Mayall, Jane EAO:EX

FILE COPY

From: McDonough, Lindsay EAO:EX
Sent: Wednesday, July 25, 2012 3:56 PM
To: 'Pierce Lefebvre Consulting'
Cc: Mayall, Jane EAO:EX; Bailey, Scott EAO:EX
Subject: 30200-20/AMIN-05-07 As promised: Ajax Scoi-Econ Analysis - Additional Info
Attachments: DRAFT Ajax Public Issues Tracking Table Summary Responses.pdf; Letter from KGHM Ajax outlining proposed changes to the draft AIR EIS Guidelines (July 2012).pdf; FYI: Requirements for Application Submission - Proposed Ajax Mine Project; Ajax dAIR Rev D_ Public Issues Tracking Table - For WG and CAG Review 2012-07-24.xlsx; Ajax dAIR Rev D_ Public Issues Tracking Table - For WG and CAG Review 2012-07-24_VCOrdered.pdf

Hi Sylvie and Claude,

Wonderful meeting you both today. I've included a number of additional information materials in the below/attached, as discussed. This includes:

1. Draft Ajax Public Issues Tracking Summary document (this is a companion document that was prepared by the proponent that includes a summary of public responses received on the dAIR).
2. Letter from the proponent outlining changes to the dAIR as a result of public and Working Group comment (we didn't speak to this today but I'm sending it to you in case you didn't receive it in the original package Scott sent).
3. Email sent to proponent regarding requirements for Application submission.
4. Sorted pdf and excel spreadsheet of public issues tracking table.

Outstanding (to come via separate email):

5. List of Valued Components being considered by Intergroup (proponent's socio-ec consultant)
6. Logistics for August 8th meeting with the proponent in Kamloops (I sent a note to the proponent asking them for a copy of the draft agenda, as well as a proposal for a morning meeting followed by a site tour in the afternoon – stay tuned).

Lindsay

From: Bailey, Scott EAO:EX
Sent: Friday, July 20, 2012 1:20 PM
To: 'Pierce Lefebvre Consulting'
Cc: Mayall, Jane EAO:EX; McDonough, Lindsay EAO:EX
Subject: Ajax Scoi-Econ Analysis - Project Documents

Hello Sylvie and Claude,

By cc, I am introducing you to Lindsay McDonough. Lindsay is a Project Assessment Officer and is providing support for me on the Ajax file. You can expect to hear from Lindsay throughout the contract period.

Attached are three MS Excel spreadsheets. These documents are tracking tables that include three things:

1) the salient parts of submissions by the public, First Nations and the Working Group (as they pertain the draft Application Information Requirements document);
2) responses by the Proponent to the comments; and

3) two columns on the far right – first column provides a category (in a drop down list), the second column provides a space to explain the comment (if necessary).

We have asked the Working Group and Community Advisory Group (CAG) to review these tables and populate the two columns on right side – indicating their assessment of the responses by the Proponent. This is essentially the task we have for you at this stage. I have also attached the instructions we provided to the Working Group (WG) to guide them in their efforts.

It is important for you to know that the WG and CAG have been given four weeks to do this – their four week period is complete at the end of next week. After that the Proponent will respond to the input about their initial responses and update the dAIR document to reflect any changes – they plan to turn this around within a week of receiving the tables and send to us for review. The WG and CAG will then have another three week period to review the updated dAIR and the Proponent's second set of responses. A schedule is in the attached.

I provide these to help you get familiar with the materials – I think we should discuss before we send you off into too much 'work'. I will also provide a second email with comments from our visual impact expert – there are clear linkages to the socio-economic impact, so I think his preliminary input from a week or so ago should be very useful for you.

I would like to set up a call – perhaps late next week to discuss the materials and the approach to working together. I am also including Jane Mayall, Project Administrative Assistant – Jane can work with you to find 90 minutes on the phone next week.

In the meantime, feel free to call me today if you want to get any initial clarification just to ensure we are off on the right foot.

Attachments:

1. **Working Group Issues Tracking Table #1 (comments received prior to March 2012):**
2. **Working Group Issues Tracking Table #2 (comments received after March 2012):**
3. **Public Issues Tracking Table (received during public comment period, Jan 11 to March 27, 2012):**
4. **Review Guidance Document (dated July 5, 2012)**

Regards,
Scott

Scott Bailey
Executive Project Director
BC Environmental Assessment Office
Phone: 250/356.1124
Cell: s.17
Email: scott.bailey@gov.bc.ca
http://www.eao.gov.bc.ca/

Mayall, Jane EAO:EX

FILE COPY

From: Bailey, Scott EAO:EX
Sent: Saturday, July 21, 2012 9:45 AM
To: 'piercelef@telus.net'; McDonough, Lindsay EAO:EX
Cc: Mayall, Jane EAO:EX
Subject: 30200-20/AMIN-14 Re: Potential Meeting Wednesday July 25

Thanks. I understand the interest in a proper review.

I am happy to defer the meeting to later in the week to a phone discussin - whatever works. Just let me know by Tuesday so we can change flights.

Thanks,
Scott

From: Pierce Lefebvre Consulting [mailto:piercelef@telus.net]
Sent: Saturday, July 21, 2012 09:16 AM
To: Bailey, Scott EAO:EX
Subject: Re: Potential Meeting Wednesday July 25

Scott,

We have received the emails and files, as well as your fax of the contract changes.

We will need a couple of days to digest this material, so that we can have a reasonably informed discussion. Clearly there is substantial community interest and engagement in this project.

I (and possibly Sylvie pending some rearrangement) could meet you at the airport on Wednesday.

Regards,
Claude

----- Original Message -----
From: Bailey, Scott EAO:EX
To: 'piercelef@telus.net'
Sent: Saturday, July 21, 2012 6:51 AM
Subject: Fw: As Promised: Proposed Ajax Mine Project - Visual Impacts Review

Hi, you will notice the message below indicates a title error on the document. The author is away, so it will be fixed at a later date.

Thanks,
Scott

From: McDonough, Lindsay EAO:EX
Sent: Thursday, July 19, 2012 12:03 PM
To: Marc, Jacques FLNR:EX
Cc: Bailey, Scott EAO:EX
Subject: RE: As Promised: Proposed Ajax Mine Project - Visual Impacts Review

Wow, this is wonderful Jacques – thank you! I noticed the title of the presentation file reads "Afton." Would you be able to change this and send a new one? This will be a very useful resource.

The proponent informed us that they now have someone else working on the visual aesthetics component and are using the visual quality objectives outlined in the Ministry of Forests guideline. I understand they will be taking photographs of various locations throughout the city in August. Just for your information.

Let us know if there is an opportunity to chat, and thanks again for your support with this.

Lindsay
CC: Scott Bailey

From: Marc, Jacques FLNR:EX
Sent: Wednesday, July 11, 2012 1:39 PM
To: McDonough, Lindsay EAO:EX
Cc: Bailey, Scott EAO:EX; Mayall, Jane EAO:EX
Subject: RE: As Promised: Proposed Ajax Mine Project - Visual Impacts Review

Hello Lindsay,

I have waded through the 40+ public responses that relate to visuals/aesthetics as they apply to the Ajax mine submission.
It is my observation that the public has a number of valid concerns regarding the visual aspect of this proposed project.
It is abundantly clear that the public is concerned about the views of the mine (especially the waste rock and tailing facilities)
from specific neighbourhoods, recreation areas and highway corridors. There is also concerns about the economic effects the mine
could have on tourism and the city of Kamloops's reputation.

Upon going through the tracking table, I found the proponent responses to be in most cases quite generic, not specific.
The proponent could have been proactive and made commitments to address the identified issue in the Application/EIS, but has chosen not to.
This may be a missed opportunity for generating good will. The absence of commitments may necessitate more oversight as the application progresses.

The public concerns will have to be addressed at some point. Committing to do a Visual Impact Assessment (VIA) is a good first step.
However, a VIA is a mechanical process of simulating the visual impact of the operation from selected viewpoints.
A VIA is not proactive. I.e. It does not design the facility to reduce impacts. Given the comments received, it is my belief that the proponent will have to do some serious
upfront thinking about how it plans on dealing with the visual impacts of this proposal.
There will be impacts and they will require visual design not just engineering design.
I would like to see the proponent explore some of the ideas proposed such as: storing the tailings in the old Afton pit to reduce the height and volume of the tailings pile?
Look at contouring the tailings pile to fit in with the natural landscape. Conducting rehab progressively as impacts are created?
These are just a few options that should be explored.

Proposing an open pit mine on the doorstep of an established community is going to take much more due diligence and extra effort to ensure that public concerns are addressed.
My comments are pretty self explanatory in the tracking document.
Where I have written the word complete, it means the proponent has covered off the issue and I don't have anything to add.

FILE COPY

Mayall, Jane EAO:EX

From: Bailey, Scott EAO:EX
Sent: Thursday, August 23, 2012 1:28 PM
To: 'Pierce Lefebvre Consulting'
Cc: Mayall, Jane EAO:EX; Butler, Adrienne L EAO:EX
Subject: 30200-20/AMIN-05-07 RE: Preliminary Findings from PLC

Claude,

I have reviewed the attached memo. Thank-you for the comprehensive comments as set out in the memo – these are consistent with both our understanding of the referenced meetings and our discussions to date. I have the following comments:

1) Your suggestion of added VCs are interesting and useful for discussion. I am in agreement with GDP, Government Revenues and Property Values.
2) I need to have a more thorough understanding of the history of how we got to where we are before I can make a decision about Recreation and Country Foods. I would expect we need also to consult the Working Group before taking a decision.
3) I am also generally in agreement with your 'Other suggestions' as outlined under point #1 in the memo. Similar to #3 above, Cost of Living, Dark Skies/shading and Jacko Lake need further consideration/understanding of history.
4) I ask for a little more clarity on your comments about 'Land and resource uses' – I am not sure I see your point clearly.
5) I appreciate the comments in #'s 2 and 3 in your memo.
6) Suggestions in #'s 4 and 5 will be forwarded to the Proponent at the appropriate time.

In order to support the next steps and to assist in our communications with the proponent, I request that you take the ideas in this memo and develop wording for direction to the Proponent from EAO. My inclination is that we will proceed with all of your suggestions, so I ask that you incorporate the wording on these suggestions as well (I will check in on the history and do the diligence with the WG). I anticipate providing the wording to the Proponent as a comprehensive set of instructions/direction from EAO. I expect the appropriate time will be to include this with the finalized tracking tables – estimating mid September. I do not know the exact format (i.e. Letter vs. Memo vs. Email), but ask for the wording with supporting arguments so that I can incorporate as appropriate – I believe your are already substantially completed the necessary level of detail with the memo.

Thanks,
Scott

Scott Bailey
Executive Project Director
BC Environmental Assessment Office
Phone: 250/356.1124
Cell: s.17
Email: scott.bailey@gov.bc.ca
http://www.eao.gov.bc.ca/

From: Pierce Lefebvre Consulting [mailto:piercelef@telus.net]
Sent: Friday, August 10, 2012 4:58 PM
To: Bailey, Scott EAO:EX; McDonough, Lindsay EAO:EX
Subject: Preliminary Findings from PLC

Lindsay, Scott,

Good meeting yesterday.

We enclose a memo that summarizes our preliminary findings on our review so far.

We would like to discuss with you the timing of upcoming deliverables for PLC:

Upcoming deliverables:

- Tracking tables: should we proceed immediately with populating the 2 columns of the tracking tables, and prepare a summary document on the proponents' responses to the comments?
- Should we wait for the next version of the AIR/EIS Guidelines to comment further on the draft AIR?

Regards,

Claude
Pierce Lefebvre Consulting
3705 West 18th Ave.
Vancouver B.C.
V6S 1B3
Email: piercelef@telus.net
Tel: 604-224-0648

Mayall, Jane EAO:EX

FILE COPY

From: McDonough, Lindsay EAO:EX
Sent: Thursday, July 26, 2012 7:11 AM
To: 'piercelef@telus.net'
Cc: Mayall, Jane EAO:EX; Bailey, Scott EAO:EX
Subject: 30200-20/AMIN-05-07 Re: As promised: Ajax Socio-Econ Analysis - Additional Info

Sorry, I meant August 9 (not 8).

From: Pierce Lefebvre Consulting [mailto:piercelef@telus.net]
Sent: Wednesday, July 25, 2012 04:31 PM
To: McDonough, Lindsay EAO:EX
Cc: Mayall, Jane EAO:EX; Bailey, Scott EAO:EX
Subject: Re: As promised: Ajax Socio-Econ Analysis - Additional Info

Lindsay, Scott,

It was very nice to meet face to face today, and thanks for sending the information.
We thought the meeting in Kamloops was August 9, rather than on August 8 as mentioned below. Either day works for us.

Regards,

Sylvie
Pierce Lefebvre Consulting
3705 West 18th Ave.
Vancouver B.C.
V6S 1B3
Email: piercelef@telus.net
Tel: 604-224-0648

----- Original Message -----
From: McDonough, Lindsay EAO:EX
To: 'Pierce Lefebvre Consulting'
Cc: Mayall, Jane EAO:EX ; Bailey, Scott EAO:EX
Sent: Wednesday, July 25, 2012 3:56 PM
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Regards,
Scott

Scott Bailey
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Proposed Ajax Mine Project
Technical EA Working Group and Public Comment Issues Tracking Table Developed by KGHM Ajax Mining Inc. for the draft Application Information Requirements/Environmental Impact Statement Guidelines (AIR/EIS Guidelines)

Process & Guidance for the Technical EA Working Group Review

Purpose:
To review the proponent's responses to Working Group (WG) and public comments that relate to the information requirements of the environmental assessment (EA) and to highlight to the BC Environmental Assessment Office (EAO) and Canadian Environmental Assessment Agency (CEA Agency) those information requirements that may require additional consideration or qualification before EAO and CEA Agency approve and issue the AIR/EIS Guidelines document.

The EAO and CEA Agency will consider input from the WG's review, in addition to input from the Community Advisory Group (CAG), which is limited to the Public Issues Tracking Table, and additional reviewers as required, to contribute to finalizing the AIR/EIS Guidelines. It is important to note that the EAO and CEA Agency are, by their respective legislations, the decision makers and are solely responsible for determining the adequacy of the AIR/EIS Guidelines.

Resources Provided by EAO/CEA Agency:

- Updated Review Guidance Document (dated July 5, 2012)
- Draft of the Working Group Comment Tracking Table in MS Excel format (Revision D, July 5, 2012)
    - This table was developed by the Proponent and includes comments from the WG with responses developed by the Proponent.
- Draft of the Public Comment Tracking Table in MS Excel format (Revision D, July 5, 2012)
    - This table was developed by the Proponent and includes comments from the public with responses developed by Proponent.
- Draft Ajax Public Issues Tracking Table Summary Responses (dated June 27, 2012)
    - Companion document which includes a summary of public responses received on the dAIR/EIS Guidelines.
- Letter from the Proponent outlining proposed changes to the draft AIR/EIS Guidelines as a result of Working Group and public comment (dated July 3, 2012)
- Link to the draft AIR/ EIS Guidelines (version sent out for public comment: January 2012)
- Link to the Section 11 Order

Outputs:

The output requested from the primary contact for each agency is one Excel file for the Public Comments Issues Tracking Table and one Excel file for the Working Group Issues Tracking Table with WG member's input.

The WG is requested to populate the Excel spreadsheets using the following instructions:

1. In the Excel spreadsheet, two columns have been created for use by the WG:
   a. The first column (**"Comment Type"**) is a drop down list to identify the type of input you are providing as one of the following:
      i. **"Complete"** – the Proponent's response to the Working Group or public comment is complete. No additional consideration or change to the draft AIR/EIS Guidelines is required on this comment.
      ii. **"Change required"** – the Proponent has not appropriately/completely considered the Working Group or public comment and the issue is related to the information requirements of the draft AIR/EIS Guidelines. Change(s) to the document may be required. *Please provide your rationale in the second column to support this advice.
      iii. "**Additional information required"** – the EAO and CEA Agency should consider or seek qualification of the Working Group or public comment and/or the Proponent's response as more information is required. *Please provide your rationale and/or contact individual in the second column to support this advice.
   b. The second column **("Rationale/ Clarification on Selection")** is available to record your rationale, or additional information.

