

Appendix 4.7-M

Issues Tracking Tables

AJAX PROJECT

**Environmental Assessment Certificate Application / Environmental Impact Statement
for a Comprehensive Study**

WORKING GROUP COMMENTS AND ISSUES RESOLUTION TABLE

(48 pages)

**Proposed Ajax Mine Project
Working Group Comments and Issues Resolution Table**

#	Commenter's Organization	Comment Date	Comment	Valued Component(s)	AIR June 30, 2014 Revision Section #	Related to Project Design Change	Issue Raised in Previous Review	Proponent Response #1	Follow-up Working Group Comment	Proponent Response #2	EAO Response
1	Ministry of Energy & Mines	9-Jul-14	"Reference as appropriate to the "Guidelines for Open Pit Slope Design" (Read and Stacey, CSIRO, 2009)". - MEM is now recommending that new proponents refer to these guidelines. This revision may be excluded if the pit design is already well advanced using a different design standard. Regardless, the selected design criteria must be rationalized or justified.	Geology, Landforms, Soils	3.4	No	No	In order to assess overall slope stability, FLAC3D finite difference methods software has been used. This software was selected due to the scale of the proposed open pit, complexity of the geology (lithology shapes and faults), and pit shape. This is in accordance with standard industry best practice, as outlined by Read and Stacey (2009) "...Finite element and finite difference continuum codes widely used by slope design practitioners include PHASE2 (Rocscience 2005b), FLAC (Itasca 2005), FLAC3D (Itasca 2006) and ABAQUS."			EAO has reviewed the comments and considers the Proponent's response adequate.
2	Ministry of Energy & Mines	9-Jul-14	"Consideration of the potential impact of Jacko Lake on the stability of, and feasibility of dewatering the East and Southeast walls of the open pit" - This was an oversight that should have been requested for inclusion in the last draft AIR. Inclusion in the final version is requested.	Geology, Landforms, Soils	3.4	No	No	In order to assess overall slope stability, FLAC3D finite difference methods software has been used. This software was selected due to the scale of the proposed open pit, complexity of the geology (lithology shapes and faults), and pit shape. This is in accordance with standard industry best practice, as outlined by Read and Stacey (2009) "...Finite element and finite difference continuum codes widely used by slope design practitioners include PHASE2 (Rocscience 2005b), FLAC (Itasca 2005), FLAC3D (Itasca 2006) and ABAQUS."			EAO has reviewed the comments and considers the Proponent's response adequate.
3	Ministry of Energy & Mines	9-Jul-14	"Consideration of the potential impacts (if any) that a failure of the South Waste Rock Storage Facility could have on the physical integrity of the TSF, including (but not limited to) the potential for an induced wave in the TSF" - The SWRSF is 70m higher than the TSF and is located in close proximity to the TSF. It is not clear if there is any potential for a failure of the SWRSF to impact the TSF, but this needs to be considered.	Geology, Landforms, Soils	3.7	Yes	No	The AIR/EISG will be revised to reflect this comment. A geotechnical stability analysis of the SWRSF is planned. The planned stability analysis shall include the potential impact, if any, on the surrounding infrastructure, including the TSF.			EAO has reviewed the comments and considers the Proponent's response adequate.
4	Ministry of Energy & Mines	9-Jul-14	"Results from the feasibility level geotechnical and stability assessment will be included in the application and considered in the design. The BC Mine Waste Rock Pile Research Committee Interim Guidelines will be referenced." - Typically included as an appendix to the application. The feasibility level report should include static and pseudo-static factors of safety for all MRSFs and all applicable failure mechanisms.	Geology, Landforms, Soils	3.8.1	No	No	The AIR/EISG will be revised to reflect this comment. A geotechnical report including stability analysis of WRSF is planned for inclusion in the Application/EIS.			EAO has reviewed the comments and considers the Proponent's response adequate.
5	Ministry of Energy & Mines	9-Jul-14	"Design criteria for contact water collection ditches and non-contact water diversion channels including design flood, channel side slopes, and proposed armour or lining" - This was an oversight that should have been requested for inclusion in the last draft AIR. Inclusion in the final version is requested.	Surface water quality	3.12	No	No	The AIR/EISG will be revised to reflect this comment.			EAO has reviewed the comments and considers the Proponent's response adequate.

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6	Ministry of Environment	28-Jul-14	Include a sentence stating that the information in the bullet list will be provided for all mine phases, and in particular, for those parameters that are expected to change with time (i.e., evaporation volumes, seepage rates and volumes); also, add 'direction of flow' to the bracketed list in this bullet: Description of tailings water seepage (potential flows, direction of flow, quality, prevention and planned management strategies) and surface drainage including their collection;	Surface water quality	3.7	Yes	No	All of these parameters will be evaluated as part of the surface water and groundwater models. AIR/EISG language will be updated as outlined by the commenter.			EAO has reviewed the comments and considers the Proponent's response adequate.
7	Ministry of Environment	28-Jul-14	In addition to the water management structures that will separate contact and non-contact water, information should be provided in the EAC application on the volumes of water expected to infiltrate (and drain from) the various mine rock Storage facilities, and whether flushing events during freshet (or large rain events) are expected to be of concern. If they are, information specific to the expected chemistry, timing and volumes released should be included in the application. 3.8.2 – The same information should be provided for the ore stockpiles. allow, contingency measures for potential re-handling of the low grade ore stockpiles (to address remaining environmental liabilities) in the event of an early shut-down or care and maintenance period should be presented and discussed.	Surface water quality	3.8 / 3.8.2	No	No	Both water quantity and water quality predictions for volumes expected to infiltrate and drain from the various waste rock storage facilities (including the ore stockpile) will be evaluated for all phases of mining.			EAO has reviewed the comments and considers the Proponent's response adequate.
8	Ministry of Environment	28-Jul-14	Will water be required for dust control? If so, volumes and seasonal requirements should be included in the water balance model and the water management plans. I see that it is mentioned in 3.14.1.	Surface water quantity	3.12	No	No	Yes. Water will be required for dust control. Volumes and seasonal requirements have been considered in the water balance model.			EAO has reviewed the comments and considers the Proponent's response adequate.
9	Ministry of Environment	28-Jul-14	Last sentence should be changed to read "...discharge quality requirements are met and stable conditions are attained." By definition, a trend is not stable.	Surface water quantity	3.18.1	No	No	The wording will be updated as suggested.			EAO has reviewed the comments and considers the Proponent's response adequate.
10	Ministry of Environment	28-Jul-14	It would be very useful to include source-pathway-receptor conceptual models in the EAC application. These diagrams will allow interactions between the various mine components and VCs to be easily understood, and will aid the cumulative effects assessment as well. This is becoming standard practice for mining project EAs in British Columbia.	Environment - General	5.1.4	No	No	Language has been added to Section 5.1.1 of the AIR to indicate that VC interaction diagrams will be added to each assessment section. Within each VC assessment Interaction Matrix tables will be used to link Project activities with potential effects.			EAO has reviewed the comments and considers the Proponent's response adequate.

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11	Ministry of Environment	28-Jul-14	3rd bullet should include the same information for seepage from the TSF, as well as the MRSFs. As mentioned in the WG meeting on June 23, the proponent should include an assessment of the probability of a release of water from the TSF, and what the expected impacts to the receiving environment resulting from this release. It's good to see that a trend analysis of regional stream flows is planned, and the logical next step would be to incorporate the findings of this analysis into the water balance model in order to inform both the water quality predictions, and the potential changes to water management practices that may be required as a result of changing water availability. Following this, a sensitivity analysis of the water balance model would be appropriate (with these results used in the water quality model) – to determine the impacts that variation in water availability could have on stream flows in Peterson Creek, TSF water cover, infiltration through the MRSFs, etc.	Surface water quality	6.4.4	Yes	No	TSF has been included in text as suggested. Seepage pathways from the TSF and WRSFs will be simulated using the 3D groundwater flow model to identify potential receptors. Flow quantities and travel times will be computed from the numerical groundwater flow model output and will be incorporated into the water quantity and quality model to help assess impacts on the receiving environment from this potential release. A range of climatic conditions will be evaluated to assess the impacts that variation in water availability could have on streamflows in Peterson Creek. Also see revised text in Section 6.6.4			EAO has reviewed the comments and considers the Proponent's response adequate.
12	EAO	22-Jul-14	The deletion of Inks Lake in Section 8.6 (Outdoor Recreation). We recognize that effects to recreational uses of Inks Lake under the revised mine plan are not likely to be as significant as under the previous mine plan, but there is still potential for substantial disturbance to access and enjoyment of Inks Lake. Inks Lake should continue to be considered in the assessment of effects on outdoor recreation; and effects to any recreational uses of Goose Lake should allow be considered in Section 8.6.	Outdoor Recreation	8.6	Yes	Yes	Inks Lake will be included under the Outdoor Recreation VC.			EAO has reviewed the comments and considers the Proponent's response adequate.
13	Ministry of Forests, Lands and Natural Resources Operations	25-Jul-14	Will fish and fish habitat survey results identifying all species encountered, including timing of survey, be provided as part of the Application?	Fish populations and fish habitat	6.7.2	No	Yes	Results of fish and fish habitat surveys will be included in baseline reports that will be appended to the Application/EIS.			EAO has reviewed the comments and considers the Proponent's response adequate.
14	Ministry of Forests, Lands and Natural Resources Operations	25-Jul-14	Section is a bit vague but suggests if no fish are present, then significant impacts to macro invertebrates are irrelevant. Macro invertebrates are not addressed anywhere else in the document (see comments for 6.11).	Fish populations and fish habitat	6.7.4	No	Yes	Invertebrates will be considered as intermediate component in the assessment of the fish and fish habitat VC - this includes downstream fish.			EAO has reviewed the comments and considers the Proponent's response adequate.
15	Ministry of Forests, Lands and Natural Resources Operations	25-Jul-14	Previous drafts of the AIR indicated that rare plant surveys would meet RISC standards. RISC standards have been changed to read "recognized standards". Please justify. The majority of surveys described for other VCs presented in this document follow RISC standards.	Rare plants	6.8.2	No	Yes	The change in wording reflects the fact that there are no RISC standards for rare plant surveys.			EAO has reviewed the comments and considers the Proponent's response adequate.

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16	Ministry of Forests, Lands and Natural Resources Operations	25-Jul-14	It is not clear from the background wording that rare and sensitive plant communities determined through inventories will be spatially depicted in the application. Will survey results be provided as part of the Application?	Rare plants	6.9.2	No	No	A themed map showing locations of rare and sensitive communities will be provided in the Application/EIS.			EAO has reviewed the comments and considers the Proponent's response adequate.
17	Ministry of Forests, Lands and Natural Resources Operations	25-Jul-14	Table 6.9.1 should read 6.10.1	N/A	6.10.1	No	No	Table numbering has been revised.			EAO has reviewed the comments and considers the Proponent's response adequate.
18	Ministry of Forests, Lands and Natural Resources Operations	25-Jul-14	Rationale for moving from grassland as VC to rare and sensitive grassland communities is not clear. Table 6.10.1 does not rationalize, only lists information sources	Rare and Sensitive Ecological Communities	6.10.1	No	No	"grasslands" VC will include all non-cultivated grasslands, including those listed as rare ecological communities.			EAO has reviewed the comments and considers the Proponent's response adequate.
19	Ministry of Forests, Lands and Natural Resources Operations	25-Jul-14	It is not clear from the background wording that rare and sensitive grassland communities determined through inventories will be spatially depicted in the application. Will survey results be provided as part of the Application?	Rare and Sensitive Ecological Communities	6.10.2	No	No	A themed map showing locations of rare and sensitive communities will be provided in the Application/EIS.			EAO has reviewed the comments and considers the Proponent's response adequate.
20	Ministry of Forests, Lands and Natural Resources Operations	25-Jul-14	Macro invertebrates in non-fish bearing water have been missed in this draft of the AIR. How will macro-invertebrate species in non-fish bearing water be addressed?	Fish populations and fish habitat	6.11.1	No	No	As listed in Section 6.7.4 of the AIR, invertebrates will be considered through evaluation of a potential effect "altered productive capacity... resulting from changes in water quality..". Benthic invertebrate in non fish-bearing waters that flow into fish bearing waters will be assessed			EAO has reviewed the comments and the Proponent's response. The AIR section 6.7.4 indicates that potential effects on benthic invertebrates will be considered with respect to the productive capacity of fish habitat. EAO acknowledges that additional information specific to Project effects on benthic invertebrates may be required should the information in the Application be inadequate in this regard.
21	Ministry of Forests, Lands and Natural Resources Operations	25-Jul-14	Has the inventory of Goose Lake identified any amphibians other than those listed under the VC?	Amphibian	6.12.1	Yes	No	Long-toed salamanders (<i>Ambystoma macrodactylum</i>) have been identified in the Project LSA. Long-toed salamanders are common and widely-distributed across the province.			EAO has reviewed the comments and considers the Proponent's response adequate.
22	Ministry of Forests, Lands and Natural Resources Operations	25-Jul-14	Has the inventory of Goose Lake identified any reptiles other than those listed under the VC?	Reptiles	6.13.1	Yes	No	Gartersnakes (<i>Thamnophis sirtalis</i> and <i>T. elegans</i>) have been detected. Both are common and widely-distributed species.			EAO has reviewed the comments and considers the Proponent's response adequate.
23	Ministry of Forests, Lands and Natural Resources Operations	25-Jul-14	As mentioned in previous dAIR version Review, the project area is an important staging area for Northern Harriers. Will this species be addressed within this VC or through another VC (e.g., grassland)?	Migratory Birds	6.15.1	No	Yes	Northern Harriers will be discussed under the 'Raptors' VC. The Northern Harrier was not chosen as an indicator species; habitat impacts will be covered under the 'grasslands' VC.			EAO has reviewed the comments and considers the Proponent's response adequate.
24	Ministry of Forests, Lands and Natural Resource Operations, Resource Practices Branch	15-Jul-14	Added bullet point to 8.4.4: Proposed mitigation measures where the visual impact assessment suggests that impacts will exceed the established VQO or are beyond the public threshold.	Visual Impact / Aesthetic Features (including Shading)	8.4.4	No	No	The AIR/EISG will be revised to reflect this comment.			EAO has reviewed the comments and considers the Proponent's response adequate.

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25	Ministry of Forests, Lands and Natural Resource Operations, Resource Practices Branch	16-Jul-14	Added bullet point to 8.4.4: Visual simulations from key viewpoints showing project components and their predicted visual impacts during operations. allow, potentially, simulations of the visual effect of proposed mitigation measures during the construction/operation phases.	Visual Impact / Aesthetic Features (including Shading)	8.4.4	No	No	The AIR/EISG will be revised to reflect this comment.			EAO has reviewed the comments and considers the Proponent's response adequate.
26	Ministry of Forests, Lands and Natural Resource Operations, Resource Practices Branch	17-Jul-14	Added bullet point to 8.4.4: Visual simulations from key viewpoints showing project components in the post-closure phase following proposed reclamation measures and activities.	Visual Impact / Aesthetic Features (including Shading)	8.4.4	No	No	The AIR/EISG will be revised to reflect this comment.			EAO has reviewed the comments and considers the Proponent's response adequate.
27	Ministry of Forests, Lands and Natural Resource Operations, Resource Practices Branch	18-Jul-14	From email to Kristin: In brief we see a need for simulations to illustrate visual effects both during operations and post-operations. We would also like to see the proponent propose explicit mitigation measures where their visual impact assessment work shows that VQOs will be exceeded or where the public has expressed concern regarding potential visual impacts.	Visual Impact / Aesthetic Features (including Shading)	8.4	No	No	The AIR/EISG will be revised to reflect this comment.			EAO has reviewed the comments and considers the Proponent's response adequate.
28	Ministry of Forests, Lands and Natural Resource Operations	7-Aug-14	Last sentence in the paragraph at the top of page 81 reads: "This grassland type is presently under threat from urbanization, grazing, ATV use and noxious weed invasion" I would like to see "industrial development" added as a threat to the grasslands.	Grasslands	6.10.1	No	Yes	The specific wording of this sentence was included as directed by EAO/CEAA (May 2013), but has been updated to include industrial development.			EAO has reviewed the comments and considers the Proponent's response adequate.
29	Ministry of Forests, Lands and Natural Resource Operations	7-Aug-14	"Field studies and resultant mapping will occur to determine:" and a number of items are listed under this. I would like to see "Forage production/supply for livestock and wildlife" added to this list.	Grasslands	6.10.2	No	No	This has not been added to this list since effects on ranching activities and wildlife are addressed elsewhere. Forage production/supply for livestock and wildlife will be assessed as part of the baseline condition and used to develop closure and reclamation objectives and plan.			EAO has reviewed the comments and considers the Proponent's response adequate.
30	Ministry of Forests, Lands and Natural Resource Operations	7-Aug-14	The map of the study area for the Grasslands VC (Figure 6.8-1 Terrestrial Biophysical Effects Study Area) is adequate.	Grasslands	6.8-1	Yes	No	Thank you.			EAO has reviewed the comments and considers the Proponent's response adequate.

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31	Ashcroft Indian Band (AIB)	7-Aug-14	<p>Page 2 of 6: Preface to AIR – EDIT to Existing text</p> <p>The Ashcroft Indian Band (AIB) and the Lower Nicola Indian Band (LNIB) are First Nation government organizations of the Nlaka'pamux Nation, and assert their Aboriginal Right and Title to this proposed Project - an area of common interest with SSN. Ashcroft Indian Band asserts Ashcroft proprietary rights and governing jurisdiction over its traditional Territory.</p> <p>Ashcroft traditional Territory encompasses vast and ecologically varying landscape units comprised of unique and important cultural values and interests inherent to Nlaka'pamux traditions and culture. These areas may have significant overlap with cultural Heritage resources, and may be comprised of all or many of the following components – medicine gathering, hunting, fishing, plant gathering, spiritual, archaeological, historical and current family gathering sites. AIB members have and continue to carry out these practices and cultural Heritage components throughout Ashcroft traditional Territory, including Kamloops and the proposed mine site.</p>	N/A	Preface	No	No	Text related to AIB and LNIB has been updated in the Preface.			EAO has reviewed the comments and considers the Proponent's response adequate.
32	Ashcroft Indian Band (AIB)	7-Aug-14	Page 4 of 202 – EDIT should read Nlaka'pamux (Lower Nicola and Ashcroft...) Nation. No "s" on Nation.	N/A	2.2.2	No	No	Change made, as described.			EAO has reviewed the comments and considers the Proponent's response adequate.
33	Ashcroft Indian Band (AIB)	7-Aug-14	Section 2.6. Page 8 of 202. COMMENT/EDIT There currently does not exist a AIB Aboriginal Land Use Plan for AIB Traditional Territory, which would enable AIB to proceed more clearly through the EA process.	Aboriginal - Part C	2.6	No	No	Acknowledged. No change made to updated AIR/EISG.			EAO has reviewed the comments and considers the Proponent's response adequate.
34	Ashcroft Indian Band (AIB)	7-Aug-14	Section 5.1.6.2 Page 46 of 202 – COMMENT/EDIT Aboriginal Use, potential Aboriginal land and resource planning has been inadequate. The Proponents offer of funding for an Ashcroft Indian Band Current Use Assessment is limited and does not provide EAO any information the proponent must receive in relation to the historic use and occupation by First Nations of the proposed project area around the time of contact with Europeans and at sovereignty (1846). AIB has repeated requested a meaningful Cultural Heritage Overview Assessment in this proposed project area.	Aboriginal - Part C	5.1.6.2	No	Yes	KAM is committed to working with First Nations to develop capacity and gather information on cultural heritage. Aboriginal interests information may be collected from a range of sources, including publically available information, information shared by Aboriginal groups, and information from other environmental assessments.			EAO has reviewed the comments and considers the Proponent's response adequate.
35	Ashcroft Indian Band (AIB)	7-Aug-14	REQUEST and EDIT: AIB INVOLVEMENT IN ALL AUDITING PRCDURES ASSOCIATED WITH AJAX MINE ACTIVITIES THROUGH THE TERM OF OPERATIONS	N/A		No	No	This request relates to potential future operations, rather than the AIR/EIS Guidelines. KAM is committed to engaging with AIB should they wish to discuss Project operations.			EAO has reviewed the comments and considers the Proponent's response adequate.
36	Ashcroft Indian Band (AIB)	7-Aug-14	AIB must be added into all tables in the Applicable Government Agency for all tables in Section 6: Assessment of potential Environmental Effects.	Environment - General	6	No	No	AIB has been added to the tables.			EAO has reviewed the comments and considers the Proponent's response adequate.

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37	Ashcroft Indian Band (AIB)	7-Aug-14	Section 8: Page 119 of 202. Assessment of potential Social Effects. REQUEST: Additional reference to Ashcroft Indian Band and its member's residing in the TNRD and City limits (asserted Nlaka'pamux Traditional Territory).	Social - general	8	No	No	On-reserve and off-reserve population data for Ashcroft Indian Band has been obtained from AANDC (Aboriginal Affairs and Northern Development Canada). If additional data is forthcoming from AIB then it will be included in the assessment.			EAO has reviewed the comments and considers the Proponent's response adequate.
38	Ashcroft Indian Band (AIB)	7-Aug-14	Section 8.5 Page 128 of 202. Land and Resource Use. REQUEST: AIB requires time and funding to build a Land Use Plan of their traditional Territory to proceed in meaningful consultation with the proponent and the Province in this proposed project area. AIB needs to be identified as an applicable Government Agency.	Land and Resource Use	8.5	No	No	KAM is committed to supporting in AIB in developing capacity. AIB has been added to the tables of stakeholders.			EAO has reviewed the comments and considers the Proponent's response adequate.
39	Ashcroft Indian Band (AIB)	7-Aug-14	Section 9.1 Page 136 of 202. Heritage Sites and Objects. REQUEST: Ashcroft Indian Band is identified as an Applicable Government Agency in Table 9.1-1.	Heritage - general	9.1	No	No	AIB has been added to the table.			EAO has reviewed the comments and considers the Proponent's response adequate.
40	Ashcroft Indian Band (AIB)	7-Aug-14	Section 10 – Assessment of potential Health effects. REQUEST: Ashcroft Indian Band is identified as an applicable Government Agency to address future generation health concerns for those member's living in Kamloops. All Tables...	Health - general	10	No	No	AIB has been added to the table.			EAO has reviewed the comments and considers the Proponent's response adequate.
41	Ashcroft Indian Band (AIB)	7-Aug-14	Section C. Request – copy for Review.	Aboriginal - Part C		No	n/a	Acknowledged.			EAO has reviewed the comments and considers the Proponent's response adequate.
42	Ministry of Forests, Lands and Natural Resources Operations	7-Aug-14	The changes to project design and footprint have resulted in significant alterations to the overall Jacko Lake/ Peterson Creek water flow management plan, which needs to be indicated in the AIR. Based on my understanding of the project, the potential removal of the Peterson Creek stream channel downstream of the Jacko Lake Dam has resulted in a plan to employ a "pump-around" of all inflows to Jacko Lake, including the largest inflow, Peterson Creek. Inflows to Jacko Lake would be pumped around the downstream work area and returned to the Peterson Creek channel at a point downstream of the work area.	Surface water quantity	6.4	Yes	No	Additional text has been added to Section 3.12 of the AIR/EISG to specifically identify the Jacko Lake/Peterson Creek works.			EAO has reviewed the comments and considers the Proponent's response adequate.
43	Ministry of Forests, Lands and Natural Resources Operations	7-Aug-14	Through discussions between the proponent and Water Stewardship staff, it is acknowledged That the "pump-around" flow management plan for Jacko Lake/ Peterson Creek water may, or may not, change in the final design. However, any flow management plan for Jacko Lake/ Peterson Creek needs to be provided in the AIR and explained in the EA.	Surface water quantity	6.4	Yes	No	Additional text has been added to Section 3.12 of the AIR/EISG to specifically identify the Jacko Lake/Peterson Creek works.			EAO has reviewed the comments and considers the Proponent's response adequate.

