefit to the Tweedsmuir-Entiako subpopulation.	Please see the response to Comment 51 for the updated offsetting calculations using the BC provincial draft offsetting Decision Support Tool.	
77	22-Sep-21	Indigenous Communities	Draft CMMP (August 2021)	NWFFN/STFN/SFN	Draft CMMP August 2021		Page 4-16	Wildlife and Habitat	Re: Additional offsets focused on recovery at the herd scale NWFFN, STFN, and SFN agree with LDN and UFN's position that BW Gold must implement additional offsets focused on recovery at the herd scale through the development of a habitat model. NWFFN, STFN, and SFN are interested in participating in the development of this model, as the herd range overlaps with the respective traditional territories of these communities. These Nations will require additional funding to undertake Indigenous Knowledge study focused on caribou use and habitat within their territories and the herd range. The results of this study must be incorporated into the habitat model.	BW Gold understands that the herd range (Tweedsmuir Local Population) overlaps with the traditional territories of LDN and UFN. BW Gold has offered to fund development of a habitat model as described in the CMMP and has engaged in dialogue on this matter directly with LDN and UFN since issuance of the CMMP (V2). BW Gold expects further discussion on the habitat model in future engagement on the CMMP. BW Gold is not proposing to fund additional Indigenous knowledge studies on caribou use as part of its CMMP.	
78	22-Sep-21	Indigenous Communities	Draft CMMP (August 2021)	NWFFN/STFN/SFN	Draft CMMP August 2021		Page 5-10	Wildlife and Habitat	Re: Non-habitat-based offsetting. BW Gold will provide support for non-habitat-based offsetting activities. NWFFN, STFN, and SFN request funding from BW Gold to support the revitalization of caribou-focused knowledge transmission between community knowledge holders and youth. The specific terms and approach of this should be determined through future discussions with NWFFN, STFN, and SFN	Funding for caribou-focused knowledge transmission between community knowledge holders and youth is beyond the scope of the CMMP and is not proposed by BW Gold.	
79	22-Sep-21	Indigenous Communities	Draft CMMP (August 2021)	NWFFN/STFN/SFN	Draft CMMP August 2021		Page 6-2	Wildlife and Habitat	Re: Adaptive Management Triggers. BW Gold intends to use statistical significance to trigger adaptive management measures. Instead, we recommend using exceedance of EA predictions as thresholds as a trigger for adaptive management actions, as the Tweedsmuir-Entiako subpopulation is small and any population effects are unlikely to be statistically significant.	Following comments from several parties, the use of statistical significance as a trigger for adaptive management has been removed and replaced with specific management triggers in Section 6.	

Blackwater Mine DRAFT CMMP August 2021:										
ADMIN	COMMENTS									
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section	Page	Comment Theme	Comment	Response
80	22-Sep-21	Indigenous Communities	Draft CMMP (August 2021)	NWFF/STFN/SFN	Draft CMMP August 2021		Page 6-3	Wildlife and Habitat	Re: monitoring of predicted effects on caribou. BW Gold states that the Project Application/EIS evaluated five potential effects on caribou, including habitat loss and alteration, changes in caribou population dynamics, mortality risk, changes in caribou movement patterns, and changes in caribou health; residual effects were only predicted for habitat loss and alteration. We are not confident that these predictions, made through the Application/EIS process, are still valid due to BW Gold's proposed mine optimizations. We are concerned that BW Gold's preference to establish two potentially acid-generating (PAG) ore stockpiles and changes to the height and length of the site c dam will lead to increased contamination risks that could affect caribou. We therefore recommend that BW Gold develop a detailed plan to monitor potential effects on mortality risk and changes in caribou health. This will provide NWFF, STFN, and SFN with necessary assurance in BW Gold's predictions of no residual effects. We also request detailed information from BW Gold on how the proposed mine optimizations may affect caribou mortality risk and changes in caribou health.	This comment discusses both caribou survival and environmental contamination, which are addressed separately below: Survival: Monitoring survival of caribou in the Tweedsmuir herd is being conducted by the province of BC through their collaring program. BW Gold may collaborate on regional programs for caribou, but does not intend to conduct a separate caribou survival program. Toxicology: In order for there to be potential risks to caribou health, three conditions must occur: 1. Caribou must be present, 2. Parameters of concern must be present in high enough concentrations to cause adverse effects, and 3. an exposure route must exist for caribou to take up Project-related parameters of concern. If any one of these conditions do not occur, potential risks to caribou health would not be expected. The Wildlife Mitigation and Monitoring Plan will include monitoring of wildlife usage of the mine site, which will identify whether wildlife (including caribou) are present within the mine site and whether exclusion measures (i.e., additional mitigation) are needed. Monitoring of soil and vegetation metal concentrations both within (under the Closure and Reclamation Plan [CRP]) and outside of (under the Country Foods Monitoring Plan [CFMP]) the mine site for Project-related changes in concentrations of parameters of concern is also proposed. Together, data collected under the WMMP, the CRP, and the CFMP can be used to determine whether there is potential risk to caribou (or other wildlife) health; where the potential for risk is identified, an ecological risk assessment could be one of the triggered responses under the adaptive management plan, if warranted.
81	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	Paragraph 3			Reference Text: Ministry of Mines and low innovation carbon. Ministry of Mines and low innovation carbon is a typo = Energy, Mines & Low Carbon Innovation (EMLI)	The Context section of the CMMP has been removed.
82	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	1-1 and multiple sections throughout the document	1-1 and multiple sections throughout the document		Reference Text: Securement Securement should be communicated as a time bound commitment	Following discussion with ECCC, FLNRORD, UFN and LDN and the BC EAO, Capoose HE-UWR will be secured for 50 years, as described in Section 4 of the CMMP.
83	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	Fig. 1.1 -1	1-4		Reference Text: "non critical habitat" The depiction of "non critical" habitat is incorrect. This should be in the matrix type 1 where it is in the herd area. See habitat section 2-2, non-critical is not a classification defined in the habitat section.	The classification of "non-critical" habitat has been removed from Figure 1.1-1 and has been replaced by the appropriate LEWR or Matrix 1, following the mapping rules provided by FLNRORD in 2018 and described in Section 2.2 of the CMMP.
84	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	1.3.4 / 2.2.1	1-6 / 2-8		Reference Text: Offset Tool Guidelines & Operational Manual, Version 5.0 (FLNRORD 2018) Incorrect reference/ should be: BC 2019. Environmental Mitigation Policy - BC Habitat Offset Decision Support Tool. Guidelines & Operational Manual. Trial Version 1.0. February 2019.	Citation updated on pages 1-6, 2-8 and in the references.
85	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	1.3.4	1-6		Reference Text: Environmental Mitigation Policy No reference to the Procedures for Mitigating Impacts on Environmental Values - May 2014 (PDF, 1.2MB) (https://www2.gov.bc.ca/gov/content/environment/natural-resource-stewardship/laws-policies-standards-guidance/environmental-guidance-and-policy/environmental-mitigation-policy#:~:text=Procedures%20for%20Mitigating%20Impacts%20on%20Environmental%20Values%20-%20May%202014%20(PDF%2C%201.2MB)) or the Interim Mitigation Offset Guidance for Proponents and Staff - https://www2.gov.bc.ca/gov/content/environment/natural-resource-stewardship/laws-policies-standards-guidance/environmental-guidance-and-policy/environmental-mitigation-policy	Citations added to page 1-6 and the references.
86	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	2.1	2-1		Reference Text: "Their new analyses, based on more extensive data, supported the 65% undisturbed threshold first identified in 2011 (Johnson et al. 2020)" Refers to boreal caribou. As presented this is an incorrect reference.	Specific reference to woodland caribou has been added.
87	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1		2-2		Reference Text: Bullet point "7" - BAFA and ESSF First use in text - define	BAFA and ESSF defined on first usage in Section 2.2
88	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	2.2	2-8		Reference Text: "forest blocks" What are "Forest blocks"?	Changed to "forested areas"
89	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	2.2	2-9		Reference Text: "An important distinction to be made is that disturbed habitat does not equate to lost habitat since caribou continue to forage in these stands at rates similar to those prior to the pine beetle outbreak (Cichowski 2010)" As written this is a misrepresentation. the paper speaks to MPB kill stands not disturbance in general. There is an issue with the cut block and road inclusion in "not lost habitat".	The text in Section 2.2 has been updated to be specific about pine beetle outbreaks: "An important distinction to be made is that disturbed habitat does not always equate to lost habitat. For example, caribou will continue to forage in stands affected by pine beetle outbreak at rates similar to those prior to the outbreak (Cichowski 2010)."
90	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	3.1	3-1		Reference Text: "no Recreation trails are allowed in caribou habitat" Is BW building recreation trails?	BW Gold is not intending to build recreation trails. However, this mitigation was a commitment that is included in the provincial mitigation table and is repeated in the CMMP.
91	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	3.1 / 3.2	3-1 / 3-2		Reference Text: pre-construction surveys Are the indicated surveys complete? Where is the data presented? what is the status of these surveys? with intention to begin work this summer this work should be largely complete.	BW Gold conducted a series of pre-construction surveys during the summer of 2021 to address requirements from the provincial EAC, federal Decision Statement and to support planning for management actions. The results of these surveys are being compiled into a "2021 Blackwater Project Wildlife Baseline Report; Pre-Construction Surveys" during Q1 of 2022.
92	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	3.2	3-2		Reference Text: "respect sensitive periods" Explicitly mention what these sensitive periods are and what activities will/will not take place.	The sensitive periods for caribou have been added to the text in Section 3.2 Mitigation to avoid sensitive periods for other wildlife species is described in the Wildlife Mitigation and Monitoring Plan. A citation has been added to the CMMP Section 3.2 to direct the reader to the WMMP.

Blackwater Mine DRAFT CMMP August 2021:										
ADMIN	COMMENTS									
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section	Page	Comment Theme	Comment	Response
93	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	3.2	3-2		Reference Text: "if caribou are observed on site or on Project roads during construction or operations, management measures will be implemented following a risk-based approach based on time of year, caribou behaviour and location, and Project activity (Section 6.6) (P 22.f)." This differs from the MAEMA approach for wildlife and looking at section 6, I am not seeing any connections to seasonal timing, behaviour, location, or project activity in any tangible way.	The sensitive periods for caribou have been added to the text in Section 3.2
94	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	3.3	3-3		Reference Text: "Using native or weed-free seed" Species need to be defined and all need to be certified weed free	The text has been updated such that all seed mixes are specified as weed-free. Specific seed mixes will be defined during the final planning process for offsetting by UFN/LDN in collaboration with the province.