   To select the "Comment Type" from the drop down menu, click on the box beside the comment you are reviewing (underneath the "Comment Type" column heading) and then click on the arrow with the three options. (A description of each comment type is also included in a worksheet within the excel spreadsheet).

   To insert text into the "Rationale/ Clarification on Selection", double click on the box beside the comment you are reviewing and type in your comment.

2. Comments may be sorted using the drop-down arrows at the top of each column heading (e.g. project component, valued component, etc.)

3. WG members are requested to focus on those comments (WG and public) that are related to the mandate of their agency and to provide advice and information requests within their agency's mandate and established policies, procedures, and standards.

4. We request that no new rows or columns be added to the spreadsheet.

5. Please send your comments (completed Excel spreadsheets) to Lindsay.McDonough@gov.bc.ca and cc the following: Scott.Bailey@gov.bc.ca and colleen.hanlan@ceaa-acee.gc.ca.

Process and Timing:

Following is a *draft schedule*. Once dates are known, this information will be updated.

1. End of March to mid June, 2012 (completed): Proponent develops WG and public comment issues tracking tables.
2. June 14 (completed): EAO and CEA Agency will organize a meeting with WG members to provide guidance on providing feedback and to clarify any questions about the process.
3. June 18-22, 2012 (completed): EAO and CEA Agency will conduct a preliminary review of the WG and public comment issues tracking tables; once satisfied that they are ready for review by the WG, tracking tables will be distributed for WG review.
4. July 6-August 3 (approximate): WG review of issues tracking tables (4 weeks total).
5. July 23-27 (approximate): EAO and CEA Agency will organize a meeting (or teleconference) to address interim questions and to provide clarification where requested. EAO and CEA Agency will be available on an *as needed* basis to WG members.
6. August 6-10 (approximate): EAO and CEA Agency conduct a review of the overall inputs received through the review process. After this date, the EAO and CEA Agency will explore options to resolve any outstanding issues (e.g. meetings with individual agencies, etc.)
7. August 13-17 (approximate): Proponent receives input from EAO and CEA Agency and makes changes to the issues tracking tables and the draft AIR/EIS Guidelines and resubmits to EAO and CEA Agency.
8. August 20-September 7 (approximate): EAO and CEA Agency may propose another round of review by the WG on specific unresolved issues (3 weeks total).
9. September 10-21 (approximate): Proponent prepares final AIR/EIS Guidelines (2 weeks).
10. September 24-28 (approximate): EAO and CEA Agency approve AIR/EIS Guidelines document and issues it to the proponent once EAO and CEA Agency are satisfied that all information requirements have been adequately considered by the proponent and the AIR/EIS Guidelines is complete.

The EAO and CEA Agency will consider the input from the WG's review, input from the CAG on the public issues tracking table only, and any others who have been requested to provide input (e.g. third party consultant).

*EAO and CEA Agency may seek clarification from reviewers on the input provided. In the event of contradictory comments, resolution may be sought with a multi-party meeting or

other approach, but ultimately government interest, policy, regulation and/or legislation will be used to guide final decisions by EAO and CEA Agency as the most appropriate final input.

Guiding Principles:

Please use these guiding principles to review the Working Group and Public Comment Issues Tracking Tables:

Each member of the working group is responsible for identifying the information it requires for the EA review so that is can be included as an information requirement in the AIR/EIS Guidelines. This information may include:

- Identifying environmental, heritage, health and socio-economic valued components (VC) in a proposed project area;
- Specifying that potential effects on these Valued Components (VCs) need to be examined;
- Commenting on the criteria that the proponent plans to use to determine the significance of any adverse effects;
- Commenting on the appropriateness of study areas; and
- Requiring any other information needed so that the Application/EIS can be properly assessed in terms of potential impacts, proposed mitigation measures and significance of any residual effects.

The AIR/EIS Guidelines should focus on information that must be included in the Application/EIS. Detailed comments relating to baseline studies should be conveyed to proponents before these studies proceed, or in a separate comment to the proponent.

Comments on the AIR/EIS Guidelines should focus on the level of information required for an Application/EIS rather than the more detailed information that is typically required during the permitting stage. However, agencies should identify the permits that may be required for the Project to proceed, if an Environmental Assessment Certificate or positive federal EA decision is granted for the proposed Project.

Please use these guiding principles to review the Public Comment Tracking Table:

Principle #1: Public comments related to issues outside the scope of the EA and the public comment period objectives– will not be considered.

For example:

Comments in opposition to the proposed Ajax Mine Project:
The EAO and CEA Agency acknowledge that the majority of public comments submitted were in opposition to the proposed Ajax Mine Project. However, it is important to recognize that the objective of the public comment period was to receive input on the information requirements

of the draft AIR/EIS Guidelines for the proposed Ajax Mine Project. The proponent has been requested to identify public comments in opposition to the proposed Ajax Mine Project but is not required to provide a response.

Comments suggesting the rejection of the proposed Ajax Mine Project and cancellation of the EA:
Under federal and provincial legislation, proponents have the right to submit a proposal for review. Due process and fairness requires that governments consider and assess the proposal (as required under respective legislations) before making a determination. The EAO and CEA Agency are responsible for ensuring a fair and transparent EA process that assesses the potential impacts of the proposed Ajax Mine Project and for submitting a report to their respective Ministers for EA decisions.

Comments recommending information requirements outside the scope (or is not a required factor) of either provincial or federal EA legislations:
For example, public comments calling for an assessment of the greenhouse gas (GHG) contributions that would be associated with the overseas processing of concentrate from the proposed Ajax Mine Project is outside the scope of the EA and will not be considered. By current international GHG accounting standards, countries are responsible for emissions that occur within their boundaries. For example, if coal were mined in Canada and combusted in Korea, Canada would be responsible for the fugitive emissions related to the mining while Korea would be responsible for the combustion emissions associated with the end use of the coal.

<u>Principle #2: Public comments that relate to the information requirements of the EA – will be considered.</u>

The proponent has been requested to consider and provide responses to the public comments that relate to the information requirements of the draft AIR/EIS Guidelines and the cooperative EA. The responses will be provided in the form of a public comment tracking table, which will be posted to the EAO's ePIC website when the EAO and CEA Agency approve the AIR/EIS Guidelines and issue it to the proponent.

Other Considerations:

- Stage of EA - remember that we are in the planning stages of the EA and for this review exercise the EAO and CEA Agency are looking for issues identification and information requirements related to the draft AIR/EIS Guidelines (not answers to questions of potential effects of the proposed Ajax Mine Project).
- Be specific – focus on your area of expertise and background/ experience. EAO and CEA Agency may seek clarification on your input.
- Be concise – input should be no more than one paragraph (See example below).

Questions to ask as you develop your feedback:

- Is the public comment related to an information requirement of the draft AIR/EIS Guidelines that is 'in' or 'out' of the scope of the EA and the public comment period objectives?
- Does the Proponent's response demonstrate complete consideration of the public comment?
- Has the draft AIR/EIS Guidelines been revised to reflect consideration of the public comment?
- Have you included a rationale with advice to support the resolution of outstanding issues?

Mayall, Jane EAO:EX

FILE COPY

From: Bailey, Scott EAO:EX
Sent: Thursday, August 23, 2012 12:57 PM
To: 'Pierce Lefebvre Consulting'
Cc: Butler, Adrienne L EAO:EX; Mayall, Jane EAO:EX
Subject: 30200-20/AMIN-05-07 RE: Ajax: Request for Review of Tracking Tables

Hi Claude,

I meant to add that we are seeking your input by September 10. Please advise if this timeframe is problematic.

Regards,
Scott

Scott Bailey
Executive Project Director
BC Environmental Assessment Office
Phone: 250/356.1124
Cell: s.17
Email: scott.bailey@gov.bc.ca
http://www.eao.gov.bc.ca/

From: Bailey, Scott EAO:EX
Sent: Thursday, August 23, 2012 10:53 AM
To: 'Pierce Lefebvre Consulting'
Cc: Butler, Adrienne L EAO:EX; Mayall, Jane EAO:EX
Subject: Ajax: Request for Review of Tracking Tables

Hello Claude,

In follow up to Lindsay's email from last week (attached), we are seeking Pierce Lefebvre's assistance in undertaking our review of the issues tracking tables developed by the proponent, specifically:*

1) Assess the adequacy of the responses provided by the Mine Proponent on the socio-economic components of the public and working group issues tracking tables. This will include all of the socio-economic Valued Components (VC's) and any other VC's that have an inter-relationship with socio-economic impacts.
2) Assess the adequacy of the responses provided by the Mine Proponent on the socio-economic sections of the most current version of the draft AIR/EIS Guidelines document.
3) Work with EAO/ CEA Agency, Mine Proponent, Working Group, and the Community Advisory Group to clarify concerns and identify solutions to issues that impede successful completion of tasks 1 and 2 above. *Communication will generally be by telephone or email at this stage.*

**Page 9 of the Request for Proposals #4863.*

The proponent has consolidated the Working Group comments on the public issues tracking tables – see attached. The proponent is currently working on consolidating the Working Group issues tracking table, which we will send via separate email as soon as it is available.

Our current goal is to provide the Proponent with the two public tracking tables complete with our (your) input so that they can work to update the dAIR by responding to all the appropriate comments from CAG, WG and EAO (Pierce Lefebvre). We intend to be clear and specific about changes they need to make, but it is expected that the CAG and WG will have differing views (even opposing views), and that some comments will not go far enough, while others will be out of scope. It is also expected that some items have not been addressed by either CAG or WG, and that EAO (Pierce Lefebvre) will need to make comment. Our aim to have you work through the public tracking tables and provide a clear, consistent level of input to the Proponent so they can turn these comments into the next version of the dAIR.

To meet our request, please:

- Review the attached Working Group comments on the public issues tracking tables, including all socio-economic Valued Components and any other VCs that have an inter-relationship with socio-economic impacts;
- Compare the Working Group comments on the public issues tracking table to comments provided by the Community Advisory Group (see attached);
- Provide advice to EAO as to the whether the comments from WG or CAG are appropriate
- Where comments could have more depth or specificity; or perhaps are out of scope for this review, if Pierce Lefebvre can provide clarification to complete the comments, please do so;
- Where comments from CAG or WG may need clarification, please note and we can go back to the author for the necessary additional information;
- Where comments from WG and CAG differ, provide advice to EAO to determine which (if any) of the comments should be sent to the Proponent;
- Provide advice to EAO as to any issues that have no responses from WG or CAG but that still may need to be addressed by the Proponent;

We find that categorizing responses as was done in the 'Comment Type' column is a very effective way of sorting and screening input – ultimately allowing us to narrow to the issues that need the most focus. I suggest your input be provided in a new column titled 'EAO Response' and you may wish to consider also categorizing them in a similar (or same) manner as is in the 'Comment Type' column by adding a second additional column. If you wish to discuss these details, I would be pleased to, but I suspect you may want to review the information before committing to a specific path.

As noted, Lindsay be away on vacation for the next two weeks. Please direct any inquiries to Adrienne Butler and me.

Regards,

Scott

Scott Bailey
Executive Project Director
BC Environmental Assessment Office
Phone: 250/356.1124
Cell: s.17
Email: scott.bailey@gov.bc.ca
http://www.eao.gov.bc.ca/

FILE COPY

Mayall, Jane EAO:EX

From: McDonough, Lindsay EAO:EX
Sent: Tuesday, August 14, 2012 12:57 PM
To: XT:Sheehan, Stephen Environment Canada EAO:IN; 'john.mackie@tc.gc.ca'; Bellefontaine, Kim MEM:EX; Howe, Diane J MEM:EX; Taylor, Andrew JTI:EX; Underhill, Brian ALC:EX; Seguin, Joe MEM:EX; Belliveau, Phil FLNR:EX; 'Dale.Desrochers@dfo-mpo.gc.ca'; Yamelst, Brian H ENV:EX; 'danwallace@tnrd.ca'; Matscha, Gabriele ENV:EX; Anderson, Mike FOR:IN; Rothman, Stephen MEM:EX; 'christie.nelson@hc-sc.gc.ca'; Hupman, C Bruce MEM:EX; Rhebergen, Frank ENV:EX; LeClair, Tracy TRAN:EX; Mayall, Jane EAO:EX; s.22 s.22 'Shelley.Ball@NRCan-RNCan.gc.ca'; 'colleen.hanlan@ceaa-acee.gc.ca'; Demchuk, Tania MEM:EX; 'suzanne.lheureux@tc.gc.ca'; 'jfretz@kamloops.ca'; Marc, Jacques FLNR:EX; McGrath, Jim; 'Jeanettejules@kib.ca'; 'referrals@kib.ca'; 'ddraney@skeetchestn.ca'; 'thewitt@skeetchestn.ca'; 'nrreception@skeetchestn.ca'; Bailey, Scott EAO:EX; Moody, Anne MEM:EX; Warnock, George MEM:EX; Oetter, Andy FLNR:EX; 'nrfieldworker@skeetchestn.ca'; 'Misty.Palm@interiorhealth.ca'; s.22 McDonough, Lindsay EAO:EX; Klingbeil, Karl B FLNR:EX; Fitton, Susan FLNR:EX; 'Julie.Pare-Lepine@NRCan-RNCan.gc.ca'; 'marcy.friedel@tc.gc.ca'; Fraser, Jennifer FLNR:EX; Delwisch, Cheryl L FLNR:EX; Wurtz, Sheryl FLNR:EX; Henry, Larry FLNR:EX; 'Larissa.Rutquist@tc.gc.ca'; Marc, Jacques FLNR:EX; 'Pierce Lefebvre Consulting'
Cc: Bailey, Scott EAO:EX; 'colleen.hanlan@ceaa-acee.gc.ca'; 'Dianna Stoopnikoff'; 'Laura Smithies'; s.22 'Stephanie Eagan'; Mayall, Jane EAO:EX; McDonough, Lindsay EAO:EX
Subject: 30200-20/AMIN-05-04 30200-20/AMIN-04-02 FYI: Update on the EA for Proposed Ajax Mine Project

Dear Ajax Working Group Members:

This round of review of both the Working Group and Public Comment issues tracking tables on the draft Application Information Requirements/ Environmental Impact Statement (AIR/EIS Guidelines) is now complete (and we look forward to receiving the remaining few sets of comments soon). On behalf of both EAO and CEA Agency, thank-you for the time and energy you put in to providing your comprehensive guidance and feedback, especially during these busy summer months.

In terms of next steps:

EAO and CEA Agency have forwarded all comments received from the Working Group to date on the Working Group issues tracking tables to the proponent. We have asked the proponent to respond to any unresolved issues. Once the updated working group issues tracking table has been received, EAO and CEA Agency will conduct an internal review and follow-up with either the proponent and/or working group member(s) to resolve issues, as appropriate.

For the public comment issues tracking table, EAO and CEA Agency have requested the proponent to compile the individual comments from the working group into one set of comments to facilitate an internal review by the EAO and CEA Agency. EAO and CEA Agency will be reviewing the Working Group comments and comments from the Community Advisory Group to compile one set of guidance/instructions to the proponent to revise their initial responses.

We hope to share both these issues tracking tables with the Working Group once the proponent has revised the initial tables. As soon as we have a better sense of the timing of this step, we will send out an update.

As always, if you have any questions, please don't hesitate to contact either myself, Scott Bailey, or Colleen Hanlan.

Many thanks,

Lindsay

Lindsay McDonough | Project Assessment Officer | BC Environmental Assessment Office
Ph: 250.387.7411 | Fax: 250.356-7440 | www.eao.gov.bc.ca
"Nothing is certain, anything is possible, and everything depends on everything else."

Mayall, Jane EAO:EX

From: McDonough, Lindsay EAO:EX
Sent: Friday, August 17, 2012 1:11 PM
To: 'Pierce Lefebvre Consulting'
Cc: Mayall, Jane EAO:EX; Bailey, Scott EAO:EX
Subject: As promised: CAG comments on the issues tracking table (Ajax dAIR)
Attachments: BCEAO Final Copy.ods; Tracking Table Covering Letter CAG.doc; FYI: Update on the EA for the Proposed Ajax Mine Project; FYI: Update on the EA for Proposed Ajax Mine Project

Hi Claude,

Thanks for the phone chat today. As discussed, please find attached the results of the Community Advisory Group's (CAG) review of the public issues tracking tables for the dAIR. We may be seeking your help in reviewing these in conjunction with comments provided by the Working Group. Scott or I will follow up by email or phone next week to provide further direction (once we've had an opportunity to look over the review comments, including your preliminary findings, in more detail).