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44	Ministry of Forests, Lands and Natural Resources Operations	7-Aug-14	I believe that the proponent needs to include a statement in the AIR which indicates this change (from baseline/ historical) in the flow management plan for Jacko Lake/ Peterson Creek water. The expectation of the EA would be a full Review of said plan, structural/ mechanical components design Review and modelling for various environmental input (i.e., freshet, precipitation) flood scenarios. The AIR description must include the expectation that the EA will describe the plans for management of licensed water-user requirements and the structural dam requirements within the Jacko Lake/ Peterson Creek water plan. Please note that any pump-around plan will require licensing under the BC Water Act and dam design requirements as directed within the BC Dam Safety Regulations and the BC Water Act, legislation under the jurisdiction of Ministry of Forests Lands and Natural Resource Operations.	Surface water quantity	6.4	Yes	No	Additional text has been added to Section 3.12 of the AIR/EISG to specifically identify the Jacko Lake/Peterson Creek works.			EAO has reviewed the comments and considers the Proponent's response adequate.
45	Ministry of Environment, Environmental protection Division	6-Aug-14	Evaluation Question -"Are the proposed changes to the Local and Regional Study Area boundaries and other revisions to Part B appropriate?" Yes, although the rationale for inclusion of the water intake pipeline in the Aquatic Effects Regional Study Area (RSA), Figure 7.6-1, are recommended to determine if other disciplines such as surface water quality and/or surface hydrology should also include this portion in their respective RSAs.	Surface water quality		Yes	No	Please see response to Comment 351.			EAO has reviewed the comments and considers the Proponent's response adequate.
46	Ministry of Environment, Environmental protection Division	6-Aug-14	Throughout the document, the term "waste rock" has been changed to "mine rock". Please provide the rationale for this change as it is unclear whether this reflects a change in process or rock composition, or if it simply a change in terminology	N/A		Yes	No	The language has been reverted to Waste Rock Storage Facility (WRSF) throughout the document.			EAO has reviewed the comments and considers the Proponent's response adequate.
47	Ministry of Environment, Environmental protection Division	6-Aug-14	Discussion of sampling includes a 5-in-30 during freshet effort, but this same effort during summer low-flow situations should allow be considered if adequate water is present at these sampling locations	Surface water quality	6.3.2	No	Yes	Water quality monitoring is in accordance with the the MOE mine guidance document (2012), which recommends "additional weekly sampling (i.e., 5 samples in 30 days) during periods of maximum hydrograph fluctuation" such as freshet and fall rains. There is not typically a marked fluctuation in fall flows in the areas. Note that surface water samples have been collected twice a month in the project area.			EAO has reviewed the comments and considers the Proponent's response adequate.
48	Ministry of Environment, Environmental protection Division	6-Aug-14	Page 21 of 202 – the proponent states That SAG mills are being considered as an alternative to HPGR crushers in this circuit. Please indicate whether both options are being evaluated in the environmental impact assessment.	Environment - General	3.6.5	Yes	No	If the option remains open, then either both mills would be assessed or the conservative case would be assessed and rationalized.			EAO has reviewed the comments and considers the Proponent's response adequate.
49	Ministry of Environment, Environmental protection Division	6-Aug-14	Page 24 and 173 of 202 – please indicate the time frame/return event used to assess the maximum potential precipitation event.	Surface water quantity	3.7 / 17.5	Yes	No	The criteria used to estimate the PMP will be included in the Application/EIS.			EAO has reviewed the comments and considers the Proponent's response adequate.

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50	Ministry of Environment, Environmental protection Division	6-Aug-14	Page 27 of 202 – there is no mention of the tailings storage facility being lined in this list. This has been mentioned by KGHM staff as an option and should be included in the assessment.	Environment - General	3.7	Yes	No	The geotechnical site investigation will determine the permeability of the native till material. The current plan is to utilize the till material as a natural liner beneath the TSF.			EAO has reviewed the comments and considers the Proponent's response adequate.
51	Ministry of Forests, Lands and Natural Resources Operations	1-Aug-14	KAM states "Geochemical data will be presented in sufficient detail to use as a basis for surface water and groundwater quality effects assessments. With respect to potential effects of ML/ARD on surface water quality, the following information will also be presented in the Application/EIS:" • Suggest changing to "With respect to potential effects of ML/ARD on surface and groundwater quality."	Surface water quality	3.3	No	No	Mine contact water seepage flow pathways will be tracked in the model in the surface and subsurface from the source to the receiving surface water body. Intermediate groundwater mixing zones will be included between major mine facilities and receiving water model nodes, where necessary. Additional modeling to predict changes in groundwater quality at known groundwater extraction locations will be done if changes are expected as a direct result of uncaptured mine seepage.			EAO has reviewed the comments and considers the Proponent's response adequate.
52	Ministry of Forests, Lands and Natural Resources Operations	1-Aug-14	Where is the concentrate stockpile located? Where are the loading facilities for shipping the concentrate?	Environment - General	3.6.9	No	No	The concentrate stockpile and concentrate loading facilities are planned to be housed within the Process Plant Building.			EAO has reviewed the comments and considers the Proponent's response adequate.
53	Ministry of Forests, Lands and Natural Resources Operations	1-Aug-14	Where is the Assay and Metallurgical Lab located?	Environment - General	3.6.11	No	No	The Assay and Metallurgical Laboratory is currently planned to be located near the Process Plant Building.			EAO has reviewed the comments and considers the Proponent's response adequate.
54	Ministry of Forests, Lands and Natural Resources Operations	1-Aug-14	Would like to see a hydrogeological assessment included for the area around the base of the mine rock Storage facilities included in the Application/EIS.	Groundwater quantity	3.8.1	No	No	Hydrogeological investigations will be completed around the WRSFs as part of the baseline surface water and groundwater assessments			EAO has reviewed the comments and considers the Proponent's response adequate.
55	Ministry of Forests, Lands and Natural Resources Operations	1-Aug-14	Would like to see a hydrogeological assessment included for the area around the base of the ore stockpiles included in the Application/EIS.	Groundwater quantity	3.8.2	No	No	Hydrogeological investigations will be completed around the Ore Stockpiles as part of the surface water and groundwater assessments			EAO has reviewed the comments and considers the Proponent's response adequate.
56	Ministry of Forests, Lands and Natural Resources Operations	1-Aug-14	Please include relevant information for the stockpile and reclamation areas on precipitation infiltration and groundwater recharge rates, and how the overburden and topsoil stockpiles and reclamation efforts will aim to preserve these rates.	Groundwater quantity	3.9	No	No	Infiltration through stockpiles during operations will be estimated using Hydrus-1D and representative hydraulic conductivity values for wasterock from historical data in the area. The stockpile areas will be considered in calculations.			EAO has reviewed the comments and considers the Proponent's response adequate.
57	Ministry of Forests, Lands and Natural Resources Operations	1-Aug-14	Please include information on the fuel Storage location(s) and spill prevention related to mining equipment.	Environment - General	3.1	Yes	No	The site layout map in the AIR/EISG will be updated to illustrate currently planned fuel storage locations.			EAO has reviewed the comments and considers the Proponent's response adequate.
58	Ministry of Forests, Lands and Natural Resources Operations	1-Aug-14	KAM states That "the Application/EIS will consider increased recharge from the WRSFs, increase in recharge to groundwater and additional seepage generated from the WRSFs;" • Suggest including ore, overburden, and topsoil stockpiles to these considerations.	Groundwater quantity	3.12	No	No	The effects of surface infrastructure (including mine waste management and stockpile materials) on recharge will be considered in the project design.			EAO has reviewed the comments and considers the Proponent's response adequate.

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59	Ministry of Forests, Lands and Natural Resources Operations	1-Aug-14	Pit drainage and dewatering system: • Would like to see consideration given to potential changes in precipitation events due to climate change, and analysis of how this will affect the pit drainage and dewatering system. I see Section 17.5 Effects of the Environment on the Project (p. 173 of 202) mentions longer-term effects of climate change will be discussed up to the projected post-closure phase of the project, but would like to see it included in the operations phase also.	Surface water quantity	3.12	No	Yes	Climate change effects are not anticipated to be significant during the operations period of 20 years. However, different intensity storm events and return periods as part of stochastic water balance work will be considered during operations.			EAO has reviewed the comments and considers the Proponent's response adequate.
60	Ministry of Forests, Lands and Natural Resources Operations	1-Aug-14	KAM states "A list of operation, decommissioning and closure, and reclamation components and activities intended to stabilize surface material with a vegetation cover as quickly as possible;" will be provided in the Application/EIS. • Would like to see information on rates of precipitation infiltration, evapotranspiration, and runoff included in this Application/EIS item.	Geology, Landforms, Soils	3.18	No	Yes	Section 3.12 of the AIR/EISG indicates that a site wide water balance will be developed, including for the decommissioning and closure and post-closure phases. This water balance will take into account precipitation, infiltration, evaporation, and runoff.			EAO has reviewed the comments and considers the Proponent's response adequate.
61	Ministry of Forests, Lands and Natural Resources Operations	1-Aug-14	Interaction with Project/potential Effects – Project components and activities including blasting/vibration on rock fracturing, pit wall and slope stability, landforms and soil erosion, and geo-hazard. • Consider adding pit dewatering and tailings discharge to the TMF to the project components and activities interacting with Geology, Landforms, and Soils.	Geology, Landforms, Soils	6.2	No	No	AIR/EISG has been updated as suggested.			EAO has reviewed the comments and considers the Proponent's response adequate.
62a	Ministry of Forests, Lands and Natural Resources Operations	1-Aug-14	KAM states that groundwater quality effects will be assessed in relation to human health. • Suggest considering surface/groundwater interaction for Jacko Lake, Edith Lake, and any other fish bearing surface water bodies. Include analysis of effects to fish habitats in these water bodies as a result of groundwater interactions.	Fish populations and fish habitat	6.5.1	Yes	No	The site-wide water balance model includes both surface runoff and groundwater flow (i.e. baseflow) components, with the baseflow component informed by the site groundwater model.			EAO has reviewed the comments and considers the Proponent's response adequate.
62b	Ministry of Forests, Lands and Natural Resources Operations	1-Aug-14	• Suggest adding groundwater quality effects in relation to aquatic species health. Based on the close proximity to Jacko Lake and Edith Lake, it's recommended to consider adding the water quality guidelines for the protection of Aquatic Life.	Fish populations and fish habitat	6.5.1	Yes	No	Water quality predictions in Jacko Lake will be compared to aquatic life guidelines. Edith Lake will not be evaluated as there are expected to be no groundwater or surface water impacts to this waterbody given its spatial relation to the mine site (i.e. upgradient and in a separate watershed).			EAO has reviewed the comments and considers the Proponent's response adequate.

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63	Ministry of Forests, Lands and Natural Resources Operations	1-Aug-14	<ul style="list-style-type: none"> Suggest updating the Federal or provincial listing or Regulation/Guidelines to include the new Water Sustainability Act (WSA). <p>The WSA received Royal Assent and is anticipated to be phased into effect as of April 2015. The current Water Act is still in effect over the next year to maintain continuity. As for the Groundwater Protection Regulations(GWPRs), work is being conducted to amend the GWPRs to reflect the updates in the WSA. The existing GWPRs will remain in effect until the amended GWPRs go through legislature and are passed in a similar procedure as the WSA. It is difficult to know when the updated GWPRs could come into effect, but until then the existing GWPRs are still in effect under the new WSA</p>	Surface water Quality	Table 6.5-1	No	No	AIR/EISG has been updated as suggested.			EAO has reviewed the comments and considers the Proponent's response adequate.
64a	Ministry of Forests, Lands and Natural Resources Operations	1-Aug-14	<p>KAM states that the locations of groundwater monitoring wells are shown on Figure 6.5-1.</p> <ul style="list-style-type: none"> There are no groundwater monitoring well locations shown on this figure. We would like to see where the planned long term groundwater monitoring wells are located to ensure continuity of groundwater monitoring and to confirm that operations will not eliminate any of the monitoring points. 	Groundwater quality	6.5.2	Yes	No	Groundwater monitoring points will be included on the figure. However, final monitoring locations, frequency and requirements will be established during permitting.			EAO has reviewed the comments and considers the Proponent's response adequate.
64b	Ministry of Forests, Lands and Natural Resources Operations	1-Aug-14	<ul style="list-style-type: none"> Suggest showing the inferred direction of groundwater flow to identify which monitoring wells are intended to serve as up gradient and down gradient wells. Groundwater-surface water interactions should also be included as part of Groundwater Quality. 	Groundwater quality	6.5.2	Yes	Yes	Estimated rate and direction of groundwater flow will be included in the Application/EIS (see Section 6.6.2), but not in the AIR/EISG figures at this time.			EAO has reviewed the comments and considers the Proponent's response adequate.
65	Ministry of Forests, Lands and Natural Resources Operations	1-Aug-14	<p>The Local Study Area (LSA) and Regional Study Area (RSA) are shown on Figure 6.5-1.</p> <ul style="list-style-type: none"> Would like to know the rationale behind the selection of the groundwater LSA and RSA boundaries. What is the northern boundary of the LSA based on? It is noted that the LSA does not include the nearby Aberdeen subdivision. Based on the existing groundwater issues present in this area and dewatering efforts by the City of Kamloops, KAM should consider extending the LSA to include the Aberdeen subdivision. 	Groundwater quantity	6.5.3 & 6.6.3	Yes	Yes	<p>The limits of the RSA for groundwater have been delineated to coincide with mapped watersheds [iMapBC, 2013], and the limits of the underlying regionally mapped aquifers documented within the online Water Resources of BC (WRBC) atlas [BC MoE, 2014]. The LSA boundaries were informed by the results of preliminary numerical groundwater flow and particle tracking simulations and is defined as the area within which the project may be expected to cause changes to the groundwater flow system.</p> <p>Available hydrogeologic, geologic and geotechnical information from the Aberdeen area will be reviewed as part of the EA to consider the potential for the project to cause changes in groundwater flows that might influence groundwater conditions in the subdivision.</p>			EAO has reviewed the comments and considers the Proponent's response adequate.

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66	Ministry of Forests, Lands and Natural Resources Operations	1-Aug-14	Consider adding the following to the list of project components and activities that will be considered in the effects analysis: - Leaks and spills during operations (e.g., fuel and oil from machinery and vehicles) - Concentrate, ore, and overburden loading and transport	Environment - General	6.5.4	No	Yes	Leaks and spills during operations and related to transport will be addressed in Section 17.6 Accidents and Malfunctions. Concentrate, ore, and overburden <i>stockpiling</i> are already called out in the list of bullets this comment is referring to. It is not clear how <i>transport</i> of these materials would influence the assessment of groundwater quality beyond that considered in Accidents and Malfunctions			EAO has reviewed the comments and considers the Proponent's response adequate.
67	Ministry of Forests, Lands and Natural Resources Operations	1-Aug-14	KAM states that groundwater quality will be used as an input for the assessment of the significance of the potential residual effects under human health. • Consider using groundwater quality as an input to the assessment of Aquatic Life. Will also need to assess surface-groundwater interactions as part of this assessment. KAM lists provincial and federal water quality guidelines to be used for comparison purposes in the Appendices. This includes BC and Canadian Water Quality Guidelines for Drinking Water; BC Water Quality Guidelines for Livestock Water Supply and Irrigation Supply; and Canadian Water Quality Guidelines for the protection of Agricultural Water Use (Irrigation and Livestock). • Suggest including the BC and Canadian Guidelines for protection of Aquatic Life in these Appendices.	Surface water quality	6.5.5	No	no	Groundwater quality will be compared to aquatic life guidelines BC and Canadian Guidelines for protection of Aquatic Life in these Appendices.			EAO has reviewed the comments and considers the Proponent's response adequate.
68	Ministry of Forests, Lands and Natural Resources Operations	1-Aug-14	KAM states they are going to interpret the aquifer and aquitard locations in the study area, and characterize the bulk hydraulic conductivity for overburden and bedrock material. • Bulk hydraulic conductivity values for overburden and bedrock may not be adequate if there are discrete hydro stratigraphic units within the bedrock and overburden. Would like to see consideration given to the potential different hydro stratigraphic units within the bedrock such as fault zones and/or different lithological units. Also recommend considering discrete hydro stratigraphic units in the overburden. If there are continuous silts, clays, sands and/or gravels, or combinations of these lithology's we would like to see divisions in hydro stratigraphic units made. It is recommended to delineate and characterize all the hydro stratigraphic units as best as possible and include monitoring points in each of these units.	Groundwater quantity	6.6.2	No	Yes	Hydraulic conductivity and water level data will be considered for discrete hydrostratigraphic units interpreted based on borehole data, mapped aquifers and lithologies. A pumping test is planned for the characterization of hydraulic properties and delineation of the Peterson Creek sand and gravel aquifer. Hydrogeologic investigations are also proposed for characterization of any mapped or interpreted fault zones that may be identified in the project area. The basis for defining individual hydrostratigraphic units will be explained in the Application/EIS.			EAO has reviewed the comments and considers the Proponent's response adequate.
69	Ministry of Forests, Lands and Natural Resources Operations	1-Aug-14	<i>Removed duplication</i>	N/A	6.5.2		n/a	n/a			N/A

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70	Ministry of Forests, Lands and Natural Resources Operations	1-Aug-14	KAM states additional monitoring wells will be installed as required to adequately address potential impacts from facilities as the mine plan is advanced. • I would like to emphasize the importance of long-term continuity in groundwater monitoring. Consider adding any additional monitoring wells as soon as possible to ensure adequate data coverage.	Groundwater quality	6.6.3	Yes	n/a	Acknowledged			EAO has reviewed the comments and considers the Proponent's response adequate.
71	Ministry of Forests, Lands and Natural Resources Operations	1-Aug-14	Consider adding MRSF features to the groundwater recharge and quality assessment, such as: • The application/EIS will predict the rate of tailings pore water leakage through the base of the TSF and MRSF features becoming groundwater recharge and the resulting groundwater quality due to this leakage. • An analytical or numerical seepage model of the TSF and MRSFs to identify main areas of potential seepage issues.	Groundwater quality	6.6.4	No	No	Added WRSF to text sections as suggested.			EAO has reviewed the comments and considers the Proponent's response adequate.
72	Ministry of Forests, Lands and Natural Resources Operations	1-Aug-14	10.2.4 potential Effects of the Project and Proposed Mitigation (p. 148 of 202) Domestic water quality is considered a VC for human health. • Consider adding groundwater quality to the discussion in this section. Are there any domestic groundwater users in the LSA and RSA boundaries? What is proposed for identifying and assessing impacts to existing groundwater users? Please note that the Ministry of Environment's online water well database is a voluntary database and should not be relied on as a complete indicator of all water wells in the LSA or RSA.	Health - general	10.2.4	No	Yes	Groundwater ingestion is incorporated into the HHERA			EAO has reviewed the comments and considers the Proponent's response adequate.
73	Ministry of Transportation and Infrastructure	22-Jul-14	The revised mine layout identifies that a portion of Goose Lake Road will be covered by the Tailings Storage Facility. The Ministry will require a detailed map and property information identifying the private and Crown lands in the area. Once the Ministry receives the information, we will commence our review of the possibility of the road closure or if we will require the road to be re-routed on a different alignment. This information is not outlined in the Revised AIR. Given, the revised layout is reliant on the closure, the Ministry requests this be included in the report.	Infrastructure, Public Facilities and Services	8.4	Yes	Yes	As outlined in the last sentence of Section 3.16, details regarding access management will be included in a Traffic Impact Study. Detailed maps will be provided in the Application/EIS.			EAO has reviewed the comments and considers the Proponent's response adequate.

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74	Ministry of Transportation and Infrastructure	22-Jul-14	The report did not address the Review of the construction schedule, campsite locations and the impact the construction phase may have on the existing infrastructure. Given the traveling public utilizes the existing roads adjacent to the proposed mine operations, the Ministry requests the construction and campsite details are included in the report.	Infrastructure, Public Facilities and Services	3.16	No	no	As outlined in Section 8.2, the temporal scope of the assessment for Infrastructure, Public Facilities, and Services includes construction. Topics to be considered include housing and transportation. This information will be provided and assessed in the Application/EIS. KAM believes that the vast majority of the construction workforce will be able to find appropriate lodging within the city of Kamloops and the surrounding area. Specific camp sites are not planned for inclusion in the Application/EIS.			EAO has reviewed the comments and the Proponent's response. If accommodation camps are proposed as part of the Project, EAO may require additional information to support the assessment of these camps.
75	Ministry of Transportation and Infrastructure	22-Jul-14	A Traffic Impact Study (TIS) was mentioned in the report specific to "access and access management strategies"; however, it does not address bus pick up locations and car pool options. The Ministry requires additional details on car pool and bus pick up locations offered by KGHM to transport employees to and from the mine site. Depending on the proposed locations the Ministry may require site specific TIS to review the impact to the existing infrastructure. As such, we request this be included with the TIS discussion in the report.	Infrastructure, Public Facilities and Services	3.16	No	No	These details are not yet available but KAM is committed to engaging with the Ministry on proposed locations once options have been developed.			EAO has reviewed the comments and considers the Proponent's response adequate.
76	Ministry of Transportation and Infrastructure	22-Jul-14	Please note the List of Acronyms does not identify the Ministry of Transportation and Infrastructure (MoTI). We are mentioned in the report. As such, it may be worthwhile to include MoTI in the list.	N/A	List of Acronyms	No	n/a	AIR/EISG has been updated as suggested.			EAO has reviewed the comments and considers the Proponent's response adequate.
Comments #156-219 (SSN) - These comments from the Stk'emlúpsemc te Secwepemc Nation (SSN) have been managed and responded to separately. Refer to EAO's website for details.											
120	City of Kamloops	29-Aug-14	The current wording pertaining to the proximity of the Ajax project and its infrastructure to the City of Kamloops (City), needs to be revised to reflect that the project is immediately adjacent to the City limits. This will ensure that the general public do not misinterpret the mine location as being a great distance from the City.	Infrastructure, Public Facilities and Services	Preface Pg 1 & 2	Yes	no	The AIR/EISG has been updated to reflect this comment.	Regarding the location of the project to City limits, the last sentence of the first paragraph states that "Some ancillary facilities, including the exploration camp, administration building, and explosives storage, may be located just within the city boundaries." However, Section 2.2.2 on page 4 of 202 states that the primary components are proposed to be adjacent to but outside Kamloops city limits, and that the closest Project facility to the neighbourhood of Aberdeen is the EWRSF at approximately 1.7 km. How does the location of the EWRSF relate to the potential location of the ancillary facilities in terms of their proximity to the Aberdeen neighbourhood.	Any ancillary facilities being contemplated are further west than the EWRSF, and more distant from the Aberdeen neighbourhood.	EAO has reviewed the comments and considers the Proponent's responses adequate.