95	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	3.3.1 and multiple sections throughout the document	3-3 and multiple sections throughout the document		Reference Text: Restoration and reclamation are not the same. The terms are not interchangeable. Reclamation is defined the reclamation provisions of the Mines Act and the Health, Safety and Reclamation Code for Mines in British Columbia. Restoration is to return the site's hydrology, topography and natural vegetative communities to pre-disturbance conditions.	The text has been updated to use "Reclamation" when referring to reclamation of the Blackwater project mine site area and access roads. "Restoration" is used in the context of the offsetting plan to restore previously impacted landscapes due to construction of forestry roads.
96	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	Not Specified	4-1		Reference Text: "habitat securement" Is temporary habitat securement - in this instance refers to "development deferral"	The discussion of land securement has been updated and is described in Section 4.4. It is no longer referred to as a "habitat securement".
97	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	Not Specified	Not Specified		Reference Text: "the basis for BW Gold's offsetting plan remains a habitat securement" According to the EMP: - To be considered an offset, the land securement must maintain or improve upon the status quo for that environmental value (prior to project development) - Land securement (relinquishing tenure) in and of itself is not an offset in most cases. However, where the offset site is under threat of imminent development, protecting it from that development by securing/relinquishing the tenure to prevent that development (therefore preventing its imminent loss), may be considered an offset. Habitat securement in and of itself is generally not considered an offset as it does not provide additional benefit to caribou above the current day status quo - needs to be paired with other conservation mechanisms such as restoration or meaningful habitat securement.	The offsetting plan has been updated in CMMP Section 4 to include habitat restoration in caribou habitat disturbed by forestry roads.
98	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	4.1	4-2		Reference Text: Offset area ratio The offset area ratio was developed for the entire polygon and needs to be considered as such.	A new offsetting plan has been updated in CMMP (V4) Section 4, including offsetting ratios identified by the BC draft offsetting Decision Support Tool, as suggested by ECCC and agreed upon by FLNRORD, UFN and LDN in January 2022.
99	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	4.1	4-2		Reference Text: the metrics to describe each polygon describe the polygon in its entirety	No comment was provided with the referenced text.
100	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	4.1	4-2		Reference Text: The offset proposal, including the metrics to describe each polygon, were accepted by these groups, ECCC, and FLNRORD and were therefore the basis of the federal and provincial EA conditions (EAO 2019b; see Table A-1 in Appendix A) This may be a little miss representation in terms of what was agreed to. It is certainly not what is in the ECCC response. Also from - ERM PROJ #0332945-0101-0005 REV C.1 AUGUST 2018 - "Details of the offsetting plan and proposed monitoring will be developed in consultation with ECCC, UFN, LDN, FLNRORD, and ENV. A preliminary version of the conceptual offsetting plan was presented to BC EAO, CEAA, FLNRORD, ENV, ECCC, UFN and LDN"	A new offsetting plan has been updated in CMMP (V4) Section 4. The Referenced text has been removed.
101	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	4.1.1	4-6		Reference Text: "Updated analyses by ECCC confirmed support for the 500 m disturbance buffer for boreal caribou (Johnson et al. 2020)." The herd level metric for landscape analysis is not the same as more recent buffer metrics looking at responses to disturbance based on disturbance type and season. Apples and Oranges... and implies that ECCC is not interested in the hybrid buffer. This reference should be clarified as the context it is being used in is a little misleading.	A new offsetting plan has been updated in CMMP (V4) Section 4. The Referenced text has been removed and the hybrid buffer is used throughout the offsetting calculations. The references to ECCC and the hybrid buffer have been updated.
102	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	4.1.2	4-6		Reference Text: This is also the approach used in the draft BC offsetting tool (FLNRORD 2018) Improper reference - BC 2019. Environmental Mitigation Policy - BC Habitat Offset Decision Support Tool. Guidelines & Operational Manual. Trial Version 1.0. February 2019.	Citation updated on pages 1-6, 2-8 and in the references.
103	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	4.1.2.1	4-6		Reference Text: With the level of certainty of the offset, it is arguable that the Project offsetting ratio might approach 1:1 for some candidate areas. Describe how this could approach 1:1 w/ equivalence unless it has the EXACT same biophysical attributes (ecological equivalency) w/ no time lag and 100% successful - however literature points to best practice for offsets being >1:1 due to uncertainty. "There have been several studies and reviews of offset policies published in the literature analyzing the effectiveness of various baseline ratios (Maron et al. 2013). These include fixed ratios as well as case-by-case ratios. Overall the results show that when a 1:1 ratio is used, there is a loss of 50% of habitat overall (i.e., for every 1 ha of functional habitat that is offset by an equivalent area, 1 ha is lost)" (BC 2019). In the memo provided on May 24, 2018 "FLNRORD Comments on Proposed Mitigation and Offsetting for Caribou" - the BC Offset tool is discussed and explains "The tool has a set minimum offset ratio based on a review of literature that would potentially meet the minimum requirement to achieve a "no net loss", while accounting for risk. Through the tool a minimum requirement of 4:1 ratio is established. To achieve the minimum offset ratio, it is dependent on the nature of the area impacted relative to the area proposed for offset (like-for-better). The tool also has a set starting point which considers the vulnerability of caribou in BC. The starting point for determining offset ratios is set at 10:1 (like-for-like). The tool also considers scenarios of like-for-worse offsetting and sets a maximum offset ratio of 200:1." This statement does not include the consideration of "time lags" and explanation of restoration techniques which have been proven to be effective. Discussion on the calculation of offsets also includes no discussion on the use of multipliers.	The offsetting plan has been updated in CMMP (V4) Section 4, including offsetting ratios identified by the BC draft offsetting Decision Support Tool, as suggested by ECCC and agreed upon by FLNRORD, UFN and LDN in January 2022.

Blackwater Mine DRAFT CMMP August 2021:											
ADMIN		COMMENTS									
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section	Page	Comment Theme	Comment	Response	
104	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	4.9	4.1.2.3		Reference Text: "Based on the criteria in Table 4.1-2 the Capoose HE-UWR and LE-UWR areas have the highest quality habitat at 4. They were followed by Johnny Lake (habitat value 3.5) and Moose Lake (habitat value 2.5). The mine site was quantified with a habitat value of 1 to 1.5." This ignores that the highest value areas in Capoose were not on the table. These areas contribute disproportionately to the value of the entire polygon and are excluded from the proposal. This needs to be clarified.	A new offsetting plan has been updated in CMMP (V4) Section 4. The Referenced text has been removed.	
105	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	4.9	4.2		Reference Text: where reclamation of caribou habitat is deemed successful, the effect of habitat loss would cease. This assumption is incorrect. Reclamation and restoration are different. Restoration of habitat takes time and there is a level of uncertainty with restoration of heavily impacted sites.	A new offsetting plan has been updated in CMMP (V4) Section 4. The Referenced text has been removed.	
106	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	4.9	4.2		Reference Text: "BW Gold expects the duration of the offset for these impacts to be approximately 50 years, until reclamation to functional caribou habitat is complete." Are we talking restoration or reclamation? Expectations for restoration of habitat need to reflect the time that it will take to achieve restoration.	A new offsetting plan has been updated in CMMP (V4) Section 4. The Referenced text has been removed.	
107	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	4.9	4.2		In some areas reclamation to functional caribou habitat is not considered feasible, such as the open pit, TSF, water treatment plants (WTP), and associated access road and transmission line. In these areas, the effect of habitat loss would be longer term and may extend beyond 50 years the time until the WTP and associated infrastructure needs to be clearly stated. this is in excess of 300 years is it not?	A new offsetting plan has been updated in CMMP (V4) Section 4. The Referenced text has been removed.	
108	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	4.2	4-10		Reference Text: The duration of the offset assumes there is no time lag between the beginning of offsetting activities and benefits for caribou. The habitat offset includes a land securement prior to Construction along with restoration within the offset area such as forestry road restoration. Both of these activities will have an immediate benefit on caribou behaviour. Securement will have no immediate benefit and may have a limited benefit in the medium term. Since securement is only for the medium term it cannot be assumed that there will be a long term benefit. Functional restoration may have an immediate benefit but likely not in terms of caribou behaviour. There is a time lag from implementation of restoration to habitat being restored. Depending on the site and the habitat this may vary from 40 to over 120 years.	A new offsetting plan has been updated in CMMP (V4) Section 4. The text now refers to functional restoration of caribou habitat through the removal of roads.	
109	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	4.3	Not Specified		There is no reference of the approximately 30 km exploration trails on Capoose.	A new offsetting plan has been updated in CMMP (V4) Section 4. The updated plan includes the 30 km of exploration trails on Capoose.	
110	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	4.3.1	4-13		Reference Text: Table 4.3.1 Habitat Value based on professional judgement using the range between 1 and 4 (FLNRORD 2018) This is an incorrect reference. the values are based on BW professional opinion. they are not values that can be attributed to the FLNRORD 2018 reference, they are not values that were published therein.	A new offsetting plan has been updated in CMMP (V4) Section 4. The Referenced text has been removed.	
111	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	4.3.1	4-13		Reference Text: "The Capoose North polygon is within the Capoose HE-UWR polygon which contains the largest area of high elevation windswept ridges and parkland to the east of Entiako Provincial Park – with areas of Boreal Alta Fescue Alpine (BAFA) and Engelmann Spruce Subalpine Fir moist very cold parkland (ESSFmvp). The majority of the polygon is high/mid-elevation ESSF forest (ESSFmv1) and 98% (3,919 ha) of the polygon is classified as HEWR. Capoose Mountain is within the core winter range (95% UD kernel), is consistently used by caribou in winter and it is contiguous with the Entiako Park. The Capoose HE-UWR was rated as the highest value habitat (4) for caribou. At the June 11, 2018 caribou sub-working group meeting, representatives from BC government agreed that the high elevation areas within Capoose represent the best quality habitat in the LPU range outside of the park (ERM 2018, p. 7-4)." This can be the discussion around the entire polygon but not the offset area. Presenting it as the offset area is not correct.	A new offsetting plan has been updated in CMMP (V4) Section 4. The Referenced text has been removed.	
