

16. SUMMARY

This section of the Application for an Environmental Assessment Certificate/Environmental Impact Statement for a Comprehensive Study (Application/EIS) provides a summary of the results of the consultation conducted with Aboriginal Groups potentially affected by the Project and identifies the potential effects on Aboriginal interests and the proposed accommodation measures.

16.1 CONSULTATION WITH ABORIGINAL GROUPS

The BC EAO formally delegated aspects of its consultation responsibilities to KAM through an Order issued under section 11 of the BC EAA. The section 11 Order identifies the Project “First Nations” as the Stk’emlupsemc te Secwépemc Nation (SSN), which is comprised of the Tk’emlúps te Secwépemc (TteS) and Skeetchestn Indian Band (SIB), whom KAM is required to consult regarding potential Project effects on their Aboriginal interests. The section 11 Order also identifies “Working Group First Nations” comprised of the Lower Nicola Indian Band (LNIB) and Ashcroft Indian Band (AIB). The section 11 Order directs KAM to provide information to the LNIB and AIB regarding the Project, specifically the Application/EIS. On July 23, 2015, the BC EAO issued a section 13 Order directing KAM to provide information to the WP/CIB regarding the Project as the “Notification First Nation”.

In addition to the Aboriginal Groups identified above, the CEA Agency identifies the Métis Nation British Columbia (MNBC) as an Aboriginal Group potentially affected by the Project.

The Project lies within SSN, Secwépemc, and Nlaka’pamux Nation traditional territories.

16.2 SUMMARY OF CONSULTATION RESULTS

KAM has tracked the issues, concerns, and interests identified by the above Aboriginal Groups throughout the consultation process. Detailed summaries of communications with Aboriginal Groups are included in Appendix 15-A, Summary of Communications with Aboriginal Groups. Appendix 15-B, Aboriginal Groups Issues Tracking Tables, summarizes the issues raised by each Aboriginal Group and responses to address those issues. The issues were compiled through ongoing consultation with each Aboriginal Group, written correspondence, comments on the draft Application Information Requirements/Environmental Impact Statement Guidelines (AIR/EIS Guidelines), BC EAO Working Group meetings, and studies completed by Aboriginal Groups for this Application/EIS.

The following provides a summary of the main issues raised by Aboriginal Groups. The main concerns expressed by SSN during the consultation process include, but are not limited to, the following:

- potential loss of SSN traditional territory, including loss of land to support cultural activities and harvesting by community members;

- changes to rights and title in relation to Jacko Lake, Goose Lake, and Kamloops Lake;
- potential effects on cultural/ceremonial sites, particularly Jacko Lake and surrounding areas (also known as *Pípsell*), including Jacko Lake, Goose Lake, Jacko Creek (upper Peterson Creek) and the Hunting Blind Complex;
- potential effects on cultural resources:
 - potential burial sites and burial cairns; and
 - sacred sites at Mount Lolo;
- potential effects on water quality and quantity in the Peterson Creek watershed, Jacko Lake, Kamloops Lake, Cherry Creek, and the Thompson River including effects from dust and/or seepage from the mine site;
- potential effects on fish, including habitat, movement and availability;
- potential effects on wildlife and wildlife habitat, including effects on non-migratory game birds, displacement of ungulates as a result of disruption in movement, and effects on other small mammals in the Project vicinity;
- destruction of grasslands which also support biodiversity;
- changes in access to and use of preferred harvesting locations (e.g., Jacko Lake, Goose Lake, Peterson Creek);
- potential effects on berry and wild root vegetation, as well as other medicinal and food plant gathering sites (in the vicinity of the Project and around Jacko Lake);
- potential effects on human health, as a result of contamination of country foods, or domestic drinking water, air quality changes (e.g., dust) as well as effects from noise and vibration (e.g., blasting);
- potential negative effects on social conditions such as increased pressure on health services, and additional social problems from increases in disposable income due to population increases;
- interest in support for economic opportunities, such as training and skills development for members and employment and contracting opportunities;
- accidents and malfunctions including potential failure of the Tailings Storage Facility (TSF);
- potential contamination during the Post-Closure phase (i.e., adequate reclamation);
- cumulative effects on traditional land use resulting from interactions with other industries and developments in the Project area; and
- consultation concerns such as a lack of capacity funding and participation in the environmental assessment process, and consideration of the Cultural Heritage Study (CHS) as a result of changes to the General Arrangement (GA).

Main concerns expressed by AIB, LNIB, WP/CIB, and MNBC include, but are not limited to, the following:

- potential effects on fishing, hunting, and gathering practices;
- potential effects on water quality and quantity as a result of contamination, dust deposition, acid rock drainage, or overuse of water resources;
- potential effects on fish and fish habitat (e.g., from blasting and vibration);
- potential effects on land and resource use such as ranching;
- potential effects on wildlife and wildlife habitat, as a result of Project activities (e.g., light);
- potential soil contamination from fugitive dust emissions (affecting plants and sensitive ecological communities);
- effects on cattle, wildlife, country food, and medicinal plants due to dust, noise, and vibration;
- accidents and malfunctions, including potential failure of the TSF, particularly on fish, fish habitat, and human health;
- effects on human health from air pollution;
- potential negative effects on economic conditions such as property values, tourism and unemployment (due to boom and bust periods);
- potential negative effects on social conditions as a result of population changes or increased pressure on health services
- cumulative effects resulting from interactions with other industries and developments in the Project area;
- potential use of temporary foreign workers for the Project;
- support for additional consultation;
- interest in contracting, training, and employment opportunities; and
- interest in development of traditional use studies to better understand potential Project effects.