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121	City of Kamloops	29-Aug-14	Development of the AIR/EIS guidelines - The consultation of community groups section does not identify the community associations of Aberdeen, Pineview Valley and Knutsford as being consulted regarding this project. As these three communities will be impacted the greatest, why have they not been consulted to date? Proper consultation must take place with these missed community groups if not done so yet.	Community health and well-being	Pg. 5 & 6	No	Yes	KAM values input from all community groups in the Kamloops area. Small group engagement sessions have targeted members from the noted communities of concern. An open house has been held in Knutsford and two open houses were held in Kamloops. BC EAO's creation of a Community Advisory Group also assists in ensuring appropriate representation.	If the community associations of Aberdeen, Pineview Valley and Knutsford were adequately consulted, then why are they not included in the list of groups and agencies at the bottom of page 5, top of page 6?	KAM has held open houses in these neighbourhoods, however, they were not specifically designed to be related to development of the AIR/EISG, and the meetings were open to the public, they were not targeted at a specific group/agency.	EAO has reviewed the comments and the Proponent's response.
122	City of Kamloops	29-Aug-14	Under ' The Application/EIS will also state the following:', the fourth bullet needs to state That the project will then be referred back to local municipal responsible authorities as well.	Economic - General	1	No	no	The AIR/EISG has been updated to reflect this comment.			EAO has reviewed the comments and considers the Proponent's response adequate.
123	City of Kamloops	29-Aug-14	The wording regarding the location of the proposed Ajax project should be revised to state That the project is 'adjacent to the City of Kamloops boundary' rather Than 'south west of the City of Kamloops'.	Social - general	2.2.2	Yes	no	The AIR/EISG has been updated to reflect this comment.	As per Comment #120 noted above, how do the locations of the EWRSF and the ancillary facilities relate to each other in their proximate distance from the neighbourhood of Aberdeen?	Any ancillary facilities being contemplated are further west than the EWRSF, and more distant from the Aberdeen neighbourhood.	EAO has reviewed the comments and considers the Proponent's responses adequate.
124	City of Kamloops	29-Aug-14	The third paragraph, second sentence should include working stating that the length of required monitoring will allow be based on groundwater stabilization, and that there must be three years of data providing that stabilization.	Groundwater quantity	2.2.4	No	no	AIR/EISG text has been updated to reflect that the length, location, and frequency of monitoring after closure of the mine will be based on permit requirements at the time.			EAO has reviewed the comments and considers the Proponent's response adequate.
125	City of Kamloops	29-Aug-14	On the third bullet down, please provide some context around what "pollution" means.	Air quality	2.2.5	No	no	In this case, 'pollution' is generally referring to constituents of concern in emissions from the project (e.g., air, water, waste).	As a footnote, or some other way of providing clarity, please include the definition of the term 'pollution' as per the Proponent Response to Comment #125	It is not clear what value would be added to the AIR/EISG by adding such a footnote.	EAO has reviewed the comments and considers the Proponent's responses adequate.
126	City of Kamloops	29-Aug-14	Please add the following sub-bullets to the fourth bullet in this section:(1) A description of the Air shed Management Plan as it relates to the project; and (2) A description of the City's groundwater monitoring and open stability program as it relates to the project.	Community health and well-being	2.6	No	no	The AIR/EISG has been updated to reflect this comment.			EAO has reviewed the comments and considers the Proponent's response adequate.
127	City of Kamloops	29-Aug-14	Where it states that "material at the project that will be investigated for ML/ARD potential include overburden, pit walls, mine rock, ore low grade ore, tailings and borrow material, if required.' This should be a mandatory requirement.	Surface water quality	3.3	Yes	no	The 'if required' refers to borrow sources, not the investigation. For clarity, the text will be removed with the understanding that borrow sources may not ultimately be used by the Project.			EAO has reviewed the comments and considers the Proponent's response adequate.
128	City of Kamloops	29-Aug-14	Please provide a figure illustrating the pit design. Also, please provide a discussion of the mine rock going into the pit as backfill.	N/A	3.4.2	Yes	no	Additional description of backfill to the pit has been included in the AIR/EISG. Drawings of the pit design will be included in the Application/EIS.	The Proponent indicates in their response to Comment #128 that additional description of backfill to the pit has been included in the AIR/EIS, however, there is no such additional information provided in section 3.4.2. If additional information has been included elsewhere in the dAIR, please indicate its location	In Section 3.8.1, additional information was included to identify that "At the proposed capacity, approximately 1/6 of the pit volume would be backfilled."	EAO has reviewed the comments and considers the Proponent's responses adequate.

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129	City of Kamloops	29-Aug-14	Information pertaining to the impacts of changing from electric/hydraulic trucks to traditional trucks should be provided. Also, please confirm in this section that the air and noise related to all heavy equipment use on site will be included in the air/noise models.	Noise and Vibration	3.4.4	Yes	Yes	The noise assessment will include all trucks and heavy equipment use on site for air/noise modelling	The proponent's response to Comment #129 reads "The noise assessment will include all trucks and heavy equipment use on site for air/noise modeling". Please clarify that the air quality assessment will also include all trucks and heavy equipment use on site for air/noise modeling.	Yes, the air quality assessment will include all trucks and heavy equipment use on site.	EAO has reviewed the comments and considers the Proponent's responses adequate.
130	City of Kamloops	29-Aug-14	Please describe the difference between a collection system and a suppression system.	Air quality	3.6.1	Yes	no	Collection systems include apparatus such as cyclones and baghouses that physically collect and accumulate material, while suppression systems are methods such as covered stockpiles and water application that reduce generation of dust. Both methods are effective means of dust control.			EAO has reviewed the comments and considers the Proponent's response adequate.
131	City of Kamloops	29-Aug-14	The management plan for control of dust/debris and other material, which may affect the visibility of the traveling public, should be restored in the dAIR despite the new location of the tailings pond. Lac Le Jeune Road and possibly the Coquihalla Highway #5 could still experience visibility issues for the travelling public. Also, additional plans need to be included which are specific to the Tailings Storage Facility (TSF) including a Secondary Containment Plan, an Emergency Response Plan, monitoring Plan and a Contingency Plan. Although these plans were included in Section 11, they need to be included here also so that they contain information specific to the TSF. In light of the significant issues with the Mount Polley tailings impoundment, the move to a conventional tailings system in the Ajax Project is concerning. The Tailings facility is proposed to be located at the upstream end of the Peterson Creek Watershed. Being that Peterson Creek drains through downtown Kamloops and discharges into the South Thompson River approximately 900 m downstream from the City's river water intake, any issues related to the tailings facility could have significant negative impacts on Kamloops. It is imperative that the utmost care and attention be paid to designing, reviewing and double/triple checking this structure.	Air quality	3.7	Yes	Yes	Management of dust/debris from the TSF is still listed within section 3.7 of the AIR/EISG, though specific reference to visibility on Highway #5 was removed. The Proponent recognizes the importance of sound TSF design, and clearly communicating this in the Application/EIS. Section 17.6 (Accidents and Malfunctions) of the AIR/EISG requires an assessment of potential TSF failure.	In the first paragraph, why has reference to Highway 5 been removed? Also, please include a comment that all aspects of the TSF will be captured in the various management plans listed in Section 11.	Reference to Highway 5 was removed to help the reader recognize the change in project design. Where previously the dry-stack TSF was located immediately adjacent to Highway 5, with the updated General Arrangement the TSF is now east of Lac le Jeune Road. The design will be developed to maximize use of Best Available Technology and Management practices as per the recommendations from the Mt Polley investigation report. It is not clear the benefit of adding a reference to Section 11 specific to the TSF. All aspects of the Project will be captured as appropriate in the various management plans...	EAO has reviewed the comments and considers the Proponent's response adequate.
132	City of Kamloops	29-Aug-14	Please provide information about how much of this mine rock will be placed back into the pit. Will the pit be filled 1/4 full with mine rock, 1/2 full, etc.?	Environment - General	3.8	Yes	no	The pit will be approximately 1/6 backfilled based on the latest data. This number may vary based on updates and assessments of geological, geotechnical, and hydrological information.			EAO has reviewed the comments and considers the Proponent's response adequate.
133	City of Kamloops	29-Aug-14	Consider what, if any, increased recharge there may be to groundwater as a result of the MRSFs. Also, consider the impact of the MRSFs on additional see page generated. Pg. 33	Groundwater quantity	3.12	No	Yes	The effects of surface infrastructure (including mine waste management and stockpile materials) on recharge will be considered in the project design. See comment 58.	Although the proponent's response to Comment #133 did address effects on groundwater as a result of the MRSFs, the response did not address the issue of additional seepage which was also raised by the City.	WRSF seepage is discussed in Section 6.4.4, 6.5.4, and 6.6.4 of the AIR/EISG.	EAO has reviewed the comments and considers the Proponent's responses adequate.
134	City of Kamloops	29-Aug-14	Please provide details about what material will be used for capping access and site roads.	Infrastructure, Public Facilities and Services	3.16	No	no	Granular materials (Gravel) will be used as road sub-base, base and surfacing material.			EAO has reviewed the comments and considers the Proponent's response adequate.

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135	City of Kamloops	29-Aug-14	Recharge from reclaimed MRSFs should be assessed relative to Aberdeen groundwater stability.	Groundwater quantity	3.18	No	Yes	<p>Potential increases (and decreases) to groundwater recharge through the WRSFs will be simulated as a sensitivity study with the numerical groundwater flow model. Recharge and seepage will be assessed in the context of the project and down gradient receiving environment. If project induced changes to the groundwater flow system may potentially affect the Aberdeen Subdivision they will be assessed in the context of slope stability in Aberdeen.</p> <p>It should be noted that the revised GA includes the relocation of the former NWRSF to the south (i.e., to the SWRSF) and a significantly reduced EWRSF design, project development upslope from Aberdeen is reduced, and therefore the risk of increased recharge through the WRSFs potentially leading to slope instability has been significantly reduced. See also response above for Comment 65.</p>			EAO has reviewed the comments and considers the Proponent's response adequate.
136	City of Kamloops	29-Aug-14	In the Temporal Boundaries section, preconstruction must also be discussed.	Environment - General	5.1.3	No	no	Any preconstruction activities planned will be discussed in the Application/EIS. .			EAO has reviewed the comments and considers the Proponent's response adequate.
137	City of Kamloops	29-Aug-14	Under the City of Kamloops section "Aberdeen groundwater control and monitoring program" needs to be included as a fourth sub-bullet.	Groundwater quantity	5.1.6.1	No	no	KAM would propose data sharing agreement between the City and the Mine to consider the results in both areas. Specific mitigation and monitoring programs, if required, will be proposed based upon the results of the effects assessment. See also comment #135 and # 65			EAO has reviewed the comments and considers the Proponent's response adequate.
138	City of Kamloops	29-Aug-14	In the "Interaction with Project/potential Effects" section of the table, Inks Lake needs to be added back in specific to dust related concerns especially during pre-construction and construction. What are the impacts of dust settling in Inks Lake?	Air quality	6.3.1	Yes	Yes	Dust deposition directly to water bodies is considered. It is a model output passed to the aquatics discipline. If the dispersion model indicates deposition at Inks Lake, effects will be assessed.			EAO has reviewed the comments and considers the Proponent's response adequate.
139	City of Kamloops	29-Aug-14	This section states that monitoring stations are shown on Figure 6.3, however, the stations are not included on the figure. Please add them.	Surface water quality	6.3.2	No	no	Monitoring stations will be added to the figure.			EAO has reviewed the comments and considers the Proponent's response adequate.
140	City of Kamloops	29-Aug-14	Where referring to the objectives of the model, there needs to be a discussion on the impacts of dust from the site that is deposited aerially into nearby water bodies (i.e., not via direct discharge).	Air quality	6.3.4	No	Yes	Dust deposition directly to water bodies is considered. It is a model output passed to the aquatics discipline.			EAO has reviewed the comments and considers the Proponent's response adequate.
141	City of Kamloops	29-Aug-14	The tracking table committed to studying evaporation rates as part of hydrometeorology rates. Where is this? It also commits to including chemical binding agents. These should both be included.	Surface water quantity	6.4.4	No	Yes	<p>Evaporation will be estimated for the site using standard empirical and theoretical methods.</p> <p>The revised Project will utilize a conventional tailings facility, not the thickened/paste tailings in the previous design, therefore chemical binding agents will not be included in the model</p>	The proponent's response addresses the issue of chemical binding agents but does not fully address the concern regarding the issue of evaporation rates. If these are to be estimated for the site as indicated in the proponent's response, then why has 'evaporation rates' been removed from the bulleted list of project activities that could affect the hydrological regime?	"Evaporation rates" was removed from the bulleted list, because the list outlines "Project activities that could affect the hydrological regime". Evaporation, while it will occur, and is important to the water balance, is not a "Project activity".	EAO has reviewed the comments and considers the Proponent's responses adequate.

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142	City of Kamloops	29-Aug-14	This section must also include in the impact of the MRSFs on seepage (as indicated in Version F of the dAIR).	Groundwater Quantity	6.4.5	No	Yes	The AIR/EISG text in Section 6.6.4 has been updated to reflect this.			EAO has reviewed the comments and considers the Proponent's response adequate.
143	City of Kamloops	29-Aug-14	The tracking table commits to including chemical binding agents. This should be added as a bullet under "project components and activities that will be considered".	Groundwater quantity	6.5.4	No	Yes	The revised Project will utilize a conventional tailings facility, not the thickened/paste tailings in the previous design, therefore chemical binding agents will not be used.			EAO has reviewed the comments and considers the Proponent's response adequate.
144	City of Kamloops	29-Aug-14	The "Groundwater quantity was selected as a VC for its importance to humans for drinking water, and livestock and irrigation water" sentence needs to be expanded to include "and its importance in controlling ground stability of certain parts of the SW section (also referred to as the Aberdeen area of Kamloops)".	Groundwater quantity	6.6.1	No	Yes	Note that the public concern that upslope development for the project might exacerbate the slope instability conditions in Aberdeen captures this consultation. See also responses to comments 65, 135 and 137.			EAO has reviewed the comments and considers the Proponent's response adequate.
145	City of Kamloops	29-Aug-14	Where it states "Existing well locations are shown on Figure 6.5B", the wells are not actually included. These wells need to be added and the figure must also include the wells in the Aberdeen area.	Groundwater quantity	6.6.2	No	no	Groundwater monitoring points will be included on the figure.			EAO has reviewed the comments and considers the Proponent's response adequate.
146	City of Kamloops	29-Aug-14	In the paragraph that starts out with "the Application/EIS will predict the rate of tailings pore water...", the Groundwater and resulting run out of MRSFs (during construction and post rehabilitation) needs to be included. When the Application describes the methods and results of assessments to evaluate potential effects associated with post-closure on groundwater quantity, it should be specified that it needs to be until the pit reaches equilibrium.	Groundwater quality	6.6.4	No	Yes	WRSFs have been added as suggested. Evaluation of the pit lake during post-closure is on-going. The Application/EIS will provide more details related to predicted post-closure conditions and time frames.			EAO has reviewed the comments and considers the Proponent's response adequate.
147	City of Kamloops	29-Aug-14	Coyotes, black bear, cougars, and yellow bellied marmots are known species that all utilize the proposed mine area and must be included in this section.	Mammals	6.17.1	No	no	A list of all mammal species detected during field surveys will be provided in the assessment as species that use the LSA			EAO has reviewed the comments and considers the Proponent's response adequate.
148	City of Kamloops	29-Aug-14	In Figure 7.1B, the Local Study Area boundaries need to be expanded to the east and south of the project (right now the LSA boundaries stop immediately to the east of the project site).	Labour force, Employment and Training	7.2.3	Yes	no	Local Study Area boundaries have been defined in a manner that corresponds largely to administrative boundaries for purposes of data collection and effects assessment. Where there are specific effects or concerns that are raised in the immediate vicinity of the Project, they will be discussed.		Note that the LSA was expanded based on the City's comment. The LSA for the Labour Force, Employment and Training VC consists of Kamloops, Savona, and Knutsford and the Project First Nations: the Tk'emlups te Secwepemc and the Skeetchestn Indian Band. Most of the Ajax employees are expected to be either sourced from this immediate area or at least temporarily residing in the area. With respect to the LSA's professional workforce, it is most likely that they reside within the LSA as well.	EAO has reviewed the comments and considers the Proponent's response adequate.
149	City of Kamloops	29-Aug-14	Section 7.2.4 (Potential Effects of the Project and Proposed Mitigation) – The adverse effects that are identified and analyzed need to include jobs potentially at risk due to the mine.	Labour force, Employment and Training	7.2.4	No	no	If studies indicate that jobs may be at risk as a result of the Project, then the effect will be considered.			EAO has reviewed the comments and considers the Proponent's response adequate.

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150	City of Kamloops	29-Aug-14	Upper Sahali needs to be added as a specific area of concern in relation to property values.	Economic - General	7.5.1	No	no	Upper Sahali will be included in the property values discussion.			EAO has reviewed the comments and considers the Proponent's response adequate.
151	City of Kamloops	29-Aug-14	Recreational use should be included as a separate bullet.	Land and Resource Use	8.5.2	No	Yes	Outdoor recreational use will be addressed in detail under the Outdoor Recreation VC.			EAO has reviewed the comments and considers the Proponent's response adequate.
152	City of Kamloops	29-Aug-14	In the Information Sources row of the table, the Kamloops Air shed Management Plan needs to be listed.	Air quality	10.1-1	No	no	This will be updated as suggested.			EAO has reviewed the comments and considers the Proponent's response adequate.
153	City of Kamloops	29-Aug-14	The tracking table commits to showing confidence in results. This needs to be included.	Community health and well-being	10.3.7	No	Yes	Confidence in modelling results is included in Section 5.1.1 of the AIR/EISG.			EAO has reviewed the comments and considers the Proponent's response adequate.
154	City of Kamloops	29-Aug-14	Vibration should not only be considered as a human health VC, but allow as it relates to City and private infrastructure.	Noise and Vibration	10.4.1	No	no	The vibration assessment will consider the Project vibration effect on the city and private infrastructure due to Project activities			EAO has reviewed the comments and considers the Proponent's response adequate.
155	City of Kamloops	29-Aug-14	Regarding sound levels of equipment, it is imperative that the Application fully considers loaded trucks that are going uphill and downhill, while utilizing engine brakes. This will reflect what the true noise conditions of the mine may be.	Noise and Vibration	10.4.4.1	No	no	The noise emission of an unloaded and a loaded truck will be considered in the assessment. Noise event associated with engine brakes (if applicable) will be considered as well.			EAO has reviewed the comments and considers the Proponent's response adequate.
Comments #156-219 (SSN) - These comments from the Stk'emlúpsenc te Secwepemc Nation (SSN) have been managed and responded to separately. Refer to EAO's website for details.											
220	Interior Health	29-Aug-14	As per request, comments on the revised June 30, 2014 Application information Requirements/Environmental Impact Statement Guidelines (AIR/EISG) follow. Comments should be taken in the context of previous correspondence from Interior Health - Health protection (IH-HP), in particular the four-page October 28, 2013 letter describing IH-HP involvement and non-involvement, and the importance of seeking input from others for topics such as slope stability.	N/A		No	Yes	Noted. No response required.			EAO has reviewed the comments and considers the Proponent's response adequate.
221	Interior Health	29-Aug-14	The providing of a Word document by the EAO highlighting the amendments is greatly appreciated. In That the AIR/EISG Review process is preliminary to possible future certificate and permit application, it should be understood That comments on this 202 page June 30, 2014 AIR/EISG are of a broader nature. IF this project moves to the certificate issuance and permit application phase, IH-HP will work with other agencies such as Health Canada with expertise and focus on such projects.	N/A		No	Yes	Noted. No response required.			EAO has reviewed the comments and considers the Proponent's response adequate.

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222	Interior Health	29-Aug-14	IH-HP expects full disclosure of all potential health impacts along with clearly acknowledged methods of mitigation to prevent a PHA health hazard. Much of the context of the 202 page AIR/EISG document is individually well-defined and described with some repeat. Missing is assurance that everything is being covered off. Accordingly, the document could benefit from inserting a general statement acknowledging this broader responsibility. With aspects of public concern coming forward, such as hexavalent chromium, uranium, country foods, and the wide dispersion of airborne particulates to name a few, the AIR/EISG should accommodate this continuation of concerns through a clear reflection of inclusive responsibility. In this context, I have concern over the words 'if required' being inserted in the revised AIR/EISG in Part 3.3 in relation to Metal Leaching and Acid Rock Drainage investigation.	Environment - General		Yes	no	The language 'if required' was in specific reference to 'borrow sources', which may not be required; however, for clarity, this wording has been removed.			EAO has reviewed the comments and considers the Proponent's response adequate.
223	Interior Health	29-Aug-14	Site water balance is uncertain and a numerical mass balance model is indicated for surface and groundwater receiving direct discharge or seepage respectively. Research and modeling is beneficial, as experience reflects That predicted discharges can vary considerably from actual discharges. Such differences can impact the receiving environment, whether it be through surface or groundwater, or airborne into Lakes and streams, or onto the land and crops. Once determined, water flow direction is more consistent Then air flow subject to daily meteorological variations and direction changes.	Surface water quantity		No	Yes	The EA studies will include groundwater, surface water and air quality modeling and the project will include monitoring for these systems.			EAO has reviewed the comments and considers the Proponent's response adequate.
224	Interior Health	29-Aug-14	To accommodate air flow uncertainty, it would be appropriate to enable the AIR/ESIG to be open to a wider geographic distribution of airborne components to cover off both country and non-country (commercial) foods, including those grown in backyard urban gardens, plus exposure through dermal contact with settled material.	Air quality		No	Yes	The HHERA will incorporate metal uptake into backyard garden and community garden produce as part of the assessment of current and potential future exposures. It will not incorporate a market based survey of commercially grown or produced foods that come frm a wide geographihc area that will not be affected by project operations.			EAO has reviewed the comments and the Proponent's response.
225	Interior Health	29-Aug-14	Concerns around the geographic area of coverage allow exist for the noise component, and until much more is known, I am not comfortable with not including the entire City of Kamloops at minimum.	noise and vibration		No	Yes	The assessment will consider sensitive receptors within the City of Kamloops, as developed in consultation with the community.			EAO has reviewed the comments and considers the Proponent's response adequate.
226	Interior Health	29-Aug-14	In wider context, an energy component to the AIR/EISG could tie into the Greenhouse Gas Management portion and also bring awareness to public transportation and safety, something that appears to be missing as a stand-alone topic. Localized and long haul road traffic can present safety concerns and stress public road infrastructure, and depending upon the method of haulage (road, rail, ship), can impact areas of thoroughfare and receiving ports.	greenhouse gas management		No	Yes	The Proponent is developing a Traffic Impact Assessment, which will address safety and stress on local road infrastructure. Refer to section 8.2.			EAO has reviewed the comments and considers the Proponent's response adequate.