112	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	4.6	4-16		Reference Text: "The securement will replace what will be impacted..." Replace is the wrong word. The habitat is already existing thus is not being replaced	A new offsetting plan has been updated in CMMP (V4) Section 4. The Referenced text has been removed.	
113	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	4.6	4-16		Reference Text: "...preventing a disturbance to habitat considered to be of the highest quality within BW Gold's mineral tenures." This is incorrect as the highest quality habitat has been excluded from the securement.	A new offsetting plan has been updated in CMMP (V4) Section 4. The Referenced text has been removed.	
114	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	4.6	4-16		Reference Text: There will be no time lag with offset since the habitat-based offset will be implemented before construction commences, is protecting an area currently consistently utilized by caribou, and preventing a disturbance to habitat considered to be of the highest quality within BW Gold's mineral tenures. Are the mineral exploration trails in the offset being restored?	A new offsetting plan has been updated in CMMP (V4) Section 4. The Referenced text has been removed. Yes, the mineral exploration trails in the Capoose UWR will be restored by BW Gold. This is described in the updated CMMP, Section 4.	
115	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	4.2	4-9		Reference Text: "reclamation to functional caribou habitat" Confusion of the terms "reclamation" and "functional restoration"	A new offsetting plan has been updated in CMMP (V4) Section 4. Throughout the document, the text has been updated to refer to on-site mine reclamation as "reclamation" and removal and restoration of forestry roads in the offsetting area as "restoration".	
116	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	5.1	5-1		Reference Text: "Improve caribou habitat" This should be restored.	The text in section 5.1 has been changed from "improve caribou habitat" to "restore caribou habitat".	
117	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	5.2	5-2		Reference Text: "These sites were restored and monitored by Avison Management Services (Avison 2016, 2017, 2018, 2019)." Restoration takes time, I would argue that the areas are decades away from being restored even if the restoration works are complete.	The text has been updated to be more specific to "functional restoration", rather than ecological restoration.	
118	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	5.3.1	5-5		Reference Text: The first 30 m of the trail will be seeded with a quick-growing reclamation seed mix given recent experience on the trails in the Capoose Exploration area. What is the species composition of the seed mix and why was it needed?	The seed mixes will be defined through the development of the final restoration prescriptions for each road segment.	
119	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	5.3.4	5-7		Reference Text: "Excessive coarse woody debris, such as disturbance blowdown from fires and MPB, may obstruct caribou movement and may need removal or dispersal." These statements are generally unfounded assumptions or refer to very spatially discrete areas that cannot be extrapolate to a landscape. Support is not wide spread (if it exists at all) for the assumptions that deadfall prevents animal movement.	The text has been updated to be specific that management of coarse woody debris will be considered in the final management prescriptions: "Excessive coarse woody debris, such as disturbance blowdown from fires and MPB, may obstruct caribou movement and final management prescriptions will consider whether this debris may need removal or dispersal."	

Blackwater Mine DRAFT CMMP August 2021:										
ADMIN	COMMENTS									
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section	Page	Comment Theme	Comment	Response
120	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	6.1	6.1		Reference Text: "The baseline information that will be used, or collected where existing baseline information is insufficient, to support the monitoring program Management framework references statistical significance for adaptive management actions. Prior to establishing monitoring programs power analyses will be needed to identify the sampling intensity needed to ensure statistical relevance can be achieved. Baseline data that has been collected needs to be clearly identified. There needs to be clear connections between the data collected as baseline, the data collected for monitoring, the monitoring question, the monitoring goal, and the analysis.	Following comments from several parties, the use of statistical significance as a trigger for adaptive management has been removed and replaced with specific management triggers in Section 6.
121	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	Multiple sections	6		Reference Text: insufficient, to support the monitoring program This requires the monitoring plan to account for type I and type II error explicitly and include power analyses to identify required sampling intensities. In some cases a significant result or trend may indicate success of a mitigation which would lead to a no change response. In many cases if insufficient baseline data has been collected or non-compatible data has been collected meaningful statistical analysis may not be possible.	Following comments from several parties, the use of statistical significance as a trigger for adaptive management has been removed and replaced with specific management triggers in Section 6.
122	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	6.1	6-3		Reference Text: "Monitoring the Tweedsmuir caribou at the herd or LPU level is beyond the ability or responsibility for any one proponent alone. BW Gold will support the Province and other groups to assist and support herd-level monitoring. Herd-level monitoring will be addressed through participation in: • Environmental Monitoring Committee (established by EAC Condition 19); and • Participation in regional programs with FLNRORD, ECCC and Indigenous Groups to monitor caribou herds. Monitoring of predicted effects on wildlife Valued Components (VCs) and monitoring of mitigation efforts will be reported in the WMMP Report. A CMMP Report will also be produced that focuses on monitoring of the effectiveness of the offsetting activities for caribou." This differs from the WMMP and reflects a more appropriate approach to herd management. the effectiveness of offsetting activities will require details	Comment noted. The effectiveness of offsetting activities being undertaken by BW Gold in the Capoose area will be monitored as described in Section 6 of the CMMP (V4).
123	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	6.3.1	6-5		Reference Text: Aerial Surveys Aerial surveys as described will not meet the monitoring objectives, performance measures are not realistic.	The adaptive management section of the CMMP (Section 6) was updated extensively following comments from FLNRORD, ECCC, UFN and LDN during November 2021 and January 2022. A draft updated adaptive management section of the CMMP was reviewed by these parties in February 2022. Following comments from FLNRORD in January 2022, aerial surveys are no longer proposed. Instead, BW Gold will liaise with FLNRORD in September of each year on what types of aerial data collected by the province may be available, and will conduct a monitoring program to examine relative abundance with respect to the mine site using pellet counts and snow track surveys. Edits and comments on Section 6, Adaptive Management, were addressed and included in the CMMP (Version 4) released March 15, 2022.
124	5-Nov-21	FLNRORD & ENV	Table	Duncan McColl (FLNRORD), Karen Stefanyk (BC ENV)	Draft CMMP Aug 2021, Version C.1	6.4.1	6-9		Reference Text: Cameras The number of cameras is far too low to meet the monitoring objectives or performance measures	The overall objectives is to determine if caribou, moose and wolves are using the restored forestry roads that are part of the project offset. The use of 20 cameras will answer that relatively simple question. BW Gold is open to discussing the final number of cameras if FLNRORD has specific guidance on camera design.
125	5-Nov-21	FLNRORD	Cover Letter	Duncan McColl	Draft CMMP Aug 2021, Version C.1	Reference to Other Plans	Reference to Other Plans	General Comments	The related plans referenced within the Draft CMMP (e.g., Wildlife Management and Monitoring Plan, Construction Management Plan, Vegetation Management Plan), show some inconsistencies in the language used to describe mitigation measures and in some of the strategies described therein. These plans are being concurrently reviewed and it is likely there will be additional requests for clarification and alignment among the various plans that have been provided.	BW Gold has endeavored to maintain consistent language across management plans. If there are inconsistencies, these can be remedied in future versions of the plans. Note that both the WMMP and CMMP are due to be updated again in Q1 2022.
126	5-Nov-21	FLNRORD	Cover Letter	Duncan McColl	Draft CMMP Aug 2021, Version C.1	N/A	N/A	General Comment - Habitat Characterization	The characterization of habitats in the Draft CMMP aligns with the information in the Environmental Assessment (EA) and is consistent with the mapping and descriptions from the EA. There is one exception; in Figure 1.1-1 within Matrix 1 habitat there is one area within identified as non-critical habitat. All Matrix 1 habitat is characterized as critical habitat. This figure is the only place in the Draft CMMP where Matrix habitat is depicted as non-critical habitat. If the Matrix 1 habitat that was described as non-critical in Figure 1.1-1 was excluded from disturbance calculations the resultant disturbance percentages would be incorrect.	Thank you for your comment. This figure has been updated.
127	5-Nov-21	FLNRORD	Cover Letter	Duncan McColl	Draft CMMP Aug 2021, Version C.1	N/A	N/A	General Comment - Restoration	Restoration and reclamation are not the same. The terms are not interchangeable. Reclamation is defined within the reclamation provisions of the Mines Act and the Health, Safety and Reclamation Code for Mines in British Columbia (Mines Code). Restoration is to return the sites' hydrology, topography, and natural vegetative communities to pre-disturbance conditions	The text has been updated to use "Reclamation" when referring to reclamation of the Blackwater project mine site area and access roads. "Restoration" is used in the context of the offsetting plan to restore previously impacted landscapes due to construction of forestry roads.
128	5-Nov-21	FLNRORD	Cover Letter	Duncan McColl	Draft CMMP Aug 2021, Version C.1	N/A	N/A	General Comment - Buffer	FLNRORD will not object to the use of the hybrid buffer as it likely better reflects the disturbance potential and is more in line with recent work that looks at more specific effects of disturbances in a behavioral context rather than the 500 meter (m) buffer the has been used to account for disturbances at a herd scale.	A new offsetting plan has been updated in CMMP Section 4. The Referenced text has been removed and the hybrid buffer is used throughout the offsetting calculations. The references to ECCC and the hybrid buffer have been updated.
129	5-Nov-21	FLNRORD	Cover Letter	Duncan McColl	Draft CMMP Aug 2021, Version C.1	N/A	N/A	General Comment - Proposed Offset	As noted, this section will require additional work. In general, the following are the main messages regarding proposed offsetting. • Proposed offset does not provide net-neutral or benefit to caribou as currently written; • Discussion of the habitat value both on and off the mine site is warranted (i.e., proposed mine site caribou habitat valued at lowest value, offset area valued at highest value); • Discussion on the determination of the offset ratio, as the minimum ratio of 4:1 was used but then reduced to 1:1 in some instances. • Proposed offset focuses mainly on tenure development deferral; to aid caribou recovery – expectation is for larger area paired with concerted effort on restoration to provide "additional" value of lands set-a-side. The duration of the offset will need to be discussed as there are components of the Project (water treatment facility, access road, transmission line, and the related disturbances) that would be considered to be permanent (in place for more than 300 years). Additionally, the implications of using auditory deterrents to prevent birds from accessing the tailings ponds may need to be further explored as a potential impact to caribou.	BW Gold updated the CMMP to address the direction given by ECCC, UFN, LDN, and FLNRORD in November 2021 communications and subsequent communications from ECCC on the use of the BC draft offsetting Decision Support Tool (DST) in January 2022. The updated CMMP includes securement of the Capoose High Elevation Ungulate Winter Range for 50 years, as well as habitat restoration in the Tweedsmuir Local Population Unit following the advice of ECCC, at an offsetting ratio identified by the DST in the examples provided by ECCC. Following a letter on December 1, 2021, the CMMP was updated to indicate that the UFN and LDN are leading this offsetting habitat restoration work.