16.3 SUMMARY OF EFFECTS ON ABORIGINAL INTERESTS

This section summarizes the potential effects of the Project on asserted Aboriginal interests (rights and title) in the Project area, as well as specific accommodation measures including design considerations, mitigation measures, and other specific commitments to address those effects.

Asserted Aboriginal interests in the Project area were identified through a variety of consultation activities including meetings with Aboriginal leadership, community meetings, written correspondence, traditional land use studies, and secondary information sources such as environmental assessments for other projects in British Columbia, ethnographic studies, legal cases, and other publicly available information.

The identification of asserted Aboriginal interests that could be affected by the Project is ongoing. As new information about Aboriginal interests is gathered, KAM will endeavour to work with Aboriginal Groups to determine whether the Project has the potential to affect these interests and, where appropriate, the additional information will be considered and incorporated in on-going Project planning.

Further information on asserted interests of potentially affected Aboriginal Groups, and corresponding mitigation to address Project-related effects is available in Section 13. In addition, Section 14 contains detailed information regarding potential effects on other Aboriginal interests with respect to potential social, economic, environmental, heritage, and health effects and how these interests have been addressed.

The assessment of potential effects on Aboriginal interests considers the assessments of other valued components relevant to an asserted Aboriginal Right. The linkages between Aboriginal Interests and other valued components are presented in Table 16.3-1.

Table 16.3-1. Summary of Linkages between Aboriginal Interests and Other Valued Components

Asserted Right	Valued Component Affected	Section in Application/EIS
Fishing	Fish and Fish Habitat	Section 6.7
	Surface Water Quality	Section 6.3
	Surface Water Quantity	Section 6.4
	Visual Impacts and Aesthetic Features	Section 8.3
	Human Health	Section 10
	Current Use of Lands and Resources for Traditional Purposes	Section 8.5
	Infrastructure, Public Facilities and Services	Section 8.1
Hunting	Mammals	Section 6.17
	Non-migratory Gamebirds	Section 6.16
	Rare and Sensitive Ecological Communities	Section 6.9
	Rare Plants	Section 6.8
	Grasslands	Section 6.10
	Current Use of Lands and Resources for Traditional Purposes	Section 8.5
	Human Health	Section 10
	Visual Impacts and Aesthetic Features	Section 8.3
	Infrastructure, Public Facilities and Services	Section 8.1
	Plant Gathering	Grasslands
Rare plants		Section 6.8
Current Use of Lands and Resources for Traditional Purposes		Section 8.5
Geology, Landforms and Soils		Section 6.2
Human Health		Section 10
Visual Impacts and Aesthetic Features		Section 8.3
Infrastructure, Public Facilities and Services		Section 8.1

Asserted Right	Valued Component Affected	Section in Application/EIS
Use of Ceremonial/Cultural Sites	Archaeological sites	Section 9.1
	Heritage sites	Section 9.2
	Current Use of Lands and Resources for Traditional Purposes	Section 8.5
	Land and Resource Use	Section 8.4
	Visual Impacts and Aesthetic Features	Section 8.3
	Infrastructure, Public Facilities and Services	Section 8.1
Title	Surface Water Quantity	Section 6.4
	Current Use of Lands and Resources for Traditional Purposes	Section 8.5
	Land and resource use	Section 8.4
	Economic Growth Effects	Section 7.1

16.3.1 Stk'emlupsemc te Secwépemc Nation

The seriousness of the effects of the Project on SSN's practice of fishing hunting and trapping, and plant harvesting is considered to be minor. The seriousness of the effects on ceremonial and cultural practices is considered to be moderate. Mitigation and accommodation measures proposed for SSN are presented in Table 16.3-2.

Table 16.3-2. Aboriginal Interest Potentially Affected and Accommodation Measures for SSN

Aboriginal Interest Affected	Mitigation and Accommodation Measures
Fishing	<p>In relation to changes to the availability:</p> <ul style="list-style-type: none"> The Fish Habitat Mitigation and Offsetting Plan (FHMOP) proposes measures to offset habitat losses in Jacko Lake and Peterson Creek. The measures proposed in the FHMOP will be the creation of fish habitat in Inks Lake, which is currently not fish-bearing but is located in close proximity to Jacko Lake. Given that only a very small portion of the Jacko Creek catchment is affected by Project activities, no effects are anticipated on the availability of fish in Jacko Creek. KAM proposes to work with the SSN to identify other potential candidate options for habitat compensation and offsetting options within the traditional territory. KAM will also support the SSN in stewardship of water and environmental quality through involvement in on-going review of existing water quality/quantity programs and plans. KAM will continue its efforts to negotiate and conclude a Project Agreement with the SSN. <p>In relation to changes to access:</p> <ul style="list-style-type: none"> KAM will maintain access to Jacko Lake through construction of an alternative access road to Jacko Lake south of the proposed main access to the Project. KAM will also construct an additional parking lot area to facilitate continued access to Jacko Lake. Jacko Creek will remain available to the SSN as the Project is not anticipated to affect availability or access to this area for fishing. The transportation management plan proposes measures to minimize traffic congestion in public roads.