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Comments #227-338 (Whispering Pines/Clinton Indian Band) are being considered by the Canadian Environmental Assessment Agency.											
339	TNRD, MCIP Planner	23-Sep-14	Planning services has reviewed the June 2014 update of the draft Application Information Requirements/Environmental Impact Statement Guidelines (DAIR) for KGHM Ajax Mining Inc., Ajax Project. We acknowledge the applicants amended site plan and land use changes as described and illustrated in KGHM's May 2014 brochure entitled, "We've Listened". At this time, we wish to underscore the validity of our previous comments dated September 30, 2011 and August 3, 2012 as they apply to the revised mine development plans. In light of the revised site plans, we forward the following new comments:	Environment - General		No	yes	Acknowledged.			EAO has reviewed the comments and considers the Proponent's response adequate.
340	TNRD, MCIP Planner	23-Sep-14	Our previous concerns related to the loss of Inks Lake have found some relief with the proposed Tailings Storage Facilities being shifted to the southeast away from Inks Lake. On the other hand, the new Tailings Storage Facility location will result in the loss of Goose Lake and much of Goose Lake Road. Goose Lake is designated as a Natural Environment lake in the TNRD's Lakeshore Development Guidelines (LDG) as a result of the lake being used for environmental education uses. The proposed complete loss of Goose Lake would obviously not comply with the LDG management guidelines. We trust that the proposed loss of this lake will be scrutinized with as much detail as the Inks Lake tailings facility location, with an eye to mitigating similar environmental and social impacts. Unfortunately, the technical impacts and mitigation are beyond our scope of planning expertise and bylaw jurisdiction. Nonetheless, if the proposal proceeds with this land use configuration, we would recommend a 'no net loss' model whereby a suitable wetland for environmental education use is re-established in the area, for example, to compensate for the loss of the lake.	Environment - General		Yes	No	Acknowledged. The potential effects on Goose Lake and mitigation measures will be included in the Application/EIS.			EAO has reviewed the comments and the Proponent's response.
341	TNRD, MCIP Planner	23-Sep-14	Under Section A, Clause 2, a mine public consultation list is provided. The list does not include the Kamloops Shotgun Sports Group (operators of clay and skeet range off Lac le Jeune Road, just northwest of Wallender Lake), School District No. 73 (loss of Goose Lake Road may impact school bus route) or the Lac le Jeune/ Walloper Lake area residents (these residents would most likely make up the bulk of year round trip generators on Lac le Jeune Road). We recommend that these groups be included on this list.	Land and Resource Use		Yes	No	KAM values input from all community groups in the Kamloops area. BC EAO's creation of a Community Advisory Group also assists in ensuring appropriate representation. KAM will continue to engage with community groups and local stakeholders.			EAO has reviewed the comments and considers the Proponent's response adequate.
342	TNRD, MCIP Planner	23-Sep-14	Under Section B, Clause 1, we recommend that a reference amendment be made to the fourth bullet to include the following: "...referred back to local municipal and regional responsible authorities..."			No	No	The AIR/EISG will be revised to reflect this comment.			EAO has reviewed the comments and considers the Proponent's response adequate.

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343	TNRD, MCIP Planner	23-Sep-14	We acknowledge and appreciate the applicants commitment under Section 8.5.2 to "consider" community land use planning (regional and municipal) in the context of mine development and operation. We have provided bylaw and policy planning advice under previous correspondence. During a recent joint agency discussion, we suggested that the applicant consider the impacts and needs of short-term construction personnel with a planned, on-site construction camp for the construction phase. Planning of this nature will hopefully discourage camping and recreational vehicle use in unapproved areas or in existing regional or municipal campgrounds where long-term recreational vehicle use may not be permitted.	Outdoor Recreation	8.5.2	No	yes	Decisions related to construction camp will be included in the project description. The Application/EIS will address topics related to temporary housing under Infrastructure, Public Facilities and Services.			EAO has reviewed the comments and considers the Proponent's response adequate.
344	Canadian Environmental Assessment Agency	30-Sep-14	The figures print to letter size scale even when printing on paper sized 11 x 17. Please enable figures to be scaled to print on 11 x 17 paper. Please include a figure of the overall site that includes all project infrastructure, such as the processing facility, explosives facility and truck stop. Please also label the roads (e.g., Goose Lake Road, Lac Le Jeune Road, Inks Lake Road, etc.) and waterbodies in the Project area on this figure. In an appropriate figure, please identify the locations of the Tailings Embankment Mine Rock Storage Facility (TEMRSF) and the tailings embankment.	N/A		Yes	No	Figures have been updated.			EAO has reviewed the comments and considers the Proponent's response adequate.
345	Canadian Environmental Assessment Agency	30-Sep-14	The Project also includes a metal mill with an ore input capacity of 4,000 tonnes per day or more, which is listed in the Comprehensive Study List Regulations. Please reference the metal mill when discussing the Comprehensive Study List Regulations here and throughout the document.	N/A		No	No	Reference to a metal mill has been included.			EAO has reviewed the comments and considers the Proponent's response adequate.
346	Canadian Environmental Assessment Agency	30-Sep-14	Please specify the source of the water required for the TSF	surface water quantity		Yes	No	Water is to be sourced from Kamloops Lake			EAO has reviewed the comments and considers the Proponent's response adequate.
347	Canadian Environmental Assessment Agency	30-Sep-14	The meteorological stations and airport are not apparent in figure 10.1-1. Please add the meteorological stations to the map/legend.	N/A	10.1	No	No	Figure has been updated			EAO has reviewed the comments and considers the Proponent's response adequate.
348	Canadian Environmental Assessment Agency	30-Sep-14	Please provide a clear description of the boundary for the Project footprint.	N/A		Yes	No	The "Infrastructure Footprint" as illustrated on the maps is derived by using GIS to merge the various individual data layers from Figure 2.2-2 (General Arrangement) to depict the full extent of anticipated direct disturbance.			EAO has reviewed the comments and considers the Proponent's response adequate.
349	Canadian Environmental Assessment Agency	30-Sep-14	Please add the marker for the boundaries of the local and regional study areas to the map legend	N/A		Yes	No	RSA and LSA are already listed in the map legends.			EAO has reviewed the comments and considers the Proponent's response adequate.

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350	Canadian Environmental Assessment Agency	30-Sep-14	The monitoring sites are not apparent in figure 6.3-1. Please add the monitoring sites to the map/legend. The Agency notes that monitoring stations or sampling sites are referenced frequently throughout the AIR/EIS Guidelines; however, this comment that these features are not present on the corresponding maps is a recurring theme. Please adjust all figures appropriately where monitoring stations or sampling sites are referenced.	Environment - General	6.3	Yes	No	Figure has been updated			EAO has reviewed the comments and considers the Proponent's response adequate.
351	Canadian Environmental Assessment Agency	30-Sep-14	Kamloops Lake is not included in the LSA or the RSA. Please provide a rationale for the exclusion of Kamloops Lake in the LSA and RSA, since freshwater will be withdrawn from Kamloops Lake to support activities at the Project site.	Surface water quantity		No	No	The hydrologic impacts of the proposed withdrawals on Kamloops Lake will be evaluated as part of the effects assessment. Because the watershed area of Kamloops Lake at the abstraction point is so large, it was difficult to graphically represent this as part of the LSA or RSA. As a result, it was decided not to include the abstraction within the LSA or RSA boundaries, although it will be evaluated			EAO has reviewed the comments and considers the Proponent's response adequate.
352	Canadian Environmental Assessment Agency	30-Sep-14	Please replace NRCan with EC as an applicable Working Group government Agency	N/A		No	No	The AIR/EISG will be revised to reflect this comment.			EAO has reviewed the comments and considers the Proponent's response adequate.
353	Canadian Environmental Assessment Agency	30-Sep-14	According to Table 6.5.1, the temporal scope includes the construction phase. Please adjust the temporal boundaries in Section 6.5.3 so they are consistent with Table 6.5.1	Land and Resource Use	6.5	No	No	The AIR/EISG will be revised to reflect this comment.			EAO has reviewed the comments and considers the Proponent's response adequate.
354	Canadian Environmental Assessment Agency	30-Sep-14	Please identify Keynes Creek, Humphrey Creek and Goose Lake on an appropriate figure.	Surface water quantity		Yes	No	The AIR/EISG will be revised to reflect this comment.			EAO has reviewed the comments and considers the Proponent's response adequate.
355	Canadian Environmental Assessment Agency	30-Sep-14	It is not clear from Figure 6.7.1 that the local study area includes the area adjacent to the water intake site on Kamloops Lake. On the figure, the Regional Study Area clearly extends to Kamloops Lake, but it is not clear if the LSA and RSA overlap along the intake pipeline to Kamloops Lake. Please provide clarity of the distinction between the LSA and RSA on figure 6.7-1. Would the LSA be two discrete areas?, etc.	Surface water quantity	6.7	Yes	No	Figure has been updated			EAO has reviewed the comments and considers the Proponent's response adequate.
356	Canadian Environmental Assessment Agency	30-Sep-14	Please include the LSA on Figure 10.1-1	Land and Resource Use	10.1	Yes	No	Figure has been updated			EAO has reviewed the comments and considers the Proponent's response adequate.
357	Canadian Environmental Assessment Agency	30-Sep-14	Please specify that information provided for Aboriginal groups in the Application/EIS, including information on current use of lands and resources for traditional purposes, will be provided for each group rather than as a collective set of information for all of the Aboriginal groups.	Aboriginal - Part C		No	No	Sections 13 and 14 will include Aboriginal-group-specific tables, and text describing issues raised and mitigation or accommodation measures.			EAO has reviewed the comments and considers the Proponent's response adequate.

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358	Canadian Environmental Assessment Agency	30-Sep-14	This Section will need to specify that the proponent will submit a standalone EIS Summary document along with the EIS. To facilitate public participation, a summary of the EIS will be available in both official languages on the Agency's website. Please note that the Agency requests a French translation of the EIS Summary for the public comment period and recommends the inclusion of the translated summary as a commitment in the AIR / EIS Guidelines.	N/A		No	No	Text has been updated to reflect that a summary document will be prepared in both English and French.			EAO has reviewed the comments and considers the Proponent's response adequate.
359a	Canadian Environmental Assessment Agency	30-Sep-14	"1. In Section 3.12 of the revised Application Information Requirements / Environmental Impact Statement Guidelines (AIR / EIS Guidelines), include additional detail about the design and water balance of the Tailings Storage Facility (TSF). Specify whether the TSF will be a "zero discharge" facility. Please indicate whether the mine site will be at a water deficit, surplus or balance. In an appropriate section of the AIR / EIS Guidelines, provide details on the location and dimensions of the embankments, and the capacity of the TSF.	surface water quantity	3.12	Yes	No	The site wide water balance is being developed for the project and will be provided with the EA Application.			EAO has reviewed the comments and considers the Proponent's response adequate.
359b	Canadian Environmental Assessment Agency	30-Sep-14	2. In Section 17.6, include the requirement for a qualitative Failure Modes and Effects Analysis (FMEA) to inform the assessment of environmental effects resulting from accidents and malfunctions. An FMEA is a qualitative methodology that provides a structured and transparent analysis of: <ul style="list-style-type: none"> • The likelihood of hypothetical failure of structures, equipment, or processes, and variation from assumptions made during design and estimates; and • The effects or consequences of such failures, particularly on the surrounding ecosystem (including human health and safety) 	surface water quantity	17.6	Yes	No	The AIR/EISG will be revised to reflect this comment.			EAO has reviewed the comments and considers the Proponent's response adequate.

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359c	Canadian Environmental Assessment Agency	30-Sep-14	<p>3. In Section 17.6, include the requirement for a quantitative dam break analysis to support the evaluation of environmental effects resulting from a failure of the TSF (worst case scenarios).</p> <p>The AIR / EIS Guidelines should identify the analytical methodologies to be used to conduct the dam break analysis, as well as the failure modes to be assessed. For technical guidance on dam safety analysis for tailings management facilities, Natural Resources Canada recommends that the proponent refer to guidance published by the Canadian Dam Association and International Commission on Large Dams.</p> <p>The dam break analysis must include an assessment of environmental effects of a catastrophic TSF dam failure, including impacts to relevant Valued Components, such as surface water and groundwater quality and quantity, fish and fish habitat, and human health, as well as resulting impacts to Aboriginal groups, including effects on their current use of lands and resources for traditional purposes.</p> <p>4. Environment Canada notes that section 4.3.4 the Environmental Code of Practice for Metal Mines (2009) (available at http://ec.gc.ca/lcpe-cepa/default.asp?lang=En&n=CBE3D59-1) addresses the long term stability of tailings management facilities. Recommendations B218 and B219 provide</p>	surface water quantity	17.6	Yes	No	Text has been revised. The project is planning to perform a dam break analysis for inclusion into the EA application. The parameters for the analysis are being developed and will form the basis of the analysis.			EAO has reviewed the comments and considers the Proponent's response adequate.
360	Canadian Environmental Assessment Agency	30-Sep-14	<p>For the significance evaluation methodology outlined in Section 5, probability (i.e., likelihood that an adverse effect will occur) will be considered with magnitude, geographic extent, duration, frequency, reversibility and context. This methodology is not consistent with the federal approach for the evaluation of significance. As outlined in the Reference Guide for the Canadian Environmental Assessment Act: Determining Whether a Project is Likely to Cause Significant Adverse Environmental Effects (Prepared by the Federal Environmental Assessment Review Office - November 1994) (Reference Guide), likelihood is considered after the significance evaluation that includes magnitude, geographic extent, duration and frequency, reversibility, and ecological context. The significance evaluation for the federal EA must be consistent with the federal guidance for the evaluation of significance to meet the requirements of the former Act. While Section 17.9 notes that the significance assessment will follow the federal guidelines outlined in the Reference Guide, please clarify that the significance analysis methodology outlined in Section 5 of the AIR/EIS Guidelines does not match the Reference Guide exactly, and that the significance assessment methodology in Section 17 will differ from the significance assessment methodology outlined in Section 5.</p>	Environment - General	5; 17.9	No	No	This direction appears to be inconsistent with guidance provided by EAO. It would be preferable to have consistent methodology throughout the document. No edit made at this time.		Clarifying text was added in Section 5.1.5 of the AIR regarding how Likelihood is considered in the assessment of significance. This language was provided by EAO	EAO has reviewed the comments and considers the Proponent's response adequate.

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361	Canadian Environmental Assessment Agency	30-Sep-14	Please note that the comment above regarding the federal significance evaluation approach applies to the significance evaluation approach for the cumulative effects assessment. The significance evaluation for cumulative effects must be consistent with the federal guidance for the evaluation of significance to meet the requirements of the former Act. Please clarify that the significance analysis methodology outlined in Section 5 of the AIR/EIS Guidelines does not match the Reference Guide exactly, and that the significance assessment methodology in Section 17 will differ from the significance assessment methodology outlined in Section 5.	N/A	5	No	No	This direction appears to be inconsistent with guidance provided by EAO. It would be preferable to have consistent methodology throughout the document. No edit made at this time.		Clarifying text was added in Section 5.1.5 of the AIR regarding how Likelihood is considered in the assessment of significance. This language was provided by EAO	EAO has reviewed the comments and considers the Proponent's response adequate.
362	Fisheries and Oceans Canada	30-Sep-14	On November 25, 2013, the fisheries protection provisions of the Fisheries Act came into force, containing a new prohibition that combines the previous section 32 and section 35 of the Fisheries Act into a new Section 35. The new prohibition manages threats to fish that are part of or support commercial, recreational or Aboriginal (CRA) fisheries with the goal of ensuring their ongoing productivity and sustainability. The DFO Projects Near Water website has been updated with new information and requirements. http://www.dfo-mpo.gc.ca/pnw-ppe/index-eng.html . This includes information on the changes to the Fisheries Act, new policies and guidance documents, a list of project activities and criteria where DFO review is not required, and Measures to Avoid Causing Harm to Fish and Fish Habitat detailing applicable best practices. The former habitat protection provisions of the Fisheries Act (e.g. HADD), policies and guidance materials, including Operational Statements, no longer apply...	Fish populations and fish habitat		No	No	The text will be revised to reflect the changes to the Fisheries Act; reference to Operational Statements will be removed as these are no longer available.			EAO has reviewed the comments and considers the Proponent's response adequate.
362 (Cont'd)	Fisheries and Oceans Canada	30-Sep-14	... The EIS should reflect the current legislation, policies and guidance material with respect to the Fisheries Act. The current guidance material should be used to guide you in the determination of the scale and extent of serious harm to fish and fish habitat and if required, the development of an appropriate offsetting plan. All references to the former habitat protection provisions of the Fisheries Act and policies including Habitat Alteration Disruption and Destruction of Fish Habitat (HADD), Fish Habitat Compensation Plan, operational statements etc. should be updated to reflect the current terminology and scope of the fisheries protection provisions of the Fisheries Act and the supporting policies and guidance material.	Fish populations and fish habitat		No	No	The text will be revised to reflect the changes to the Fisheries Act; reference to Operational Statements will be removed as these are no longer available.			EAO has reviewed the comments and considers the Proponent's response adequate.

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363a	Fisheries and Oceans Canada	30-Sep-14	In addition to the identified information for Rainbow Trout VEC, it is also important to know the different fish species known to utilize the waterbodies to understand potential linkages with other CRA fisheries including forage fish species. Please provide a list of fish species, their abundance, and distribution as it relates to life history stages, known to utilise each of the potentially impacted waterbodies and waterways.	Fish populations and fish habitat		Yes	No	This information will be provided in the Application.			EAO has reviewed the comments and considers the Proponent's response adequate.
363b	Fisheries and Oceans Canada	30-Sep-14	In the case of Goose Lake, where preliminary monitoring indicates possible fish absence, due to an apparent lack of surface flow connectivity with other water bodies and a potential lack of overwintering habitat, sufficient level of baseline monitoring (seasonal fish surveys, overwintering habitat mapping and confirmation of lack of surface flow connections during high water) should be undertaken to support the final classification.	Fish populations and fish habitat		Yes	No	This information will be provided in the Application.			EAO has reviewed the comments and considers the Proponent's response adequate.
364	Natural Resources Canada (NRCan)	30-Sep-14	NRCan requests a 3D numerical groundwater flow model be developed based on the conceptual model for the Project area. This commitment should be included in the AIR / EIS Guidelines. Please include the rationale for the selected model and the modelling objectives in the Application / EIS, and specify in the AIR / EIS Guidelines that this information will be provided in the Application / EIS.	Groundwater quantity		No	No	The AIR/EISG will be revised to reflect this comment.			EAO has reviewed the comments and considers the Proponent's response adequate.
365	Natural Resources Canada (NRCan)	30-Sep-14	Please add a commitment to Section 6.6 for a sensitivity analysis that will be performed to test the 3D numerical groundwater flow model sensitivity to climatic variations (e.g., recharge) and hydrogeologic parameters (e.g., hydraulic conductivity, type of boundary conditions, etc.)	Groundwater quantity	6.6	No	No	The AIR/EISG will be revised to reflect this comment.			EAO has reviewed the comments and considers the Proponent's response adequate.
366	Natural Resources Canada (NRCan)	30-Sep-14	The AIR / EIS Guidelines should specify that the 3D numerical groundwater flow model will incorporate the anticipated groundwater seepage locations, rates, and seepage quality from the following mine components: open pit, tailings management facilities, mine/waste rock stockpile, open pits during any future overflow.	Groundwater quantity		No	No	See section 6.6.4 text revisions. Note that the 3D groundwater model simulates flow and not solute transport. Whether a full solute transport model is required for the project would be determined based on the results of water quality studies (i.e., if potential contaminants of concern (CoCs) are identified from these studies) per the BC MOE Groundwater Modelling Guidelines (2012).			EAO has reviewed the comments and considers the Proponent's response adequate.
367	Natural Resources Canada (NRCan)	30-Sep-14	Please specify in the AIR / EIS Guidelines that the 3D numerical groundwater flow model will be used to predict effects of mine dewatering or pumping in and around the study area; and the model will be used to predict the transport and fate of seepage from tailings impoundments and other mine waste facilities.	Groundwater quantity		No	No	The AIR/EISG will be revised to reflect this comment.			EAO has reviewed the comments and considers the Proponent's response adequate.

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368	Natural Resources Canada (NRCAN)	30-Sep-14	Please specify in the AIR / EIS Guidelines that the 3D numerical groundwater flow model will include the post-closure period, incorporating all major permanent mine components, including the open pit, tailings management facilities, etc.	Groundwater quantity		No	No	Text has been revised. Request for clarification from NRCAN: Will the tailings facilities and WRSFs need to be represented in 3d (i.e., with revisions to the model grid) for the post-closure period?			EAO has reviewed the comments and considers the Proponent's response adequate. EAO recommends that the Proponent follow-up with NRCAN directly for a response.
369	Natural Resources Canada (NRCAN)	30-Sep-14	Please include "explosives manufacture" in table 6.4.1 as an "Interaction with Project/Potential Effects."	greenhouse gas management	6.4	No	No	The GHG assessment will be completed in accordance with federal guidelines - any machinery and equipment used in the manufacture of explosives on site will be included in the GHG accounting.	NRCAN requested the addition of explosives to Table 6.4-1, which refers to surface water quality. The proponent has indicated here that the issue is about greenhouse gases. I think they may have confused our comment with another as NRCAN does not generally comment on GHGs. NRCAN is re-requesting that "explosives manufacture" be included in the description of explosives in Table 6.4-1.	"manufacture" has been added to the description of Tables 6.3-1, 6.4-1 and 10.2-1.	EAO has reviewed the comments and considers the Proponent's response adequate.
370	Natural Resources Canada (NRCAN)	30-Sep-14	Please include "explosives manufacture" in table 10.2.1 as an "Interaction with Project/Potential Effects."	greenhouse gas management	10.2	No	yes	Explosives storage and use is currently included in Table 10.2-1.	As above, NRCAN is re-requesting that "explosives manufacture" be added to the description of explosives in Table 10.2-1. As above, this section refers to water quality and not GHGs.	"manufacture" has been added to the description of Tables 6.3-1, 6.4-1 and 10.2-1.	EAO has reviewed the comments and considers the Proponent's response adequate.
371	Natural Resources Canada (NRCAN)	30-Sep-14	Please specify in Section 3.7 that the Application/EIS will include information on the TSF design - geotechnical properties/characteristics of the material to be used.	Geology, Landforms, Soils	3.7	Yes	No	The AIR/EISG will be revised to reflect this comment.			EAO has reviewed the comments and considers the Proponent's response adequate.
372	Natural Resources Canada (NRCAN)	30-Sep-14	Please add "landslides, slope erosion, and potential for ground and rock instability" as part of the baseline information to be collected in Section 6.2.2.	Geology, Landforms, Soils	6.2.2	No	yes	This information is currently listed in the AIR/EISG - data will be compiled on "signs of terrain instability"; erosion is also referenced.			EAO has reviewed the comments and considers the Proponent's response adequate.
373	Transport Canada	30-Sep-14	The proponent's response to our original comment no. 21 on "Rev D" (The residual effects should be summarized before the potential cumulative impacts.) was: "The proponent will accommodate this request in the document." TC therefore expects that potential cumulative effects will be included in the Executive Summary.	N/A		No	yes	Bullet point in Executive Summary will be updated as follows: • Summary of the potential effects, mitigation and significance of residual effects, and cumulative effects ;			EAO has reviewed the comments and considers the Proponent's response adequate.
374	Transport Canada	30-Sep-14	The Navigable Waters Protection Act (NWPAA) has been replaced by the Navigation Protection Act (NPA), which came into force April 1st, 2014. Please update the AIR / EIS Guidelines appropriately throughout the document to reflect this change.	Land and Resource Use		No	No	Reference will be updated.			EAO has reviewed the comments and considers the Proponent's response adequate.
375	Transport Canada	30-Sep-14	The Minor Works and Waters Order has been replaced by the Minor Works Order under the Navigation Protection Act. The link to TC's webpage referring to the Minor Works Order is: http://www.tc.gc.ca/eng/programs-633.html . Please update the AIR / EIS Guidelines to reflect this change.	Land and Resource Use		No	No	Reference will be updated.			EAO has reviewed the comments and considers the Proponent's response adequate.