130	5-Nov-21	FLNRORD	Cover Letter	Duncan McColl	Draft CMMP Aug 2021, Version C.1	N/A	N/A	General Comment - Pre-Construction Surveys	Within the Draft CMMP pre-construction surveys are mentioned in a manner that indicates they have yet to be undertaken, this includes the work proposed in Sections 5.4, and the pre-work that is the foundation of much of Section 6. This is rather important as it is needed to undertake monitoring activities where there is a desire to observe change. Identifying data that has been collected and the specific linkages to the monitoring goals and analysis. If this data has not been collected it may be difficult to implement the some of the monitoring especially where the adaptive management triggers depend on significant results. Where works have been undertaken it should be indicated.	BW Gold conducted a series of pre-construction surveys during the summer of 2021 to address requirements from the provincial EAC, federal Decision Statement and to support planning for management actions. The results of these surveys are being compiled into a "2021 Blackwater Project Wildlife Baseline Report; Pre-Construction Surveys" during Q1 of 2022.

Blackwater Mine DRAFT CMMP August 2021:										
ADMIN	COMMENTS									
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section	Page	Comment Theme	Comment	Response
131	5-Nov-21	FLNRORD	Cover Letter	Duncan McColl	Draft CMMP Aug 2021, Version C.1	N/A	N/A	General Comment - Adaptive Management	This section will require some discussion. As I have noted in my previous comments regarding pre-construction surveys, data collected to this point needs to be identified and clearly connected to the monitoring question, monitoring data collection, and the intended analysis. Some of the methods described for data collection may be at scales (spatial and temporal) that are not appropriate to answer the monitoring question. This is very relevant for areal surveys, telemetry data, and behavioral response to restoration. Camera studies require detailed planning to determine minimum numbers of cameras required to allow for meaningful analysis. Given the trigger window tends to be 7 m by 7 m the information that they provide is very limited. Using a small number of cameras to infer trends in distribution and abundance is not appropriate. Permanent plots to assess physical works (blocking of access) and vegetation (whitebark pine and restoration) can be effective providing the data being collected is appropriate for the analysis, and reflects the purpose of the works. Restoration of caribou habitat can be considered in different ways depending on the habitat and the purpose of restoration. In terms of caribou habitat the return to a state of functional habitat can be in excess of 70 years. For management of alternative prey that period may be 40 years. The monitoring questions appear to be mostly targeting prevention of access rather than restoration of habitat.	Thank you for your comments. The individual comments have been addressed above. BW Gold is interested in working collaboratively with FLNRORD in the development of the detailed methods for these monitoring studies.
132	5-Nov-21	ECCC			Draft CMMP Aug 2021, Version C.1		page 1-5	Legislation	Table 1.3-1: ECCC recommends replacing <i>Impact Assessment Act</i> with <i>Canadian Environmental Assessment Act 2012</i> as it was under CEAA 2012 that the 2019 Decision Statement was issued, not IAA.	The text has been updated as suggested.
133	5-Nov-21	ECCC			Draft CMMP Aug 2021, Version C.1		page 1-5	Legislation	Table 1.3-1: Rather than providing the purpose of SARA, ECCC suggests describing how SARA is relevant to the project / CMMP. e.g. "Woodland Caribou, Southern mountain population, which includes the Tweedsmuir caribou herd, is listed as Threatened under Schedule 1 of the SARA. The project activities must be compliant with the relevant provisions of SARA, and with the conditions of the Decision Statement issued under CEAA 2012 that refer to the listed species."	The text has been updated as suggested.
134	5-Nov-21	ECCC			Draft CMMP Aug 2021, Version C.1		page 1-5	Legislation	Table 1.3-1: ECCC recommends deleting the Recovery Strategy for the Woodland Caribou, Southern mountain Population (Rangifer tarandus caribou) in Canada (EC 2014) from this table, as it is not a piece of legislation (and the table only otherwise includes legislation, per its title).	The title of the table has been updated to include legislation, management plans and best management practices. This change addresses the issue raised by ECCC and also reflects comments from FLNRORD to add several BMPs to the table.
135	5-Nov-21	ECCC			Draft CMMP Aug 2021, Version C.1		page 2-1	Context	ECCC recommends adding more specificity to the following sentence on page 2-1: "In general, the Tweedsmuir herd spends the summer in the western portion of the LPU range in Tweedsmuir Park and centered around Eutsuk Lake. Figure 2-1 displays a 95% utilization distribution (UD) kernel of satellite collar data for the herd during summer." (e.g. Telemetry data for years (x-y) indicate, in general, collared caribou in the Tweedsmuir herd..."	The text has been updated as suggested. Note that the date ranges were provided in the legend of Figures 2-1 and 2-2.
136	5-Nov-21	ECCC			Draft CMMP Aug 2021, Version C.1		page 2-1	Recovery Strategy	ECCC recommends the following edits: "The Recovery Strategy for the Woodland Caribou, Southern Mountain Population (hereafter: Recovery Strategy), was issued by EC in 2014. The Tweedsmuir herd is an LPU of the Woodland Caribou Southern Mountain caribou population (hereafter: Southern Mountain Caribou)."	The text has been updated as suggested.
137	5-Nov-21	ECCC			Draft CMMP Aug 2021, Version C.1		page 2-1	Recovery Strategy	ECCC suggests the following text on page 2-1 is a conflation of the recovery goal and an oversimplification of the Population and Distribution Objectives - there is more to the definition of self-sustaining than positive lambda. Suggested replacement text is simply: The recovery goal for southern mountain caribou is to achieve self-sustaining populations in all LPUs (including the Tweedsmuir LPU) within their current distribution.	The text has been updated as suggested.
138	5-Nov-21	ECCC			Draft CMMP Aug 2021, Version C.1		page 2-1	Recovery Strategy	ECCC suggests the following text is inaccurate and also should not be intertwined with recovery goal or population and distribution objectives, and therefore recommends deleting from this paragraph. ECCC comments on the next paragraph are suggested to improve the accuracy of the text and place it in a more logical location.	Comment line refers to the text in comment 137.
139	5-Nov-21	ECCC			Draft CMMP Aug 2021, Version C.1		page 2-1	Recovery Strategy	ECCC suggests the following is not entirely accurate language and recommends replanting the text with a quote directly from the Recovery Strategy section 5.2 - i.e. The population and distribution objectives are, to the extent possible, to: [...]	Comment line refers to the text in comment 137.
140	5-Nov-21	ECCC			Draft CMMP Aug 2021, Version C.1		page 2-1	Recovery Strategy	ECCC recommends the following edits to the text on page 2-1: "Environment Canada (2011, 2012) assessed habitat disturbance by natural and anthropogenic disturbance by natural and anthropogenic sources in some boreal caribou ranges, and found that a minimum of 65% undisturbed habitat resulted in a 60% probability that a boreal caribou range would be self-sustaining. As data became available from more boreal caribou populations, Environment and Climate Change Canada (ECCC) has revisited the relationship between disturbance level and the likelihood of boreal caribou populations to be self-sustaining. Their new analyses, based on more extensive data, supported the minimum 65% undisturbed threshold first identified in 2011, for boreal caribou (Johnson et al. 2020). Equivalent analyses have not been completed for Southern Mountain Caribou, the critical habitat of which is less homogenous than that of boreal caribou. The Southern Mountain Caribou Recovery Strategy indicates that "Minimal disturbance for high-elevation winter and/or summer ranges in all Groups, and at least a 65% undisturbed habitat level for low elevation winter ranges and Type 1 matrix range in the Northern and Central Groups, are currently considered as necessary to achieve recovery of LPUs", in addition to maintaining the ecological function of Type 2 Matrix range with respect to predator / prey dynamics.	The text has been updated as suggested.
141	5-Nov-21	ECCC			Draft CMMP Aug 2021, Version C.1		page 2-2	Recovery Strategy	ECCC recommends adding a new sub-heading: Provincial Conservation Status prior to the following paragraph "Northern Mountain Caribou are blue-listed by the BC Conservation Data Centre (BC CDC 2021). The province lists the Tweedsmuir-Entiako subpopulation as part of the Northern Mountain caribou population (population 15)."	The text has been updated as suggested.
142	5-Nov-21	ECCC			Draft CMMP Aug 2021, Version C.1		page 2-7	Habitat	With regard to the following text on page 2-7: "The habitat classifications within the Tweedsmuir LPU range are as follows", ECCC suggests adding some text to the effect that the terms "HE-Matrix 1" and "LE-Matrix 1" are terms used solely for this Project and are not consistent with terminology in the Recovery Strategy or any other SMC context beyond this Project.	The text has been updated as suggested.
143	5-Nov-21	ECCC			Draft CMMP Aug 2021, Version C.1		page 2-7	Habitat	ECCC recommends the following additions to the header on page 2-7: "High Elevation Winter Range (HEWR) and HE-Matrix 1)"	The text has been updated as suggested.
144	5-Nov-21	ECCC			Draft CMMP Aug 2021, Version C.1		page 2-8	Guideline and Best Management Practices	ECCC notes that the section on Guidelines and Best Management Practices seems to be out of place, as it interrupts the description of habitat classifications. ECCC also recommends the following edits to the text on page 2-8 and below: "At the provincial level, the CMMP has been informed by the Environmental Mitigation Policy; Offset Tool Guidelines & Operational Manual, Version 5.0 (FLNRORD 2018), [comma added] and the Tweedsmuir-Entiako Caribou (Rangifer tarandus) Tactical Restoration Plan (Cichowski et al. 2020). At the time of the writing of the CMMP, there are no practical examples of the Environmental Mitigation Policy being used for caribou habitat offsets in BC."	Agreed, the text has been moved to section 1.3.4. The comma has been added as suggested in section 1.3.4.