In terms of next steps in the EA, please refer to the email I sent to the Working Group and CAG this week for which you were cc'd – attached.

Many thanks,

Lindsay

From: s.22
Sent: Tuesday, August 7, 2012 4:01 PM
To: Bailey, Scott EAO:EX; s.22
s.22
Cc: McDonough, Lindsay EAO:EX
Subject: Re: Fw: Tracking Table - Final Response from CAG Ajax Mine

Hello Scott and Lindsay,

Please find attached the final edition of the CAG members responses to the Proponents Tracking Table and Michael Hewitt's summary covering letter. The former is subject to errors or omissions due to time constraints and the awkwardness of dealing with the Tracking program. The members of the CAG have put in a tremendous amount of time and work to deal with the issues, however we are concerned that many issues remain unanswered. I thank them for their great effort in protecting our community and the surrounding environment.

John Schleiermacher

FILE COPY

From: McDonough, Lindsay EAO:EX
Sent: Thursday, September 27, 2012 1:27 PM
To: 'Pierce Lefebvre Consulting'
Cc: Bailey, Scott EAO:EX; Mayall, Jane EAO:EX; 'Ponsford,Catherine [CEAA]'
Subject: 30200-20/AMIN-05-07 Request: Upcoming Community Advisory Group Meeting (Oct 2nd)
Attachments: DRAFT CAG Agenda (October 2 2012).doc; Ajax dAIR SEIA Proposed IG Revisions 2012 09 26.pdf

Hi Claude,

A couple of updates and requests:

1. **October 2nd Community Advisory Group Meeting** – We are sending a draft agenda to the Community Advisory Group today which I've attached to this email. The overall purpose of the meeting is to discuss the outcome of EAO and CEA Agency's review of comments on the public issues tracking table and to speak to some of the issues raised by CAG and recommendations regarding the social-economic sections of the dAIR. It would be useful to have your help with the latter (see below for details).

   Re: Agenda item #3 – The intent here is to identify 3-5 areas of key concern raised by the CAG and/or public regarding various topics in the dAIR and to speak to how those issues are being considered at this time, e.g. Jacko Lake, compensation (this will be led by Scott and myself).

   Re: Agenda item #5 – This is where we would like PLC's input and participation. The intent is for PLC to dial-in for this portion of the meeting to speak to some of the broader principles for social-economic review ("guiding philosophy"), in addition to some example comments flagged by the CAG for response by PLC.

   Specifically, we ask PLC to prepare the following:
   a. a short overview of general best practices and guidance for consideration of social-economic components in environmental assessment (i.e. the lens you were drawing your conclusions from); and
   b. similar to the above, a few (3-5) examples of where social-economic issues raised by the CAG align (or do not align) with current guidance/ best practices.

   Pending your availability for this meeting, we would ask that you prepare some speaking points which EAO can review in advance of the meeting (e.g. prior to noon on Mon, Oct 1st). Please confirm that you are able to meet this timeline and are available to speak to some of these points during the meeting.

2. **Revised Social-Economic VC Proposal** – Intergroup (proponent's consultant) sent us a revised social-economic proposal yesterday which I'm providing to you for your information (see attached). We are still working through this to determine the direction that will be provided to the proponent but will keep you abreast of our progress.

Many thanks, and please don't hesitate to contact Scott or myself if you have any questions (note: I will be out of the office on Friday but available by email on this afternoon and Monday).

Lindsay

Lindsay McDonough | Project Assessment Officer | BC Environmental Assessment Office
Ph: 250.387.7411 | Fax: 250.356-7440 | www.eao.gov.bc.ca
"Nothing is certain, anything is possible, and everything depends on everything else."

InterGroup CONSULTANTS

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MEMORANDUM

DRAFT FOR INTERNAL REVIEW

DATE:	September 26, 2012	**PROJECT:**	Ajax
TO:	Scott Bailey (EAO); Lindsay McDonough (EAO)	**FILE:**	SEIA
CC:	Dianna Stoopnikoff (KGHM Ajax); Chris Brodie (Knight Piesold)		
FROM:	Darcy McGregor; John Osler		
SUBJECT:	Proposed Revisions to draft Application Information Requirements for the Ajax Project		

1.0 PURPOSE

InterGroup Consultants has been tasked with completing the socioeconomic impact assessment (SEIA) component of the Ajax Project. As part of these responsibilities, InterGroup has provided input to the draft Application Information Requirements and engaged in public consultation activities related to this document. As the environmental assessment process has enfolded it has become increasingly clear that the document and therefore, socio-economic assessment process, could benefit from a revisiting of the document's structure and language. This was made clearer during a meeting on August 9th, 2012 with representatives from the EAO, Pierce Lefebvre Consulting, KGHM Ajax and InterGroup Consultants.

InterGroup produced a memo (dated August 29, 2012) outlining proposed revisions to the dAIR. This was circulated to the parties identified above. The EAO (via Pierce Lefebvre Consulting) concurrently produced a similar piece which served to guide a teleconference discussion on September 24, 2012.

Outcomes from this conference call included the following (in order of appearance on document from EAO dated September 20th):

- Government revenues and Gross Domestic Product (GDP) will be placed under a new VC entitled *Economic Growth*.
- *Property Value* will be considered a VC unto itself. Topics related more broadly to housing and accommodation will be addressed separately. InterGroup proposes placing discussion on housing and accommodation into the VC entitled *Infrastructure, Public Facilities and Services*.
- *Community Health and Well-being* will be retained as a VC heading. The EAO noted the potential for confusion related to the difficulties in defining community 'health'. InterGroup will ensure that relevant terminology is well-defined at the outset of the discussion.

- Cost of living will be removed as a VC. Any potential concerns will be incorporated into other sections as required.
- Culture will no longer be presented as its own VC. Instead, Aboriginal culture will be incorporated into archaeology impacts, Aboriginal Community Interests and Traditional Use studies. Further discussion will be required on this. Non-Aboriginal cultural aspects (e.g., City image) will be placed into *Community Health and Well-being*, *Economic Diversification*, *Land and Resource Use*, etc., as required (exact placement to be determined).
- Infrastructure and transportation (to be entitled *Infrastructure, Public Facilities and Services)* will include consideration of modes of transportation other than just roads (e.g., air, rail, bus).
- Placement of *Dark Sky and Shading* under relevant VC heading/s requires discussion between EAO and CAG/Working Group.
- Consideration of *Jacko Lake* as its own VC rather than a sum of its individual components related to each other VC requires discussion between the EAO and CAG/Working Group.
- *Outdoor Recreation* will be considered a new, stand-alone VC. It will cover topics related to hunting, fishing (especially in and around Jacko Lake and Inks Lake) activities as well as hiking, ice racing, bicycling, skiing, orienteering, hunting and others.
- The *Land and Resource Use* VC will no longer include outdoor recreation activities (as *Outdoor Recreation* will be a stand-alone VC). This section will include discussion on if, and/or how the project fits within community and regional land use plans, and will consider instances where the project footprint potentially conflicts with other resource users.
- Other general discussion points:
    - Most of the socio-economic studies are dependent upon studies being produced by other topic-specific study team members. These linkages will be described in the next iteration of the AIR.
    - Full assessment for all VCs, including effects, mitigation, residual effects, cumulative effects, and significance will be undertaken.
    - Effects assessment will include criteria such as uncertainty as appropriate to each VC.
    - Definitions for VCs will be provided in the next iteration of the AIR.
    - Definitions and rationales for Local and Regional Study Area boundaries will be provided.
    - The BC input-output model is being utilized for this Project.
    - The *Property Value* effects assessment will address areas of the City and surrounding area that may experience direct effects from the Project.
    - Country foods, community gardens, etc. will be considered in both a human health and ecological risk assessment context as well as a social context (exact placement within VCs to be determined but expected to be in *Community Health and Well-being*).

In addition to the revisions proposed (and largely accepted) above, InterGroup would like to propose the following additional changes:

- Merging of Labour force, Education and Training and Employment topic headings into a single section called Labour Force, Employment and Training. These topics are typically so intertwined that it is more intuitive and efficient to address them in the same place.
- Merging Healthy Living and Health Education. The topics are sufficiently related that they can be addressed together without the need for cross-references between different sections.

InterGroup understands that no notable changes with respect to structure or scope have been identified to date regarding the following VC headings:

- Income
- Business
- Economic Diversification
- Visual impact

Community Advisory Group on the EA for the proposed Ajax Mine Project

AGENDA

Date: Tuesday, October 2, 2012
Time: 12:30pm-4:00pm
Location: Ministry of Forests, Lands and Natural Resource Operations, (PineGrass Room, 1st Floor), 441 Columbia Street, Kamloops*

*Please sign in at reception upon arrival. Coffee/ tea provided.

Meeting Objectives:

1. Discuss the outcome of EAO and CEA Agency's review of comments on the public issues tracking table regarding the draft Application Information Requirements/ Environmental Impact Statement guidelines (dAIR/ EIS GL);
2. Report out on EAO's third party consultant review of the social-economic sections of the dAIR/ EIS guidelines and public issues tracking table; and,
3. Update on next steps in the environmental assessment process and discuss future CAG involvement.

Agenda:

1. Housekeeping, Scott Bailey, Executive Project Director, EAO (Chair), **12:30pm-12:50pm**
   - Introductions (name and organization)
   - Review and approval of agenda/ meeting objectives
   - Review of action items from the last (April 19) meeting – see page 2.

2. Recap of dAIR/ EIS GL review process and guidance, Lindsay McDonough, Project Assessment Officer, **12:50pm-1:05pm**

3. Outcome of EAO/ CEA Agency review of comments on the public issues tracking table, Project Assessment Officer, Lindsay McDonough, **1:05pm-2:00pm**
   - Example issues identified during review of the public issues tracking table

4. BREAK, **2:00pm-2:15pm**

5. Report out on EAO's third party consultant review, Claude Pierce, Pierce-Lefebvre Consulting (TBC), **2:15pm-3:30pm**
   - Overview of guiding philosophy for review of social-economic impacts in environmental assessments
   - Examples of social-economic issues raised by the CAG in relation to current guidance/ best practices

6. Wrap-up – Scott Bailey, Executive Project Director, EAO (Chair), **3:30pm-4:00pm**
   - Next steps in the environmental assessment process
   - Future CAG involvement

- Review of action items
- Next meeting

Action Items from April 19, 2012:

1. EAO to distribute feedback session notes to the proponent for their information – **Completed.**

2. EAO to send CAG link to recent (March 29, 2012) "estimates" debate, re: reference to the proposed Ajax Project/ Community Advisory Group – **Completed.**

3. EAO to send logistical email to CAG regarding site tour of proposed Ajax Mine Project – **Completed**.

4. Amber Cowie (Grasslands Conservation Council of BC) to communicate date/time/location of future CAG meetings to media for end of meeting interviews – **Ongoing**.

Mayall, Jane EAO:EX

From: Pierce Lefebvre Consulting <piercelef@telus.net>
Sent: September-20-12 2:27 PM
To: McDonough, Lindsay EAO:EX
Cc: Bailey, Scott EAO:EX
Subject: PLC Review of: Socio-Ec VC Proposal - Draft for Discussion
Attachments: PLC Comments Re For Discussion - Social-Ec Valued Component Proposals (Sept 2012).doc

Follow Up Flag: Follow up
Flag Status: Flagged

Lindsay,

As requested, please find attached our suggested edits/comments on the Social-Ec Valued Component Proposals.

Regards,
Claude

Pierce Lefebvre Consulting
3705 West 18th Ave.
Vancouver B.C.
V6S 1B3
Email: piercelef@telus.net
Tel: 604-224-0648

----- Original Message -----
From: McDonough, Lindsay EAO:EX
To: 'Pierce Lefebvre Consulting'
Sent: Wednesday, September 19, 2012 11:06 AM
Subject: Request: Socio-Ec VC Proposal - Draft for Discussion

Hi Claude,

I pulled some of the findings from your report and created a separate document which we can share with the proponent for discussion next week (see proposed dates/times below). My intent in reformatting this is to ensure we have full clarity about what proposals are being presented and why. I've highlighted a couple of areas that need some tweaking or further information from your end.

Could you please review the attached and send me your comments within the next day or so, preferably by end of day Thursday (Sept 20)?

I'll contact the proponent in the meantime to set up a call for next week. At this time, we're proposing:

- Monday (Sept 24), 1:30pm-3:00pm OR
- Tuesday (Sept 25), 3:00pm-4:30pm OR
- Wednesday (Sept 26), 10:00am-11:30am OR

It would be good to have PLC participation on the call (let me know if any of these dates do not work for you).

Lindsay

Lindsay McDonough | Project Assessment Officer | BC Environmental Assessment Office
Ph: 250.387.7411 | Fax: 250.356-7440 | www.eao.gov.bc.ca
"Nothing is certain, anything is possible, and everything depends on everything else."

FOR DISCUSSION: SOCIAL-ECONOMIC VALUED COMPONENT (VC) PROPOSAL

Proposed new VC's and changes to existing VC's.

- **Government Revenues**:
  - *Context:* The current proposal in the draft AIR is to include government revenues in the Project Benefits description.
  - *Issue:* Consistent with EAO AIR Template (BC EAO. 2010) to describe expected project benefits in the Application including expected effects on government revenues.
  - *Proposed Solution:* Include 'Government Revenues' as a separate VC complete with methodology description. This would inform the Project Benefits Description

Comment [CP1]: Agree

- **Gross Domestic Product (GDP)**:
  - *Context:* The current proposal in the draft AIR is not clear on how GDP is captured.
  - *Issue:* Consistent with EAO AIR Template (BC EAO. 2010) to describe expected project benefits in the Application and refer to the BC Stats Input-Output model as a source of employment and GDP effects estimates.
  - *Proposed Solution:* Include a specific VC for GDP effects complete with methodology description. This would inform the Project Benefits Description.

Comment [CP2]: Agree

- **Property Values**:
  - *Context:* The draft AIR includes discussions of residential property values as part of the Housing VC.
  - *Issue:* This is incomplete. Other property types including residential, commercial, industrial, agricultural and institutional are not captured.
  - *Proposed Solution #1:* Create a new VC named 'Property Values' to enable assessment of effects on *all* property types. The effects assessment on property values would include both expected positive influences (e.g. workers moving into areas, improved road access) and negative influences (e.g. noise, dust, visuals, increased traffic on nearby roads), as well as mitigation strategies (e.g. monitoring and adaptive management) to help minimize effects on properties.
  - *Proposed Solution #2:* The existing 'Housing' VC could then be renamed 'Housing and Accommodation', and focus primarily on potential accommodation options for construction and operations workers, and any displacement of current residents that may result.

Comment [CP3]: Agree

- **Community Well-Being**:
  - *Context:* 'Community Health and Well-Being' is currently a VC in the draft AIR.
  - *Issue:* Community Health is a vague term with no known consistent definition (may be confused with health of the individual).
  - *Proposed Solution:* Rename VC to 'Community Well-Being', and any health related discussion be included as part of Health Effects.

Comment [CP4]: Agree

- **Cost of Living:**
  - *Context:* 'Cost of Living' is currently a VC in the draft AIR.
  - *Issue:* The KGHM/Ajax list of public consultation issues (page 8 of KGHM Ajax Response Summary document dated June 27, 2012) indicates that cost of living is not a major public concern.
  - *Proposed Solution:* Remove as a separate VC and any cost-of-living concerns should be incorporated as part of Community Well-Being or another economic VC.

Comment [I5]: PLC to confirm: is there any other justification for this change?

Comment [CP6]: There are not likely to be a significant Cost of Living effects in the Kamloops context, and the KGHM/Ajax list of public ....

FOR DISCUSSION: SOCIAL-ECONOMIC VALUED COMPONENT (VC) PROPOSAL

- **Culture:**
  - *Context:* Culture is currently a VC in the draft AIR.
  - *Issue:* Should not be a separate VC as it is difficult to define and is inconsistent with current EAO practice.
  - *Proposed Solution #1:* Aboriginal culture should be incorporated in archeology impacts and aboriginal community interests/ Traditional Use studies. Community image and branding can be incorporated in Community Well-Being or Economic Diversification. Effects on "way of life" for say farmers/ranchers can be incorporated in Community Well-Being.