Aboriginal Interest Affected	Mitigation and Accommodation Measures
Fishing (<i>cont'd</i>)	<ul style="list-style-type: none"> • Portions of Peterson Creek within the mine footprint will continue to be inaccessible for SSN harvesters. The Reclamation and Closure Plan proposes post-closure land use objectives that include allowing access to the mine site consistent with current practice (e.g., by obtaining permission from land owner) for fishing purposes along Peterson Creek where appropriate. <p>In relation to the changes to the experience:</p> <ul style="list-style-type: none"> • Air quality, noise, and visual disturbances will be mitigated with the implementation of management plans including Dust Control Plan, Noise Management Plan and Dark Sky Management Plan. <p>In relation to the changes to the quality of the resource harvested:</p> <ul style="list-style-type: none"> • Mitigation measures to control air and dust emissions and to control surface water and groundwater discharges are considered to be effective in addressing the potential effects to country foods and will reduce Project effects to levels that are protective of human health. • KAM proposes to establish a committee with the SSN to facilitate implementation of mitigation and monitoring. The committee will foster SSN's participation in understanding the effectiveness of the mitigation proposed on an on-going basis.
Hunting and Trapping	<p>In relation to the changes to the availability of the resource:</p> <ul style="list-style-type: none"> • Implementation of a Reclamation and Closure Plan that will aim to reverse habitat losses and re-establish the land to a similar condition to prior to Project development, where feasible. • KAM will support SSN in documenting past, present, and future land uses in the areas surrounding the Project and in the larger traditional territory. This will aim to facilitate SSN involvement in future reclamation activities and may include identification of habitat offsetting locations for key species such as the deer, moose, American Badger or sharp-tailed grouse. KAM will also work with the SSN to investigate the need for future studies on biodiversity and animal population trends in the region to determine the possible role of the Project or other industrial activities in future conditions as they relate to harvested species. • KAM will continue its efforts to negotiate and conclude a Project Agreement with the SSN. <p>In relation to changes in accessing harvesting locations:</p> <ul style="list-style-type: none"> • KAM will maintain access to Jacko Lake through construction of an alternative access road to Jacko Lake south of the proposed main access to the Project. KAM will also construct an additional parking lot area to facilitate continued access to Jacko Lake. • Implementation of a Reclamation and Closure Plan that will aim to reverse habitat losses and re-establish the land to a similar condition to prior to Project development, where feasible. <p>In relation to changes in the experience of harvesting:</p> <ul style="list-style-type: none"> • Air quality, noise, and visual disturbances will be mitigated with the implementation of management plans including Dust Control Plan, Noise Management Plan and Dark Sky Management Plan. <p>In relation to changes in the quality of the resources harvested:</p> <ul style="list-style-type: none"> • Mitigation measures to control air and dust emissions and to control surface water and groundwater discharges are considered to be effective in addressing the potential effects to country foods and will reduce Project effects to levels that are protective of human health. • KAM proposes to establish a committee with the SSN to facilitate implementation of mitigation and ongoing monitoring. The committee will foster SSN's participation in understanding the effectiveness of the mitigation proposed on an on-going basis.

Aboriginal Interest Affected	Mitigation and Accommodation Measures
Plant Harvesting	<p>In relation to the changes to the availability of the resource:</p> <ul style="list-style-type: none"> • Implementation of a Reclamation and Closure Plan that will aim to reverse habitat losses and re-establish the land to a similar condition to prior to Project development, where feasible. • KAM will support SSN in documenting past, present, and future land uses in the areas surrounding the Project and in the larger traditional territory. This will aim to facilitate SSN involvement in future reclamation activities and may include identification of habitat offsetting locations for key species such as the deer, moose, American Badger or sharp-tailed grouse. KAM will also work with the SSN to investigate the need for future studies on biodiversity and animal population trends in the region to determine the possible role of the Project or other industrial activities in future conditions as they relate to harvested species. • KAM will also provide support to the SSN to participate in accessing, harvesting, and/or documenting plants of value prior and during Project execution. KAM will work with the SSN to identify opportunities to support cultural heritage programming for SSN members. • KAM will continue its efforts to negotiate and conclude a Project Agreement with the SSN. <p>In relation to changes in access to preferred harvesting locations:</p> <ul style="list-style-type: none"> • KAM will maintain access to Jacko Lake through construction of an alternative access road to Jacko Lake south of the proposed main access to the Project. KAM will also construct an additional parking lot area to facilitate continued access to Jacko Lake. • The Reclamation and Closure Plan proposes post-closure land use objectives that include allowing access to the mine site consistent with current practice (e.g., by obtaining permission from land owner) for plant gathering purposes where appropriate. <p>In relation to the changes to the experience of plant harvesting:</p> <ul style="list-style-type: none"> • Air quality, noise, and visual disturbances will be mitigated with the implementation of management plans including Dust Control Plan, Noise Management Plan and Dark Sky Management Plan. <p>In relation to the changes to the quality of resources harvested:</p> <ul style="list-style-type: none"> • Mitigation measures to control air and dust emissions and to control surface water and groundwater discharges are considered to be effective in addressing the potential effects to country foods and will reduce Project effects to levels that are protective of human health. • KAM proposes to establish a committee with the SSN to facilitate implementation of mitigation and monitoring. The committee will foster SSN's participation in understanding the effectiveness of the mitigation proposed on an on-going basis.
Ceremonial Use	<p>In relation to changes in the availability of ceremonial sites:</p> <ul style="list-style-type: none"> • To mitigate for the losses of areas of ceremonial use (i.e., the Hunting Blind and Goose Lake) KAM will continue to engage the SSN in identifying mitigation for ceremonial uses. This may include relocating features of the Hunting Blind Complex to a suitable location identified by the SSN, documenting the Hunting Blind Complex using 3D imagery, preparation of a documentary or scaled 3D model of the Hunting Blind Complex for educational purposes, and funding for heritage education or other relevant programming • KAM will also provide support to the SSN to participate in accessing, harvesting, and/or documenting resources of cultural value prior and during Project execution.