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376	Transport Canada	30-Sep-14	TC reminds KGHM Ajax Mining Inc. that potential existing Navigable Waters Protection Act (NWPA)-approved road bridges or other works (i.e. under the NWPA or any existing BC government-owned bridge) might need regulatory approval for modifications or replacement under the Navigation Protection Act (NPA). TC will need the proponent to list any existing (NWPA-approved or BC government -owned) bridges that will be modified for the project so that TC can determine if the bridge owner wishes to opt out of the NPA or whether a Notice of Work is required (see attached). Where there is a decision not to opt out, the following will be required: drawings of the works; methodology of construction (including contingency plans); description of historic, baseline and potential navigation use including First Nations use; description of the level of impact; and suggestion of appropriate mitigation for the impacts.	Infrastructure, Public Facilities and Services		Yes	No	Acknowledged.			EAO has reviewed the comments and considers the Proponent's response adequate.
377	Transport Canada	30-Sep-14	TC is interested in knowing if/how Aboriginal groups navigate in the project area, particularly Goose Lake, for the purpose of practicing their traditional activities (such as but not limited to hunting, fishing, trapping, and harvesting) in the event Goose Lake is deemed navigable. This information should be included in Part C of the AIR / EIS Guidelines in the event this information is required.	Land and Resource Use		Yes	No	TC-Navigation Protection Program has provided an email/letter to KAM informing that Goose Lake is determined to be non-navigable, Part C already includes requirements to consider how Aboriginal groups use the project area.			EAO has reviewed the comments and considers the Proponent's response adequate.
378	Environment Canada	30-Sep-14	In Section 2.8, or another appropriate section of the AIR/EIS Guidelines, please reflect that the Application/EIS will state clearly whether the proponent will request a Metal Mining Effluent Regulations (MMER) Schedule 2 amendment due to a planned deposit of tailings into waters frequented by fish.	Fish populations and fish habitat	2.8	Yes	No	Work is currently on-going to confirm the fish bearing status of streams and lakes in the Project area; however, at this time, it is not expected that a Schedule 2 amendment will be required. The Application/EIS will make a clear statement of KAM's understanding and intent at the time of submission.			EAO has reviewed the comments and considers the Proponent's response adequate.
379	Environment Canada-CWS	30-Sep-14	Please delete "provided by the Government of Canada" after "Information on SARA-listed taxa" here and anywhere this statement occurs in the AIR / EIS Guidelines. This information will not be provided by the government of Canada, as it is the proponent's responsibility to gather and present this information. In addition to SARA-listed taxa, please include COSEWIC listed species here.	Rare plants		No	No	The original wording in the AIR was intended to acknowledge that information on species at risk is available from EC from a number sources (e.g. its website, publications) and that this information would be obtained and reviewed as part of baseline data collection. Reworded to '...information on SARA-listed taxa available from the Government of Canada...' to clarify our intent			EAO has reviewed the comments and considers the Proponent's response adequate.
380	Environment Canada-CWS	30-Sep-14	In addition to SARA-listed taxa, please include COSEWIC listed species here.	Rare plants		No	No	Reference to COSEWIC has been included.			EAO has reviewed the comments and considers the Proponent's response adequate.
381	Environment Canada-CWS	30-Sep-14	The LSA should include all linear features (e.g., new and existing access roads, haul roads and transmission lines, buffered by a minimum of 500 m). The inclusion of these features should be specified in the AIR / EIS Guidelines.	Rare plants		Yes	No	The revised LSA for this VC will include all Project facilities buffered by a minimum of 500 m			EAO has reviewed the comments and considers the Proponent's response adequate.

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382	Environment Canada-CWS	30-Sep-14	Please add riparian habitat to the list of rare and sensitive ecological communities.	Rare and Sensitive Ecological Communities		No	No	We will add riparian habitat by buffering the creeks in the LSA by distances specified in the provincial riparian management guidelines			EAO has reviewed the comments and considers the Proponent's response adequate.
383	Environment Canada-CWS	30-Sep-14	EC recommends that wetland assessment be included to section 6.9.2. Assessment should include wetland identification and classification, identification of Red and Blue listed ecological communities within wetland communities and assessment of wetland ecological function. The Canadian Wildlife Service Technical Report entitled "Wetland Ecological Function Assessment: An Overview of Approaches" (Hanson et al 2008) may be useful in providing options for selecting the appropriate function assessment methodology.	Rare and Sensitive Ecological Communities	6.9.2	No	No	Wetlands are listed in 6.9.2 as sensitive ecosystems that will be included in the assessment. Rare wetland types will be covered as the wetland ecological communities at risk defined by the BC Conservation Data Centre	No change was made to the draft AIR/EISG. The EISG states for baseline studies for Rare and Sensitive Ecological Communities (Section 6.9.2): "Field surveys will be used to: - confirm presences of ecological communities, and - confirm accuracy of the typed polygons within mapped areas" EC acknowledges that the response confirms that wetlands will be assessed as part of the rare and sensitive communities and those wetland ecological communities at risk (blue- and red listed wetland ecological communities) will be identified through the CDC. However, it is important that assessment of wetland function is included in baseline studies. The current EISG draft only mentions "confirm presence of ecological communities". The need to assess wetland function should be specifically stated in the EISG.	"evaluate wetland function" has been added to the bullet list referenced.	EAO has reviewed the comments and considers the Proponent's responses adequate.
384	Environment Canada-CWS	30-Sep-14	The LSA should include all linear features (e.g., new and existing access roads, haul roads and transmission lines, buffered by a minimum of 500 m). The inclusion of these features should be specified in the AIR / EIS Guidelines.	Rare and Sensitive Ecological Communities		Yes	No	The revised LSA for this VC will include all Project facilities buffered by a minimum of 500 m			EAO has reviewed the comments and considers the Proponent's response adequate.
385	Environment Canada-CWS	30-Sep-14	Please list the mitigation hierarchy in the AIR / EIS Guidelines: avoidance, mitigation, then compensation for wetlands. It is important that all efforts be made to avoid impacts to wetlands and compensation should be considered the least preferred mitigation	Rare and Sensitive Ecological Communities		No	No	The AIR/EISG will be revised to reflect this comment.			EAO has reviewed the comments and considers the Proponent's response adequate.
386	Environment Canada-CWS	30-Sep-14	In addition to SARA-listed taxa, please include COSEWIC listed species here.	Terrestrial Invertebrates		No	No	The AIR/EISG will be revised to reflect this comment.			EAO has reviewed the comments and considers the Proponent's response adequate.
387	Environment Canada-CWS	30-Sep-14	Please specify in the AIR / EIS Guidelines that field surveys will be used to confirm species composition, abundance and distribution of terrestrial invertebrates	Terrestrial Invertebrates		No	No	Field surveys will be used to assess species presence but cannot provide an accurate indication of invertebrate population numbers			EAO has reviewed the comments and considers the Proponent's response adequate.
388	Environment Canada-CWS	30-Sep-14	The LSA should include all linear features (e.g., new and existing access roads, haul roads and transmission lines, buffered by a minimum of 500 m). The inclusion of these features should be specified in the AIR / EIS Guidelines.	Terrestrial Invertebrates		Yes	No	The revised LSA for this VC will include all Project facilities buffered by a minimum of 500 m			EAO has reviewed the comments and considers the Proponent's response adequate.
389	Environment Canada-CWS	30-Sep-14	In addition to SARA-listed taxa, please include COSEWIC listed species here.	Amphibian		No	No	Reference to COSEWIC has been included.			EAO has reviewed the comments and considers the Proponent's response adequate.

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390	Environment Canada-CWS	30-Sep-14	Please specify in the AIR / EIS Guidelines that field surveys will be used to confirm species composition, abundance and breeding and non-breeding distribution of amphibians	Amphibian		No	No	Field surveys will be used to assess species presence and broad distribution patterns but cannot provide an accurate indication of amphibian population numbers			EAO has reviewed the comments and considers the Proponent's response adequate.
391	Environment Canada-CWS	30-Sep-14	The LSA should include all linear features (e.g., new and existing access roads, haul roads and transmission lines, buffered by a minimum of 500 m). The inclusion of these features should be specified in the AIR / EIS Guidelines.	Amphibian		Yes	No	The revised LSA for this VC will include all Project facilities buffered by a minimum of 500 m			EAO has reviewed the comments and considers the Proponent's response adequate.
392	Environment Canada-CWS	30-Sep-14	EC mentions that the "North American racer" listed in Section 6.13.1 is referred to as the Western Yellow-bellied Racer by COSEWIC and SARA Schedule 1.	Reptiles	6.13.1	No	No	Reference to the subspecies will be added in the AIR for clarification. Note that there is only one subspecies in BC so the BC Conservation Data Centre uses the species name, as we have.	EC was unable to locate the change that was made to the EISG.	This has now been corrected.	EAO has reviewed the comments and considers the Proponent's responses adequate.
393	Environment Canada-CWS	30-Sep-14	In addition to SARA-listed taxa, please include COSEWIC listed species here.	Reptiles		No	No	Reference to COSEWIC has been included.			EAO has reviewed the comments and considers the Proponent's response adequate.
394	Environment Canada-CWS	30-Sep-14	Please specify in the AIR / EIS Guidelines that field surveys will be used to confirm species composition, abundance and breeding and non-breeding distribution of reptiles	Reptiles		No	No	Field surveys will be used to assess species presence and broad distribution patterns but cannot be used reliably to indicate population numbers			EAO has reviewed the comments and considers the Proponent's response adequate.
395	Environment Canada-CWS	30-Sep-14	The LSA should include all linear features (e.g., new and existing access roads, haul roads and transmission lines, buffered by a minimum of 500 m). The inclusion of these features should be specified in the AIR / EIS Guidelines.	Reptiles		Yes	No	The revised LSA for this VC will include all Project facilities buffered by a minimum of 500 m			EAO has reviewed the comments and considers the Proponent's response adequate.
396	Environment Canada-CWS	30-Sep-14	In addition to SARA-listed taxa, please include COSEWIC listed species here.	Migratory Birds		No	No	Reference to COSEWIC has been included.			EAO has reviewed the comments and considers the Proponent's response adequate.
397	Environment Canada-CWS	30-Sep-14	EC recommends that marsh birds be used a focal species group in stead of the American Bittern. This change should be reflected in the AIR / EIS Guidelines.	Migratory Birds		No	No	Marsh birds will be addressed in the migratory bird assessment, and marsh bird habitats will be covered in the wetland assessment			EAO has reviewed the comments and considers the Proponent's response adequate.
398	Environment Canada-CWS	30-Sep-14	Please specify in the AIR / EIS Guidelines that field surveys will be used to confirm species composition, abundance and distribution of migratory birds.	Migratory Birds		No	No	Field surveys will be used to assess species presence but cannot be used reliably to confirm population numbers.			EAO has reviewed the comments and considers the Proponent's response adequate.
399	Environment Canada-CWS	30-Sep-14	The LSA should include all linear features (e.g., new and existing access roads, haul roads and transmission lines, buffered by a minimum of 500 m). The inclusion of these features should be specified in the AIR / EIS Guidelines.	Migratory Birds		Yes	No	The revised LSA for this VC will include all Project facilities buffered by a minimum of 500 m			EAO has reviewed the comments and considers the Proponent's response adequate.
400	Environment Canada-CWS	30-Sep-14	Please add to the AIR / EIS Guidelines that best available information, including draft recovery strategies to this list of mitigation strategies.	Migratory Birds		No	No	Reference to draft recovery strategies has been added.			EAO has reviewed the comments and considers the Proponent's response adequate.
401	Environment Canada-CWS	30-Sep-14	In addition to SARA-listed taxa, please include COSEWIC listed species here.	Raptors		No	No	Reference to COSEWIC has been included.			EAO has reviewed the comments and considers the Proponent's response adequate.
402	Environment Canada-CWS	30-Sep-14	Please specify in the AIR / EIS Guidelines that field surveys will be used to confirm species composition, abundance and distribution of raptors	Raptors		No	No	Field surveys will be used to assess species presence and broad distribution patterns but cannot be used reliably to confirm population numbers.			EAO has reviewed the comments and considers the Proponent's response adequate.

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403	Environment Canada-CWS	30-Sep-14	The LSA should include all linear features (e.g., new and existing access roads, haul roads and transmission lines, buffered by a minimum of 500 m). The inclusion of these features should be specified in the AIR / EIS Guidelines.	Raptors		Yes	No	The revised LSA for this VC will include all Project facilities buffered by a minimum of 500 m			EAO has reviewed the comments and considers the Proponent's response adequate.
404	Environment Canada-CWS	30-Sep-14	In addition to SARA-listed taxa, please include COSEWIC listed species here.	Raptors		No	No	Reference to COSEWIC has been included.			EAO has reviewed the comments and considers the Proponent's response adequate.
405	Environment Canada-CWS	30-Sep-14	Please specify in the AIR / EIS Guidelines that field surveys will be used to confirm species composition, abundance and distribution of mammals	Mammals		No	No	Field surveys will be used to assess species presence and broad distribution patterns but cannot be used reliably to indicate population numbers.			EAO has reviewed the comments and considers the Proponent's response adequate.
406	Environment Canada-CWS	30-Sep-14	The LSA should include all linear features (e.g., new and existing access roads, haul roads and transmission lines, buffered by a minimum of 500 m). The inclusion of these features should be specified in the AIR / EIS Guidelines.	Mammals		Yes	No	The revised LSA for this VC will include all Project facilities buffered by a minimum of 500 m			EAO has reviewed the comments and considers the Proponent's response adequate.
407	Environment Canada-CWS	30-Sep-14	Please add to the AIR / EIS Guidelines that best available information, including draft recovery strategies to this list of mitigation strategies.	Mammals		No	No	Reference to draft recovery strategies has been added.			EAO has reviewed the comments and considers the Proponent's response adequate.
408	Health Canada	30-Jun-14	Identify any naturally-occurring contaminants that may be present in surface waters within the study area, and which may be further influenced by project activities.	Surface water Quality		No	yes	Surface water baseline information will be presented in the Application/EIS, as currently stated in the AIR/EISG			EAO has reviewed the comments and considers the Proponent's response adequate.
409	Health Canada	30-Jun-14	If there is a potential pathway for human exposure to contaminants of potential concern (COPC) (through inhalation, ingestion of food or water, or dermal contact), undertake a detailed, quantitative human health risk assessment as part of the Human Health and Ecological Risk Assessment (HHERA) being proposed.	Health - general		No	yes	A detailed quantitative human health risk assessment is being conducted as part of the EA submission.			EAO has reviewed the comments and considers the Proponent's response adequate.
410	Health Canada	30-Jun-14	<input type="checkbox"/> Provide an assessment of the following scenarios in the HHERA for human health impacts: consideration of baseline (pre-project), project alone, baseline + project (Application case), baseline + project + future project (Cumulative case), and decommissioning (post-project) scenarios.	Health - general		No	yes	The HHERA will provide exposure and risk estimates for base, project alone, application and cumulative cases in appendices to the HHERA technical data report but the assessment will focus on the changes in exposures and risks that occur between base and application and cumulative cases.			EAO has reviewed the comments and considers the Proponent's response adequate.
411	Health Canada	30-Jun-14	Please list the Criteria Air Contaminants which will be assessed, e.g. NOx, SOx, CO, VOCs, PM, ground-level ozone.	Air quality		No	yes	The substances of interest are listed in Section 10.1.4			EAO has reviewed the comments and considers the Proponent's response adequate.

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412	Health Canada	30-Jun-14	The existing CCME Air Quality Guidelines (or National Ambient Air Quality Objectives) for NO2 and SO2 are currently being revised for what will eventually become Canadian Ambient Air Quality Standards (CAAQS). The Proponent is strongly encouraged to reference more conservative health-based air quality objectives in this section, including the proposed CAAQS (PM and O3), and other guidelines from US EPA and WHO, as may be applicable.	Air quality		No	yes	A supplemental analysis will be included of the predicted concentrations against the following: <ul style="list-style-type: none"> • For the 1-hour SO2 and NO2 objectives, the U.S. EPA National Ambient Air Quality Standards (US NAAQS) modified for 1-hour averages (U.S. EPA 2012) • For the annual NO2 objective, the WHO Guidelines (WHO 2006). Ozone and secondary PM have been scoped out of the assessment following discussion with the BC MOE. More specific details will be included in the Detailed Dispersion Modelling Plan.			EAO has reviewed the comments and considers the Proponent's response adequate.
413	Health Canada	30-Jun-14	Professional judgement is listed as an information source. This is not an information source but is more appropriately classified as an assessment method.	Air quality		No	n/a	"Professional judgement based on relevant best practices" (as listed in Table 10.1-1) is an information sources (e.g. knowledge of best practices).			EAO has reviewed the comments and considers the Proponent's response adequate.
414	Health Canada	30-Jun-14	Dust from the open pit is a source of direct emissions from area sources. It can be a significant contributor to air contaminants and including dust from the open pit as one of the sources to be assessed would provide more certainty in the adequacy of the HHERA.	Air quality		No	yes	Metal accumluation in soil and veg as a result fo dust deposition has been included in the HHERA			EAO has reviewed the comments and considers the Proponent's response adequate.
415	Health Canada	30-Jun-14	In acknowledgement of public concerns over potential health effects resulting from uptake of metals present in particulate matter, Health Canada (HC) suggests including a health-based guiding principle in the particulate assessment program in the AIR/EIS Guidelines: to minimize the potential health impacts from toxic metals present in particulate matter (e.g. due to dermal and ingestion exposures from toxic metals deposited to soils and garden produce).	Air quality		No	yes	Metal accumluation in soil and veg as a result fo dust deposition has been included in the HHERA			EAO has reviewed the comments and considers the Proponent's response adequate.
416	Health Canada	30-Jun-14	HC suggests that the Application/EIS also include maps showing contours of CAC concentrations overlaid with the locations of sensitive sub-populations, e.g. schools, health facilities, etc.	Air quality		No	yes	Agreed. This level of detail is generally beyond that included in the AIR/EISG, however, consistent with The Guidelines for Dispersion Modelling in British Columbia, this will be included in a Detailed Dispersion Modelling Plan.			EAO has reviewed the comments and considers the Proponent's response adequate.
417	Health Canada	30-Jun-14	Include emissions from the open pit as an example of emissions from areas sources (see list on page 143). Dust from the open pit can be a significant contributor to air quality and listing this source provides more certainty that it will be assessed in the HHERA.	Air quality		No	yes	Agreed. This level of detail is generally beyond that included in the AIR/EISG, however, consistent with The Guidelines for Dispersion Modelling in British Columbia, this will be included in a Detailed Dispersion Modelling Plan.			EAO has reviewed the comments and considers the Proponent's response adequate.

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418	Health Canada	30-Jun-14	Include VOCs (e.g. benzene) and ground-level ozone (formed in the presence of sunlight and NOx) in the list of Criteria Air Contaminants to be assessed.	Air quality		No	yes	The only VOCs to be addressed are Polynuclear Aromatic Hydrocarbon species (PAH) expressed as Benzo (a) Pyrene (B(a)P) equivalent (as a mass concentration in air). B(a)P equivalent is a proxy for 'diesel particulate matter' for which there are no applicable criteria. Reactive VOCs are not being modelled as Ozone and secondary PM have been scoped out of the assessment following discussion with the BC MOE. This level of detail is generally beyond that included in the AIR/EISG, however, consistent with The Guidelines for Dispersion Modelling in British Columbia, this will be included in a Detailed Dispersion Modelling Plan.			EAO has reviewed the comments and considers the Proponent's response adequate.
419	Health Canada	30-Jun-14	Include particle size ranges in the references to inhalable and respirable particulate matter, e.g. PM2.5, PM10.	Air quality		No	yes	The only VOCs to be addressed are Polynuclear Aromatic Hydrocarbon species (PAH) expressed as Benzo (a) Pyrene (B(a)P) equivalent (as a mass concentration in air). B(a)P equivalent is a proxy for 'diesel particulate matter' for which there are no applicable criteria. Reactive VOCs are not being modelled as Ozone and secondary PM have been scoped out of the assessment following discussion with the BC MOE. This level of detail is generally beyond that included in the AIR/EISG, however, consistent with The Guidelines for Dispersion Modelling in British Columbia, this will be included in a Detailed Dispersion Modelling Plan.			EAO has reviewed the comments and considers the Proponent's response adequate.
420	Health Canada	30-Jun-14	Include a strong scientific rationale for exclusion from further assessment of metals which are present in the ore or airborne particulate matter, with particular reference to hexavalent chromium, manganese and uranium which are the focus of some public concern. The draft AIR/EIS Guidelines indicates that a minimum concentration threshold is indicated as a criterion for assessment; however, it would be beneficial to indicate the criteria for selection of the threshold concentrations.	Air quality		No	yes	Agreed. This level of detail is generally beyond that included in the AIR/EISG, however, consistent with The Guidelines for Dispersion Modelling in British Columbia, this will be included in a Detailed Dispersion Modelling Plan.			EAO has reviewed the comments and considers the Proponent's response adequate.
421	Health Canada	30-Jun-14	Include in the lists of special receptors, "Aboriginal people", e.g. "Places frequented by Aboriginal people and sensitive sub-population of the community (page 144). The definition of an environmental effect under the former Act requires an assessment of the effect of any change to the environment on health and socio-economic conditions and on the current use of lands and resources for traditional purposes by Aboriginal persons.	Air quality		No	yes	Agreed. This level of detail is generally beyond that included in the AIR/EISG, however, consistent with The Guidelines for Dispersion Modelling in British Columbia, this will be included in a Detailed Dispersion Modelling Plan.			EAO has reviewed the comments and considers the Proponent's response adequate.
422	Health Canada	30-Jun-14	Include temporary and seasonal human receptor locations (e.g. overnight camps, hunting lodges, First Nations ceremonial use areas etc.) in the list of sensitive receptors for Air Quality (and other human health VCs) - since people who spend more time outdoors could be more greatly affected by changes in air quality.	Health - general		No	yes	HHERA will consider inhalation exposures for the identified special receptor locations. The HHERA assumes all time is spent outdoor for all receptor locations			EAO has reviewed the comments and considers the Proponent's response adequate.

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423	Health Canada	30-Jun-14	The statement on page 144 that "The standards or benchmarks used towards the assessment....will be clearly presented in the Application/EIS" adds no useful information to the AIR/EIS Guidelines. It is a reasonable expectation that ALL information in the Application would be "clearly presented". HC suggests that additional information be provided on how standards or benchmarks will be applied in the HHERA, e.g. what will be done if risk benchmarks are exceeded, i.e. will a more detailed site-specific risk assessment be done? Will additional mitigation/follow-up measures be undertaken?	Health - general		No	yes	The determination of significance in the HHERA will be based on the incremental change in exposures and risk predicted to occur between base and application cases. Thus, if exceedance hazard or risk acceptability benchmarks are noted for the application case that are not noted for the base case, appropriate mitigation measures will be recommended.			EAO has reviewed the comments and considers the Proponent's response adequate.
424	Health Canada	30-Jun-14	A modelling domain of 20 km by 20 km centered on the Project site may not include all human receptors of interest in the City of Kamloops, e.g. human health impacts may be underestimated since fine particulate matter can travel a considerable distance from the source.	Air quality		No	yes	While the CALPUFF study area is 30 km x 30 km the dispersion modelling domain encompasses a region 70 km wide by 55 km long. This region is sufficiently large to capture all of the potential effects of the Project. If results indicate a need to go beyond a 30 km x 30 km domain the data are available.			EAO has reviewed the comments and considers the Proponent's response adequate.
425	Health Canada	30-Jun-14	The AIR/EIS Guidelines indicates that air dispersion modelling results for specific metals will be compared against Texas screening levels or Washington State acceptable source impact levels. Some standards are more suitable for protection of the environment rather than human health, e.g. most of the acceptable source impact levels from Washington State are listed for averages over a year (24-hour averages are more relevant for assessing short-term health effects than annual averages). Where available for specific substances, guidelines or standards from Canadian jurisdictions or those which are the most conservative and protective of human health are preferred, e.g. Ontario Ministry of Environment (http://www.ebr.gov.on.ca/ERS-WEB-External/displaynoticecontent.do?noticeId=MTA3MDkz&statusId=MTY0NTkx).	Air quality		No	yes	This approach (Texas Screening levels and WA State ASILs) has been abandoned and a full HHERA commissioned. The AIR/EISG has been edited to reflect this.			EAO has reviewed the comments and considers the Proponent's response adequate.
426	Health Canada	30-Jun-14	Predicted concentrations for each assessment scenario (baseline, project alone, baseline + project (Application case), baseline + project + future projects (Cumulative), and decommissioning) should be compared to appropriate and relevant human health-based air quality guidelines and/or standards. It is advisable to use the most current and conservative standards/guidelines which are protective of human health as the basis for significance assessment, including Canadian Ambient Air Quality Standards for PM2.5 and ozone, World Health Organization Air Quality Guidelines for PM2.5, PM10, ozone, NO2 and SO2 .	Air quality		No	No	Acknowledged. Assessment of inhalation exposures will be based on human health-based air quality exposure limits.			EAO has reviewed the comments and considers the Proponent's response adequate.