145	5-Nov-21	ECCC			Draft CMMP Aug 2021, Version C.1		page 2-8	Habitat	ECCC recommends the following addition to the header on page 2-8: "Low Elevation Winter Range (LEWR) and LE-Matrix 1"	The text has been updated as suggested.

Blackwater Mine DRAFT CMMP August 2021:										
ADMIN	COMMENTS									
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section	Page	Comment Theme	Comment	Response
146	5-Nov-21	ECCC			Draft CMMP Aug 2021, Version C.1		page 2-9	Habitat	ECCC recommends the following edits to the text on page 2-9: "Relative to modelled baseline conditions, mapping indicates that approximately 40% of the available LEWR habitat across the LPU range has been disturbed in some way. This value surpasses the disturbance threshold of 35% identified in the Recovery Strategy (EC 2014) for LEWR and Type 1 categories of critical habitat within Northern Group ranges. This disturbance is primarily associated with fires and cut blocks and associated roads at lower elevations. The Chichowski reference is a mischaracterization, and inappropriate for this discussion, hence the suggested deletion. Chichowski 2010 found continued use by caribou of mature, standing MPB-affected stands, which is entirely different from habitat disturbed by cutblocks and roads.	The text has been updated as suggested. The text surrounding the Chichowski reference has been edited to present continued use of forests affected by beetle kill as an example.
147	5-Nov-21	ECCC			Draft CMMP Aug 2021, Version C.1		page 2-9	Habitat	ECCC recommends the following addition to the header on page 2-9: "Matrix 1 (general) Habitat"	The text has been updated as suggested.
148	5-Nov-21	ECCC			Draft CMMP Aug 2021, Version C.1		page 3-3	Restoration	ECCC recommends defining precisely, and being consistent and precise in the use of the terms reclamation and restoration. Comment applies throughout the document.	The text has been updated to use "Reclamation" when referring to reclamation of the Blackwater project mine site area and access roads. "Restoration" is used in the context of the offsetting plan to restore previously impacted landscapes due to construction of forestry roads.
149	5-Nov-21	ECCC			Draft CMMP Aug 2021, Version C.1		page 3-3	Restoration	ECCC recommends the following edits to the text on page 3-3 and below: Being informed by the Recovery Strategy for Woodland Caribou, Southern Mountain Population (Rangifer tarandus caribou) in Canada (EC 2014) and/or the provincial Draft Caribou Recovery Program and/or the Tweedsmuir Herd Plan when it becomes available and/or the Tweedsmuir-Entiako Caribou Tactical Restoration Plan 2020 (MT 8-22)."	The text has been updated as suggested.
150	5-Nov-21	ECCC			Draft CMMP Aug 2021, Version C.1		page 3-3	Restoration	ECCC recommends the following clarifying edits to the text on page 3-3 and below: "BW Gold has experience restoring exploration trails in both types of environments and will use established best practice to restore these roads. Restoration of existing trails/roads includes blocking access, mechanical site preparation for re-sloping, and soil preparation, and piling of woody debris to block predator views, and revegetation (Photo 3.3-1)."	The text has been updated as suggested.
151	5-Nov-21	ECCC			Draft CMMP Aug 2021, Version C.1		page 4-1	Offset	ECCC recommends the following edits to the text on page 4-1 and below: "BW Gold used the UWRs as boundaries because the UWRs afford a level of protection from forestry activity by forestry tenure holders. Ungulate Winter Ranges were established to protect high elevation and low elevation habitats for caribou. Forest harvesting is prohibited in high elevation (HE) UWR polygons, and restricted to 50% of the forest in the low elevation (LE) polygons. Given the level of protection afforded, the UWRs influence the administrative certainty for the offset and therefore the Project offsetting ratio and offset area ratio (Sections 4.2)." Reason for the deletion is that the text was inaccurate and misleading, implying that 50% harvest is beneficial for caribou.	Note that Section 4 has been re-written to update the offsetting plan. The sentence in question, discussing the 50% harvest in LE-UWR has been used to describe the previous offsetting plan and has been updated as suggested.
152	5-Nov-21	ECCC			Draft CMMP Aug 2021, Version C.1		page 4-1 (and others)	Offset	In various places throughout the document, the term habitat securement is used. ECCC recommends being precise about the use of this term; for example, when referring to the proposed package on page 4-1 ("the basis for BW Gold's offsetting plan remains a habitat offset"), the current proposal would be more accurately described as a temporary deferral of specific mining-related development rights. Habitat securement implies that the habitat is permanently secured against all forms of disturbance.	The land securement has been updated and is described in Section 4 of the CMMP (V4).
153	5-Nov-21	ECCC			Draft CMMP Aug 2021, Version C.1		page 4-6	Offset	As currently written and placed, the following sentence may be misleading. "Updated analyses by ECCC confirmed support for the 500 m disturbance buffer for boreal caribou (Johnson et al. 2020)." As suggested during the June 23, 2021 meeting, ECCC clarifies that the support that Johnson et al. 2020 confirms, is the use of a 500m buffer to understand the cumulative effects of all disturbance at the LPU-scale to understand demographic effects on the caribou at the population scale (i.e. the effects on caribou survival and recruitment for the population). This research does not speak to avoidance, sensory buffers, zones of influence, for individual caribou affected by individual disturbances. The best research for that, remains Johnson et al. 2015, which supports use of a 3-km buffer.	A new offsetting plan has been updated in CMMP (V4) Section 4. The referenced text has been removed and the hybrid buffer is used throughout the offsetting calculations. The references to ECCC and the hybrid buffer have been updated.
154	5-Nov-21	ECCC			Draft CMMP Aug 2021, Version C.1		page 4-10	Offset	ECCC suggests that the following text on page 4-10 is inaccurate and needs to be entirely reframed: "The duration of the offset assumes there is no time lag between the beginning of offsetting activities and benefits for caribou. The habitat offset includes a land securement prior to Construction along with restoration within the offset area such as forestry road restoration. Both of these activities will have an immediate benefit on caribou behaviour." Land securement (or temporary deferral of mining rights) will have no effect on caribou behaviour - from the caribou perspective there is no incremental benefit. Depending on the specifics of the functional and ecological road restoration plans there may or may not be an immediate benefit to caribou, but it's more likely to result from a modification of predator behaviour (i.e. reduced access) than caribou behaviour.	A new offsetting plan has been updated in CMMP (V4) Section 4. The referenced text has been removed. The updated offsetting plan includes focuses on restoration of existing disturbance to habitat BW Gold refers to the ECCC letter on November 30, 2021 that indicates that the land securement of mineral leases in the Capoose UWR will provide an incremental conservation benefit for caribou. The updated CMMP (V4) therefore references the Capoose land securement as part of the offsetting package.
155	5-Nov-21	ECCC			Draft CMMP Aug 2021, Version C.1		page 5-1	Offset	Regarding the paragraph on page 5-1 starting with: "Most caribou habitat restoration initiatives in Canada are in boreal caribou habitat and are focused on restoring linear features from oil and gas development, primarily in Alberta (ERM 2018; Golder 2015)." - ECCC recommends the Proponent also review information from the Habitat Conservation Trust Foundation's Caribou Habitat Restoration Grant program, which has funded a number of projects in BC (https://hctf.ca/grants/caribou-habitat-restoration-grants/) and BC's Operational Restoration Framework: https://hctf.ca/wp-content/uploads/2021/09/Operational-Restoration-Framework_final-draft_25Aug2021.pdf	Thank you for the comment and reference to the Habitat Conservation Trust Fund's program. The reference to Alberta has been removed.
156	5-Nov-21	ECCC			Draft CMMP Aug 2021, Version C.1		Not Specified	Federal Condition	ECCC notes that the federal condition 8.18 states, "When developing the compensation plan, the Proponent shall take into account habitat needs for migratory birds and listed species at risk." Please indicate how the plan will address this part of the condition.	An additional section has been added to the CMMP (V4, March 2022) in Section 4.5 (Consideration of Migratory Birds and Species at Risk), to address how the offset considers other species at risk. This section includes references from the primary scientific literature to support the rationale.
157	5-Nov-21	ECCC			Draft CMMP Aug 2021, Version C.1		Not Specified	General Comment	ECCC is of the view that the amount of habitat restored should be the main focus of the offset plan and the offset ratio should be informed by BC's draft Habitat Offset Decision Support Tool, in collaboration with ECCC, BC, and First Nations. Lastly, regardless of the amount of habitat proposed for securement, ECCC is of the view that the proposed habitat securement does not sufficiently address the concepts of additionality or equivalency.	BW Gold updated the CMMP to address the direction given by ECCC, UFN, LDN, and FLNRORD in November 2021 communications and subsequent communications from ECCC on the use of the BC draft offsetting Decision Support Tool (DST) in January 2022. The updated CMMP includes securement of the Capoose High Elevation Ungulate Winter Range for 50 years, as well as habitat restoration in the Tweedsmuir Local Population Unit following the advice of ECCC, at an offsetting ratio identified by the DST in the examples provided by ECCC. Following a letter on December 1, 2021, the CMMP was updated to indicate that the UFN and LDN are leading this offsetting habitat restoration work.
158	5-Nov-21	ECCC			Draft CMMP Aug 2021, Version C.1		Not Specified	General Comment	ECCC notes that the dCMMP submitted on August 12, 2021 was not developed in consultation with ECCC. The Proponent presented a high level summary of their intentions with respect to the dCMMP to ECCC and other Parties on June 23, 2021, but ECCC was not provided with an opportunity to comment during the development of the dCMMP prior to Aug 12th.	The dCMMP was developed following engagement with Indigenous Groups in the winter and spring of 2021 and provided to Regulators more than six months in advance of the proposed start of construction in August 2021. BW Gold respects the views and expertise provided by ECCC and appreciates the comments provided on the August CMMP (V2) and December CMMP (V3). These comments and communications have been integral to updating the CMMP to the current version (V4, March 2022).