Aboriginal Interest Affected	Mitigation and Accommodation Measures
Ceremonial Use (cont'd)	<ul style="list-style-type: none"> • KAM will work with the SSN to identify opportunities to support cultural heritage programming for SSN members. • KAM will continue its efforts to negotiate and conclude a Project Agreement with the SSN. <p>In relation to changes in accessing ceremonial sites:</p> <ul style="list-style-type: none"> • KAM will maintain access to Jacko Lake through construction of an alternative access road to Jacko Lake south of the proposed main access to the Project. KAM will also construct an additional parking lot area to facilitate continued access to Jacko Lake. <p>In relation to changes in the experience of using ceremonial sites:</p> <ul style="list-style-type: none"> • Air quality, noise, and visual disturbances will be mitigated with the implementation of management plans including Dust Control Plan, Noise Management Plan and Dark Sky Management Plan.

SSN has also expressed other interests and concerns not directly related to their Aboriginal interests. The proposed mitigation measures to address other interest discussed in Section 14 of the Application are summarized in Table 16.3-3.

Table 16.3-3. Residual Effects and Mitigation for Other Aboriginal Interests of SSN

Other Aboriginal Interest	Valued Component that Informed the Assessment			Mitigation Measures
	Residual Effect	Project Phase		
Economic Conditions	Decreased employment and income for SSN members after Project closure	Labour Force, Income and Training	Decommissioning and Closure	Implementation of a communications and transition program.
	Increase in costs caused by staff turnover and the need to compete for staff against the Project	Labour Force, Income and Training	Construction and Operation	The effect was characterized as negligible and did not required mitigation.
Social Conditions	Reduction in access for SSN members to health services	Community Health and Well-being	Construction and Operation	Establish a Socio-economic Monitoring Advisory Committee. Implementing a Socio-economic Monitoring Plan. Keep health service providers informed about Project workforce requirements. Contracting a family physician to be the designated medical resource for the construction workforce. Contributing financially or in-kind to physician recruitment efforts and the new residency program for family physicians currently in place in Kamloops.

Other Aboriginal Interest	Residual Effect	Valued Component that Informed the Assessment	Project Phase	Mitigation Measures
Social Conditions (cont'd)	Increases in social problems (i.e., substance abuse) in SSN communities due to spending of additional income	Community Health and Well-being	Construction and Operation	<p>Offer counseling services to employees if needed.</p> <p>Provide money management training as required.</p> <p>Implement a zero tolerance policy with respect to drug and alcohol at the Project site for Project employees and contractors.</p> <p>Work with local agencies to monitor Project socio-economic effects and to take corrective actions as appropriate.</p> <p>Establish a Socio-economic Monitoring Advisory Committee.</p> <p>Implementation of a Socio-economic Monitoring Plan.</p>
Physical and Cultural Heritage Resources	Disturbances to the availability, access and experience of sites associated with Pipsell including the Hunting Blind Complex, Goose Lake, portions of Peterson Creek and minor portions of Jacko Lake	Archaeological Sites Heritage Sites	All	<p>Systematic data recovery. Mitigation measures approved by the Archaeology Branch and the SSN.</p> <p>Develop an Access Management Plan in consultation with Aboriginal Groups.</p> <p>Provide support to the SSN to participate in accessing, harvesting, and/or documenting plants or other resources of cultural value prior to the Project footprint disturbance.</p> <p>Work with the SSN to identify opportunities to support cultural heritage programming for SSN members.</p> <p>Implement a site disturbance policy.</p> <p>Mitigation measures to mitigate effects on CULRTP outlined in Section 8.5.</p> <p>Mitigation measures to control noise and vibration emissions outlined in Section 10.5.</p> <p>Mitigation measures to control air and dust emissions outlined in Section 10.1.</p> <p>Mitigation measures described in Section 8.3, Visual Impact/Aesthetic Features.</p>
Health Conditions	Health effects associated to exposure (i.e., inhalation or ingestion) to contaminants generated by the Project	Human Health Country Foods	All	<p>Mitigation measures to control air and dust emissions outlined in the Air Quality section (Section 10.1).</p> <p>Mitigation measures to control surface water discharges outlined in the Surface Water Quality section (Section 6.4).</p>

16.3.2 Other Aboriginal Groups

The residual Project effects on the interest of other Aboriginal Groups including Ashcroft Indian Band, Lower Nicola Indian Band, Whispering Pines/Clinton Indian Band, and the Métis Nation British Columbia are summarized in the following sections.