Comment [I7]: Additional questions for the proponent: Is anything missing? What is the definition of "culture" and what did this include?

- **Infrastructure and Transportation:**
  - *Context:* Infrastructure is currently a VC in the draft AIR.
  - *Issue:* Current ~~proposal~~ dAIR? does not include all potentially affected modes of transportation.
  - *Proposed Solution:* Expand VC to "Infrastructure and Transportation" in order to address all potentially affected modes of transportation including project effects on road, air ~~transport~~ and rail transport (if shipping concentrate by rail is raised as an option in the alternative means discussion).

Comment [I8]: Additional questions for the proponent: What does "infrastructure" include? Where is transportation currently considered in the proponent's proposal, and does it include all modes of transport?

Comment [I9]: PLC to confirm: please list all other modes of transport requested here.

- **Dark Skies & Shading:**
  - *Context:* Dark Skies & Shading is currently a stand-alone VC in the draft AIR.
  - *Issue:* Dark Skies and Shading would appear to fit logically under the more general Visual Impacts/Aesthetic Features VC, particularly since there may not be a large number of other sub-components under this VC. ~~Determining significance of any adverse effects may be more difficult with this structure~~ (?)
  - *Proposed Solution:* Remove as stand-alone VC and include as part of visual impact/ aesthetic features.

Comment [I10]: PLC to confirm. Other rationale for change?

- **Jacko Lake:**
  - *Context:* Jacko Lake is currently a stand-alone VC in the draft AIR.
  - *Issue:* Determining significance of any adverse effects may be more difficult with this structure. It is unusual to have a geographic feature assessed as a separate VC rather than assessing the feature's contribution to environmental services (VCs) such as fish habitat and recreation. The BC EAO defines Valued Components as: "components (environmental, economic, social, heritage or health) that are considered important by the proponent, public, First Nations, scientists and government agencies involved in the assessment process." From a social and economic standpoint, VCs are indicators of economic health and social well-being.
  - *Proposed Solution #1:* Remove Jacko Lake as a VC and ensure concerns with Jacko Lake are addressed in other appropriate VCs (e.g. Outdoor Recreation, First Nations, and Country Foods as well as any appropriate biophysical or ecological VCs. others?)
  - NOTE: It is recognized that the Working Group had an interest in this VC – it would be appropriate to consult with them prior to making a change.

Comment [I11]: PLC to confirm.

Comment [CP12]: Surface water quality and quantiy;, Fish, Birds, and Amphibian habitat?;

- **Outdoor Recreation:**
  - *Context:* 'Outdoor Recreation' in the draft AIR is included as part of **Land and Resource Uses** and will be discussed in the context ~~as part~~ of the effects on **Jacko Lake**.

FOR DISCUSSION: SOCIAL-ECONOMIC VALUED COMPONENT (VC) PROPOSAL

- *Issue:* The potential project effects on outdoor recreation opportunities are an important public concern not only in respect of effects on Jacko Lake activities, but also effects on **Inks Lake** activities, as well as hiking, bicycling, skiing and other recreation activities.
- *Proposed Solution: Create new VC called 'Outdoor Recreation'.*

- **Land and Resource Uses:**
  - *Context:* The draft AIR mentions that **Land and Resource Uses** will focus on if, and/or how the project fits within community and regional land use plans, and how the project footprint conflicts with other resource users.
  - *Issue:* It is not clear what specific values, components, and effects pathways will be assessed under the current ~~proposal~~dAIR?.
  - *Proposed Solution:* The draft AIR should make it clearer that consideration of the Land and Resource Uses VC will include a review of the Kamloops OCP and associated neighbourhood plans and an assessment of the project on city growth plans.

Comment [I13]: PLC to confirm.

Additional discussion points; proponent to confirm the following:

1. ~~What~~ Will the design of some social and economic VC effects assessment studies will be contingent on findings of other studies? (E.g. study of effects on property values ~~will~~may depend on noise, vibration, visual and dust assessments). If so, which ones?
2. Will the proponent include full assessment of all VCs, including: effects, mitigation, residual effects, cumulative effects, and significance?
3. Will the determination of significance include risk assessments and consider uncertainty when considering probability?
4. What is the definition and rationale for the proposed LSA and RSA boundaries for social and economic values outlined in the dAIR? (E.g. What municipalities, census divisions or other administrative boundaries are included?)
5. Does the proponent intend to apply the BC Input-Output model to this project as a potential source of data to assess GDP and government revenue project effects from construction and operations?
6. ~~5.~~ Will the Property Value effects assessment be confined to the Aberdeen and Pineview neighbourhoods, or will it include Knutsford and any other area/neighbourhood that may experience direct effects from Project construction, operations or decommissioning.

Comment [I14]: Note: this information was pulled from page 3 of PLC's Recommendations Report ("Proposed Studies"). These have been reformatted to specific questions for the proponent to consider and confirm. Please review and ensure nothing is missing.

Mayall, Jane EAO:EX

FILE COPY

From: McDonough, Lindsay EAO:EX
Sent: Friday, September 14, 2012 4:30 PM
To: 'Pierce Lefebvre Consulting'
Cc: Bailey, Scott EAO:EX; Mayall, Jane EAO:EX; McDonough, Lindsay EAO:EX
Subject: 30200-20/AMIN-05-07 Request: Meeting to discuss PLC's review of Ajax AIR/ Tracking Table
Attachments: PLC Summary Document and Findings - EAO Comments for Discussion (Sept 14, 2012).doc; PLC Tracking Table - WG Comments on dAIR Rev D Public Comment Period Round 2 WITH CAG COMMENTS (EAO Review Sept 14, 2012).xls

Hi Claude,

We've reviewed your preliminary draft report and tracking table comments and have provided some comments in track changes on the former – see attached. Scott and I would like to discuss these with you early next week as per my previous email. You note from your last email that Monday afternoon would be preferred so I've blocked off some time from 2:30pm to 4:00pm on Monday, September 18th. Dial-in information is as follows: s.15, s.17 ID: s.15, s.17

Re: Preliminary Draft Report

In terms of general comments, we would like to discuss PLC's rationale for narrowing some VC's and expanding others. In some cases, the rationale for adding a VC is mainly due to the level of public interest (e.g. property values, outdoor recreation), however, in circumstances where the proponent has proposed a VC for a similar reason (e.g. Jacko Lake, Dark Skies and Shading, Cost of living), PLC has recommended that the VC be encompassed under other existing VCs.

It would be also good to discuss PLC's definition of a Valued Component to help better understand the basis of your recommendations.

Re: Tracking Table

We are in agreement with the majority of your comments but would like some clarification and further discussion around the following issues: 668, 258, 448, 1150, and 327 (see blue highlight in attached). As well, it's noted that in some instances where you identified the response needs to be changed/improved by the proponent, no rationale or suggestions were provided. Additional EAO comments regarding your review of the tracking table are included on page 4 of your preliminary draft report.

Looking forward to our discussion. Happy weekend!

Lindsay
CC: Scott Bailey

Lindsay McDonough | Project Assessment Officer | BC Environmental Assessment Office
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"Nothing is certain, anything is possible, and everything depends on everything else."

KGHM Ajax Mine
Summary of Comments and Recommendations
For Social and Economic Analysis

Preliminary Draft Report – September 10th, 2012

Presented to the BC Environmental Assessment Office (EAO)

Prepared by:

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KGHM Ajax Mine
Summary of Comments and Recommendations
For Social and Economic Analysis

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LIST OF APPENDICES

1 Introduction

The purpose of this work is to provide a third party review of the social and economic aspects of the Environmental Assessment (EA) and support the BC EAO in their review of the EA documents for the proposed Ajax Mine Project in/near Kamloops BC.

Comment [I1]: Is there another purpose? This is in keeping with the contract.

The objectives of this phase of the project are to:

- review and comment on the proponent's draft Application Information Requirements (AIR)/ Environmental Impact Statement (EIS) Guidelines (January 6th, 2012) and subsequent changes suggested by the proponent in a July 3rd, 2012 letter to the BC EAO; and
- comment on the proponent's responses to public comments submitted during the January 11 to March 27, 2012 public comment period on the draft AIR/ EIS Guidelines which are captured in the below-noted Tracking Tables.

Pierce Lefebvre Consulting (PLC) has reviewed:

- proponent's draft AIR/EIS Guidelines - Revision D (January 6th, 2012);
- Consolidated Tracking Table prepared by the BC EAO;
- Draft Summary of Tracking Table Issues prepared by proponent (June 27, 2012); and
- July 3rd letter from proponent to the BC EAO.

2 PLC Review of Proponent's Draft AIR/ EIS Guidelines

PLC comments on the proponent's draft AIR are organized as follows:

- Valued Components
- Proposed Studies

2.1 Valued Components

The proponent's draft AIR suggests an initial listing of the Valued Components (VCs) that are likely to be most relevant to the Project.

PLC has reviewed the list of VCs suggested by the proponent and recommends several changes. These are summarized below and in Appendix 1. Also listed in Appendix 1 are some of the effects pathways by which the project is likely to influence each social and economic VC, and some of the rationale for the recommendations.

Comment [I2]: Provide definition. (Consistent with proponent's definition?)

PLC recommends adding the following as separate VCs:

- **Government Revenues**: The EAO AIR Template (BC EAO, 2010) requests that the proponent describe expected project benefits in the Application including expected effects on government revenues. The proponent has indicated its intent to include government revenues in the Project Benefits description. In order to inform the Project Benefits description, we suggest the proponent include a specific VC for government revenues complete with methodology description.

Comment [I3]: For discussion. Need more clarification around rationale for including as a VC. What is the benefit? Does this have the potential for significant adverse effects, if so, how? (Not typically identified as a VC in EAs).

- **Gross Domestic Product (GDP)**: The EAO AIR Template (BC EAO. 2010) requests that the proponent describe expected project benefits in the Application and refers to the BC Stats Input-Output model as a source of employment and GDP effects estimates. In order to inform the Project Benefits description, we suggest the proponent include a specific VC for GDP effects complete with methodology description.

Comment [I4]: For discussion. Same as above ("Government Revenues").

- **Property Values**: PLC suggests an analysis of property values effects as a separate VC to enable assessment of effects on all property types including residential, commercial, industrial, agricultural and institutional. The draft AIR includes discussions of residential property values as part of the Housing VC. PLC recommends that the Housing VC be renamed Housing and Accommodation and focus primarily on potential accommodation options for construction and operations workers, and any displacement of current residents that may result.

Comment [I5]: For discussion. Good recommendation, however, see general comments in email for discussion.

An alternative to adding these as separate VCs may be to add them as sub-components to another economic VC, for example, Property Values could be part of Land and Resource Use.

PLC has the following recommendations for the other VCs:

- **Community Well-Being**: The Community Health and Well-Being VC should be renamed Community Well-Being, and any health related discussion be included as part of Health Effects.

Comment [I6]: For discussion. Confirm that Community Well-Being VC includes health of the community, e.g. established social groups, growing population, etc.

- **Cost of Living** should not be a separate VC and any cost-of-living concerns should be incorporated as part of Community Well-Being or another economic VC. The KGHM/Ajax list of public consultation issues (page 8 of KGHM Ajax Response Summary document dated June 27, 2012) indicates that cost of living is not a major public concern.

Comment [I7]: For discussion. Good recommendation, however, see general comments in email for discussion.

- **Culture** should not be a separate VC. Aboriginal culture should be incorporated in archeology impacts and aboriginal community interests/ Traditional Use studies. Community image and branding can be incorporated in Community Well-Being or Economic Diversification. Effects on "way of life" for say farmers/ranchers can be incorporated in Community Well-Being.

Comment [I8]: For discussion. Agree with rationale ("Culture" difficult to define). Need to confirm that everything captured under Culture has been captured elsewhere.

- **Infrastructure and Transportation**: The VC on infrastructure has been expanded to include transportation, and should address all modes of transportation including project effects on air transport.

Comment [I9]: For discussion. Any examples of project effects on air transport? (Dust? Fog?)

- **Dark Skies & Shading** could be included as part of visual impact/ aesthetic features.

Comment [I10]: For discussion. Good recommendation, however, see general comments in email for discussion.

PLC also has the following comments:

- **Jacko Lake** has been identified in the draft AIR as a separate VC. It is unusual to have a geographic feature assessed as a separate VC rather than assessing the feature's contribution to environmental services (VCs) such as fish habitat and recreation. Determining significance of any adverse effects may be more difficult with this structure. (The BC EAO defines Valued Components (VCs) as "components (environmental, economic, social, heritage or health) that are considered important by the proponent, public, First Nations, scientists and government agencies involved in the assessment process." From a social and economic standpoint, VCs are indicators of economic health and social well-being. (AIR Template. 2010))

Comment [I11]: For discussion. Good recommendation, however, see general comments in email for discussion.

- **Outdoor Recreation** in the draft AIR is included as part of **Land and Resource Uses** and will be discussed as part of the effects on **Jacko Lake**. The potential project effects on outdoor recreation opportunities are an important public concern not only in respect of effects on Jacko Lake activities, but also effects on **Inks Lake** activities, as well as hiking, bicycling, skiing and other recreation activities. The proponent should consider **Outdoor Recreation** as a separate VC.

Comment [I12]: For discussion. Why not just "Recreation" (why limit to outdoor)? How is this being defined? Does this include other activities that are not currently captured under "Land and Resource Use"? (Not typically identified as a VC in EAs).

- The draft AIR mentions that **Land and Resource Uses** will focus on if, and/or how the project fits within community and regional land use plans, and how the project footprint conflicts with other resource users. The draft AIR should make it clearer that consideration of the Land and Resource Uses VC will include a review of the Kamloops OCP and associated neighbourhood plans and an assessment of the project on city growth plans (as is indicated in the above mentioned July 3rd letter).

Comment [I13]: For discussion.

It is the opinion of PLC that all the social and economic VCs being suggested in the draft AIR appear to be assessable to varying degrees with the understanding that some assessments would be more qualitative than quantitative.

2.2 Proposed Studies

PLC has reviewed the draft AIR and has the following comments and recommendations regarding the proposed studies for the social and economic effects assessments.

- As demonstrated on the effects pathways in Appendix 1, several of the social and economic VC effects assessments will be contingent on findings of other studies. For example, the study of effects on property values will depend on the noise, vibration, dust, etc. assessments and the ability to mitigate any adverse effects.

Comment [I14]: Proponent to confirm.

- The adequacy of the proposed studies assumes that the proponent will include full assessment of all VCs (effects, mitigation, residual effects, cumulative effects, significance).

Comment [I15]: Proponent to confirm.

- The adequacy of the proposed studies assumes that the determination of significance will include risk assessments and consider uncertainty when considering probability (the draft AIR specifies that assessments of significance will consider magnitude, geographic extent, duration and frequency, reversibility, context and probability).

Comment [I16]: Proponent to confirm.

- The draft AIR proposes boundaries for the LSA and RSA for social and economic values (map 7.1-1) but does not provide a rationale or define those boundaries in terms of administrative jurisdictions for example, which municipalities are included, what Census Divisions, etc.

Comment [I17]: PLC to confirm: is this a comment or a recommendation? If latter, should be written as such.

- The draft AIR does not make any references to applying the **BC Input-Output model** to this project. The AIR Template (BC EAO. 2010) suggests the BC Input-Output model as a potential source of data to assess GDP and government revenue project effects from construction and operations.

- PLC makes the following comments on the assessment of project effects on **Property Values**:
  - The proponent indicates the assessment will provide "a discussion of property values" in Aberdeen and Pine Valley residential areas of Kamloops.

Comment [I18]: PLC to confirm: are these assessment areas sufficient?

- PLC recommends the effects assessment on property value should include expected positive influences (e.g. workers moving into areas, improved road access) and negative influences (e.g. noise, dust, visuals, increased traffic on nearby roads).
- The assessment may include mitigation strategies (e.g. monitoring and adaptive management) to help minimize effects on properties (dust, noise, traffic, etc.).
- The assessment should not be limited to residential, but should also include effects on commercial, industrial, agricultural and institutional properties.