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427	Health Canada	30-Jun-14	The project's overall contribution of pollutants to the local airshed, regardless of whether the predicted values are well below the standards or criteria is an important factor in assessing the significance of impacts.	Air quality		No	No	Emission summaries for all of the cases studied will be presented (Existing or Base and Project Alone). While emission quantities are an important metric, the bulk of the assessment will focus on the predicted effects of these emissions.			EAO has reviewed the comments and considers the Proponent's response adequate.
428	Health Canada	30-Jun-14	If the air quality impact assessment predicts that Contaminants of Potential Concern (COPC) values exceed applicable guidelines, or the project is the dominant source of a pollutant in the area, or the proposed project is in an area that is already experiencing environmental pressures from other developments, it is advisable that a quantitative human health risk assessment be conducted to provide more refined conclusion of human health risks (see also comment on Section 10.0)	Air quality		No	No	A quantitative human health risk assessment is being undertaken as part of the HHERA.			EAO has reviewed the comments and considers the Proponent's response adequate.
429	Health Canada	30-Jun-14	The statement that the EIS will provide an assessment of the significance of the cumulative effects (of changes in air quality) does not provide any specific information on how the cumulative effects assessment will be applied to human health impacts. Please provide a detailed description on how the cumulative effects assessment will be applied to human health impacts in the AIR/EIS Guidelines.	Air quality		No	No	The assessment of potential human health risks associated with cumulative effects assessment will be conducted in the same manner as the human health risk assessment of the baseline and application cases. The predicted concentrations of COPCs in air and other media anticipated to result from the project and other identified sources will be used to estimate potential human exposures and the associated health risks.			EAO has reviewed the comments and considers the Proponent's response adequate.
430	Health Canada	30-Jun-14	Include the potential effects of the project on groundwater sources of drinking water which are used by the general population or Aboriginal peoples. For example, acid rock drainage, or migration of chemical contaminants due to seepage from tailings pond or metal leaching into aquifers may affect the quality of well water.	Domestic water quality		No		The HHERA includes the assessment of water consumption on human health.			EAO has reviewed the comments and considers the Proponent's response adequate.
431	Health Canada	30-Jun-14	If the consumption of traditional foods is one potential pathway of exposure to contaminants, a quantitative human health risk assessment would be informed by adequate baseline tissue data from the country foods being fished, hunted and harvested by local Aboriginal and non-Aboriginal communities. Please specify whether consumption of traditional foods is an operable pathway of exposure to contaminants and whether country foods will be done.	Country foods		No		The HHERA includes the assessment of traditional food consumption on human health.			EAO has reviewed the comments and considers the Proponent's response adequate.
432	Health Canada	30-Jun-14	Information on the dietary patterns of local subsistence communities, particularly Aboriginal peoples, would also be useful for determining the magnitude of potential human health risks from the consumption of traditional foods.	Country foods		No	no	Where information is made available to the Proponent regarding dietary patterns through engagement with Aboriginal groups, this will be reviewed and incorporated into the assessment.			EAO has reviewed the comments and considers the Proponent's response adequate.

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433	Health Canada	30-Jun-14	Potential ingestion of metals in soils is an applicable route of exposure for inclusion in the HHERA due to deposition of airborne particulates to soil from mining activities (e.g. Science of the Total Environment 408 (2010) 2181–2188). It is noted that the deposition of metals into soils from airborne particulate matter will be modelled (Section 10.3.4).	Country foods		No		Acknowledged.			EAO has reviewed the comments and considers the Proponent's response adequate.
434	Health Canada	30-Jun-14	Include animal-based country foods (along with plant-based country foods) in the assessment of cumulative uptake of metals from environmental media.	Country foods		No		The HHERA includes the assessment of animal-based country food consumption on human health.			EAO has reviewed the comments and considers the Proponent's response adequate.
435	Health Canada	30-Jun-14	Specify whether a screening level and/or quantitative, detailed (site-specific) human health risk assessment of consumption of country foods will be undertaken, and include the criteria that would require escalation to a detailed quantitative assessment, if only a qualitative assessment is planned.	Country foods		No		The HHERA will include a quantitative assessment of the potential effects of consumption of country foods on human health			EAO has reviewed the comments and considers the Proponent's response adequate.
436	Health Canada	30-Jun-14	Health Canada advises that consideration of community annoyance with noise, measured as percent highly annoyed (%HA) is a reliable and widely acceptable indicator of noise-induced human health effects for project operational noise and for long-term construction noise exposure and it is appropriate for the AIR/EIS Guidelines to include this human health effects of noise (ISO 1996-1:2003).	Noise and vibration		No	yes	The %HA will be included as an indicator in the noise assessment			EAO has reviewed the comments and considers the Proponent's response adequate.
437	Health Canada	30-Jun-14	It is desirable for the Proponent to commit to a Noise Management Plan which describes in detail the measures which will be undertaken to mitigate the potential health impacts of noise, including community outreach actions. Health Canada advises that noise mitigation measures be considered when a change in the calculated %HA of human receptors exposed to long-term noise exceeds 6.5% (cf. U.S. Federal Transit Administration Report No. FTA-VA-90-1003-06 (2006))	Noise and vibration		No	yes	A Noise Management Plan is listed as a requirement in Section 11.2			EAO has reviewed the comments and considers the Proponent's response adequate.
438	Health Canada	30-Jun-14	To the extent that grouse, deer, moose or other animals may be consumed by local Aboriginal and non-Aboriginal communities, include a separate "Country Foods Monitoring Plan" that is inclusive of both plants and animals. This would allow for a more thorough characterization of potential human health risks from dietary exposure to contaminants.	Environment - General		No		The elements of a Country Foods Monitoring Plan will be specified based on the findings of the HHERA (Monitoring and Follow-up Section).			EAO has reviewed the comments and considers the Proponent's response adequate.
439	BC EAO	30-Sep-14	Throughout the document, the Proponent has changed the words "waste rock" to "mine rock". This change does not seem to be linked to changes in the project design. Please change back to waste rock	Environment - General		yes	No	Mine rock is the preferred term since it better represents the fact that the rock can be used for various on-site purposes, such as for aggregate. Thus, it is not strictly 'waste'. However, for the purposes of the AIR, 'waste rock' will be used to maintain consistency.			EAO has reviewed the comments and considers the Proponent's response adequate.

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440	BC EAO	30-Sep-14	There are fewer details included in the project description than in the previously finalized AIR/EISg. EAO recognizes that some engineering details may not yet have been finalized and some flexibility is needed. However, EAO requires additional details about the current planned general arrangement (as a range of options where necessary) with clear caveats that such details may change through the assessment. Further, details about the location and scale of the proposed project components should be updated and included - for example, distance of TSF away from open pit (p. 3 of preface and p. 26 of section 3) and scale of stockpiles (p. 3 of preface).	Environment - General		Yes	No	Additional detail has been added to the General Arrangement and description.			EAO has reviewed the comments and considers the Proponent's response adequate.
441	BC EAO	30-Sep-14	Please ensure you provide a clear overview in maps and text information about access to the mine	Environment - General		Yes	No	Additional detail has been added to the General Arrangement and description.			EAO has reviewed the comments and considers the Proponent's response adequate.
442	BC EAO	30-Sep-14	Please ensure you provide the most current information available as to the relationship between the Kinder Morgan Pipeline and the mine	Environment - General		Yes	No	Additional detail has been added to the document.			EAO has reviewed the comments and considers the Proponent's response adequate.
443	BC EAO	30-Sep-14	Preface - Development of AIR/EIS Guidelines (p. 6): o Last paragraph of this section - reword to "this resulted in changes to the Project's General Arrangement (GA) that the Proponent felt would address some of the concerns raised in earlier consultation processes." o Last paragraph of this section – remove the word "minor". o Last paragraph of this section – delete last sentence starting with "these design changes..."	Environment - General	Preface	Yes	No	The AIR/EISG will be revised to reflect this comment.			EAO has reviewed the comments and considers the Proponent's response adequate.
444	BC EAO	30-Sep-14	Section 3 – Detailed Project Description: o P. 11 - in two places, the words "with updates as available" have been added. Clarify whether you mean updates would be provided in advance of the Application or up-to-date information would be included in the Application? Reword accordingly.	Environment - General	3	Yes	No	The phrases have been re-worded.			EAO has reviewed the comments and considers the Proponent's response adequate.
445	BC EAO	30-Sep-14	Section 3 – Detailed Project Description: o P. 14 – clarify why "if required" was added to the first paragraph.	Environment - General	3	Yes	No	If required' was added to refer to the fact that borrow sources may not been required for the Project. To improve clarity, this has been removed with the understanding that assessment will not be conducted on borrow sources if they are not proposed.			EAO has reviewed the comments and considers the Proponent's response adequate.
446	BC EAO	30-Sep-14	Section 3 – Detailed Project Description: o P. 14 – clarify why "geochemical" was replaced with "water quality" in bullet (b).	Environment - General	3	No	No	The geochemical characterization forms the basis for developing source terms, which are an input to the water quality model.			EAO has reviewed the comments and considers the Proponent's response adequate.

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447	BC EAO	30-Sep-14	Section 3 – Detailed Project Description: o P. 14 – clarify why “concentrate” was removed from bullet (c).	Environment - General	3	No	No	Concentrate will be stored indoors before being loaded onto trucks and transported off site. Water from the concentrate will not form part of the water balance in terms of potential flow path to the environment.			EAO has reviewed the comments and considers the Proponent's response adequate.
448	BC EAO	30-Sep-14	Section 3 – Detailed Project Description: o P. 16 – clarify why angle of bench face was removed and replaced with “as per design sector” – what does that mean?	Environment - General	3	Yes	No	The bench face angle is dependent on geotechnical conditions, which can differ depending on the area of the pit. Text has been revised to clarify.			EAO has reviewed the comments and considers the Proponent's response adequate.
449	BC EAO	30-Sep-14	Section 3 – Detailed Project Description: o P. 16 – typo in second to last paragraph on page – “Blast-hole drilling in will be performed...”	Environment - General	3	Yes	No	The AIR/EISG will be revised to reflect this comment.			EAO has reviewed the comments and considers the Proponent's response adequate.
450	BC EAO	30-Sep-14	Section 3 – Detailed Project Description: o P. 32 – clarify why several bullets have been removed from the list in section 3.11 that describes what will be included in the Application/EIS.	Environment - General	3	Yes	No	The bullets have been simplified to remove redundancy. There is no intention to remove requirements.			EAO has reviewed the comments and considers the Proponent's response adequate.
451	BC EAO	30-Sep-14	Section 4 – Assessment Process o P. 40 – in section 4.3, reword first bullet in list to “...in the Section 11 Order and/or any Section 13 Order...”	Environment - General	4	No	No	The AIR/EISG will be revised to reflect this comment.			EAO has reviewed the comments and considers the Proponent's response adequate.
452	BC EAO	30-Sep-14	Section 6.4 – Surface Water Quantity o P. 66 – clarify why extreme events were removed from the last paragraph of this section. While EAO is not the expert in this area, this language was carefully developed by the Working Group members responsible. Please do not change this as it does not appear to have any relation to the change in mine design.	Surface water quantity	6.4	No	No	The AIR/EISG will be revised to reflect this comment.			EAO has reviewed the comments and considers the Proponent's response adequate.
453	BC EAO	30-Sep-14	Section 6.10 – Grasslands o P. 87 – The change in Grasslands VC to be about “rare and sensitive grassland communities” is not related to the change in the design. Please change this back to the original format	Grasslands	6.10	No	No	VC has been updated accordingly.			EAO has reviewed the comments and considers the Proponent's response adequate.
454	BC EAO	30-Sep-14	Section 9.1 – Heritage Sites and Objects o P. 143 – as noted above, Heritage Sites and Objects are to be set out as they were originally	Heritage - general	9.1	No	No	The proposed revision to combine Heritage Sites and Heritage Objects has been reverted to the previously approved text.			EAO has reviewed the comments and considers the Proponent's response adequate.

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455	BC EAO	30-Sep-14	Part C o P. 171 – EAO’s guidance document to proponents on FN consultation has been updated – reference most recent (2013) version. EAO will be providing First Nations an opportunity to comment on the revised AIR through the end of the Public Comment Period. During this time, EAO will also review carefully the updated FN consultation guidance and may provide supplementary information to ensure the current legal and policy context for First Nations consultation is considered and adequately addressed for your Application	Aboriginal - Part C	Part C	No	No	Guidance information in the text has been updated. Potential for supplementary information acknowledged.			EAO has reviewed the comments and considers the Proponent’s response adequate.
456	Canadian Environmental Assessment Agency	8-Oct-14	In comment 2, WPCIB has requested the AIR/EIS Guidelines be revised to include WPBIC as an Aboriginal group whose interests may be affected by the Project. Where Part C of the AIR/EIS Guidelines lists Aboriginal groups potentially affected by the Project, please add WPCIB under the "Additional Aboriginal groups identified by the Agency" heading throughout Part C. The Application/EIS will need to include the information outlined in Part C for the WPCIB, as well as the other groups identified for the purposes of the EA.	Aboriginal - Part C	Part C	No	No	The AIR/EISG will be revised to reflect this comment.			EAO has reviewed the comments and considers the Proponent’s response adequate.
457	Canadian Environmental Assessment Agency	8-Oct-14	In comment 5, WPCIB highlights the importance of assessing the potential adverse impacts of the Project on asserted Aboriginal rights and interests. The Agency notes that sections 13 and 14 of the draft revised AIR/EIS Guidelines considers potential adverse impacts to Aboriginal rights and interests, and that the information required in the Application /EIS by these sections is already sufficient to fulfill the requirements for a comprehensive study under the former Canadian Environmental Assessment Act (the former Act).	Aboriginal - Part C	13; 14	No	yes	Acknowledged.			EAO has reviewed the comments and considers the Proponent’s response adequate.

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458	Canadian Environmental Assessment Agency	8-Oct-14	Under comment 27, WPCIB requests that the development of the Galaxy deposit and potential ore bodies in the vicinity of the Ajax deposit be included as "reasonably foreseeable" projects in the cumulative effects assessment. As noted in the draft revised AIR/EIS Guidelines, the cumulative effects assessment in the Application/EIS will be consistent with the Agency's guidance documents listed in Section 5.1.6. The development of the Galaxy deposit and potential ore bodies in the vicinity of the Ajax deposit would be considered "hypothetical projects" under the Operational Policy Statement Addressing Cumulative Environmental Effects under the Canadian Environmental Assessment Act (updated November 2007). The Agency does not require the consideration of hypothetical projects as part of the cumulative effects assessment.	Environment - General	5.1.6	No	No	Acknowledged.			EAO has reviewed the comments and considers the Proponent's response adequate.
459	Canadian Environmental Assessment Agency	8-Oct-14	in comment 41, WPCIB provides a number of comments relating to the assessment of economic effects of the project. The assessment of "environmental effects" under the former Act includes the effect of any change to the environment on health and socio-economic conditions and on the current use of lands and resources for traditional purposes by Aboriginal persons. As noted in Section 17.1 of the revised AIR/EIS Guidelines, the Application/EIS will include an assessment of "environmental effects" as defined under the former Act.	Aboriginal - Part C		No	yes	Acknowledged.			EAO has reviewed the comments and considers the Proponent's response adequate.
460	Canadian Environmental Assessment Agency	8-Oct-14	in comment 65, WPCIB is concerned with the accuracy of the following statement from the Preface to the draft revised AIR/EIS Guidelines: "These design changes do not affect the scope of the proposed Project or the requirements of the environmental assessment process." The Agency was also intending to comment on this statement, which is incorrect. The AIR/EIS Guidelines are being revised to reflect the changes to the design of the Project, including the geographic extent of project components (scope of project) and the studies required as part of the environmental assessment (scope of assessment). The revision of the AIR/EIS Guidelines themselves is also a change to the environmental assessment process. Please correct or remove this sentence from the revised AIR/EIS Guidelines.	Environment - General		Yes	No	The AIR/EISG will be revised to reflect this comment.			EAO has reviewed the comments and considers the Proponent's response adequate.

**Proposed Ajax Mine Project
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461	Canadian Environmental Assessment Agency	8-Oct-14	In comment 2 and 18, SSN recommends Goose Lake be assessed separately as a supporting topic in a similar manner to Jacko Lake. SSN further requests an assessment of SSN's use of Goose Lake and the surrounding ecosystem for hunting. Please add Goose Lake to the revised AIR/EIS Guidelines as a supporting topic, or provide rationale for why this addition is not required	Aboriginal - Part C		Yes	No	Potential effects to VCs in relation to use of the area around Goose Lake will be fully addressed in the Application/EIS and therefore will be assessed to the same extent as Jacko Lake. This includes assessment for outdoor recreation and traditional uses. However, based on information collected to date, Goose Lake does not have the same broad-scale level of interest/use as Jacko Lake, and thus does not warrant summarization as a "Supporting Topic".			EAO has reviewed the comments and the Proponent's response. Refer to SSN issues resolution tracking table and correspondence on EAO's website for further details on the resolution of these issues.
462	Canadian Environmental Assessment Agency	8-Oct-14	Under comment 4, SSN recommends the environmental assessment include a review and analysis of potential fluctuations in commodity prices over the life of the mine. Comments 14, 15 and 16 also outline concerns with the assessment of economic or socio-economic effects. The assessment of 'environmental effects' under the former Canadian Environmental Assessment Act (former Act) includes the effect of any change to the environment on health and socio-economic conditions and on the current use of lands and resources for traditional purposes by Aboriginal persons. As noted in section 17.1 of the revised AIR/EIS Guidelines, the Application/EIS will include an assessment of 'environmental effects' as defined under the former Act.	Aboriginal - Part C		No	yes	Acknowledged.			EAO has reviewed the comments and considers the Proponent's response adequate.
463	Canadian Environmental Assessment Agency	8-Oct-14	In comment 5, SSN outlines concerns with the proposed tailings storage facility and the potential for accidents and malfunction. Section 16 of the former Act requires the federal environmental assessment to consider the environmental effects of malfunction or accidents that may occur in connection with the Project. As noted in federal comments provided through the Working Group, please specify in the AIR/EIS Guidelines the requirement to assess the environmental effects of accidents and malfunctions, including potential failure of the tailings storage facility, in the Application /EIS.	Aboriginal - Part C		Yes	No	The AIR/EISG will be revised to reflect this comment.			EAO has reviewed the comments and considers the Proponent's response adequate.
464	Canadian Environmental Assessment Agency	8-Oct-14	Under comment 6 and in other comments, SSN recommends a number of Valued Components (VCs) for inclusion in the revised AIR /EIS Guidelines. In responding to this comment, please note where VCs have been added to the revised AIR/EIS Guidelines, or provide a rationale for the exclusion of any VCs recommended by Aboriginal groups.	Aboriginal - Part C		No	yes	No additional VCs have been proposed as there is no evidence from on-going studies that any additional VCs beyond those established during previous discussions would be potentially affected by the Project. As outlined in Section 5 of the AIR/EISG, the Application/EIS will provide further rationalization for the selection of VCs. See also response to comment 91.			EAO has reviewed the comments and the Proponent's response. Refer to SSN issues resolution tracking table and correspondence on EAO's website for further details on the resolution of these issues.

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465	Canadian Environmental Assessment Agency	8-Oct-14	In comment 20, SSN recommends its Cultural Heritage Study be incorporated in the AIR/EIS Guidelines. The Agency encourages the proponent to work with the SSN to consider the Cultural Heritage Study as par of the assessment of 'environmental effect' in the Application / EIS, including the effects of changes to the environment on physical and cultural heritage.	Aboriginal - Part C		No	yes	KAM is committed to incorporating all portions of the Cultural Heritage Study report made available to it in the applicable sections of the Application/EIS.			EAO has reviewed the comments and considers the Proponent's response adequate.
466	Canadian Environmental Assessment Agency	8-Oct-14	In comment 21, SSN is concerned that the cumulative impact of the New Afton mine is not considered in relation to air quality. The Agency required that the proponent provide a cumulative effects assessment in accordance with the Agency's Operational Policy Statement Addressing Cumulative Environmental Effects under the CEAA (updated November 2007). Under Section 5.1.6.1 of the draft revised AIR / EIS Guidelines, the Knew Gold mine is included in the list of other projects and activities that have been identified for consideration in the cumulative effects assessment. Please specify that the New Gold mine is the same as the New Afton mine in the AIR / EIS Guidelines. According to Section 10.1.6 of the draft revised AIR / EIS Guidelines, 'The cumulative effects assessment for air quality will consider existing industrial, commercial and residential activities in the region. Existing activities that may contribute to background PM in the Kamloops area near the projects site will be assessed as per Section 5. The cumulative effects assessment for air quality will need to include residual effects to air quality for all contaminants identified in the AIR / EIS Guidelines, and not only particulate matter. The Agency expects that the New Afton mine will be included in the cumulative effects assessment for air quality; please provide a rational in the AIR / EIS Guidelines if this is not the case.	Aboriginal - Part C		No	No	Section 5.1.6.1 updated to clarify that the "New Gold Mine" is the same as the "New Afton Mine" The New Afton Mine will be considered as part of the effects assessment for air quality, as it forms part of the baseline condition for the Project. Where appropriate, it will also be considered in a cumulative effects assessment.			EAO has reviewed the comments and considers the Proponent's response adequate.
467	Canadian Environmental Assessment Agency	8-Oct-14	In comment 22, SSN Requests that information relating to SSN's traditional use be provided to SSN for review prior to inclusion in the Application /EIS. The Agency's letter of June 9, 2014, to KGHM Ajax Mining Inc. requires that the proponent provide Aboriginal groups with an opportunity to review information relating to their current use of lands and resources for traditional purposes, and that the Application / EIS include a summary of any comments provided by Aboriginal groups in relation to the information provided.	Aboriginal - Part C		No	yes	Acknowledged.			EAO has reviewed the comments and considers the Proponent's response adequate.
468	Ministry of Environment, Environmental protection Division	19-Dec-14	In section 10.1.2 on background concentrations, it is stated that the NAPS station is in Brocklehurst. The NAPS station had to be moved last year and is now located at the Federal station downtown. Previously, this was a satellite station measuring TRS, SO2 and PM2.5 only. Background air quality levels will be based on all available measurements from the airshed, not just the decommissioned Brocklehurst station. Indeed, this is implied in the last sentence of the paragraph regarding data from additional stations in the airshed.	Air quality		No	No	Acknowledged.			EAO has reviewed the comments and considers the Proponent's response adequate.