16.3.2.1 Ashcroft Indian Band

The seriousness of effects of the Project on AIB’s practice of fishing, hunting and trapping and plant harvesting interests is considered to be negligible. Mitigation and accommodation measures proposed for AIB are presented in Table 16.3-4. To date, research conducted by KAM and consultation with AIB has not identified ceremonial practices within the vicinity of the Project although these activities likely occur within AIB’s traditional territory and closer to key harvesting locations.

Table 16.3-4. Aboriginal Interest Potentially Affected and Accommodation Measures for AIB

Aboriginal Interest Affected	Mitigation and Accommodation Measures
Fishing	<ul style="list-style-type: none"> • The Fish Habitat Mitigation and Offsetting Plan (FHMOP) proposes measures to offset habitat losses in Jacko Lake and Peterson Creek. The measures proposed in the FHMOP will be the creation of fish habitat in Inks Lake, which is currently not fish-bearing but is located in close proximity to Jacko Lake. Given that only a very small portion of the Jacko Creek catchment is affected by Project activities, no effects are anticipated on the availability of fish in Jacko Creek. • KAM will maintain access to Jacko Lake through construction of an alternative access road to Jacko Lake south of the proposed main access to the Project. KAM will also construct an additional parking lot area to facilitate continued access to Jacko Lake. • The transportation management plan proposes measures to minimize traffic congestion in public roads. • The Reclamation and Closure Plan proposes post-closure land use objectives that include allowing access to the mine site consistent with current practice (e.g., by obtaining permission from land owner) for fishing purposes along Peterson Creek where appropriate. • Air quality, noise, and visual disturbances will be mitigated with the implementation of management plans including Dust Control Plan, Noise Management Plan and Dark Sky Management Plan. • AIB has been accommodated with a Consultation and Benefits Agreement and has sent letters of support for the Ajax Project to various Provincial and Federal agencies.
Hunting and Trapping	<ul style="list-style-type: none"> • KAM will maintain access to Jacko Lake through construction of an alternative access road to Jacko Lake south of the proposed main access to the Project. KAM will also construct an additional parking lot area to facilitate continued access to Jacko Lake. • Implementation of a Reclamation and Closure Plan that will aim to reverse habitat losses and re-established the land to a similar condition to prior to Project development, where feasible. • The Reclamation and Closure Plan proposes post-closure land use objectives that include allowing access to the mine site consistent with current practice (e.g., by obtaining permission from land owner) for hunting and trapping purposes where appropriate.

Aboriginal Interest Affected	Mitigation and Accommodation Measures
Hunting and Trapping (cont'd)	<ul style="list-style-type: none"> Air quality, noise, and visual disturbances will be mitigated with the implementation of management plans including Dust Control Plan, Noise Management Plan and Dark Sky Management Plan. AIB has been accommodated with a Consultation and Benefits Agreement and has sent letters of support for the Ajax Project to various Provincial and Federal agencies.
Plant Harvesting	<ul style="list-style-type: none"> KAM will maintain access to Jacko Lake through construction of an alternative access road to Jacko Lake south of the proposed main access to the Project. KAM will also construct an additional parking lot area to facilitate continued access to Jacko Lake. Implementation of a Reclamation and Closure Plan that will aim to reverse habitat losses and re-established the land to a similar condition to prior to Project development, where feasible. The Reclamation and Closure Plan proposes post-closure land use objectives that include allowing access to the mine site consistent with current practice (e.g., by obtaining permission from land owner) for plant gathering purposes, where appropriate. Air quality, noise, and visual disturbances will be mitigated with the implementation of management plans including Dust Control Plan, Noise Management Plan and Dark Sky Management Plan. AIB has been accommodated with a Consultation and Benefits Agreement and has sent letters of support for the Ajax Project to various Provincial and Federal agencies.

AIB has also expressed other interests and concerns not directly related to their Aboriginal interests. Table 16.3-5 identifies other interests and concerns and the section of the Application/EIS where those are addressed.

Table 16.3-5. Other Interests and Concerns Expressed by AIB

Other Interests or Matters of Concern	AIB Issue/Concern/Comment	Valued Component / Section of Application/EIS
Economic conditions	Interest expressed in contracting, employment, training and procurement opportunities.	Labour Force, Employment and Training
	Concern about the potential use of temporary foreign workers as employees for the Project.	Labour Force, Employment and Training
Health conditions	Potential effects on cattle from metals	Human Health
Water quality and quantity	General concerns about changes to water quantity and quality.	Surface Water Quality Surface Water Quantity Groundwater Quality Groundwater Quantity
	Potential effects on Thompson River.	Surface Water Quality Surface Water Quantity
Cumulative effects	Concern about cumulative effects (including the Kinder Morgan pipeline).	Multiple VCs as appropriate

16.3.2.2 Lower Nicola Indian Band

The seriousness of the effects of the Project on LNIB’s practice of fishing, hunting and trapping and plant harvesting interests is considered to be negligible. To date, research conducted by KAM and consultation with LNIB has not identified ceremonial practices within the vicinity of the Project although these activities likely occur within LNIB’s traditional territory and closer to key harvesting locations. Mitigation and accommodation measures proposed for LNIB are presented in Table 16.3-6.