3 PLC Review of Proponent's Responses in Comment Tracking Tables

PLC has reviewed the proponents' responses to socio-economic questions arising from the public review of the draft AIR and commented on each of those responses in the tracking tables.

This section summarizes some of the major issues discussed in the Tracking Table, and makes specific recommendations to the proponent regarding those issues.

Comment [I19]: Good comments but need to distinguish between "recommendations" and "advice" in communicating review results to the proponent.

Proximity to Urban Areas

In spite of a history of mining activity in this area, and on a substantial portion of the proposed project footprint, proximity to the Kamloops urban environment is likely to present socio-economic issues related to the mining/urban interface.

In general, in its effects assessment, the proponent needs to recognize the social environment in which it will be operating. The proposed mine is near a highly developed area, which results in benefits such as availability of a skilled workforce and proximity to existing roads and infrastructure, but proximity to Kamloops will likely result in the need for mitigation and monitoring strategies to minimize any potential significant effects on specific social and economic VCs such as property values, recreation values, and community well-being.

PLC suggests that the proponent change its responses to several public comments to indicate recognition of the Project's unusual proximity to urban areas and consequently, the many types of sensitive receptors.

Comment [I20]: Please provide examples of sensitive receptors.

Land Use Planning

There are many tracking table comments relating to City of Kamloops expansion in the Aberdeen area. In its Draft Summary of Issues in the Tracking Table and its July 3rd letter outlining proposed changes to the draft AIR, the proponent commits to describing the Kamloops OCP in relation to the project and to assessing the effects of the project on the ability of the City of Kamloops to expand.

The proponent should specifically acknowledge and refer to the Aberdeen Area Plan as part of the Kamloops OCP.

Property Values

The public comments on the draft AIR highlight public concerns related to the potential effects on property values in the Aberdeen, Pineview, Knutsford and other neighbourhoods.

Potential effects on property values are contingent on the results of separate studies on other

VCs that may have an effect on property values. PLC suggests that the proponent identify potential effects pathways (e.g. dust, noise, vibration, lighting, aesthetics, public health and groundwater) that may influence property values, and develop mitigation and monitoring strategies (e.g. pre and post strategies) for those pathways to understand and minimize potential effects on property values.

Building Structure Assessments

Project related effects of blasting and hydrology changes on building structures are a concern often expressed in the public comments on the draft AIR.

In some of the responses to those comments, the proponent suggests the possibility of pre-development structural assessments if blasting and hydrology studies suggest properties may be at risk. PLC suggests that the proponent identify potential effects pathways (e.g. blasting and hydrology changes) that may influence building structures, and develop mitigation and monitoring strategies (e.g. pre and post strategies) for those pathways to minimize effects on building structures.

(See issue 180 – submission 73, Issue 248, submission 86, and Issue 828, submission 246; Also, full test blast: good answers given to issues 928, 929 and 930 of submission 257).

Models and Maps

The public has requested better maps and 3-D models of the proposed mine development. These are requested as part of the assessment of social and economic VCs including property values, land and resource uses and visual/ aesthetics values. Some of these comments may be outdated, but there may still be a need for the proponent to develop better visual aids to assist with the public review.

Comment [I21]: Advice. (Not related to AIR specifically).

Community Image

The public has expressed significant concern relating to potential project effects on the community image, in part from health effects concerns but also as a result of aesthetics/ visual concerns. PLC is satisfied with the proponent's approach to assessing effects on community image in the context of economic diversification, community well-being and business.

Employment

The public has expressed doubts about the project generating uninterrupted employment and project benefits during the life of the mine, particularly if mineral prices drop below certain thresholds and result in temporary mine closures. The determination of significance of any anticipated effect includes an assessment of probability, and the proponent may wish to include a discussion of uncertainty as it relates to employment and project benefits.

Comment [I22]: PLC to clarify this statement.

Basic Project Feasibility/ Profitability

The public has questioned assumptions and project feasibility studies including the use of discount rates. The primary purpose of the Environmental Assessment (EA) is to assess adverse project effects and identify ways to mitigate adverse effects including adverse cumulative effects. The EA also documents project benefits. . The purpose of the EA is not to describe or assess the project's financial feasibility and/or business case. PLC agrees with the proponent that public concerns regarding project feasibility are outside the scope of the EA.

Compensation

The public has requested the proponent to provide information on compensation obligations, arrangements and studies relating to compensation. The proponent has generally responded that compensation issues are not within the scope of the AIR/EIS Guidelines. While PLC is generally in agreement with that response in regard to social and economic values, a more complete and useful response would refer to the studies of potential effects pathways and strategies to mitigate adverse effects.

Comment [123]: Agree. Application review process will focus on the mitigation measures or compensation strategies the proponent is prepared to take to avoid or minimize any significant adverse effects.

Jacko Lake and Recreation Values

Jacko Lake and its environmental services is the subject of many public comments, including comments on its value as a public recreation venue. The proponent has indicated its intention to assess potential effects on Jacko Lake's contribution to those environmental services.

PLC recommends that the proponent specifically commit to assessing the recreation value of Jacko Lake in the community and regional context, and characterizing the significance of any expected effect on that value.

Water Quality and Water Quantity

Water quality and water quantity concerns have been raised and the proponent is committed to an effects assessment of these VCs and social and economic concerns related to current users of the nearby water resource, including nearby ranching and agricultural operations.

Requested Studies

Many public comments request Project Description information at a level of specificity that may not yet be available from the proponent or necessarily required for the EAC Application. In certain instances, the public has asked for extensive studies from the proponent regarding potential project effects on community image, economic diversity, and/or property values. The proponent has affirmed their willingness to develop estimates of expected effects on those values for the EAC Application. PLC in general is satisfied with the proposed social and economic studies proposed by the proponent but there may be a need to enhance the information on specific issues at a later date (after completion of studies on specific effects pathways) if there appears to be potential for significant residual effects.

APPENDIX 1 KGHM Ajax Mine: Economic and Social VCs

VC / Issue	Project Component	Effects Pathways	Public Concern	Notes
Economic				
Labour Force	All	• effects on labour force composition		• As suggested by draft AIR
Education and Training	All	• employee training programs • effects on education services supply and demand		• As suggested by draft AIR
Employment	All	• construction • operations • decommissioning • post closure monitoring	yes	• As suggested by draft AIR; • Includes direct, indirect and induced in person years per BC EAO AIR Template (BC EAO. 2010)
Employment Income	All	• construction • operations • decommissioning • post closure monitoring		• Draft AIR suggested 'Income' as VC, changed to 'Employment Income'; • Includes direct, indirect and induced
Business Opportunities	All	• supply and service contracts • induced business activity • displaced business activity		• Draft AIR suggested "Business" as VC, suggest changing to 'Business Opportunities'
Gross Domestic Product	All	• construction • operations • decommissioning • post closure monitoring		• Suggest adding as a VC as per BC EAO AIR Template (BC EAO. 2010) • Potential source: I.O. model for construction and operations
Government Revenues	All	• mineral taxes, royalties, income tax, sales tax, property tax		• Suggest adding as a VC as per BC EAO AIR Template (BC EAO. 2010) • Include federal, provincial, local Potential source: I.O. model and direct estimates

VC / Issue	Project Component	Effects Pathways	Public Concern	Notes
Property Value	All	• dust • air quality • noise • vibration • visuals/ aesthetics • geology, landforms and soils • supply and demand influences	Major issue	• Suggest adding as a VC • Includes all property types: residential, commercial, industrial, agricultural, institutional
Cost of Living?			Not mentioned as issue (page 23)	• Suggest deleting as separate VC and perhaps including as part of Community Well-Being and/or other values
Housing and Accommodation	All	• housing supply available for construction worker accommodation • housing supply available for operations worker accommodation		• Draft AIR suggested Housing; added 'Accommodation'
Infrastructure and Transportation	All	• construction access • operations access • ore hauling • power supply • water supply • fire protection • sewer • solid waste disposal	yes	• Draft AIR suggested Infrastructure; added 'Transportation' • Should include effects of project on air transportation
Economic Diversification	All	• project employment • supplies and services • displacement of other activities	yes	• As suggested by draft AIR; • Applies at regional and community level; • Possibly include image/ branding of community
Social				

VC / Issue	Project Component	Effects Pathways	Public Concern	Notes
Culture?	All		yes	• Suggest deleting as a separate VC, perhaps including changes to way-of-life and other related issues as part of community well-being • Aboriginal culture considered in FN assessments and effects on Aboriginal communities
Community Well-Being	All	• Changes in population demographics (gender, age, etc.) • Changes in economic structure	yes	• Draft AIR suggested Community Health be included with Community Well-Being; • Possibly include community resilience, family relationships, crime, image/ branding of community, "way of life", etc.
Public Facilities and Services	All	• Changes in population demographics (gender, age, etc.) • Changes in industrial/ business activities		• Draft AIR suggested 'Transportation' be included here; suggest transportation be included as part of infrastructure leaving this to focus on community facilities (e.g. schools, fire protection, police, health services, emergency services, etc.)
Land and Resource Use	All	• consistency with Kamloops OCP, TNRD Regional Growth Strategy (RGS), Kamloops LRMP, ALR; • conflicts with current land and resource use including recreation, ranching, other tenure holders and other resource uses • effects from dust, air quality	Major issue	• As suggested by draft AIR, project effects to include project footprint and buffer area, as well as conflicts with other resource uses (ranching, recreation, etc.) and tenure holders • Suggest draft AIR be more specific and refer to Kamloops OCP, neighourhood plans, etc. • Given importance of recreation values may want to address effects on recreation as separate VC • Suggest add country foods / urban gardening (berry picking and plant gathering as possible other resource uses)

VC / Issue	Project Component	Effects Pathways	Public Concern	Notes
Outdoor Recreation	All	• Jacko Lake • Inks Lake • hiking and biking trails • Other recreational areas (if any) • dust • air quality • noise • vibration • visuals	yes	• Suggest adding as a VC • Suggest also including Jacko Lake as part of Outdoor Recreation
Jacko Lake	All	• Views • Access • Fish Habitat • Wilderness Quality	Major issue	• As suggested by draft AIR; • Unusual to have a specific recreation feature singled out as a VC; • May be problematic when assessing significance
Visual Impact/ Aesthetic Features	Power Lines Tailings Storage Ore Storage	• views from city • views from nearby residences • views from recreation areas • views from roads/highways • Dark Sky? • Shading?	major issue	• As suggested by draft AIR • Suggest Visuals consider dark sky & possibly shading issues
Dark Sky?	Outdoor Lighting	• 24 hr operations	yes	• Suggest include as part of Visuals; also, include shading

Notes: I.O. model: BC Stats Input-Output model.

FOR DISCUSSION: SOCIAL-ECONOMIC VALUED COMPONENT (VC) PROPOSAL

Proposed new VC's and changes to existing VC's.

- **Government Revenues**:
  - *Context:* The current proposal in the draft AIR is to include government revenues in the Project Benefits description.
  - *Issue:* Consistent with EAO AIR Template (BC EAO. 2010) to describe expected project benefits in the Application including expected effects on government revenues.
  - *Proposed Solution:* Include 'Government Revenues' as a separate VC complete with methodology description. This would inform the Project Benefits Description

- **Gross Domestic Product (GDP)**:
  - *Context:* The current proposal in the draft AIR is not clear on how GDP is captured.
  - *Issue:* Consistent with EAO AIR Template (BC EAO. 2010) to describe expected project benefits in the Application and refer to the BC Stats Input-Output model as a source of employment and GDP effects estimates.
  - *Proposed Solution:* Include a specific VC for GDP effects complete with methodology description. This would inform the Project Benefits Description.

- **Property Values**:
  - *Context:* The draft AIR includes discussions of residential property values as part of the Housing VC.
  - *Issue:* This is incomplete. Other property types including residential, commercial, industrial, agricultural and institutional are not captured.
  - *Proposed Solution #1:* Create a new VC named 'Property Values' to enable assessment of effects on *all* property types. The effects assessment on property values would include both expected positive influences (e.g. workers moving into areas, improved road access) and negative influences (e.g. noise, dust, visuals, increased traffic on nearby roads), as well as mitigation strategies (e.g. monitoring and adaptive management) to help minimize effects on properties.
  - *Proposed Solution #2:* The existing 'Housing' VC could then be renamed 'Housing and Accommodation', and focus primarily on potential accommodation options for construction and operations workers, and any displacement of current residents that may result.

- **Community Well-Being**:
  - *Context:* 'Community Health and Well-Being' is currently a VC in the draft AIR.
  - *Issue:* Community Health is a vague term with no known consistent definition (may be confused with health of the individual).
  - *Proposed Solution:* Rename VC to 'Community Well-Being', and any health related discussion be included as part of Health Effects.

- **Cost of Living:**
  - *Context:* 'Cost of Living' is currently a VC in the draft AIR.
  - *Issue:* The KGHM/Ajax list of public consultation issues (page 8 of KGHM Ajax Response Summary document dated June 27, 2012) indicates that cost of living is not a major public concern (likelihood for significant adverse effects is small).
  - *Proposed Solution:* Remove as a separate VC and any cost-of-living concerns should be incorporated as part of Community Well-Being or another economic VC.

- **Culture:**
  - *Context:* Culture is currently a VC in the draft AIR.
  - *Issue:* Should not be a separate VC as it is difficult to define and is inconsistent with current EAO practice.
  - *Proposed Solution #1:* Aboriginal culture should be incorporated in archeology impacts and aboriginal community interests/ Traditional Use studies. Community image and branding can be incorporated in Community Well-Being or Economic Diversification. Effects on "way of life" for say farmers/ranchers can be incorporated in Community Well-Being.

- **Infrastructure and Transportation:**
  - *Context:* Infrastructure is currently a VC in the draft AIR.
  - *Issue:* Current draft AIR does not include all potentially affected modes of transportation.
  - *Proposed Solution:* Expand VC to "Infrastructure and Transportation" in order to address all potentially affected modes of transportation including project effects on road, air and rail transport (if shipping concentrate by rail is raised as an option in the alternative means discussion).

- **Dark Skies & Shading:**
  - *Context:* Dark Skies & Shading is currently a stand-alone VC in the draft AIR.
  - *Issue:* Dark Skies and Shading would appear to fit logically under the more general Visual Impacts/Aesthetic Features VC, particularly since there may not be a large number of other sub-components under this VC.
  - *Proposed Solution:* Remove as stand-alone VC and include as part of visual impact/ aesthetic features.

- **Jacko Lake:**
  - *Context:* Jacko Lake is currently a stand-alone VC in the draft AIR.
  - *Issue:* Determining significance of any adverse effects may be more difficult with this structure. It is unusual to have a geographic feature assessed as a separate VC rather than assessing the feature's contribution to environmental services (VCs) such as fish habitat and recreation. The BC EAO defines Valued Components as: "components (environmental, economic, social, heritage or health) that are considered important by the proponent, public, First Nations, scientists and government agencies involved in the assessment process." From a social and economic standpoint, VCs are indicators of economic health and social well-being.
  - *Proposed Solution #1:* Remove Jacko Lake as a VC and ensure concerns with Jacko Lake are addressed in other appropriate VCs (e.g. Outdoor Recreation, First Nations, and Country Foods as well as any appropriate biophysical or ecological VCs).
  - NOTE: It is recognized that the Working Group had an interest in this VC – it would be appropriate to consult with them prior to making a change.

- **Outdoor Recreation:**
  - *Context:* 'Outdoor Recreation' in the draft AIR is included as part of **Land and Resource Uses** and will be discussed in the context of the effects on **Jacko Lake**.
  - *Issue:* The potential project effects on outdoor recreation opportunities are an important public concern not only in respect of effects on Jacko Lake activities, but also effects on **Inks Lake** activities, as well as hiking, bicycling, skiing and other recreation activities.
  - *Proposed Solution: Create new VC called 'Outdoor Recreation'.*

- **Land and Resource Uses:**
  - *Context:* The draft AIR mentions that **Land and Resource Uses** will focus on if, and/or how the project fits within community and regional land use plans, and how the project footprint conflicts with other resource users.
  - *Issue:* It is not clear what specific values, components, and effects pathways will be assessed under the current draft AIR?.
  - *Proposed Solution:* The draft AIR should make it clearer that consideration of the Land and Resource Uses VC will include a review of the Kamloops OCP and associated neighbourhood plans and an assessment of the project on city growth plans.