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469	Ministry of Environment, Environmental protection Division	19-Dec-14	The comments regarding air quality fall into three groups: those from Sarah Hansen on behalf of SSN, those from Chief Michael LeBourdais of Whispering Pines, and those from Health Canada. As far as I can tell, all the comments in the first two groups have been, or are being, dealt with adequately.	Air quality		No	No	Acknowledged.			EAO has reviewed the comments and considers the Proponent's response adequate.
470	Ministry of Environment, Environmental protection Division	19-Dec-14	In the case of the Health Canada Comments, many of them actually deal with the use of output from the dispersion modelling studies in the health effects analysis. As a meteorologist I am not qualified to comment on the use of the models used in the HHERA.	Air quality		No	No	Acknowledged.			EAO has reviewed the comments and considers the Proponent's response adequate.
471	Ministry of Environment, Environmental protection Division	19-Dec-14	The issue that seems to be of importance for the air dispersion modelling study is the HC request to expand the list of parameters that will be modelled. I note in the revised AIR I reviewed that SO ₂ , NO _x , and CO have now been added to the list of modelled gasses, and that Chromium, Tin, Vanadium and Uranium had been added to the list of metals considered in the dustfall predictions. In their comments HC also requested that ground level ozone be included in the parameters modelled. Over the past years I have argued that, given the relatively small production of ozone precursors from the mine relative to Kamloops, and the small size of the domain of interest, that an increase in ozone levels in the airshed is very unlikely. The draft detailed dispersion modelling plan for the Ajax proposal is now under review, Health Canada is one of the groups involved in the review. I believe the question of whether ozone should be included in the modelling will be fully addressed through that review process.	Air quality		No	No	Acknowledged.			EAO has reviewed the comments and the Proponent's response. The inclusion of ozone in the air quality modelling was thoroughly discussed by MOE, EC, Health Canada and EAO. EAO recognizes the importance of considering all relevant and reasonable information to support a meaningful assessment of the potential air quality and human health effects, however, that there are substantial limitations and technical difficulties associated with ozone modelling, including large, and possibly unacceptable, uncertainties associated with the results and a lack of monitoring stations to validate the results of ozone modelling.
472	Ministry of Energy & Mines	19-Dec-14	Section 3.7: The proponent has committed to including "results from the on-going geotechnical investigation and stability assessment" in the design. In a previous revision, the proponent changed from "feasibility level" geotechnical investigation and stability assessment to an unspecified "ongoing" level. He advises EAO that this AIR should include the TSF designs to a "Feasibility Level", and that this design should be included as an Appendix to the application.	N/A		No	No	"feasibility level" has been included again.			EAO has reviewed the comments and considers the Proponent's response adequate.

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473	Ministry of Energy & Mines	19-Dec-14	Section 17.4: This section requires the proponent to include "A description of the alternative means of carrying out the Project." He advises additional clarity by adding language that ensure that this broad requirement will include a consideration of alternative methods or locations of tailings storage. This should not be an onerous requirement since a previous version of the project description included a dry stacked tailings storage facility. The reasons why this earlier concept was abandoned should be explained.	N/A		No	No	Additional information has been added to Section 2.5 of the AIR to reflect the requirements for tailings alternatives analysis, as outlined in the March 19, 2015 letter from the Associate Deputy Minister.			EAO has reviewed the comments and considers the Proponent's response adequate.
474	Ministry of Energy & Mines	19-Dec-14	Section 17.6: This section includes a commitment to conduct a "quantitative dam break and inundation study consistent with technical guidance from the Canadian Dam Association..." for the TSF embankments. It is George's view that this information requirement should provide an adequate assessment of the potential impacts of a tailings dam breach on the City of Kamloops.	N/A		No	No	AIR/EISG language has been updated to: "Using the results of the dam break analysis, an assessment of the environmental effects of a catastrophic TSF dam failure, will be completed, including assessment of potential impacts to relevant Valued Components, and an emphasis on measures to protect downstream communities "			EAO has reviewed the comments and considers the Proponent's response adequate.
475	Pierce Lefebvre Consulting	19-Dec-14	Section 2.7 in Part A of the Application will detail project benefits as prescribed in the AIR/EIS Guidelines, including measures of the Project's contribution to 'economic growth'. Part B of the Application assesses potential effects of the Project, focusing primarily on adverse effects. Section 7.1 in Part B of the AIR/EIS Guidelines describes a VC called 'Economic Growth', but there is no indication that adverse effects on 'Economic Growth' are being contemplated. Adverse effects on 'economic growth' would most likely relate to temporary market cycle closures, or the decommissioning and post-closure phases of the Project, or will otherwise be captured in the assessment of effects on the other economic VCs in Section 7. If the Economic Growth VC is to focus on adverse effects of temporary closures or the decommissioning and post-closure phases of the Project, it is not clear how the BC Stats Input/Output model cited as the source of information for the assessment will inform the analysis.	Economic Growth		No	No	Acknowledged. The language in Section 7.1.4 of the AIR/EISG has been modified to remove reference to the economic model results, and to focus on identification of potential adverse effects.			EAO has reviewed the comments and considers the Proponent's response adequate.
478	Ministry of Forests, Lands and Natural Resource Operations, Resource Practices Branch	19-Dec-14	Jacques and I have reviewed the document and tracking table and they have adequately captured our comments/concerns re visual impact assessment. Thanks.	Visual Impact / Aesthetic Features (including Shading)		No	No	Acknowledged.			EAO has reviewed the comments and considers the Proponent's response adequate.

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479	Ministry of Forests, Lands and Natural Resources Operations	19-Dec-14	<ul style="list-style-type: none"> Re: Comment 64a - monitoring well locations. The proponent has indicated plans to submit their application in April 2015. The application needs to include at least one year of baseline groundwater quality and quantity data. If the baseline groundwater monitoring wells are not currently established, it is doubtful they will be fully prepared to submit their application at that time. 	Groundwater quality		No	No	Many wells have been established in the Project area, with varying lengths of data record. The Application will clearly outline the robustness of the baseline dataset, and the plan for on-going baseline data collection at recently installed wells.			EAO has reviewed the comments and considers the Proponent's response adequate.
480	Ministry of Forests, Lands and Natural Resources Operations	19-Dec-14	<ul style="list-style-type: none"> Section 6.6.4 Potential Effects of the Project and Proposed Mitigation – I noticed that Cherry Creek has been removed from this section. It is understood that due to the project layout changes, the project is no longer located within the Cherry Creek watershed. However, consideration should be given to the potential effects of mine activities (pit-dewatering, changes in groundwater recharge from mine facilities, mine water management, water diversion facilities, etc) on groundwater divide locations. Has the proponent considered the possibility that the groundwater divide location may be altered as a result of mine activities in a manner that could affect groundwater quantity in the Cherry Creek watershed? 	Groundwater quantity		No	No	The Cherry Creek watershed is within the groundwater modelling domain. If the results of the groundwater modelling suggest a change in groundwater divide as a result of the project, this will be discussed in the Application, and study areas will be revised as necessary.			EAO has reviewed the comments and considers the Proponent's response adequate.
Comments #481-492 (SSN) - These comments from the Stk'emlúpsenc te Secwepemc Nation (SSN) have been managed and responded to separately. Refer to EAO's website for details.											
493	Environment Canada	17-Dec-14	The revised EISG relies on generic text stating that baseline water quality conditions will be quantified within "the proposed mine footprint, up-gradient, and down-gradient of the proposed facilities". Specific references to Peterson Creek and Cherry Creek have been deleted from the previous draft, and Goose Lake is not mentioned. This is likely sufficient for the EISG stage if the proponent understands that it should be conducting baseline work and reporting baseline conditions for all these watersheds. Also, monitoring locations are to be shown on Figure 6.3-1, but that figure is not presented in the EISG.	Surface water quality		No	No	Plans for assessment of the Peterson Creek Watershed remain unchanged from the previously approved AIR/EISG. Revised language was provided in Section 6.3.4 of the AIR/EISG to clearly describe how Cherry Creek watershed is addressed.			EAO has reviewed the comments and considers the Proponent's response adequate.
494	Environment Canada	17-Dec-14	Section 3.17 Project Supplies and Concentrate Transport Corridor (page 38): Please consider expanding "Traffic safety plan" to also include spill contingency plans.	N/A		No	No	Bullet has been updated to "Traffic safety and spill contingency planning"			EAO has reviewed the comments and considers the Proponent's response adequate.

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495	Environment Canada	17-Dec-14	<p>Section 17.6 Accidents and Malfunctions: - regarding "Describe the measures to decrease the likelihood or to mitigate for accidents and malfunctions..." please consider revising this statement by replacing "or" with "and" and by replacing "mitigate" with "prevent, prepare for, and respond to" (page 196) - Regarding: "Accidents or malfunctions (including evaluation of worst case scenarios)", please consider adding "... for each incident type" after "scenarios" (page 197) - regarding: "motor vehicle accidents" please consider adding ".../transportation accidents" (page 197)</p>	N/A		No	No	Revisions have been made as suggested.			EAO has reviewed the comments and considers the Proponent's response adequate.
496	Environment Canada	17-Dec-14	<p>Section 11.2 Environmental Management and Monitoring Plans (page 182), please consider adding the following plans: - Explosives Management Plan; - Hazardous Materials Management Plan (including transportation and spill response components); - Spill Contingency Plan; - and Emergency Communications Plan. Ideally the Contaminated Sites Management Plan and/or the Accidents and Malfunctions Plan should include spill remediation and long term monitoring plan components. "Transportation Management Plan" (page 183) should ideally include a spill contingency plan component, and contractor Transportation Management Plans should also be detailed to meet the same criteria.</p>	N/A		No	No	Explosives Management and Spill Contingency plans will be added. Hazardous Materials will be addressed through plans already listed in the AIR/EISG (e.g., Construction Waste Mgmt, Solid Wast Mgmt, Hazardous Waste Mgmt) Emergency Communication will be addressed in the Emergency Response Plan, which is already listed in the AIR/EISG.			EAO has reviewed the comments and considers the Proponent's response adequate.
497	City of Kamloops	22-Dec-14	<p>Cumulative Effects Assessment of Additional Minerals Rights To ensure that any incremental development or expansion of the project beyond those set forth in the proponent's current project design is properly addressed, the City requests that the non project mineral deposits that the proponent owns near or within the City boundaries (i.e. Rainbow, Ajax North, Crescent, Tia Madra, Iron Mask) be assessed for cumulative effects in conjunction with the project review. At stake for the City in this matter of future mineral development is the potential impact to the residential development area designated in the Kamloops Official Community Plan and Aberdeen Community Plans, including but not limited to potential impacts to development of these areas beyond the current proposed lifespan of the project.</p>	N/A		No		Please see comment 458 from CEAA, which addresses this topic.			EAO has reviewed the comments and considers the Proponent's response adequate.

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498	City of Kamloops	22-Dec-14	<p>Surface Hydrology and Groundwater Effects Study Areas</p> <p>Given the significant issue of slope stability in the Aberdeen neighbourhood, it would appear that the Local Study Areas outlined for the Surface Hydrology and Groundwater assessments (Figures 6.4 1 and 6.5 1, respectively) are insufficient to adequately assess the potential impacts of the project on this sensitive area of the City.</p> <p>The City's understanding is that the boundaries need to be far enough away from the area being assessed that it does not lock the result (i.e., if a constant head boundary were placed close to an area being evaluated it would probably make the model insensitive to any changes). As the City is quite concerned about the area along Hugh Allan Drive, shouldn't the Local Study Area boundaries be quite a bit further away?</p>					<p>The Aberdeen neighbourhood is within the groundwater modelling domain. The southern limit of the neighbourhood that is closest to the mine is included in the LSA.</p> <p>As outlined in 6.6.4 of the AIR, potential effects to "changes to piezometric levels in the Aberdeen Hills area" are being assessed.</p>			<p>EAO has reviewed the comments and considers the Proponent's response adequate.</p>

Comments #499-510 (Whispering Pines/Clinton Indian Band) are being considered by the Canadian Environmental Assessment Agency.

GOVERNMENT AGENCIES ISSUES TRACKING TABLES

Issues Expressed by the Government Agencies and KAM Responses

(12 pages)

Issues Expressed by the Government Agencies and KAM Responses

Topic	Key Government Issue/Concern/Comment	Stakeholder	Manner Raised	KAM Response	Status of Resolution
Tailings Storage Facility	<ul style="list-style-type: none"> Concerns regarding the former tailings storage facility location and methodology, in particular with respect to the proximity of a large and unproven (at planned production rates) dry tailings facility next to the Coquihalla Highway and its visual impacts. 	<ul style="list-style-type: none"> MEM MoTI, City of Kamloops (COK) 	<ul style="list-style-type: none"> Meetings Formal Working Group Comment 	<p>On May 29, 2014, KAM announced the Ajax South General Arrangement (GA), which outlined an optimized Project design intended to address many of the concerns raised in earlier consultation processes. Key changes to the Project included:</p> <ul style="list-style-type: none"> relocating the Tailings Storage Facility more than five kilometres southeast, away from the Coquihalla Highway and farther from City neighborhoods; re-designing the Tailing Storage Facility from a dry stack to a conventional tailings storage facility; re-designing the Project to avoid impacts to Inks Lake, initially proposed to be used as a TSF seepage pond. The lake, though on private property, serves as a recreational destination for some community members. On account of the redesign, users, wildlife and the ecosystem will not be impacted by mine operations. 	<ul style="list-style-type: none"> KAM presented an overview of the proposed project redesigns to the Project Working Group on June 23, 2014 in Kamloops and responded to any questions. A site tour was also coordinated to provide regulatory members an opportunity to tour sections of the newly proposed Ajax South footprint. The results of the technical studies will be presented in the Application/EIS under the Alternative Means of Undertaking the Project, Section 2.4. Planned consultation activities during the Technical Review Stage are presented in Section 4.7.3 of the Application/EIS.
	<ul style="list-style-type: none"> Pursuant the Mt. Polley TSF breach, KAM received significant inquiry regarding its TSF design. Further, KAM received a directives letter form EAO on March 19, 2014 outlining submission requirements to address elements of the Independent Panel Report's findings. 	<ul style="list-style-type: none"> MEM MOE EAO CEAA 	<ul style="list-style-type: none"> Letter Meeting 	<ul style="list-style-type: none"> Following the Panel Report's release, KAM immediately commenced assessment and evaluation of the proposed facility, informed by the aforementioned report's recommendations, to ensure appropriate design review. KAM has undertaken an alternatives assessment to ensure that the best available tailings management technology for the Ajax Project (site specific) was chosen. Informed by the assessment's findings, KAM has modified its tailings management designs from a conventional unthickened buttresses design (32% solids) to a conventional thickened buttressed facility (60%) solids. This evolution in design reduces the expected water consumption requirement for the operation, will assist with dust mitigation on account of biodegradable binding agents added to the tailings (thickening polymer) and will also reduce the overall size of the facility. KAM has also performed an inundation study for the proposed TSF. 	<ul style="list-style-type: none"> KAM presented the preliminary findings and outcomes of the TSF Alternatives Assessment to EAO, CEAA, and MEM staff at a meeting on May 29, 2015. KAM presented a high-level overview to the Project Working Group on July 7-9, 2015 in Kamloops and responded to any questions. Consultants were available in person to discuss specifics about the assessment and preliminary inundation study results. The results of the technical studies will be presented in the Application/EIS under the Alternative Means of Undertaking the Project, Section 2.4 as well as under the Accidents or Malfunctions Section 17.4. Planned consultation activities during the Technical Review Stage are presented in Section 4.7.3 of the Application/EIS.
Tournament Capital of Canada Brand	<ul style="list-style-type: none"> Potential impact to the Tournament Capital of Canada (TCC) brand, adopted by the City some years ago under the Kamplan. Of specific note were the visual impacts of facilities (former Project Design) and the potential implications to the brand itself given project pressures and proximity to the mining operation. 	<ul style="list-style-type: none"> COK 	<ul style="list-style-type: none"> 	<ul style="list-style-type: none"> In 2013/2014 KAM undertook a Project redesign which was in part informed by the COK's concerns relating to the potential visual impacts of the project on the City and the TCC brand. The visual impacts of the Project, particularly from the COK and major transportation corridors, have been reduced on account of the reconfiguration. Under the Social VCs Pillar of the Application/EIS KAM acknowledges this concern. KAM, in pursuant discussions with COK personnel have identified components of potential impact that will be described in further detail under the Infrastructure, Public Facilities and Services VC, Section 8.1. Particular concern was raised around the potential impacts to temporary accommodation availability, in particular during the summer, during KAM's expected influx of a temporary work force during project construction. KAM has discussed this with the City and will present potential mitigations in the Application/EIS. 	<ul style="list-style-type: none"> Consistent engagement on this matter has been undertaken with the COK, particularly through infrastructure discussions, but also relating to Social VCs. Further discussion will be presented in the Application/EIS under the Infrastructure, Public Facilities, and Services VC, Section 8.1. Planned consultation activities during the Technical Review Stage are presented in Section 4.7.3 of the Application/EIS.
Accidents and Malfunctions	<ul style="list-style-type: none"> Pursuant the Mt. Polley TSF breach, the Federal regulatory 	<ul style="list-style-type: none"> CEAA NRCAN 	<ul style="list-style-type: none"> Meetings Letter 	<ul style="list-style-type: none"> KAM worked with the Agency to include all revisions into the updated EIS Guidelines document and have ensured that those information and assessment requirements will be satisfied in the 	<ul style="list-style-type: none"> Resolved. Specifics will be provided in the Application/EIS, under the Accidents or Malfunctions Section 17.4.

Note: This table does not include comments made / recorded during formal Working Group commenting periods. Working Group comment tracking tables are available on BC EAO's website and are also provided as an appendix.

Topic	Key Government Issue/Concern/Comment	Stakeholder	Manner Raised	KAM Response	Status of Resolution
	<p>group, coordinated through CEAA, directed revisions to the Accidents and Malfunctions section of the EIS Guideline while the document was undergoing revision.</p>	<ul style="list-style-type: none"> EC 		<p>EIS/Application.</p> <ul style="list-style-type: none"> Accidents and Malfunctions are assessed in Section 17.6 of the Application/EIS. 	<ul style="list-style-type: none"> Planned consultation activities during the Technical Review Stage are presented in Section 4.7.3 of the Application/EIS.
Project Access and Infrastructure	<ul style="list-style-type: none"> Concerns related to proposed project access, originally proposed via Lac le Jeune Road via the Copperhead interchange. Potential inadequacies of the existing road network for expected traffic volumes and load types. 	<ul style="list-style-type: none"> COK MoTI 	<ul style="list-style-type: none"> Meeting Comment 	<ul style="list-style-type: none"> During the Ajax Project redesign process (2013/2014) KAM sought to identify an appropriate site access alternative mindful of regulatory considerations. KAM explored alternatives, leading to the development of the current project access proposal, which will route all site traffic through an upgraded and reconfigured Inks Lake interchange. KAM also developed eight alternatives for discussion and deliberation with government staff, and regulatory input was critical to the establishment of the preferred site access detailed in the Application/EIS. Potential effects on transportation and traffic are assessed in Section 8.1 Infrastructure, Public Facilities and Services of the Application/EIS. Project activities are expected to affect flow of traffic through some interchanges while overall, the Traffic Impact Assessment (TIA, Opus International 2015) concludes that the Project will affect interchange performance minimally, although some interchanges have pre-existing low level of service. The effect is expected to be not significant (minor). This residual effect is expected to interact with construction of the Trans Mountain Expansion Project (TMEP). Currently, Trans Mountain Pipeline ULC (TMPL) is devising its logistics plans, which makes it difficult to determine the cumulative effects, although interaction is anticipated. 	<ul style="list-style-type: none"> Mine Access design changes have been presented to Working Group members at the June 23, 2014 and July 7-9, 2015 formal working group meetings. KAM has engaged with MoTI and CoK staff over the past 18 months on the design development and the Traffic Impact Assessment. Although the initial findings have been shared with both CoK and MoTI staff, Technical findings and results will be presented in the Application/EIS under the Infrastructure, Public Facilities, and Services VC, Section 8.1. Planned consultation activities during the Technical Review Stage are presented in Section 4.7.3 of the Application/EIS.
Air Quality	<ul style="list-style-type: none"> Concerns raised regarding potential air quality and dust effects attributable to mine on the surrounding areas; The mine will have prevailing winds flowing over rock piles and into the city – concern raised what those impacts will have to air shed from the dust. 	<ul style="list-style-type: none"> Ministry of Forest, Lands and Natural Resource Operations (MFLNRO) COK 	<ul style="list-style-type: none"> Meeting Letter Meeting 	<ul style="list-style-type: none"> KAM has changed the General Arrangement (GA) moving significant Mine Rock Storage Facilities further away from the community and intends to implement further measures to address air quality and dust concerns. Potential effects of the Project on dustfall and changes in air quality have been modelled in accordance with a detailed Dispersion Modelling Plan approved by the BC Ministry of Environment. Details of the assessment of air quality are presented in Section 10.1 of the Application/EIS. The air quality modelling takes into account varying atmospheric conditions, prevailing winds, and proximity to the City of Kamloops. A three-dimensional CALMET wind field was used to drive the CALPUFF model. The CALMET data are based on surface measurements at four locations in the airshed, plus appropriate upper air data and prognostic meteorological data and was developed by the Ministry. A base case model was developed and considers existing land based transportation emissions sources and existing non-point sources within the Kamloops airshed. Industrial emissions, including those of existing sources, are considered in the dispersion modelling assessment. The effects assessments also consider linkages between effects related to one VC and potential for effects on other VCs (e.g. air quality effects on country foods or surface water). Project-specific meteorology and dust fall stations have been established, and data collection is ongoing. Results from these stations will be augmented with long-term regional data to derive appropriate estimates of weather conditions. Potential effects on human health are assessed in Section 10.4 of the Application/EIS. The assessment considers all potential exposure pathways (including air, drinking water and country foods such as wild meat, vegetation, fish and traditional medicines), for human receptors for Aboriginal and non-Aboriginal people for all age groups and consider sensitive members of the population (young children, the elderly, pregnant women, etc.). KAM will be required to meet requirements related to air quality in the waste discharge permit 	<ul style="list-style-type: none"> Engagement with relevant Working Group members has led to the design of the Air Quality Assessment, most significantly was the multi-party meeting in Kamloops on November 26, 2014 with representatives from EAO, CEAA, MEM, IHA, COK, TNRD. KAM’s Dispersion Modelling Plan approved by the BC Ministry of Environment in 2014. Application results were presented at the July 7-9, 2015 Working Group Meetings; a specific Air Quality Sub working group, as part of the Health Sub-working group session, was also presented by lead consultants from Stantec. The results of the technical studies will be presented in the Application/EIS under the Air Quality VC, Section 10.1. Planned consultation activities during the Technical Review Stage are presented in Section 4.7.3 of the Application/EIS.