Table 16.3-6. Aboriginal Interest Potentially Affected and Accommodation Measures for LNIB

Aboriginal Interest Affected	Mitigation and Accommodation Measures
Fishing	<ul style="list-style-type: none"> • The Fish Habitat Mitigation and Offsetting Plan (FHMOP) proposes measures to offset habitat losses in Jacko Lake and Peterson Creek. The measures proposed in the FHMOP will be the creation of fish habitat in Inks Lake, which is currently not fish-bearing but is located in close proximity to Jacko Lake. Given that only a very small portion of the Jacko Creek catchment is affected by Project activities, no effects are anticipated on the availability of fish in Jacko Creek. • KAM will maintain access to Jacko Lake through construction of an alternative access road to Jacko Lake south of the proposed main access to the Project. KAM will also construct an additional parking lot area to facilitate continued access to Jacko Lake. • The transportation management plan proposes measures to minimize traffic congestion in public roads. • The Reclamation and Closure Plan proposes post-closure land use objectives that include allowing access to the mine site consistent with current practice (e.g., by obtaining permission from land owner) for fishing purposes along Peterson Creek where appropriate. • Air quality, noise, and visual disturbances will be mitigated with the implementation of management plans including Dust Control Plan, Noise Management Plan and Dark Sky Management Plan. • KAM will continue its efforts to negotiate and conclude a Project Agreement with the LNIB.
Hunting and Trapping	<ul style="list-style-type: none"> • KAM will maintain access to Jacko Lake through construction of an alternative access road to Jacko Lake south of the proposed main access to the Project. KAM will also construct an additional parking lot area to facilitate continued access to Jacko Lake. • Implementation of a Reclamation and Closure Plan that will aim to reverse habitat losses and re-established the land to a similar condition to prior to Project development, where feasible. • The Reclamation and Closure Plan proposes post-closure land use objectives that include allowing access to the mine site consistent with current practice (e.g., by obtaining permission from land owner) for hunting and trapping purposes, where appropriate. • Air quality, noise, and visual disturbances will be mitigated with the implementation of management plans including Dust Control Plan, Noise Management Plan and Dark Sky Management Plan. • KAM will continue its efforts to negotiate and conclude a Project Agreement with the LNIB.

Aboriginal Interest Affected	Mitigation and Accommodation Measures
Plant Harvesting	<ul style="list-style-type: none"> • KAM will maintain access to Jacko Lake through construction of an alternative access road to Jacko Lake south of the proposed main access to the Project. KAM will also construct an additional parking lot area to facilitate continued access to Jacko Lake. • Implementation of a Reclamation and Closure Plan that will aim to reverse habitat losses and re-established the land to a similar condition to prior to Project development, where feasible. • The Reclamation and Closure Plan proposes post-closure land use objectives that include allowing access to the mine site consistent with current practice (e.g., by obtaining permission from land owner) for plant gathering purposes where appropriate. • Air quality, noise, and visual disturbances will be mitigated with the implementation of management plans including Dust Control Plan, Noise Management Plan and Dark Sky Management Plan. • KAM will continue its efforts to negotiate and conclude a Project Agreement with the LNIB.

LNIB has also expressed other interests and concerns not directly related to their Aboriginal interests. Table 16.3-7 identifies other interests and concerns and the section of the Application/EIS where those are addressed.

Table 16.3-7. Other Interests and Concerns Expressed by LNIB.

Other Interests or Matters of Concern	LNIB Issue/Concern/Comment	Valued Component / Section of Application/EIS
Economic conditions	Interest in potential education, training, and employment opportunities.	Labour Force, Employment and Training
	Interest in developing economic and business opportunities.	Business
	Interest in creation of economic diversification.	Economic Diversification
Water quantity and water quality	Potential downstream effects from changes in water quantity and quality.	Surface Water Quality Surface Water Quantity Groundwater Quality Groundwater Quantity
Accidents and malfunctions	Potential failure of the TSF, including potential effects on the Kinder Morgan pipeline, which is located under the proposed mine rock and TSF.	Accidents and Malfunctions (Section 17.6)

16.3.2.3 *Whispering Pines / Clinton Indian Band*

The seriousness of the effects of the Project on the practice of fishing, hunting and trapping and plant harvesting interests are considered to be negligible. To date, research conducted by KAM and consultation with WP/CIB has not identified ceremonial practices within the vicinity of the Project although these activities likely occur within WP/CIB's traditional territory and closer to key harvesting locations. Mitigation and accommodation measures for WP/CIB proposed are presented in Table 16.3-8.