Additional discussion points; proponent to confirm the following:

1. Will the design of some social and economic VC effects assessment studies will be contingent on findings of other studies? (E.g. study of effects on property values may depend on noise, vibration, visual and dust assessments). If so, which ones?
2. Will the proponent include full assessment of all VCs, including: effects, mitigation, residual effects, cumulative effects, and significance?
3. Will the determination of significance include risk assessments and consider uncertainty when considering probability?
4. What is the definition and rationale for the proposed LSA and RSA boundaries for social and economic values outlined in the dAIR? (E.g. What municipalities, census divisions or other administrative boundaries are included?)
5. Does the proponent intend to apply the BC Input-Output model to this project as a potential source of data to assess GDP and government revenue project effects from construction and operations?
6. Will the Property Value effects assessment be confined to the Aberdeen and Pineview neighbourhoods, or will it include Knutsford and any other area/neighbourhood that may experience direct effects from Project construction, operations or decommissioning.

Pierce Lefebvre Consulting Comments on:

Merged dAIR Rev C and D Agency Tracking Table_07Sept 2012

Comment #	PLC Comments	PLC Rationale
C172	xEAO TO FOLLOW UP	PLC has previously suggested removing the words "Community Health" from the Community Health and Well-being VC, to keep a clear distinction between the Community Well-being and Human Health VCs. Our concern is not only to avoid the type of confusion expressed in this comment by Health Canada, but also to keep the Community Well-being section focused on issues such as community capacity, sustainability, resilience, cohesion, social interaction and governance.
D93	Proponent to change response, but no change to dAIR required: The proponent must provide a better response in the tracking table (typically to be more responsive to the question).	Baseline information 'sufficient to delineate the pathway of effects' may not be sufficient to determine the likely significance of effects.
D94	Proponent to change response, but no change to dAIR required: The proponent must provide a better response in the tracking table (typically to be more responsive to the question).	Proponent should indicate that assessment of potential effects of the power line on private property value will be included under the proposed "Property Value" VC. This issue can be very controversial, for example in the case of the BC Hydro Vancouver Island Transmission Reinforcement Project reviewed by BCEAO.
D95	Proponent to change response, but no change to dAIR required: The proponent must provide a better response in the tracking table (typically to be more responsive to the question).	Sept. 26, 2012 memorandum from InterGroup to EAO indicates that Property Value will be a separate VC, and that housing issues such as availability and affordability will be addressed under the VC called "Infrastructure, Public Facilities and Services". There will be no "Section 7.7 Housing"
D96	Proponent to change response, but no change to dAIR required: The proponent must provide a better response in the tracking table (typically to be more responsive to the question).	Proponent should refer to information (models, maps etc.) that will be included in the Application.

Comment #	PLC Comments	PLC Rationale
D97	Proponent to change response, but no change to dAIR required: The proponent must provide a better response in the tracking table (typically to be more responsive to the question).	Response to Comment C24 regarding potential power line health effects should be repeated here.
D98	Proponent to change response, but no change to dAIR required: The proponent must provide a better response in the tracking table (typically to be more responsive to the question).	Proponent should not imply that the Traffic Impact Study will be limited to the Lac Le Jeune Road
D99	Proponent to change response, but no change to dAIR required: The proponent must provide a better response in the tracking table (typically to be more responsive to the question).	Assessment of the potential effects of the Project on the existing Kinder Morgan pipeline and any expansion plans should be included under the "Land and Resource Use" VC and/or the "Infrastructure, Public Facilities and Services" VC. The Kinder Morgan pipeline expansion should also be considered as part of the cumulative effects assessment, particularly with regard to Jacko Lake.
D91	Proponent to change dAIR: The proponent must change the response tracking table and corresponding section(s) in dAIR to address comments made.	Sept. 26, 2012 memorandum from InterGroup to EAO indicates that Property Value will be a separate VC, and that housing issues such as availability and affordability will be addressed under the VC called "Infrastructure, Public Facilities and Services".
D92	Proponent to change dAIR: The proponent must change the response tracking table and corresponding section(s) in dAIR to address comments made.	Sept. 26, 2012 memorandum from InterGroup to EAO indicates that Property Value will be a separate VC, and that housing issues such as availability and affordability will be addressed under the VC called "Infrastructure, Public Facilities and Services". The "Cost of Living " VC will be dropped and any potential concerns incorporated into other sections as required.

Mayall, Jane EAO:EX

From: Pierce Lefebvre Consulting <piercelef@telus.net>
Sent: September-11-12 7:40 AM
To: McDonough, Lindsay EAO:EX
Subject: Fw: PLC Tracking Table Comments
Attachments: PLC Tracking Table - WG Comments on dAIR Rev D Public Comment Period Round 2 WITH CAG COMMENTS.xlsx; Guide to PLC Comments on Tracking Table.docx

Follow Up Flag: Follow up
Flag Status: Flagged

----- Original Message -----
From: Pierce Lefebvre Consulting
To: Scott Bailey
Sent: Monday, September 10, 2012 1:42 PM
Subject: PLC Tracking Table Comments

Scott,

Please find attached two files, a Word file containing a short guide to our Tracking table comments, and an Excel file containing the Combined Tracking Table with two additional columns with our comments.

We continue to work on our draft summary report, and hope to have something you can review by late this evening.

Regards,
Claude

Pierce Lefebvre Consulting
3705 West 18th Ave.
Vancouver B.C.
V6S 1B3
Email: piercelef@telus.net
Tel: 604-224-0648

Guide to PLC Comments on Tracking Table

PLC has added two columns to the tracking table to the right of the CAG comment columns, one for a standardized initial response (Comment Type PLC), and one for further explanation or rationale (Rationale/Clarification on Selection PLC).

The Comment Type column is populated by choosing from a drop down list of six possible responses listed on the "Types of Comment" worksheet.

The Rationale/Clarification on Selection PLC column is populated either with a keystroke entered comment, or by copying and pasting a more generic custom comment from the "Types of Comments" worksheet.

A response of "N/A" in the Comment Type column indicates that PLC has reviewed the comment but did not judge it to be directly relevant to the economic or social project effects assessment.

The breakdown of PLC Comment Type responses is as follows:

Comment Type	Frequency
Proponent to change dAIR: The proponent must change the response tracking table and corresponding section(s) in dAIR to address comments made.	12
Proponent to change response, but no change to dAIR required: The proponent must provide a better response in the tracking table (typically to be more responsive to the question).	150
No further action required: EAO/CEAA is satisfied with proponent's response	434
EAO TO FOLLOW UP	3
CEAA TO FOLLOW UP	0
N/A	869

Further to the PLC tracking table comments, PLC has reviewed the KGHM Ajax Mine dAIR/EIS Guidelines Rev. D and recommended changes, which are detailed in the report "KGHM Ajax Mine, Summary of Comments and Recommendations for Social and Economic Analysis" submitted in conjunction with our tracking table comments. Not all recommended changes to dAIR/EIS Guidelines Rev. D are reflected in our tracking table comments.

FILE COPY

Mayall, Jane EAO:EX

Subject: FW: 30200-20/AMIN-05-07 Re: Request: PLC feedback on VC changes - Proposed Ajax Project (Part 2)

From: Bailey, Scott EAO:EX
Sent: Monday, October 29, 2012 7:24 PM
To: 'piercelef@telus.net'; McDonough, Lindsay EAO:EX
Cc: Mayall, Jane EAO:EX
Subject: 30200-20/AMIN-05-07 Re: Request: PLC feedback on VC changes - Proposed Ajax Project (Part 2)

Thanks for the fast turnaround!

We are close to having our final direction to the proponent completed (CEAA review and a couple of outstanding items pending).

Likely the next item for PLC will be the finalization of the report for this phase - hopefully we can discuss within the next week or so. We may also seek advice on any questions from the proponent on our direction to date.

Beyond that, we will advise you once we have more clarity on timing for next steps.

Thanks,
Scott

Mayall, Jane EAO:EX

FILE COPY

From: Pierce Lefebvre Consulting [piercelef@telus.net]
Sent: Monday, October 29, 2012 4:46 PM
To: McDonough, Lindsay EAO:EX
Cc: Bailey, Scott EAO:EX; Mayall, Jane EAO:EX
Subject: 30200-20/AMIN-14 Re: Request: PLC feedback on VC changes - Proposed Ajax Project (Part 2)
Attachments: Oct 29 PLC Comments on Merged dAIR Rev C and D Agency Tracking Table_07Sept2012.xlsx; Oct 29 Summary of Pierce Lefebvre Consulting Comments on Agency Tracking Table 07 Sept 2012.docx

Lindsay/Scott,

Please find attached a Word file and an Excel file with a second attempt to communicate our comments on the Agency Tracking table. As before, the Excel file is sorted so that the issues requiring attention in our opinion appear first.

With respect to the additional issues noted below, we are in agreement with both the proponent's suggested changes, and the wording of the direction from the EAO regarding Outdoor Recreation and Property Values (with the exception that the statement of the Issue under Property Values doesn't quite read as a complete sentence).

Regards,
Claude

----- Original Message -----
From: McDonough, Lindsay EAO:EX
To: 'Pierce Lefebvre Consulting'
Cc: Bailey, Scott EAO:EX ; Mayall, Jane EAO:EX
Sent: Monday, October 29, 2012 1:48 PM
Subject: Request: PLC feedback on VC changes - Proposed Ajax Project (Part 2)

My apologies Claude, I forgot to include the two additional proposed changes in my last email. These are included below, for your input:

1. **Labour force, Education and Training, Employment** – the proponent is proposing to merge the aforementioned into a single section called "Labour Force, Employment and Training" as these topics are typically intertwined and it is more intuitive/ efficient to address them in the same place.

2. **Healthy Living and Health Education** – again, the proponent is of the view that these topics are sufficiently related and should be addressed together without the need for cross-reference between different sections.

From: McDonough, Lindsay EAO:EX
Sent: Monday, October 29, 2012 1:23 PM
To: 'Pierce Lefebvre Consulting'
Cc: Bailey, Scott EAO:EX; Mayall, Jane EAO:EX; McDonough, Lindsay EAO:EX
Subject: Request: PLC feedback on VC changes - Proposed Ajax Project

Hi Claude,

We have 2 things we want you to check and comment on (these are the 2 VC change items I added below). As well, the proponent proposes two additional changes that we think are reasonable, but are seeking PLC advice on.

EAO proposes the following language to Proponent – seeking PLC comment:

New VC – Outdoor Recreation

Issue: 'Outdoor Recreation' in the draft AIR is included as part of existing 'Land and Resource Uses' VC. The potential project effects on outdoor recreation opportunities are an important public concern for the project area, with an emphasis on Jacko Lake and Inks Lake. Activities in the area include fishing, hiking, bicycling, skiing, orienteering, hunting, and other recreation activities.

Direction: Create new VC called 'Outdoor Recreation' and include the outdoor recreation components from 'Land and Resource Uses' VC into the new VC. It will be important to consider that 'Jacko Lake' is also a stand-alone VC, and due consideration will need to be given to effects that apply both to Jacko Lake as a VC and to Outdoor Recreation.

Create New VC – Property Values; Remove Existing VC 'Housing'

Issue: The draft AIR includes discussions of residential property values as part of the Housing VC is incomplete. Other property types including residential, commercial, industrial, agricultural and institutional are not captured.

Direction #1: Create a new VC named 'Property Values' to enable assessment of property value effects on *all* property types. The effects assessment on property values would include both expected positive influences (e.g. workers moving into areas, improved road access) and negative influences (e.g. noise, dust, visuals, increased traffic on nearby roads), as well as mitigation strategies (e.g. monitoring and adaptive management) to help minimize effects on properties.

Direction #2: Remove VC 'Housing'. The remaining (non-property value) components of the current 'Housing' VC to be grouped as 'Housing and Accommodation', and focus primarily on potential accommodation options for construction and operations workers, and any displacement of current residents that may result. This new grouping to be added to the existing VC entitled '*Infrastructure, Public Facilities and Services*'

If you could provide feedback within the next day, it would be appreciated.

Lindsay

Pierce Lefebvre Consulting Comments on:

Merged dAIR Rev C and D Agency Tracking Table_07Sept 2012

Comment #	PLC Comments	PLC Rationale
C172	xEAO TO FOLLOW UP	PLC has previously suggested removing the words "Community Health" from the Community Health and Well-being VC, to keep a clear distinction between the Community Well-being and Human Health VCs. Our concern is not only to avoid the type of confusion expressed in this comment by Health Canada, but also to keep the Community Well-being section focused on issues such as community capacity, sustainability, resilience, cohesion, social interaction and governance.
C70	Proponent to change response, but no change to dAIR required: The proponent must provide a better response in the tracking table (typically to be more responsive to the question).	Baseline information 'sufficient to delineate the pathway of effects' may not be sufficient to determine the likely significance of effects.
D72	Proponent to change response, but no change to dAIR required: The proponent must provide a better response in the tracking table (typically to be more responsive to the question).	Proponent may wish to indicate the potential for mitigation measures or strategies related to potential adverse effects to provide benefits to affected communities.
D103	Proponent to change response, but no change to dAIR required: The proponent must provide a better response in the tracking table (typically to be more responsive to the question).	Proponent should refer to information (models, maps etc.) that will be included in the Application.
D104	Proponent to change response, but no change to dAIR required: The proponent must provide a better response in the tracking table (typically to be more responsive to the question).	Response to Comment C24 regarding potential power line health effects should be repeated here.

Comment #	PLC Comments	PLC Rationale
D106	Proponent to change response, but no change to dAIR required: The proponent must provide a better response in the tracking table (typically to be more responsive to the question).	Proponent should indicate that assessment of potential effects of the power line on private property value will be included under the proposed "Property Value" VC. This issue can be very controversial, for example in the case of the BC Hydro Vancouver Island Transmission Reinforcement Project reviewed by BCEAO.
D110	Proponent to change response, but no change to dAIR required: The proponent must provide a better response in the tracking table (typically to be more responsive to the question).	Proponent should not imply that the Traffic Impact Study will be limited to the Lac Le Jeune Road
D126	Proponent to change response, but no change to dAIR required: The proponent must provide a better response in the tracking table (typically to be more responsive to the question).	Assessment of the potential effects of the Project on the existing Kinder Morgan pipeline and any expansion plans should be included under the "Land and Resource Use" VC and/or the "Infrastructure, Public Facilities and Services" VC. The Kinder Morgan pipeline expansion should also be considered as part of the cumulative effects assessment, particularly with regard to Jacko Lake.
C167	Proponent to change response, but no change to dAIR required: The proponent must provide a better response in the tracking table (typically to be more responsive to the question).	Sept. 26, 2012 memorandum from InterGroup to EAO indicates that Property Value will be a separate VC, and that housing issues such as availability and affordability will be addressed under the VC called "Infrastructure, Public Facilities and Services". There will be no "Section 7.7 Housing"
D73	Proponent to change dAIR: The proponent must change the response tracking table and corresponding section(s) in dAIR to address comments made.	Sept. 26, 2012 memorandum from InterGroup to EAO indicates that Property Value will be a separate VC, and that housing issues such as availability and affordability will be addressed under the VC called "Infrastructure, Public Facilities and Services". The "Cost of Living " VC will be dropped and any potential concerns incorporated into other sections as required.

Mayall, Jane EAO:EX

From: McDonough, Lindsay EAO:EX
Sent: Monday, October 22, 2012 4:41 PM
To: 'Pierce Lefebvre Consulting'
Cc: Bailey, Scott EAO:EX; Mayall, Jane EAO:EX
Subject: 30200-20/AMIN-05-07 RE: Feedback on WG tracking table

Hi Claude,

Thanks for your comments on the Working Group tracking table and summary piece. We've read through your comments and have no questions at this time; however, we'll get in touch with you again once we are closer to finalizing our direction to the proponent (we anticipate 1-2 weeks to complete this). No other tasks are required from your end between now and then.

In other news, we had a good meeting with the proponent's consultants (Knight Piesold) last Friday regarding EAO and CEA Agency's initial comments on the public tracking table and summary of public responses document. Knight Piesold is incorporating these changes over the next couple of weeks and we can share any updated documents with you, once received.