Blackwater Mine DRAFT CMMP August 2021:										
ADMIN	COMMENTS									
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section	Page	Comment Theme	Comment	Response
159	5-Nov-21	ECCC			Draft CMMP Aug 2021, Version C.1		Not Specified	General Comment - Habitat Restoration	<p>The dCMMP indicates that BW Gold will provide funding of up to \$50,000, and in-kind support, to assist in developing a habitat model to inform habitat restoration efforts, and to conduct habitat restoration in the offsetting areas up to a value of \$200,000.</p> <p>a) ECCC supports habitat restoration that benefits caribou in an ecologically appropriate timeframe and location, and is of the view that such measures could, in sufficient amounts, provide sufficient incremental conservation benefits to fully offset the risk of significant adverse effects on the recovery of the species this Project otherwise presents.</p> <p>b) ECCC is of the view that the amount of habitat restored should be the main focus of the offset plan, with habitat securement contextualized as a complimentary approach.</p> <p>c) The dCMMP does not give any indication as to how much habitat would be restored with a proposed \$200,000 financial contribution, nor does the dCMMP identify how this was determined to be an appropriate figure.</p> <p>d) ECCC is of the view that offset ratio calculations should be applied to the amount of habitat restored or enhanced, including a 500 m buffer on restored linear features, and that there may be additional areas for restoration outside the proposed habitat securement areas.</p> <p>ECCC recognises that the details of habitat restoration, including exact locations, may take some time to finalize, and that the approach of a financial contribution rather than a commitment by the Proponent to restore a given amount of habitat may be appropriate. However, ECCC's view is that the amount of the financial contribution should be calculated transparently, based on reasonable expected costs to plan, restore, and monitor the total amount of habitat to which offset ratios have been applied. As an illustrative and non-prescriptive example of how this could be presented: Estimates of costs to plan, fully implement, and monitor linear feature restoration in each of the field verified priority areas within the Tweedsmuir LPU range from approximately \$xx-\$xx/km2. After applying a 500m buffer to either side of each 1 km of restored linear features while considering the need to restore overlapping disturbance within the buffer, this results in each 1 km2 of restored habitat costing \$xx-\$xx. The Proponent's proposed contribution of \$xx is thus expected to restore approximately xx km2 of habitat.</p>	<p>On January 21, 2022 BW Gold met with representatives of UFN, LDN, ECCC, BC EAO, EMLI, and FLNRORD to discuss the December 2021 draft CMMP (Version 3). At that meeting, ECCC summarized their comments which were subsequently provided in writing on January 28, 2022. ECCC shared examples of offset calculations using the caribou version of the draft BC Habitat Offset Decision Support Tool (the DST), and suggested the DST represents a transparent, repeatable mechanism to inform offset ratios that includes each of the considerations required by federal condition 8.18.2. ECCC further indicated that the draft runs of the DST had been shared with FLNRORD, UFN and LDN; and that there was general agreement on the approach and DST inputs.</p> <p>ECCC also provided a range of potential conversion factors to translate the DST outputs of area of habitat to be offset through restoration to linear kilometers of roads as well as cost estimates for restoring roads.</p> <p>On January 25, 2022 UFN and LDN provided comments on the Dec 2021 draft CMMP and a report that described five priority areas for restoration in the Tweedsmuir LPU and surrounding area, which was discussed at a meeting with UFN, LDN, ECCC, EMLI, and FLNRORD on January 26, 2022, along with further discussion on monitoring, adaptive management, and inputs to the DST.</p> <p>During January and February of 2022, BW Gold updated Section 4 (Offsetting), 5.7 (Habitat Suitability Mapping) and 6 (Adaptive Management) of the CMMP and delivered it to BC EAO, EMPR, EMLI, ENV, FLNRORD, ECCC and Indigenous groups (UFN and LDN). Comments and edits were received from ECCC, FLNRORD, LDN, UFN, and BC ENV.</p> <p>BW Gold accepted the offsetting calculations, justifications, and assumptions proposed by ECCC, as well as the edits and comments from reviewers and updated the CMMP to Version 4 of the offset proposal.</p>
160	5-Nov-21	ECCC			Draft CMMP Aug 2021, Version C.1		Not Specified	General Comment - Offset ratios, ecological equivalency	<p>Calculations of ecological equivalency of offset sites vs. the impact site were used to determine an area ratio in the dCMMP and range from 1:1 up to 4:1.</p> <p>a) ECCC is of the view that the proposed offset ratios are unlikely to address the Project's contribution to cumulative effects. ECCC previously indicated that a minimum offset ratio of 4:1 (offset outcome : residual impact) would be a benchmark ratio that could be applied to a project that is in the lower end of the risk spectrum; for example, a project with a low severity impact adversely affecting a low vulnerability ecological component.</p> <p>b) ECCC suggests BC's draft Habitat Offset Decision Support Tool, which has a 10:1 base ratio, could inform the offset components of the dCMMP, with the considerations around equivalency provided below. ECCC has completed some example runs of the Tool, and output ratios include of over 20:1 for the 256 ha of HEWR, and over 8:1 for the 4,468 ha of Type 1 Matrix, but ECCC recognizes the calculator is sensitive to inputs on both the impact site and potential offset sites. As such, ECCC suggests that collaborative workshop focussed on how this decision support tool could be used would be a valuable next step.</p> <p>c) ECCC is of the view that the habitat value of the mine site plus buffered area that will be affected by the Project should be assigned habitat values that better reflect habitat equivalency and rarity. Specifically, and using here the dCMMP suggested scale ranging from 1 to 4, any high elevation winter range (HEWR) (i.e. the 248 ha on Mt Davidson that falls within the hybrid buffer) should be valued as a 4, regardless of the amount of documented current consistent use, on the basis of scarcity of that habitat in the Tweedsmuir range, and its identification in the species' recovery strategy as critical habitat (i.e., the habitat necessary for the recovery of the species). Similarly, Type 1 matrix habitat that currently possesses the biophysical attributes of critical habitat (i.e. is not part of a current temporary or permanent disturbance footprint) should be valued as 3, again on the basis of scarcity of remaining habitat within the LPU boundaries, where the disturbance threshold has already been surpassed. For context, ECCC's view is that a 1 or 2 habitat valuation may be appropriate for Type 2 matrix or for situations where habitat disturbance thresholds have not been surpassed.</p> <p>d) ECCC suggests that the following sentence in the dCMMP is a mischaracterization. "The offset proposal, including the metrics to describe each polygon, were accepted by these groups, ECCC, and FLNRORD and were therefore the basis of the federal and provincial EA conditions". As noted in the Environmental Assessment Report (CEAA 2019), ECCC expressed a number of concerns with the offsetting approach, which were intended to be addressed through the current process of</p>	<p>Please see response to Comment 159.</p>
161	5-Nov-21	ECCC			Draft CMMP Aug 2021, Version C.1		Not Specified	General Comment - Habitat Securement	<p>The dCMMP outlines proposed temporary deferral of mineral rights held by Artemis of 4516 ha of habitat in the Capoose north area and 2101 ha in the Johnny Lake-Fawmie area, which are portions of two of eight potential offset areas identified during the EA process. This temporary deferral of 6617 ha of Artemis' tenure is characterized as habitat securement, and the dCMMP indicates it would be put in place prior to construction through as-yet-undetermined mechanisms, and remain in place for 25-50 years. The area of habitat proposed for deferral for 50 years vs 25 years is unclear.</p> <p>a) ECCC's Operational Framework for Use of Conservation Allowances (ECCC 2012) (hereafter the Framework) speaks to incremental conservation benefits. In this case, there is no net improvement to habitat condition; caribou are currently using the offset area, so it remains status quo from a caribou perspective – the 4716 ha of (High Elevation Winter Range) HEWR and Type 1 Matrix critical habitat that could be permanently lost as a result of the Project would not be replaced by the proposed temporarily and partially secured habitat, nor will the deferral have an immediate benefit on caribou behaviour as asserted by the Proponent.</p> <p>b) Furthermore, the Framework recommends for offsets that propose to preserve existing habitat, that existing habitat be under identified threat and that the proposed offset extend effective legal protection that responds to that threat. For example, a threat may exist when all required regulatory approvals are in place, a project or activity has all the required financing, and construction is essentially ready to begin. However, the proposed securement offset areas are not under threat of development; to the contrary, as noted in the dCMMP, certain types of resource development within a subset of these areas (e.g., those designated as UWRs) is currently constrained.</p> <p>c) In addition, ECCC notes that the Proponent's proposed temporary relinquishment of mineral rights would not preclude the issuance of other industrial authorizations, so the area could not be considered secured unless all other holders of industrial tenures and authorizations were also willing to relinquish their rights, and a legally binding form of long term securement put in place.</p> <p>d) Regardless of the amount of habitat proposed for securement, ECCC is of the view that the proposed habitat securement does not sufficiently address the concepts of additionality or equivalency.</p> <p>e) ECCC's view is that some of the indirect effects of the Project on caribou habitat, including HEWR captured in the hybrid buffer, will extend beyond the operational life of the mine, and that any measures intended to offset those effects should be long term.</p>	<p>A new offsetting plan has been updated in CMMP (V4) Section 4. This updated plan addresses the concepts of additionality and equivalency by proposing to offset habitat loss through a land securement of mineral rights in Capoose UWR for 50 years and habitat restoration through the removal of forestry roads within the LPU.</p> <p>BW Gold refers to the ECCC letter on November 30, 2021 that indicates that the land securement of mineral leases in the Capoose UWR will provide an incremental conservation benefit for caribou. The updated CMMP (V4) therefore references the Capoose land securement as part of the offsetting package.</p> <p>The hybrid buffer used in the calculation of the impacted area, uses a 3 km buffer surrounding the open pit specifically to address noise from operations, and a 500 m buffer elsewhere for the project. At closure, when the noise of blasting and operations ceases, the 3 km buffer should be reduced to a 500 m buffer used elsewhere for the project. The use of this hybrid buffer was supported by FLNRORD and ECCC in letters dated November 5, 2021.</p>

Blackwater Mine DRAFT CMMP August 2021:										
ADMIN		COMMENTS								
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section	Page	Comment Theme	Comment	Response
162	5-Nov-21	ECCC			Draft CMMP Aug 2021, Version C.1		Not Specified	General Comment - Buffers and Project Effects	Throughout the dCMMP, the Proponent provides calculations for the Project impact area using both a 500 m buffer and a hybrid 3km/500m buffer. The Project impact area during construction and operation phases was determined to be 3,965 ha including the 500 m disturbance buffer, and 4,716 ha with the hybrid buffer of 3km/500m. With the hybrid buffer, this includes 248 ha of High Elevation Winter Range (HEWR) and 4468 ha of Type 1 Matrix categories of critical habitat. The impact area post-closure, assuming reclamation of portions of the mine site is successful, is calculated as 1,825 ha, which includes the 500m buffer only. Consistent with comments provided during the EA process, ECCC maintains the view that the hybrid buffer should be used to quantify the Project impact area, including for the purpose of calculating offsets in the post-closure phase, as a precautionary approach encourages working under the assumption of the real possibility that caribou would continue to avoid the area within the hybrid buffer until full restoration of the mine site footprint is complete, which may be on a long time horizon (e.g. >60 years).	A new offsetting plan has been updated in CMMP Section 4. This updated plan uses the 3 km/500 m hybrid buffer throughout for the calculation of the offset. The use of this hybrid buffer was supported by FLNRORD and ECCC in letters dated November 5, 2021.