Table 16.3-8. Aboriginal Interest Potentially Affected and Accommodation Measures for WP/CIB

Aboriginal Interest Affected	Mitigation and Accommodation Measures
Fishing	<ul style="list-style-type: none"> • The Fish Habitat Mitigation and Offsetting Plan (FHMOP) proposes measures to offset habitat losses in Jacko Lake and Peterson Creek. The measures proposed in the FHMOP will be the creation of fish habitat in Inks Lake, which is currently not fish-bearing but is located in close proximity to Jacko Lake. Given that only a very small portion of the Jacko Creek catchment is affected by Project activities, no effects are anticipated on the availability of fish in Jacko Creek. • KAM will maintain access to Jacko Lake through construction of an alternative access road to Jacko Lake south of the proposed main access to the Project. KAM will also construct an additional parking lot area to facilitate continued access to Jacko Lake. • The transportation management plan proposes measures to minimize traffic congestion in public roads. • The Reclamation and Closure Plan proposes post-closure land use objectives that including restoring access to the mine site for fishing purposes along Peterson Creek. • Air quality, noise, and visual disturbances will be mitigated with the implementation of management plans including Dust Control Plan, Noise Management Plan and Dark Sky Management Plan. • KAM will continue its efforts to negotiate and conclude a Project Agreement with the WP/CIB.
Hunting and Trapping	<ul style="list-style-type: none"> • KAM will maintain access to Jacko Lake through construction of an alternative access road to Jacko Lake south of the proposed main access to the Project. KAM will also construct an additional parking lot area to facilitate continued access to Jacko Lake. • Implementation of a Reclamation and Closure Plan that will aim to reverse habitat losses and re-established the land to a similar condition to prior to Project development, where feasible. • The Reclamation and Closure Plan proposes post-closure land use objectives that including restoring access to the mine site for hunting and trapping purposes. • Air quality, noise, and visual disturbances will be mitigated with the implementation of management plans including Dust Control Plan, Noise Management Plan and Dark Sky Management Plan. • KAM will continue its efforts to negotiate and conclude a Project Agreement with the WP/CIB.
Plant Harvesting	<ul style="list-style-type: none"> • KAM will maintain access to Jacko Lake through construction of an alternative access road to Jacko Lake south of the proposed main access to the Project. KAM will also construct an additional parking lot area to facilitate continued access to Jacko Lake. • Implementation of a Reclamation and Closure Plan that will aim to reverse habitat losses and re-established the land to a similar condition to prior to Project development, where feasible. • The Reclamation and Closure Plan proposes post-closure land use objectives that includes restoring access to the mine site for plant gathering purposes. • Air quality, noise, and visual disturbances will be mitigated with the implementation of management plans including Dust Control Plan, Noise Management Plan and Dark Sky Management Plan. • KAM will continue its efforts to negotiate and conclude a Project Agreement with the WP/CIB.

WP/CIB has also expressed other interests and concerns not directly related to their Aboriginal interests. Table 16.3-9 identifies other interests and concerns and the section of the Application/EIS where those are addressed.

Table 16.3-9. Other Interests and Concerns Expressed by WP/CIB

Other Interests or Matters of Concern	WP/CIB Issue/Concern/Comment	Value Component / Section of Application/EIS
Economic conditions	Potential effects on tourism opportunities from sensory disturbances such as effects to aesthetic and visual resources and noise.	Business Outdoor Recreation
	Potential increase of unemployment and poverty due to mine activities.	Community Health and Well-being
	Potential effects of boom and bust periods on employment, including spillover effects.	Labour Force, Employment and Training Community Health and Well-being
Social conditions	Potential effects on access to health care facilities and medical practitioners (i.e., loss of physicians and health personnel) due to mine operations.	Infrastructure, Public Facilities, and Services Community Health and Well-being
Health conditions	Potential effects of air pollution on human health including: <ul style="list-style-type: none"> • effects from chemicals in blast emissions (including uranium); • effects from transportation-related emissions (large diesel generators, heavy equipment) on nearby Indian Reserves and traditional use areas; • effects from chemicals in fugitive dust on nearby traditional use areas; • potential for dust to be distributed at considerable distance from the mine site including to WP/CIB Reserve No 4. 	Human Health Air Quality
	Potential contamination of plants, wildlife, and country foods, including through soil contamination and dust emissions.	Human Health Country Foods
	Potential sensory disturbances (noise and vibration effects) for those residing on the WP/CIB Indian Reserves.	Noise and Vibration
Water quantity and water quality	Effects on water quality from acid rock drainage and other potential contamination during and after production.	Surface Water Quality Groundwater Quality
	Concern about the significant amount of water that will be used by the Project from Kamloops Lake and the Thompson River, which could deplete water resources available for the community and other uses including cattle and hay ranching.	Surface Water Quantity
	Potential effects on water quality due to dust deposition on nearby waterbodies.	Surface Water Quality