Thanks again for all your help and for the fast turnaround on the WG tracking table review – much appreciated!

Lindsay

From: Pierce Lefebvre Consulting [mailto:piercelef@telus.net]
Sent: Tuesday, October 16, 2012 10:21 AM
To: McDonough, Lindsay EAO:EX
Cc: Bailey, Scott EAO:EX; Mayall, Jane EAO:EX
Subject: Re: Thank-you and request

Lindsay,

As discussed we have reviewed the agency comment tracking table, and attach an Excel file of the tracking table with our comments included, as well as a Word file summarizing the comment numbers for which we suggest further action may be required.

The Excel file is sorted so that the 10 issues for which we have suggested further action appear first, followed by 20 issues pertaining to social or economic values where we are satisfied with the Proponent's responses, and then the balance which we deemed to be Not Applicable to our expertise.

Please call if you have any difficulties with these files.

Regards,
Claude

Pierce Lefebvre Consulting
3705 West 18th Ave.
Vancouver B.C.
V6S 1B3
Email: piercelef@telus.net
Tel: 604-224-0648

----- Original Message -----
From: McDonough, Lindsay EAO:EX
To: 'Pierce Lefebvre Consulting'
Cc: Bailey, Scott EAO:EX ; Mayall, Jane EAO:EX
Sent: Thursday, October 11, 2012 9:20 AM
Subject: Thank-you and request

Good morning Claude and Sylvie,

Thanks to both of you for your presentation at last week's Community Advisory Group (CAG) meeting and for sharing your knowledge with the group. We had some really good feedback from CAG members and I know they appreciated your thoughtful response to their questions/ concerns.

In terms of "to do's," Scott and I would like your help in reviewing the socio-economic (and related) sections of the Working Group Issues Tracking Table – attached. We are aiming to have this completed from our end by end of next week, e.g. October 19. Let us know if you're able to meet that deadline.

Many thanks,

Lindsay

Lindsay McDonough | Project Assessment Officer | BC Environmental Assessment Office
Ph: 250.387.7411 | Fax: 250.356-7440 | www.eao.gov.bc.ca
"Nothing is certain, anything is possible, and everything depends on everything else." **"Nothing is certain, anything is possible, and everything depends on**
> everything else."

Mayall, Jane EAO:EX

FILE COPY

From: McDonough, Lindsay EAO:EX
Sent: Thursday, October 11, 2012 4:27 PM
To: 'Pierce Lefebvre Consulting'
Cc: Bailey, Scott EAO:EX; Mayall, Jane EAO:EX
Subject: 30200-20/AMIN-05-07 RE: Thank-you and request

Thanks Claude. Scott is away tomorrow but I'm available to chat after lunch tomorrow, say 2pm? Is this the best number to reach you: (604) 224-0648?

Lindsay

From: Pierce Lefebvre Consulting [mailto:piercelef@telus.net]
Sent: Thursday, October 11, 2012 4:05 PM
To: McDonough, Lindsay EAO:EX
Cc: Bailey, Scott EAO:EX; Mayall, Jane EAO:EX
Subject: Re: Thank-you and request

Lindsay/Scott,

Yes, we have some time available to address these comments within your indicated time frame. We note that our budgeted consulting time for 'Phase 1' (as per our workplan) has now been exceeded, and we are now drawing on consulting time budgeted for subsequent project 'Phases'.

Please call tomorrow (we will be out of the office for the rest of today) to discuss how we can best provide our input on relevant issues remaining in the Agency Tracking Table.

Regards,
Claude

----- Original Message -----
From: McDonough, Lindsay EAO:EX
To: 'Pierce Lefebvre Consulting'
Cc: Bailey, Scott EAO:EX ; Mayall, Jane EAO:EX
Sent: Thursday, October 11, 2012 9:20 AM
Subject: Thank-you and request

Good morning Claude and Sylvie,

Thanks to both of you for your presentation at last week's Community Advisory Group (CAG) meeting and for sharing your knowledge with the group. We had some really good feedback from CAG members and I know they appreciated your thoughtful response to their questions/ concerns.

In terms of "to do's," Scott and I would like your help in reviewing the socio-economic (and related) sections of the Working Group Issues Tracking Table – attached. We are aiming to have this completed from our end by end of next week, e.g. October 19. Let us know if you're able to meet that deadline.

Many thanks,

Lindsay

Lindsay McDonough | Project Assessment Officer | BC Environmental Assessment Office
Ph: 250.387.7411 | Fax: 250.356-7440 | www.eao.gov.bc.ca
"Nothing is certain, anything is possible, and everything depends on everything else." **"Nothing is certain, anything is possible, and everything depends on**
> everything else."

Notes in preparation for CAG meeting Oct 2, 2012

General Perspectives on Social and Economic Components in EA Assessment

1. The EA process is an effects assessment process rather than a cost/benefit accounting exercise. The EA process is primarily concerned with identifying and avoiding potential adverse effects.

2. A description of project benefits is a required component of an EA assessment.

3. The EA process is not concerned with determining the financial feasibility of projects. There is provision to discuss the likelihood of positive and adverse effects occurring in the context of assessing effects significance.

4. The organization of Valued Components and sub-components is driven firstly by the 5 pillars (in the case of the BC EA process), secondly by guidelines contained in the BC EAO AIR Template, and thirdly by logical groupings for analysis continuity and report readability. Each project has its unique aspects which influence the ultimate selection of VCs and design of the AIR/EIS Guidelines document.

5. The purpose of AIR/EIS Guidelines is to identify values that may be adversely affected by the project, identify effects pathway hypotheses, and outline assessment methodologies. It is important to recognize the iterative nature of the assessment process in respect of potential economic or social effects that can only be determined after results of other assessment studies are known. It is also important not to make implicit judgements about the priority or weighting of values/issues by their heading rank in the AIR/EIS Guidelines.

6. There is very little guidance on the principles and methodologies for assessing effects on Economic or Social components in EA assessment, and very few management targets/ thresholds/ benchmarks or standards by which to assess significance of effects.

Summary of CAG Issues/Themes Flagged for Reference to SE Consultant

	CAG Issue/Theme	PLC Advice
1	Effects on city image and potential consequences to tourism, Tournament Capital brand, Communities in Bloom initiatives, ability to attract doctors, university professors, university students, seniors and specific types of businesses.	Potential effects on these values need to be examined. Assessment will be at least partially contingent on results of specific studies on some of the effects pathways.
2	Alternative locations for Waste Rock and Tailings Storage Facilities	Proponent to include discussion of alternative locations for these facilities, and rationale for choices in the Application sections on alternative means of undertaking the project.
3	Baseline health studies for on-going monitoring	Premature to design and implement baseline studies related to potential health effects until more is known about specific effects pathways.
4	BC Hydro rates for industrial power users	Not really relevant to the effects assessment unless the Project puts some particular strain on public electric power generation or delivery infrastructure, or is accorded different treatment than other industrial power users.
5	Better mapping/ representation of mine relative to sensitive receptors	Agree that the Application would benefit from better illustrations of mine components and their spatial relation to sensitive receptors.
6	Cost of disruption or alteration to community growth plans	Proponent to assess the 'fit' of the project with all official regional, municipal, and neighbourhood growth plans as well as any expected effects of the Project on those plans.
7	Effects of "nuisance emissions" at sub-threshold levels	Assessing the significance of various types of emissions (noise, dust light, vibration) that are below thresholds identified in regulations or human health research will be a major challenge of this assessment. The location of the mine site at the urban/rural interface will likely produce varying levels of tolerance for different types of "nuisance emissions".
8	Effects on air transport	Agree with CAG that this needs to be incorporated in the AIR/EIS Guidelines.
9	"Hidden cost" – attracting medical professionals, increased hospital visits, reduced work performance	Potential effects on these values may need to be examined. Assessment will be at least partially contingent on results of specific studies on some of the effects pathways.

	CAG Issue/Theme	PLC Advice
10	Financial feasibility and predicted mine life	Should be addressed in general terms when determining the significance of expected effects on economic growth, employment, and government revenues. One of the criteria of significance determination is likelihood of occurrence.
11	Full size operational blast experiment	Understand the desire for a full operational scale blasting experiment, but not qualified to comment on the feasibility of such a test.
12	Impacts on, and costs to replicate recreation experiences close to urban centre	Proponent to characterize any effects on recreation activities or venues in terms of their local and regional significance.
13	Light pollution/ dark sky	Agree that potential effects should be assessed.
14	Location of the mine infrastructure in and near a large urban area.	Proponent to recognize the mine's unusual proximity to urban areas and consequently, the many types of sensitive receptors.
15	Mitigation / remediation/ compensation for reduced property values and decreasing business revenues	Proponent to identify potential effects pathways (e.g. dust, noise, vibration, lighting, public health perceptions, aesthetics, ground water) that may influence property values, and develop baseline, mitigation and monitoring strategies (e.g. pre and post strategies) for those pathways to understand and minimize potential effects on property values.
16	Mitigation/ remediation/ compensation for property damage due to dust, groundwater or vibration issues	Similar to issue 15 above.
17	Need for "new, quantitative data reflecting current economic context", so that people can do cost/benefit assessments of the project	EA process is an effects assessment rather than a cost/benefit accounting exercise.
18	People invested in neighbourhoods assuming they would not be bordering heavy industry	Proponent to indicate how the Project and its several elements fit with current land use zoning and permitted uses across the Project footprint.
19	Transportation Plan and Traffic Impact Study	Agree that a more comprehensive study of potential Project effects on traffic volumes and patterns than is suggested so far in the dAIR is required.

FILE COPY

Mayall, Jane EAO:EX

From: Bailey, Scott EAO:EX
Sent: Monday, August 26, 2013 3:50 PM
To: McDonough, Lindsay EAO:EX; XT:Sheehan, Stephen Environment Canada EAO:IN; 'john.mackie@tc.gc.ca'; Bellefontaine, Kim MEM:EX; Howe, Diane J MEM:EX; Taylor, Andrew JTST:EX; Underhill, Brian ALC:EX; Bennett, Darren J FLNR:EX; Seguin, Joe MEM:EX; Belliveau, Phil FLNR:EX; 'Dale.Desrochers@dfo-mpo.gc.ca'; Yamelst, Brian H ENV:EX; 'danwallace@tnrd.ca'; Matscha, Gabriele ENV:EX; Anderson, Mike FLNR:IN; Rothman, Stephen MEM:EX; 'carl.alleyne@hc-sc.gc.ca'; Hupman, C Bruce MEM:EX; Rhebergen, Frank ENV:EX; LeClair, Tracy TRAN:EX; Mayall, Jane EAO:EX; s.22 ; 'Shelley.Ball@NRCan-RNCan.gc.ca'; Demchuk, Tania MEM:EX; 'suzanne.lheureux@tc.gc.ca'; 'jfretz@kamloops.ca'; Marc, Jacques FLNR:EX; McGrath, Jim; 'Jeanettejules@kib.ca'; 'referrals@kib.ca'; 'ddraney@skeetchestn.ca'; Jackson, Scott ENV:EX; 'thewitt@skeetchestn.ca'; 'nrreception@skeetchestn.ca'; Moody, Anne MEM:EX; Warnock, George MEM:EX; Puhallo, Jennifer ENV:EX; Thomson, Skye FLNR:EX; Oetter, Andy FLNR:EX; 'christie.nelson@ceaa-acee.gc.ca'; XT:Vingarzan, Roxanne ENV:IN; 'nrfieldworker@skeetchestn.ca'; 'Misty.Palm@interiorhealth.ca'; 'mdentremont@lgl.com'; s.22 ; Klingbeil, Karl B FLNR:EX; Fitton, Susan FLNR:EX; 'Julie.Pare-Lepine@NRCan-RNCan.gc.ca'; Fraser, Jennifer FLNR:EX; 'lauren.knowles@nrcan.gc.ca'; XT:HLTH Baytalan, Greg; 'piercelef@telus.net'; Wurtz, Sheryl FLNR:EX; Henry, Larry FLNR:EX; 'melanie.campbell@nrcan-rncan.gc.ca'; 'dan@wattersongeoscience.com'; 'Larissa.Rutquist@tc.gc.ca'; McConnachie, Jennifer MEM:EX; Barb Stewart (barb@stkemlupsemc.ca)
Cc: Christie, Karen L EAO:EX; Mayall, Jane EAO:EX; McDonough, Lindsay EAO:EX
Subject: 30200-20/AMIN-05-04 30200-20/AMIN-04-02 Ajax Project Update

Ajax Working Group Members:

As you may be aware, the Proponent for the proposed Ajax Mine Project, KGHM International, has announced that they have some potential changes to the proposed Project layout and scope.

EAO currently does not have enough information to determine what, if any, impacts this may have on the EA process. However, it is clear that the timing of the EA process has changed – the Proponent had previously stated their intention to submit an EA Application this fall – we only know that this timing will no longer be in effect.

As we learn more from the Proponent, we will be able to understand if and how this impacts the process and how it impacts the timing. We will provide Working Group members as much advance notice as possible on any updates.

Please feel free to call Lindsay or me if you have any questions.

Thanks,
Scott

Scott Bailey
Executive Project Director
BC Environmental Assessment Office
Phone: 250/356.1124
Cell: s.17
Email: scott.bailey@gov.bc.ca

Mayall, Jane EAO:EX

FILE C

From: McDonough, Lindsay EAO:EX
Sent: Tuesday, June 4, 2013 5:06 PM
To: XT:Sheehan, Stephen Environment Canada EAO:IN; 'john.mackie@tc.gc.ca'; Bellefontaine, Kim EMNG:EX; Howe, Diane J EMNG:EX; Taylor, Andrew JTST:EX; Underhill, Brian ALC:EX; Bennett, Darren J FLNR:EX; Seguin, Joe EMNG:EX; Belliveau, Phil FLNR:EX; 'Dale.Desrochers@dfo-mpo.gc.ca'; Yamelst, Brian H ENV:EX; 'danwallace@tnrd.ca'; Matscha, Gabriele ENV:EX; Anderson, Mike FLNR:IN; Rothman, Stephen EMNG:EX; 'carl.alleyne@hc-sc.gc.ca'; Hupman, C Bruce EMNG:EX; Rhebergen, Frank ENV:EX; LeClair, Tracy TRAN:EX; Mayall, Jane EAO:EX; 'jmorrison@telus.net'; s.22 'Shelley.Ball@NRCan-RNCan.gc.ca'; Demchuk, Tania EMNG:EX; 'suzanne.lheureux@tc.gc.ca'; 'jfretz@kamloops.ca'; Marc, Jacques FLNR:EX; McGrath, Jim; 'Jeanettejules@kib.ca'; 'referrals@kib.ca'; 'ddraney@skeetchestn.ca'; Jackson, Scott ENV:EX; 'thewitt@skeetchestn.ca'; 'nrreception@skeetchestn.ca'; Bailey, Scott EAO:EX; Moody, Anne EMNG:EX; Warnock, George EMNG:EX; Puhallo, Jennifer ENV:EX; Thomson, Skye FLNR:EX; Oetter, Andy FLNR:EX; 'christie.nelson@ceaa-acee.gc.ca'; XT:Vingarzan, Roxanne ENV:IN; 'nrfieldworker@skeetchestn.ca'; 'Misty.Palm@interiorhealth.ca'; 'mdentremont@lgl.com'; s.22 McDonough, Lindsay EAO:EX; Klingbeil, Karl B FLNR:EX; Fitton, Susan FLNR:EX; 'Julie.Pare-Lepine@NRCan-RNCan.gc.ca'; Fraser, Jennifer FLNR:EX; 'lauren.knowles@nrcan.gc.ca'; XT:HLTH Baytalan, Greg; 'piercelef@telus.net'; Wurtz, Sheryl FLNR:EX; Henry, Larry FLNR:EX; 'melanie.campbell@nrcan-rncan.gc.ca'; s.22 'Larissa.Rutquist@tc.gc.ca'; McConnachie, Jennifer EMNG:EX
Cc: Bailey, Scott EAO:EX; Mayall, Jane EAO:EX; McDonough, Lindsay EAO:EX; 'christie.nelson@ceaa-acee.gc.ca'; 'Dan Ferriter'; 'Sara LaBrash'; s.22 'Stephanie Eagen'
Subject: 30200-20/AMIN-05-04 30200-20/AMIN-04-02 FYI: Approved Ajax AIR/ EISG

Hello Ajax Working Group Members:

1. **Finalization of Ajax Application Information Requirements/ Environmental Impact Statement Guidelines (AIR/EISG)**

EAO and CEA Agency issued a letter to the proponent today (June 4, 2013) approving the AIR/ EISG for the proposed Ajax Mine Project. The following documents are now available on EAO's website:

- Final (approved) AIR/ EISG
- Agency Tracking Table
- Public Tracking Table
- Community Advisory Group Tracking Table (comments on Rev F)
- KGHM Public Issues Summary Document
- EAO/ CEA Agency Response to Public Comments

2. **Next Steps in EA**

The Proponent has indicated they plan to submit an Application for an environmental assessment certificate in the Fall of 2013. As mentioned, there are no legislated timelines during the pre-Application stage; the timing for submission of an Application is dependent upon the Proponent and is subject to change. Once an Application is received, it will be screened by EAO and CEA Agency for consistency with the AIR/ EISG. The EAO and CEA Agency will possibly request advice from working group members during the statutory 30-day screening period. If EAO and CEA Agency determine that the Application meets the requirements set out in

the AIR/ EISG, it will be accepted for formal review and the legislated 180-day Application Review period will begin.