163	5-Nov-21	ECCC			Draft CMMP Aug 2021, Version C.1		Not Specified	General Comment - Mapping	ECCC notes that there is no explanation or definition of "non-CH" in Fig 1.1-1: Tweedsmuir Caribou Range Habitat in Relation to the Blackwater Project Certified Project Description. We assume it aligns with the note under Table 4-1 of the 2018 Updated Effects Assessment and Significance Determination which states "In habitat suitability, non-critical habitat is that habitat with high densities of linear features or a high degree of fire or forestry disturbance." a) ECCC notes that, consistent with the Recovery Strategy, within the LPU boundaries of the Northern Group, in general, only permanent anthropogenic disturbances are excluded from the identification of critical habitat, and as such would not agree with the extent of mapped "non-CH".	The area of non-CH has been removed in Figure 1.1-1 and replaced by LEWR or Matrix 1, as described in the mapping directions found in Section 2.2 of the CMMP (V3).
164	30-Nov-21	ECCC	Letter	Blair Hammond,	Draft CMMP Aug 2021, Version C.1	N/A	N/A	ECCC expectations regarding Federal Condition 8.18	Federal condition 8.18 states, "the Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, and to the satisfaction of Environment and Climate Change Canada (ECCC), a compensation plan for Southern Mountain Caribou (SMC; Rangifer tarandus caribou)". "The compensation plan shall include: ... an offsetting ratio for direct habitat loss and indirect (e.g. sensory) losses based on an assessment of options, including revegetation and road closures, that consider the types of offset, location, time lags, securement, technical and economic feasibility, and probability of success". As outlined in ECCC's initial comments provided on Nov 5, 2021, if the Department is satisfied that the offsets reduce the risk of significant adverse effects on the recovery of the species to Low Risk, ECCC would then consider the residual environmental effects to be appropriately offset. ECCC is of the view that habitat restoration should be the main focus of the offset plan. As previously noted, the range of offset ratios could vary from between 8:1 and 20:1, or higher or lower depending on the inputs for impact site and potential offset sites. The dollar amount of this restoration will be determined by the cost of restoration to meet the objective of ensuring the mitigation and offsets result in a low level of risk to the species, informed by expertise provided by the Government of British Columbia (BC) and First Nations. After discussions with First Nations and BC (as indicated in the joint letter provided Nov 30, 2021), ECCC supports the view that securement of Capoose High Elevation Ungulate Winter Range (11,059 ha) for 50 years is a necessary part of the offset plan. The long-term securement of this entire area would provide certainty with respect to maintenance of the existing habitat for current and future caribou, and First Nation use. ECCC's understanding is that, in the absence of a legally binding form of securement, the possibility of further mineral exploration and potential development exists, which could represent a threat to the caribou herd. As such, the securement of this 11,059 ha could represent an incremental conservation benefit for the species and thus contribute to the overall offsetting package, when combined with meaningful amounts of habitat restoration. Finally, ECCC expects that subsequent drafts of the CMMP will be developed in consultation with Indigenous groups, ECCC, and BC, as required by federal condition 8.18. ECCC is available to discuss the development of the next draft of the CMMP with Artemis, BC and the Nations in the coming weeks and requests a formal response to this letter by January 10, 2021.	BW Gold updated the CMMP to address the direction given by ECCC, UFN, LDN, and FLNRORD in the 30 Nov 2021, and subsequent communications from ECCC on the use of the BC draft offsetting Decision Support Tool (DST) in January 2022. The updated CMMP (V4) includes: 1) habitat restoration in the Tweedsmuir Local Population Unit following the advice of ECCC, at an offsetting ratio identified by the DST in the examples provided by ECCC. Following a letter on December 1, 2021, the CMMP was updated to indicate that the UFN and LDN are leading this offsetting habitat restoration work. 2) Securement of the Capoose High Elevation Ungulate Winter Range for 50 years has also been added to the CMMP. The amount of funding required for the offset is informed by the offsetting ratios provided by ECCC in the DST, offsetting multipliers that convert areas to linear road length, accounting for overlap, and costs per km of road restoration provided by ECCC and FLNRORD. Timing of payment is discussed in the CMMP. The CMMP (V3) was updated in December 2021 and released for comment. Following comments on the DST and potential locations for restoration identified by LDN and UFN in January 2022, BW Gold updated the Offsetting and Adaptive Management sections of the CMMP. These sections were reviewed, edited and commented on by FLNRORD, ECCC, LDN and UFN during February 2022. The comments and edits were addressed and incorporated into the CMMP, and released as Version 4 in March 2022.
165	30-Nov-21	ECCC, FLNRORD, and Indigenous Communities	Letter	Blair Hammond, Laurie Vaughan, Neil Gauthreau, and Duncan McColl	Draft CMMP Aug 2021, Version C.1	N/A	N/A	Shared views of ECCC, UFN, LDN, and FLNRORD	Shared views of ECCC, UFN, LDN, and FLNRORD include: 1) A significant amount of habitat restoration within the Tweedsmuir Local Population Unit (consistent with advice provided by ECCC) is necessary to offset the direct and indirect loss of habitat as a result of the project. The outcomes of this restoration must result in an increase, over time, in the overall amount of undisturbed habitat within the Tweedsmuir Local Population Unit. 2) Securement of Capoose High Elevation Ungulate Winter Range (11,059 ha) for a period of 50 years is a necessary part of the offset proposal. We, the undersigned, look forward to discussing the development of the next draft of the CMMP, including specifics of the amount (based on an offset ratio) and timing of the habitat restoration (or financial contribution that will result in habitat restoration), with Artemis in the near future.	BW Gold updated the CMMP to address the direction given by ECCC, UFN, LDN, and FLNRORD in the 30 Nov 2021, and subsequent communications from ECCC on the use of the BC draft offsetting Decision Support Tool (DST). The updated CMMP (V4) includes: 1) habitat restoration in the Tweedsmuir Local Population Unit following the advice of ECCC, at an offsetting ratio identified by the DST in the examples provided by ECCC. Following a letter on December 1, 2021, the CMMP was updated to indicate that the UFN and LDN are leading this offsetting habitat restoration work. 2) Securement of the Capoose High Elevation Ungulate Winter Range for 50 years has also been added to the CMMP. The amount of funding required for the offset is informed by the offsetting ratios provided by ECCC in the DST, offsetting multipliers that convert areas to linear road length, accounting for overlap, and costs per km of road restoration provided by ECCC and FLNRORD. Timing of payment is discussed in the CMMP.
166	1-Dec-21	Indigenous Communities	Letter	Laurie Vaughan, Neil Gauthreau, Michael Keefer, and Steve Ross		N/A	N/A	General Comment - Blackwater Gold Project Caribou Habitat Offset and Restoration	As a follow-up to the joint Governmental-First Nations letter on caribou habitat offsetting, we would like to assert that both Uikatcho and Lhoosk'uz Dené Nations expect to lead the caribou habitat restoration activities. As explained in the letter, offsetting for the Blackwater Mine requires a significant amount of habitat restoration, though the exact scope remains undetermined. We are currently building capacity and expertise in caribou habitat restoration, and as stewards of the land we feel we are in the best position to conduct this work. We look forward to working together to determine the funding required for restoration that will bring the Blackwater Mine to a point considered to be a low risk to caribou.	On December 1, 2021, BW Gold received a letter from LDN and UFN asserting that the Nations expect to lead the caribou habitat restoration activities in conjunction with FLNRORD that would be conducted as part of the CMMP. The CMMP (V4) was updated to indicate that LDN and UFN will be leading the caribou habitat restoration in conjunction with FLNRORD.
167	28-Jan-22	Indigenous Communities	Table	LDN/UFN	CMMP	Table 6.1-1		Compliance	DS 8.1 is said to be addressed partly in Table 6.1-1, however this table does not exist.	DS 8.1, Management of Lighting, is addressed for all wildlife species in the WMMP, Section 3.1 Infrastructure Design Management.
168	28-Jan-22	Indigenous Communities	Table	LDN/UFN	FDB Table of Concordance	DS Condition 8.9	Section 3.2, Table 6.1-1	Compliance	FDS Condition 8.9 is not met.	DS 8.9, Identification and Avoidance of Wildlife Sensitive Periods is addressed for all wildlife species in the WMMP, Section 3.3.1 Sensitive Timing Windows. Sensitive periods for caribou are described in the CMMP (Version 4), Section 3.2 Minimize.
169	28-Jan-22	Indigenous Communities	Table	LDN/UFN	FDB Table of Concordance	DS Condition 8.18	Figures 2.1-2, 2.2-2; Sections: 4.1.2, 4.2, 4.4, 5.3, 5.4, 5.6, 6.3, 6.4, 6.5	Compliance	FDS Condition 8.18 is not met.	Comment received on CMMP (Version 3) submitted in December 2021. DS 8.18, Offsetting Plan for Caribou, is addressed in the CMMP (Version 4) Section 4, Offsetting, CMMP Section 5, Habitat Restoration, and CMMP Section 6, Adaptive Management, which have been updated following comments from ECCC, FLNRORD, UFN and LDN on the Version 3 of the plan.

Blackwater Mine DRAFT CMMP August 2021:										
ADMIN	COMMENTS									
ID	Comment Date	Reviewer Agency	Reviewer Source Doc	Reviewer Name	Application Document	Application Section	Page	Comment Theme	Comment	Response
170	28-Jan-22	FLNRORD	Tracked version of E.1_0575928_Blackwater_Caribou MMP	Duncan McColl	Draft CMMP	Throughout	Throughout	Editorial	4 editorial comments related to grammar, suggested word choice, and phrasing. See marked version for more details. Version can be provided to interested parties upon request.	Updated as suggested throughout document.