Other Interests or Matters of Concern	WP/CIB Issue/Concern/Comment	Value Component / Section of Application/EIS
Reclamation and closure	Potential for contamination during the Post-Closure phase.	Reclamation and Closure Plan
	Potential use of contaminated soil in reclamation programs.	Geology, Landforms, and Soils
Accidents and malfunctions	Potential effects on traditional resources from a spill or accident along the transportation corridor.	Accidents and Malfunctions (Section 17.6)
	Potential failure of mine facilities (in particular the TSF and the MRSF, as well as potential accidents/malfunctions associated with the Kinder Morgan pipeline.	Accidents and Malfunctions (Section 17.6)
Cumulative effects	Potential cumulative effects of various mining operations on traditional land use.	Multiple VCs as appropriate

16.3.2.4 Métis Nation British Columbia

MNBC has stated that land use activities within Project area include hunting, trapping, fishing, gathering (food and medicines), gathering of firewood, cultural sites, and spiritual practices, camping and hiking. The seriousness of the effects of the Project on the practice of fishing, hunting and trapping and plant harvesting interests are considered to be negligible. To date, research conducted by KAM and consultation with MNBC has not identified ceremonial practices within the vicinity of the Project although these activities likely occur closer to MNBC’s key harvesting locations. Mitigation and accommodation measures proposed for MNBC are presented in Table 16.3-10.

Table 16.3-10. Aboriginal Interest Potentially Affected and Accommodation Measures for MNBC

Aboriginal Interest Affected	Mitigation and Accommodation Measures
Fishing	<ul style="list-style-type: none"> The Fish Habitat Mitigation and Offsetting Plan (FHMOP) proposes measures to offset habitat losses in Jacko Lake and Peterson Creek. The measures proposed in the FHMOP will be the creation of fish habitat in Inks Lake, which is currently not fish-bearing but is located in close proximity to Jacko Lake. Given that only a very small portion of the Jacko Creek catchment is affected by Project activities, no effects are anticipated on the availability of fish in Jacko Creek. KAM will maintain access to Jacko Lake through construction of an alternative access road to Jacko Lake south of the proposed main access to the Project. KAM will also construct an additional parking lot area to facilitate continued access to Jacko Lake. The transportation management plan proposes measures to minimize traffic congestion in public roads. The Reclamation and Closure Plan proposes post-closure land use objectives that include allowing access to the mine site consistent with current practice (e.g., by obtaining permission from land owner) for fishing purposes along Peterson Creek where appropriate. Air quality, noise, and visual disturbances will be mitigated with the implementation of management plans including Dust Control Plan, Noise Management Plan and Dark Sky Management Plan.

Aboriginal Interest Affected	Mitigation and Accommodation Measures
Hunting and Trapping	<ul style="list-style-type: none"> • KAM will maintain access to Jacko Lake through construction of an alternative access road to Jacko Lake south of the proposed main access to the Project. KAM will also construct an additional parking lot area to facilitate continued access to Jacko Lake. • Implementation of a Reclamation and Closure Plan that will aim to reverse habitat losses and re-established the land to a similar condition to prior to Project development, where feasible. • The Reclamation and Closure Plan proposes post-closure land use objectives that include allowing access to the mine site consistent with current practice (e.g., by obtaining permission from land owner) for hunting and trapping purposes where appropriate. • Air quality, noise, and visual disturbances will be mitigated with the implementation of management plans including Dust Control Plan, Noise Management Plan and Dark Sky Management Plan.
Plant Harvesting	<ul style="list-style-type: none"> • KAM will maintain access to Jacko Lake through construction of an alternative access road to Jacko Lake south of the proposed main access to the Project. KAM will also construct an additional parking lot area to facilitate continued access to Jacko Lake. • Implementation of a Reclamation and Closure Plan that will aim to reverse habitat losses and re-established the land to a similar condition to prior to Project development, where feasible. • The Reclamation and Closure Plan proposes post-closure land use objectives that include allowing access to the mine site consistent with current practice (e.g., by obtaining permission from land owner) for plant gathering purposes where appropriate. • Air quality, noise, and visual disturbances will be mitigated with the implementation of management plans including Dust Control Plan, Noise Management Plan and Dark Sky Management Plan.

MNBC has also expressed other interests and concerns not directly related to their Aboriginal interests. Table 16.3-11 identifies other interests and concerns and the section of the Application/EIS where those are addressed.

Table 16.3-11. Other Interests and Concerns Expressed by MNBC

Other Interests or Matters of Concern	AIB Issue/Concern/Comment	Valued Component / Section of Application/EIS
Economic conditions	Interest expressed in potential employment and economic opportunities.	Labour Force, Employment and Training
	Interest expressed in training and skills development.	Labour Force, Employment and Training
	Concern about the use of foreign labour force.	Labour Force, Employment and Training
Social conditions	Potential effects on property values such as increases in housing costs.	Infrastructure, Public Facilities, and Services
	Potential effects from transportation of ore and increased truck traffic.	Infrastructure, Public Facilities, and Services

Other Interests or Matters of Concern	AIB Issue/Concern/Comment	Valued Component/ Section of Application/EIS
Health conditions	Potential noise effects from blasting and crushing activities on local residents.	Noise and Vibration
Water quantity and water quality	Potential effects on water quality in Jacko Lake as well as other waterbodies (such as the Thompson River).	Surface Water Quality
	Changes in water quantity to nearby waterbodies.	Surface Water Quantity
Accidents and malfunctions	TSF safety and potential malfunctions.	Accidents and Malfunctions