EAO will be in touch with Working Group members regarding further details related to the screening process and future meetings at a later date.

Many thanks,

Lindsay

Mayall, Jane EAO:EX

From: McDonough, Lindsay EAO:EX
Sent: Tuesday, March 26, 2013 8:48 AM
To: Anderson, Mike FLNR:IN; Rothman, Stephen EMNG:EX; XT:Sheehan, Stephen Environment Canada EAO:IN; Seguin, Joe EMNG:EX; Belliveau, Phil FLNR:EX; 'Dale.Desrochers@dfo-mpo.gc.ca'; Yamelst, Brian H ENV:EX; 'john.mackie@tc.gc.ca'; Bellefontaine, Kim EMNG:EX; Howe, Diane J EMNG:EX; Taylor, Andrew JTST:EX; Underhill, Brian ALC:EX; 'danwallace@tnrd.ca'; Matscha, Gabriele ENV:EX; Demchuk, Tania EMNG:EX; 'suzanne.lheureux@tc.gc.ca'; Bennett, Darren J FLNR:EX; s.22 Oetter, Andy FLNR:EX; Warnock, George EMNG:EX; Rhebergen, Frank ENV:EX; Wurtz, Sheryl FLNR:EX; 'Julie.Pare-Lepine@NRCan-RNCan.gc.ca'; 'lauren.knowles@nrcan.gc.ca'; 'Jeanettejules@kib.ca'; Moody, Anne EMNG:EX; 'referrals@kib.ca'; 'dan@wattersongeoscience.com'; 'ddraney@skeetchestn.ca'; 'thewitt@skeetchestn.ca'; 'nrreception@skeetchestn.ca'; McConnachie, Jennifer EMNG:EX; Mayall, Jane EAO:EX; LeClair, Tracy TRAN:EX; Marc, Jacques FLNR:EX; Klingbeil, Karl B FLNR:EX; 'Meghan.sullivan@nrcan.gc.ca'; s.22 ; 'Larissa.Rutquist@tc.gc.ca'; 'christie.nelson@ceaa-acee.gc.ca'; XT:Vingarzan, Roxanne ENV:IN; 'Misty.Palm@interiorhealth.ca'; McDonough, Lindsay EAO:EX; Bailey, Scott EAO:EX; Henry, Larry FLNR:EX; Fitton, Susan FLNR:EX; 'piercelef@telus.net'; 'Shelley.Ball@NRCan-RNCan.gc.ca'; 'jfretz@kamloops.ca'; McGrath, Jim; 'carl.alleyne@hc-sc.gc.ca'; s.22 ; 'nrfieldworker@skeetchestn.ca'; Jackson, Scott ENV:EX; 'melanie.campbell@nrcan-rncan.gc.ca'; Puhallo, Jennifer ENV:EX; Hupman, C Bruce EMNG:EX; Fraser, Jennifer FLNR:EX
Cc: Bailey, Scott EAO:EX; 'christie.nelson@ceaa-acee.gc.ca'; Mayall, Jane EAO:EX; McDonough, Lindsay EAO:EX; 'Dianna Stoopnikoff';
Subject: 30200-20/AMIN-05-04 30200-20/AMIN-04-02 s.22 FYI: Update and request regarding the proposed Ajax Mine Project EA

Hello Ajax Working Group Members,

Please see below update and request regarding the EA for the proposed Ajax Mine Project:

1. **Finalization of Application Information Requirements/ Environmental Impact Statement Guidelines (AIR/ EISG) – UPDATE**

Big thanks to everyone for providing final comment on ("Rev F") of the draft AIR/ EIS Guidelines. EAO and CEA Agency have been working closely over the past several weeks to follow-up with individual agencies/ First Nations to clarify comments and seek additional information where needed. We will continue to do so over the next little while as we develop our final direction to the proponent. An email will be sent out to the Working Group once the AIR/ EISG is finalized and a copy will be posted to the EAO website. Timing for this is unknown at this time but likely to occur over the next month.

2. **Engagement with Proponent during Pre-Application (Study Results, Mitigations) – REQUEST**

EAO is working with the proponent to identify opportunities for early discussion of key components of the EA during the pre-Application stage (i.e. after finalization of the dAIR/ EISG and prior to an Application/ EIS being submitted). As this is not a requirement of the EA process, the proponent will decide what topics it wishes to engage on and when. However, EAO and CEA Agency have encouraged the proponent to engage with agencies early on in the process to allow more time for issue resolution and information gaps to be identified.

*Please respond to me (Lindsay.McDonough@gov.bc.ca) by April 2, 2013 with the following:

- Do you wish to participate in early discussions with the proponent regarding study results, mitigation, or other topics?
- If yes to above, what specific study results (or Valued Components) are you interested in discussing?
- Please provide any additional details regarding suggested priority topics for discussion.

3. Timing for Application/ EIS Submission – UPDATE

The proponent recently announced its intent to submit an Application/ EIS for the proposed Ajax Mine Project in the Fall of 2013. Prior to the EAO and CEA Agency accepting an Application/EIS for review, EAO/ CEA Agency will undertake an evaluation (screening) of the Application/EIS with the assistance of Working Group members, including First Nations, to determine if the Application/EIS includes all the information specified in the final AIR/ EIS guidelines. An in-depth evaluation of the content of the Application is only conducted if the Application is accepted for review. EAO and CEA Agency will continue to provide direction to the proponent and Working Group on process as the EA unfolds.

The anticipated timing for the start of the 180-day review, should the Application/ EIS pass the screening stage, is Oct/Nov 2013 – subject to change.

Should you have any questions related to the above, please contact either myself or Scott Bailey (cc'd) from the BC EAO, or Christie Nelson (cc'd) from the federal CEA Agency.

Many thanks,

Lindsay

Lindsay McDonough | Project Assessment Officer | BC Environmental Assessment Office
Ph: 250.387.7411 | Fax: 250.356-7440 | www.eao.gov.bc.ca
"Nothing is certain, anything is possible, and everything depends on everything else."

Mayall, Jane EAO:EX

From: McDonough, Lindsay EAO:EX
Sent: Thursday, February 21, 2013 8:03 AM
To: 'Pierce Lefebvre Consulting'
Cc: Bailey, Scott EAO:EX; Mayall, Jane EAO:EX
Subject: 30200-20/AMIN-05-07 Request: Review of "Rev F" dAIR/ EIS Guidelines - Feedback due March 12, 2013
Attachments: Ajax Issues and Direction Document for dAIR Rev D - Dec 19-2012 Final.pdf; 2 - Ajax_AIR_RevF_Text_130218.docx; 4 - Public Issues Response Summary FINAL 130218.pdf; 1 - CoverLetter_130218.pdf; 3 - Ajax_AIR_RevF_Figures_130218.pdf; 5 - TableConcordance_IssuesDirections_130218.xlsx

Hi Claude, see my email from yesterday copied below, re: request for review of "Rev F" of the draft AIR/ EIS Guidelines for the proposed Ajax Mine Project. The review documents are located on the Ajax SharePoint site (instructions below), however, I've attached everything with the exception of the tracking tables to this email for your convenience. Let us know if you have any concerns meeting the March 12, 2013 deadline for input.

We would be happy to set up a call with you in the next couple of weeks if you have any questions or items to discuss.

Many thanks,

Lindsay
CC: Scott Bailey

INSTRUCTIONS FOR ACCESSING SHAREPOINT SITE

The login and password is:

User ID:
Password: s.15

Those accessing the SharePoint site from outside gov't need to register for a "BCEID" before accessing the SharePoint (if you already have one, please disregard the below).

The fastest and easiest way to register for a BCEID so is to go the BCEID home page and phone their technical support to walk you through the steps: s.15, s.17 It shouldn't take long but, due to the varying privacy settings for different organizations/ computers, it's much better to deal with the tech experts directly.

Please send me a note once you get access to the SharePoint site.

From: McDonough, Lindsay EAO:EX
Sent: Wednesday, February 20, 2013 11:45 AM
To: XT:Sheehan, Stephen Environment Canada EAO:IN; 'john.mackie@tc.gc.ca'; Bellefontaine, Kim EMNG:EX; Howe, Diane J EMNG:EX; Taylor, Andrew JTST:EX; Underhill, Brian ALC:EX; Bennett, Darren J FLNR:EX; Seguin, Joe EMNG:EX; Belliveau, Phil FLNR:EX; 'Dale.Desrochers@dfo-mpo.gc.ca'; Yamelst, Brian H ENV:EX; 'danwallace@tnrd.ca'; Matscha, Gabriele ENV:EX; Rothman, Stephen EMNG:EX; 'carl.alleyne@hc-sc.gc.ca'; Hupman, C Bruce EMNG:EX; Rhebergen, Frank ENV:EX; LeClair, Tracy TRAN:EX; Mayall, Jane EAO:EX; s.22 'Shelley.Ball@NRCan-RNCan.gc.ca'; Demchuk, Tania EMNG:EX; 'suzanne.lheureux@tc.gc.ca'; 'jfretz@kamloops.ca'; Marc,

Jacques FLNR:EX; Jackson, Scott ENV:EX; Bailey, Scott EAO:EX; Moody, Anne EMNG:EX; Warnock, George EMNG:EX; Puhallo, Jennifer ENV:EX; Oetter, Andy FLNR:EX; 'christie.nelson@ceaa-acee.gc.ca'; XT:Vingarzan, Roxanne ENV:IN; 'Misty.Palm@interiorhealth.ca'; McDonough, Lindsay EAO:EX; Klingbeil, Karl B FLNR:EX; Fitton, Susan FLNR:EX; 'Julie.Pare-Lepine@NRCan-RNCan.gc.ca'; Fraser, Jennifer FLNR:EX; 'lauren.knowles@nrcan.gc.ca'; Wurtz, Sheryl FLNR:EX; Henry, Larry FLNR:EX; 'melanie.campbell@nrcan-rncan.gc.ca'; 'dan@wattersongeoscience.com'; 'Larissa.Rutquist@tc.gc.ca'; McConnachie, Jennifer EMNG:EX
Cc: Mayall, Jane EAO:EX; Bailey, Scott EAO:EX; 'Nelson,Christie [CEAA]'; 'Catherine.Ponsford@ceaa-acee.gc.ca'; McDonough, Lindsay EAO:EX; 'Dianna Stoopnikoff'; s.22 'Stephanie Eagen'; 'Sara LaBrash'
Subject: Request: Review of "Rev F" dAIR/ EIS Guidelines - Feedback due March 12, 2013

Dear Ajax Working Group Members,

EAO and CEA Agency are requesting your review and comment on documents pertaining to the draft Application Information Requirements/ Environmental Impact Statement (dAIR/ EIS) Guidelines by March 12, 2013.

Preamble:

The public, First Nations and Working Group commented on "Rev D" of the dAIR/EIS Guidelines. The Proponent updated it to "Rev E", which EAO and CEA Agency commented on. The result is the current working draft, "Rev F", for your review. EAO and CEA Agency will be reviewing "Rev F" of the draft AIR/ EIS Guidelines, in detail, simultaneously with the Working Group. The AIR/ EIS Guidelines for the proposed Project have evolved through various iterations over the past 1.5 years; EAO and CEA Agency are viewing "Rev F" as the penultimate draft, with the aim to have all input from agencies be very specific and focussed so the Proponent can use this review to finalize the AIR/EIS Guidelines.

Please carefully read through the review instructions below and provide feedback on "Rev F" with your "track changes" input to Lindsay.McDonough@gov.bc.ca, and cc the following: Jane.Mayall@gov.bc.ca, Scott.Bailey@gov.bc.ca and Christie.Nelson@ceaa-acee.gc.ca.

Deadline: **March 12, 2013**.

Review instructions for Rev F draft AIR/ EIS Guidelines:

Working Group members are requested to review "Rev F" of the draft AIR/ EIS Guidelines using the following instructions:

1. Focus on topics within your organization/ agency mandate, established policies, procedures, and standards.
2. Insert written feedback directly into the "Rev F" document using the "track change" function. Specific wording changes only please.
3. If you have completed your review and do not have additional changes to propose, please advise us. Please also advise us as soon as possible if you have any concerns with the proposed review timelines.

EAO and CEA Agency will review proposed wording changes and will make the final determination regarding finalization of the AIR/ EIS in order to ensure that the Application/ EIS contains the necessary information.

To support your review, the below-noted documents are available on the Ajax Project EA SharePoint site – click on "Review of Rev F of dAIR" link at top/ center of page, or link in left-hand column under "Documents." Please notify Lindsay.McDonough@gov.bc.ca if you have any issues accessing the SharePoint site.

Resources provided by EAO/ CEA Agency (available on the SharePoint Site):

1. **Updated draft AIR/ EIS Guidelines "Rev F"** (dated February 18, 2013) – includes all changes directed by EAO and CEA Agency as a result of Working Group and First Nation feedback on "Rev C" and "Rev D" of the draft AIR/ EIS, as well as public input on "Rev D". FOR REVIEW (#1 priority).

2. **Draft Public Issue Response Summary** (dated February 18, 2013) – companion document which includes a summary of public responses received on the draft AIR/ EIS Guidelines. FOR OPTIONAL REVIEW by Working Group members – EAO and CEA Agency are satisfied that this document is ready for public posting, but focussed comments are welcomed.

3. **Cover letter from proponent** (dated February 18, 2013) – regarding the evolution of the draft AIR/ EIS Guidelines and request for feedback on the current ("Rev F") version. FOR INFO.

4. **EAO and CEA Agency's "Issues and Direction" document** (dated December 19, 2012) – contains joint direction to the Proponent regarding required changes to the draft AIR/ EIS Guidelines based on "Rev D". (Note: this is the same version that was sent out by EAO on January 22, 2013). FOR INFO.

5. **Table of Concordance** (dated February 18, 2013) – tracks history of direction and changes from "Rev D" to "Rev F" – this is based on the "Issues and Direction" document. FOR INFO.

6. **Updated Working Group Issue Tracking Table** (dated January 15, 2013) – table developed by the proponent which includes comments from the Working Group on "Rev C" and "Rev D" of the draft AIR/ EIS and proponent responses. FOR INFO – EAO and CEA Agency are satisfied that this document is complete. Should you identify any concerns, please advise.

7. **Updated Public Issue Tracking Table** (dated January 9, 3013) – table developed by the proponent which includes comments from the public on "Rev D" of the draft AIR/ EIS Guidelines and proponent responses. FOR INFO – EAO and CEAA are satisfied that this document is complete.

*Please note that priority should be given to providing feedback on "Rev F" of the draft AIR/ EIS Guidelines. Input is also welcome on the public summary response document, but is dependent on your time. The updated Working Group and Public Issues Tracking Tables are provided for your information only – we are not seeking additional feedback on these items.

Many thanks,

Lindsay McDonough | Project Assessment Officer | BC Environmental Assessment Office
Ph: 250.387.7411 | Fax: 250.356-7440 | www.eao.gov.bc.ca
"Nothing is certain, anything is possible, and everything depends on everything else." **"Nothing is certain, anything is possible, and everything depends on > everything else."**