171	24-Jan-22	Indigenous Communities	Table	LDN/UFN	Draft CMMP	Page 2-2			Unresolved. There still remain a number of comments that state that the mine is outside of the core herd range, measured as 95% kernel density of collar locations. Given recent discussions it should be clear that 95% kernel ranges do not define core caribou habitat, they define a current range area of a portion of the caribou population (females wearing collars). To preserve the herd the full range needs to be managed appropriately, it is not only core areas that are important for the species recovery. In addition, as the herd has been impacted over time their range area has decreased, cumulative effects have increased and their use of isolated habitats (such as the Blackwater mine) as decreased due to lack of connectivity. However this lack of use does not mean intact habitat, outside the core 95% range, are of less value as is indicated throughout the CMMP. If anything due to cumulative effects, these remaining intact habitats are of more value as they are the key to restoration. We have also seen no justification for using a 95% kernel home-range to represent the Tweedsmuir population, this is a very unusual use of a home range area. Please revise and use plain language that describes the mine within the herds range.	The text of the CMMP (Version 4) has been updated to reflect that caribou are sometimes seen in the Project area, and the project is in the historic range of the herd. However, the 95% kernel density cannot be removed entirely from the document since it was used by FLNRORD to determine the difference between LEWR and Matrix 1 habitat at the Project site. The text in Sections 1.1 and 2.2 has been updated to read: The Project is on the eastern edge of the Tweedsmuir Local Population Unit (LPU) of southern mountain caribou (Rangifer tarandus caribou); with approximately half of the mine site falling inside the LPU. The mine site is within the historic range of the Tweedsmuir caribou based on Traditional Knowledge from UFN and LDN and includes areas mapped as winter caribou habitat (Figure 1.1-1). The mine site is outside of the annual range (1980-2020) used by collared female caribou, but is still used intermittently by caribou based on aerial surveys, snow track surveys and incidental observation.
172	24-Jan-22	Indigenous Communities	Table	LDN/UFN	Draft CMMP	Page 4-8			Overall 2.8 million dollars will be provided for restoration but the first 1 million will be provided after major works start, this is expected to be in about mid-2024 or about 2.5 years from now. Early works (march 2022) will result in a significant amount of damage to the site (grubbing, site prep) and the area will cease to be caribou habitat after early works. the first payment for restoration should occur immediately following early works, this is more in line with reducing the time for compensatory restoration to take place which is a priority of the CMMP.	BW Gold's contribution to the restoration initiatives will be paid in two tranches; one within 30 days of the start of early works construction and the second in equal payments over the first 5 years following commercial production.
173	24-Jan-22	Indigenous Communities	Table	LDN/UFN	Draft CMMP	Page 2-3			I think through various conversations with the government we have now established beyond doubt that the 95% polygons of the Tweedsmuir herd do not really represent critical habitat in the area, so this reference should be removed at some point and all the other references you make to the 95% polygons should be removed - this is irrelevant to the CMMPs workings.	Updated as described in the response to comment 171.
174	24-Jan-22	Indigenous Communities	Table	LDN/UFN	Draft CMMP	Page 4-8			As the timelines for providing offsetting money are very long it should be stated that the funds will increase at the same rate as inflation rate.	BW Gold's contribution to the restoration initiatives will be paid in two tranches; one within 30 days of the start of early works construction and the second in equal payments over the first 5 years following commercial production. BW Gold respectfully disagrees that the funds should be indexed to inflation. BW Gold's cash proposal for restoration tabled in the December 31, 2021 version of the plan was an all-in proposal.
175	24-Jan-22	Indigenous Communities	Table	LDN/UFN	Draft CMMP	Page 4-9			The duration of the offset assumes there is no time lag between the beginning of offsetting activities and benefits for caribou. BW Gold conservatively assumed that the maximum extent of the hybrid sensory and direct habitat losses occur at the beginning of construction and remain until the end of mining (i.e., 25 years). Please update with a more realistic time lag.	Time lags have been updated following the draft Decision Support Tool provided by ECCC on January 26, 2022.
176	24-Jan-22	Indigenous Communities	Table	LDN/UFN	Draft CMMP	Page 4-9			Offsetting the 4,468 ha of Matrix 1 at the mine site at an offsetting ratio of 6:1; this is lower than required by ECCC	On January 21, 2022 BW Gold met with representatives of UFN, LDN, ECCC, BC EAO, EMLI, and FLNRORD to discuss the December 2021 draft CMMP (Version 3). At that meeting, ECCC summarized their comments which were subsequently provided in writing on January 28, 2022. ECCC shared examples of offset calculations using the caribou version of the draft BC Habitat Offset Decision Support Tool (the DST), and suggested the DST represents a transparent, repeatable mechanism to inform offset ratios that includes each of the considerations required by federal condition 8.18.2. ECCC further indicated that the draft runs of the DST had been shared with FLNRORD, UFN and LDN; and that there was general agreement on the approach and DST inputs. The offsetting section of the CMMP was updated with this information and reviewed by the UFN/LDN in February 2022. With these updates to the CMMP BW Gold believes that this comment is resolved.
177	24-Jan-22	Indigenous Communities	Table	LDN/UFN	Draft CMMP	Page 5-6			My experience is that the Capoose trails are not in an advanced stage of restoration	Reference to Capoose trails has been removed on page 5-6. Project trails in the Capoose Securement will be restored as part of the offset program for caribou.
178	24-Jan-22	Indigenous Communities	Table	LDN/UFN	Draft CMMP	Page 6.4			Based on your own survey data showing caribou are still using Mount Davidson and the new CMMP format it is important to include that the project will also have effects on caribou population dynamics and caribou movement patterns. These are very much associated with habitat loss anyway.	Comment received on CMMP (Version 3) submitted in December 2021 and the CMMP has been updated accordingly. Predicted effects and monitoring programs for caribou population dynamics and movement patterns were updated in Section 6.2.3 of the CMMP, a draft of which was reviewed by the UFN/LDN in February 2022. With these updates to the CMMP BW Gold believes that this comment is resolved.
179	24-Jan-22	Indigenous Communities	Table	LDN/UFN	Draft CMMP	Page 6.4			Artemis is having a localised effect on habitat loss and will restore local habitat patches - taking a landscape / population level approach to monitoring will not effectively monitoring the impacts and restoration efforts you are working on. You need a local approach to monitoring not a population approach. Although the DS specifies caribou abundance and distribution should be monitored this will only be useful at a local scale of monitoring. Camera trapping is probably the best way to approach this and will provide the information specified in DS.	Following discussions with FLNRORD, ECCC, UFN and LDN in January 2022, the monitoring program for caribou distribution was updated to focus on relative abundance of caribou through time relative to the mine site, using pellet counts and snow track surveys in Section 6.2.2 of the CMMP, a draft of which was reviewed by the UFN/LDN in February 2022. With these updates to the CMMP BW Gold believes that this comment is resolved.
180	24-Jan-22	Indigenous Communities	Table	LDN/UFN	Draft CMMP	Page 6.4			Condition 22.p – a monitoring program to determine the effectiveness of the offset. - This needs some details attached that tell us how this will be paid for.	Section 6.3 of the CMMP has been updated to specify that BW Gold will be funding the monitoring program for the effectiveness of the offset. With these updates to the CMMP BW Gold believes that this comment is resolved.
181	24-Jan-22	Indigenous Communities	Table	LDN/UFN	Draft CMMP	Page 6.4			The current winter distribution and density estimate of moose - some justification of why this will inform the caribou monitoring? E.g. Just to inform general ecological integrity or as alternative prey for wolves (I don't think this later reason is a good one)?	See response to Comment 179. As such, we believe that this comment is resolved.
182	24-Jan-22	Indigenous Communities	Table	LDN/UFN	Draft CMMP				Study Area and Sample Distribution - The mine site is not the study area this needs revised to specify the restoration areas and securement.	Following discussions with FLNRORD, ECCC, UFN and LDN in January 2022, the monitoring programs in Section 6 have been updated and reviewed by the UFN/LDN in February 2022. As such, we believe that this comment is resolved.
183	24-Jan-22	Indigenous Communities	Table	LDN/UFN	Draft CMMP	Page 6.5			Aerial surveys are not a good monitoring method they will not yield data that has any meaning in terms of restoration success and status of caribou at this localised scale - revise methods.	See response to Comment 179. As such, we believe that this comment is resolved.
184	24-Jan-22	Indigenous Communities	Table	LDN/UFN	Draft CMMP	Page 6.6			6.3.2 Telemetry Study - This method is also a large scale population level method that will not provide details about the caribou you are concerned with. The telemetry study should be removed, the suggested way of using this data is irrelevant to monitoring the securement and restoration offsetting.	See response to Comment 179. As such, we believe that this comment is resolved.
185	24-Jan-22	Indigenous Communities	Table	LDN/UFN	Draft CMMP				There is a complete mismatch of resolution here you can not use home range areas to assess small scale changes in habitat or the population. Please remove this.	See response to Comment 179. As such, we believe that this comment is resolved.
186	24-Jan-22	Indigenous Communities	Table	LDN/UFN	Draft CMMP	Page 6.9			Trail cameras (20) the Capoose area required more than 20 trail cameras to monitor sufficiently 80 camera traps should be your minimum sample size here, based on statistical methods that can be used to test for changes in occupancy of the monitored species.	Following discussions with FLNRORD, ECCC, UFN and LDN in January 2022, the monitoring programs in Section 6 have been updated and reviewed by the UFN/LDN in February 2022. As such, we believe that this comment is resolved.
187	24-Jan-22	Indigenous Communities	Table	LDN/UFN	Draft CMMP	Page 6.10			Trends in the number of caribou, moose and wolf observations will be compared over time using Generalized Additive Mixed Models (GAMM). - This method is not suitable, you should commit to using 80 cameras and use occupancy models to determine trends in occupancy in Capoose.	Occupancy models have been added to Section 6.3.4 of the CMMP.
188	24-Jan-22	Indigenous Communities	Table	LDN/UFN	Draft CMMP	Page 6.10			These triggers are not specific enough.	Following discussions with FLNRORD, ECCC, UFN and LDN in January 2022, the monitoring programs in Section 6 have been updated and reviewed by the UFN/LDN in February 2022. As such, we believe that this comment is resolved.