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				<p>issued by the BC Ministry of Environment (BC MOE). KAM will implement an Air Quality Monitoring and Dust Control Plan, including measures to mitigate fugitive dust.</p> <p>In particular, dust will be minimized by:</p> <ul style="list-style-type: none"> covering crushed ore stock piles and conveyors, paving the main access road, and employing best-available dust suppressant technology, including watering and organic binding agents, vacuum collection systems, and covered structures; Progressive reclamation of facilities, where practicable and appropriate. <p>Emissions will be minimized by:</p> <ul style="list-style-type: none"> reducing haul distances as a result of condensed footprint, and using the latest in EPA-approved diesel engine technology. <p>KAM will also implement a Mine Closure and Reclamation Plan as presented in Section 3.17 of the Application/EIS.</p> <ul style="list-style-type: none"> The TSF surface will be reclaimed with a dry cover system designed to 'store and release' water, limit infiltration to underlying waste materials and provide a medium for establishing sustainable vegetation cover consistent with the final land use. The TSF cover system includes a low-permeability layer and overlying growth medium layer. Environmental monitoring plans will be developed to inform the environmental management system and to support progressive reclamation during mining and closure at the end of mine life. 	
Noise	<ul style="list-style-type: none"> Concern regarding the need for a buffer between the mine and the communities of Aberdeen and Knutsford to reduce noise, light and aesthetic impacts, and the possibility of a physical barrier (wall, berm, etc.) being placed between the mine and surrounding neighborhoods to reduce the noise, light and aesthetic impacts. 	<ul style="list-style-type: none"> COK 	<ul style="list-style-type: none"> Letter Meeting 	<ul style="list-style-type: none"> On May 29, 2014, KAM announced the Ajax South General Arrangement (GA), which outlined an optimized Project design intended to address many of the concerns raised in earlier consultation processes. Mine facilities such as the TSF and waste rock dumps were moved further to the south and away from the community of Kamloops. Section 10.5 of the Application/EIS identifies and evaluates potential effects of the Project on noise and vibration levels and proposes mitigation measures for the construction and operational phases of the Project. Noise baseline studies were conducted in 2012 and 2014 to quantify the baseline sound levels at selected locations within the Project Regional Study Area through field measurements. The baseline monitoring program included six locations that represented different areas. Two of the locations were in a rural area. Two locations were near the Aberdeen development boundary, representative of a transition area between rural and suburban environments. The final two locations were within the suburban residential community of Aberdeen. During both the construction and operations phases the predicted noise modelling results for the average noise levels at the nearest in the Aberdeen community are homes are below baseline levels while predicted average noise levels at all residential locations are below the annoyance guideline levels. <p>Potential noise effects will be mitigated by Project design achieved by reducing the noise emission to receptor by increasing buffer distance, reducing equipment usage, and the use of enclosures.</p> <p>Proposed mitigation measures include:</p> <ul style="list-style-type: none"> conveyor from crusher to plant will be installed inside a gallery to reduce noise emission; coarse ore stockpile enclosure will provide noise attenuation for equipment activities; enclose heavy equipment such as mills, secondary crusher, compressors, pumps, and motors will be located inside buildings; design roads to minimize haul distances; use large trucks for ore and waste transport to minimize the number of trips required between 	<ul style="list-style-type: none"> Preliminary findings were presented to relevant working group members, including COK personnel, at a meeting at KAM's office on October 28, 2014. Results were also presented to all working group members at the July7-9, 2015 WG meetings in Kamloops. The results of the technical studies will be presented in the Application/EIS under the Noise and Vibration VC, Section 10.5. Planned consultation activities during the Technical Review Stage are presented in Section 4.7.3 of the Application/EIS.

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				<ul style="list-style-type: none"> the source and destination; ensure that the mobile equipment is equipped with the manufacturer-recommended exhaust mufflers; and location of plant facilities further from the City of Kamloops boundary. <ul style="list-style-type: none"> Section 10.4.7 states noise effects from the Construction and Operation phases of the Project are predicted to comply with the BC OGC noise guideline, WHO and Health Canada noise guidance. The noise effect during the Closure and Reclamation phase is expected to be lower than that for the Construction and Operation phases. KAM will also implement a Noise Management Plan. 	
Visual Aesthetics / Aesthetic Features	<ul style="list-style-type: none"> Concern regarding the need for a buffer between the mine and the communities of Aberdeen and Knutsford to reduce noise, light and aesthetic impacts, and the possibility of a physical barrier (wall, berm, etc.) being placed between the mine and surrounding neighborhoods to reduce the noise, light and aesthetic impacts. 	<ul style="list-style-type: none"> COK 	<ul style="list-style-type: none"> Letter 	<ul style="list-style-type: none"> On May 29, 2014, KAM announced the Ajax South General Arrangement (GA), which outlined an optimized Project design intended to address many of the concerns raised in earlier consultation processes. Mine facilities such as the TSF, and waste rock dumps were moved further to the south removing many of the aesthetic impacts from the City and major transportation corridors. Section 8.4 of the Application/EIS presents the assessment of potential Visual Impact and Aesthetic Features effects. In the assessment, the Construction and Decommissioning and Closure Phases were assessed together with the Operations Phase, as the effects during those phases will not be substantially different nor greater than the effects during the Operations Phase. During these phases, the Project will alter the visual quality of the landscape. Mitigation measures including progressive re-vegetation will be applied, but residual effects on the landscape from some viewpoints will remain as presented in Table 8.4-13. The construction and use of the mine rock storage facilities and overburden and topsoil stockpiles will continue throughout the Operations Phase, and the parts of those Project components that are in use cannot be re-vegetated. Landscape viewing locations closer to the Project will be affected to a larger degree than those further away, as the Project components will occupy a larger portion of the view of the landscape. All Project components will be re-vegetated at closure which will minimize the long-term effect on visual quality during the Post-Closure phase. The effects assessment concludes that both the Project-specific and cumulative residual effect (reduction of visual quality) is predicted to be Non-Significant (Moderate). KAM developed their visual impacts methodology, and viewpoint locations for assessment, through engagement with the COK and FLNRO. In British Columbia, the <i>Forest and Range Practices Act (2002)</i> recognizes “scenic areas” as an element of the province’s resource base and establishes Visual Quality Objectives (VQOs) for those areas. The Act requires forest operators to set specific targets and develop strategies for addressing environmental priorities and objectives regarding visual quality. To that end, the BC Ministry of Forests, Lands and Natural Resources Operations (BC MFLNRO) has established procedures and developed tools for performing visual impact assessments to aid in managing visual effects of forestry activities. Non-forestry resource development activities are not subject to this legislation with respect to visual quality; however, the approach established by BC MFLNRO will be used as the framework for this assessment. Significant engagement with FLNRO staff was required to ensure the proper application of their methodology and to identify any additional locations for assessment. Under the Social VCs Pillar of the Application/EIS KAM acknowledges this concern. KAM, in pursuant discussions with COK personnel have identified components of potential impact that will be described in further detail under the <i>Infrastructure, Public Facilities and Services VC</i>. A 3D Interactive Digital model, created with a local Kamloops company, integrated the proposed project design into a google earth platform. This model was presented to COK staff and councilors on May 13, 2013 for beta testing and feedback. Additional waypoint/viewpoints were added following the meeting. The model provides the public an opportunity to visualize the project at their respective computers; the model remains updated and demonstrates various stages of mine development 	<ul style="list-style-type: none"> KAM has engaged with COK, particularly through infrastructure discussions, but also relating to Social VCs and cited Community interest. Technical information and further discussion will be presented in the Application/EIS under the Visual Impact/ Aesthetic Features VC, Section 8.2. Planned consultation activities during the Technical Review Stage are presented in Section 4.7.3 of the Application/EIS.in the Application/EIS.
	<ul style="list-style-type: none"> Visual impacts from various points within the community. Where will these structures be seen from? 	<ul style="list-style-type: none"> COK 	<ul style="list-style-type: none"> Meeting 		
	<ul style="list-style-type: none"> Visual impact of this industrial facility as travelers approached Kamloops from the south. 	<ul style="list-style-type: none"> COK 	<ul style="list-style-type: none"> Meeting 		

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				5,10,15,23 and post-reclamation. Users can orient themselves from a chosen location to determine what, if any, visual impact there might be from that site.	
Dark Sky	<ul style="list-style-type: none"> Concern regarding light pollution being a health concern for residents near the Project. Concern regarding the need for a buffer between the mine and the communities of Aberdeen and Knutsford to reduce noise, light and aesthetic impacts, and the possibility of a physical barrier (wall, berm, etc.) being placed between the mine and surrounding neighborhoods to reduce the noise, light and aesthetic impacts. 	<ul style="list-style-type: none"> Interior Health Authority COK 	<ul style="list-style-type: none"> Meeting Letter 	<ul style="list-style-type: none"> On May 29, 2014, KAM announced the Ajax South General Arrangement (GA), which outlined an optimized Project design intended to address many of the concerns raised in earlier consultation processes. Mine facilities such as the TSF, and waste rock dumps were moved further to the south and further away from the City of Kamloops. KAM has also sought to identify technologies and operational practices that will diminish the potential for light pollution including: using LED lighting, light shielding, and employing timers, motion sensors and dimmers. These have been determine highly effective mitigations in similar operations. Section 8.2 of the Application/EIS presents the effects assessment on the Dark Sky Valued Component. 	<ul style="list-style-type: none"> Technical information and further discussion will be presented in the Application/EIS under the Dark Sky VC, Section 8.2. Planned consultation activities during the Technical Review Stage are presented in Section 4.7.3 of the Application/EIS.
Groundwater	<ul style="list-style-type: none"> Concerns raised regarding potential effects of the tailings storage facility on groundwater and any effects on slope stability issues on surrounding areas (including Aberdeen). 	<ul style="list-style-type: none"> COK 	<ul style="list-style-type: none"> Letter Water 	<ul style="list-style-type: none"> KAM has undertaken discussions with the COK in order to better understand their existing de-watering system, consisting of roughly 20 wells, in the Aberdeen area. Through those conversations it is understood that water volume draws are fairly low. Following KAM's groundwater study and assessment no groundwater connectivity between City of Kamloops development areas (Pineview and Aberdeen) has been identified. Additionally, based on preliminary numerical groundwater flow and particle tracking simulations groundwater is not predicted to migrate across the boundary between the Cherry Creek and Peterson Creek watersheds. Detailed results of the assessment of potential effects on groundwater quality and groundwater quantity are presented in Sections 6.5 and Section 6.6 of the Application/EIS. Section 10.2 of the Application/EIS presents the effects assessment of the Domestic Water Quality Valued Component. KAM will monitor water quality on an on-going basis throughout the life of the Project and will implement Surface Water and Groundwater Quality Management and Monitoring Plans to ensure human and environmental health is accounted for through all phases of the Project development (Section 11). 	<ul style="list-style-type: none"> Initial discussions surrounding groundwater connectivity as well as the preliminary interpretations were provided to relevant Working Group members at a Friday November 14, 2014 meeting. Members from COK, MOE, TNRD, FLNRO attended. During the July 7-9, 2015 Working Group sessions KAM presented results of the groundwater assessments. While the high-level findings were presented to all working group members, KAM coordinated a separate session for water quantity and quality topics in a Water VC specific sub-working group question and answer session. Technical information and further discussion relating to Groundwater will be presented in the Application/EIS under the Groundwater Quality Section, 6.5 and Groundwater Quantity Section 6.6. Planned consultation activities during the Technical Review Stage are presented in Section 4.7.3 of the Application/EIS.
Slope and Geotechnical Stability	<ul style="list-style-type: none"> Concerns regarding the potential implications the project may have on existing slope stability issues within the COK North Slope communities of Aberdeen and Pineview. 	<ul style="list-style-type: none"> COK 	<ul style="list-style-type: none"> Meeting Letter 	<ul style="list-style-type: none"> Geologically, no connection between the project area and the development areas within COK exist; therefore, it is not expected that the project will have any implications on existing slope stability considerations within the COK communities of Aberdeen or Pineview. Further information regarding local and regional geology will be provided under the Geology, Landforms and Soils VC, Section 6.2. With respect to potential vibration effects on structures, Section 10.4.7 states that the predicted air blast levels for all homes, industrial structures and towers were all well below the structural damage 	<ul style="list-style-type: none"> Preliminary findings and interpretations were presented to relevant working group members, including COK personnel, at a meeting at KAM's office on October 28, 2014. Noise and Vibration results were also presented to all working group members at the July7-9, 2015 WG

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				<p>(133 dBL) and annoyance levels (120 dBL). The predicted air blast level at the closest residential structure is 112 dBL. Thus, it is also highly unlikely that any air blast can cause any cosmetic or structural damage for this receptor and other similar receptors at further distance.</p> <ul style="list-style-type: none"> Vibration levels are below the annoyance threshold levels at the all residential locations; vibrations levels are predicted to be below the annoyance threshold outside of 1km from the project site. 	<p>meetings in Kamloops.</p> <ul style="list-style-type: none"> Technical information and further discussion will be presented in the Application/EIS under the Geology, Landforms and Soils VC, Section 6.2 as well as the Noise and Vibrations VC, Section 10.5. Planned consultation activities during the Technical Review Stage are presented in Section 4.7.3 of the Application/EIS.
Blasting	<ul style="list-style-type: none"> Concern raised regarding short- and long-term effects of blasting on the surrounding area, including vibration effects. The frequency and time of day of the blasting, as well as potential vibration of the neighboring houses is an issue; 	<ul style="list-style-type: none"> COK 	<ul style="list-style-type: none"> Letter Meeting 	<ul style="list-style-type: none"> The noise and vibration assessment for potential human health effects covers a broad area with a wide array of residential receptors ranging from urban and suburban to rural and quiet rural locations. Section 10.5 of the Application/EIS identifies and evaluates potential effects of the Project on noise and vibration levels and proposes mitigation measures for all phases of the Project to minimize the identified effects. <p>Noise:</p> <ul style="list-style-type: none"> Noise baseline studies were conducted in 2012 and 2014 to quantify the baseline sound levels at selected locations within the Project Regional Study Area through field measurements. Potential noise effects will be mitigated by Project design achieved by reducing the noise emission to receptor by increasing buffer distance, reducing equipment usage, and the use of enclosures. Proposed mitigation measures include: <ul style="list-style-type: none"> conveyor from crusher to plant will be installed inside a gallery to reduce noise emission; coarse ore stockpile enclosure will provide noise attenuation for equipment activities; enclose heavy equipment such as mills, secondary crusher, compressors, pumps, and motors will be located inside buildings; design roads to minimize haul distances; use large trucks for ore and waste transport to minimize the number of trips required between the source and destination; ensure that the mobile equipment is equipped with the manufacturer-recommended exhaust mufflers; and location of plant facilities further from the City of Kamloops boundary. Section 10.4.7 states noise effects from the Construction and Operation phases of the Project are predicted to be below baseline the BC OGC noise guideline, WHO and Health Canada noise guidance. The noise effect during the Closure and Reclamation phase is expected to be lower than that for the Construction phase. During both the construction and operations phases the predicted noise modelling results for the average noise levels at the nearest in the Aberdeen community are homes are below baseline levels while predicted average noise levels at all residential locations are below the annoyance guideline levels. KAM will also implement a Noise Management Plan. <p>Vibration:</p> <ul style="list-style-type: none"> Section 10.4.7 states that vibration effects from the Construction and Operation phases of the Project are predicted to comply with the USBM and DFO vibration guidelines, and will be not significant 	<ul style="list-style-type: none"> Preliminary findings and interpretations were presented to relevant working group members at a meeting at KAM's office on October 28, 2014. Noise and Vibration results were also presented to all working group members at the July7-9, 2015 WG meetings in Kamloops. Technical information and further discussion will be presented in the Application/EIS under the Noise and Vibration VC, Section 10.5. Planned consultation activities during the Technical Review Stage are presented in Section 4.7.3 of the Application/EIS.

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				<p>(moderate). The vibration effect during the Closure and Reclamation phase is expected to be lower than that for the Construction phase.</p> <ul style="list-style-type: none"> With respect to potential vibration effects on structures, Section 10.4.7 states that the predicted air blast levels for all homes, industrial structures and towers were all well below the structural damage (133 dBL) and annoyance levels (120 dBL). The predicted air blast level at the closest residential structure is 112 dBL. Thus, it is also highly unlikely that any air blast can cause any cosmetic or structural damage for this receptor and other similar receptors at further distance. <p>Proposed mitigation measures for potential vibration effects include:</p> <ul style="list-style-type: none"> blast designs were based on the damage threshold at the closest location (i.e. Jacko Lake) while other receptors are located much further away; blast designs were developed to reduce annoyance effects from blast-induced air blast overpressure; maximum explosives mass per time delay for the different blast zones (Z1, Z2, and Z3) decreases substantially from 1020 Kg to 68 Kg as the blasts approach Jacko Lake use of lower explosives per delay in Z3 enables the blast effect to be in compliance with the DFO stipulation at Jacko Lake hole diameter sizes, number of decks, and stemming configurations are designed for different zones; only one hole/delay will be fired on the blast; minimum time delay between holes in all blasts will not be less than 8 millisecond (ms); and row time delays will be incremented from the front of the blast towards the back with 100 to 300 ms. Blast timing and frequency can be adapted and designed to address concerns potential concerns. 	
Country Foods	<ul style="list-style-type: none"> With respect to “other additional issues that need to be fully addressed” provided by SSN, concern raised regarding KAM's consideration of plant inventory done on Secwepemc medicinal, spiritual and food plants, how they will be impacted and if they will be transplanted. 	<ul style="list-style-type: none"> Canadian Environmental Assessment (CEA) Agency 	<ul style="list-style-type: none"> E-Mail 	<ul style="list-style-type: none"> The plant inventory on Secwepemc medicinal, spiritual and food plants was considered in the effects assessment of the following Valued Components: <ul style="list-style-type: none"> Country Foods Valued Component (section 10.3 of the Application/EIS); Rare Plants (Section 6.8 of the Application/EIS); and Current Use of Lands and Resources for Traditional Purposes (Section 8.5 of the Application/EIS). Table 6.8-10 in Section 6.8 presents the locations and range of losses of Traditional Use Plants within the rare plants VC Project Study Area. The highest estimated losses of Traditional Use Plants will be cattail (100%) and willow (57%). Willows and cattails are associated with wetland habitats. Wetlands were assessed in Section 6.9. Willows are associated with swamps and cattail is an indicator of marshes and there will be additional habitat around the Local Study Area in which these species could still be collected. For those rare plant occurrences that cannot be avoided, transplantation of these rare plants will be considered based upon the guiding principles laid out in the BMP: Guidelines for Translocation of Plant Species at Risk in British Columbia. The effects assessment of the Country Foods Valued Component states that for traditional plants and backyard garden produce, increases in trace metal concentrations between baseline and future cases are smaller than those noted animal and fish tissue and reflect the very small increases in metal concentrations in soil associated with the Project. The baseline and future case trace metal tissue concentrations are used in conjunction with estimated metal concentrations in other environmental media (e.g. domestic water) to estimate human exposures to trace metals from multiple sources for baseline and future cases. The potential human health risks associated with exposures to trace metals from multiple sources are evaluated in detail in the Human Health Ecological Risk Assessment (HHERA) and the significance of these exposures is evaluated in the Human Health VC (Section 10.4 of the Application/EIS). Residual effects from the Project on human health are assessed to be not significant. 	<ul style="list-style-type: none"> KAM hosted a meeting with relevant Working Group members on November 26, 2014, during which the HHERA assessment inputs, outputs and methodology, including Country Foods, was presented for discussion. Representatives from EAO, CEAA, MEM, IHA, COK, TNRD attended. Human Health results were presented to all working group members at the July7-9, 2015 WG meetings in Kamloops. Further exploration of findings was made available during the Health Sub-Working group breakout session on July 8, 2015. Discussion surrounding the assessment and findings on Terrestrial ecosystems, including medicinal, spiritual and food plants for First Nations was better outlined during the Working Group session on Terrestrial topics on July 9, 2015. Technical information and further discussion will be presented in the Application/EIS under Country Foods VC, Section 10.3 while Rare Plants, Section 6.8, and Cultural Use of Land and resources for Traditional Purposes, Section 8.5 will provide more specificity as it relates to First Nations concerns.

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					<ul style="list-style-type: none"> Planned consultation activities during the Technical Review Stage are presented in Section 4.7.3 of the Application/EIS.
Fish and Fish Habitat	<ul style="list-style-type: none"> Concerns regarding the initially proposed Fish Offsetting Plan which focused efforts on Jacko Lake as like for like offset within the watershed. With respect to “other additional issues that need to be fully addressed” provided by SSN, concern raised regarding KAM's consideration of fish and fish habitat studies. 	<ul style="list-style-type: none"> FLNRO DFO CEAA 	<ul style="list-style-type: none"> Meeting E-Mail 	<ul style="list-style-type: none"> KAM initially focused on a proposal and model that would see offsetting measures developed for both Jacko Lake and Peterson Creek, as Jacko Lake had seen similar offsetting during Teck’s Ajax Mining operations during the 1980s and ’90s. Following further discussions, the regulatory group, consisting largely of personnel from FLNRO, DFO, MoE, outlined a preferred option – the development of a new sport fishery and wildlife ecosystem at Inks Lake. Inks Lake is directly adjacent the project and offsetting at Inks Lake is consistent with Provincial government interests and largely aligned with DFO offsetting objectives which seeks to ensure such work is performed in close proximity to expected losses. Inks Lake is currently unsuitable as a fishery and would require significant work in order to render the ecosystem appropriate to accept the introduction of fish. Potential effects on fish populations and fish habitat, including potential cumulative effects when appropriate, are assessed in Section 6.7 of the Application/EIS. The effects assessments concludes the following with respect to direct, indirect habitat loss, fish mortality and primary productivity: <ul style="list-style-type: none"> The Significance of direct habitat loss of the northeast arm of Jacko Lake and the section of Peterson Creek within the Project footprint is anticipated to be Not Significant (minor). With the proposed offsetting ratios (habitat loss: habitat gain) and the similarity of the offsetting measures with the historical and ongoing mitigation and management measures in Jacko Lake (fish stocking, installation of outlet dams to raise the water level and increase water storage) the effectiveness of the offsetting plan to address serious harm to fish associated with direct habitat loss in Jacko Lake and Peterson Creek is assumed to be high. The Significance of indirect direct habitat loss in Peterson Creek resulting from reduced flow is anticipated to be Not Significant (moderate). The Probability that the residual indirect habitat loss will occur is deemed Low, since the magnitude of flows during September to April are very small and the difference between the predicted flow and guideline threshold flow is often on the order 0.001 m3/s, which is likely within the resolution of the water balance model and field validation measurements. The Significance of fish mortality on the productivity of the rainbow trout population within Jacko Lake from Blasting and from installation of the sheet pile dam is anticipated to be Not Significant (minor). The Probability that there will be a measureable change on the productivity of the rainbow trout population is deemed Low. The Significance of changes in primary productivity on the productivity of the rainbow trout population Peterson Creek is anticipated to be Not Significant (minor). The Probability that there will be a measureable change on primary productivity is deemed Low, since the magnitude of flow changes are likely within the resolution of the water balance model and field validation measurements. <p>KAM will implement a Fisheries And Aquatic Life Monitoring Plan so that measures and controls are in place to minimize potential adverse effects on fish during all phases of the Project.</p>	<ul style="list-style-type: none"> KAM has engaged with relevant regulatory WG members. Following up on an initial discussion on October 8, 2014, in which KAM presented preliminary assessment findings while seeking guidance from regulatory attendees regarding the application’s contents and offsetting, KAM presented their initial offsetting plan on February 5, 2015 (Provincial) and February 19, 2015 (Federal). A subsequent meeting was requested and coordinated by FLNRO staff on April 21, 2015. KAM attended and presented their offsetting plan in greater detail. Following the meeting KAM was directed to look at alternatives for their fish offsetting plan, specifically potential for the creation of a fishery at Inks Lake. KAM undertook a significant shift in assessment and design as a result. Fish and Aquatics assessment results and the updated offsetting plan were presented to all working group members at the July7-9, 2015 WG meetings in Kamloops. Further exploration of findings was made available during the Fish and Aquatics Sub-Working group breakout session on July 8, 2015. Technical information and further discussion will be presented in the Application/EIS under the Fish and Fish Populations VC, Section 6.7. Planned consultation activities during the Technical Review Stage are presented in Section 4.7.3 of the Application/EIS.

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				Current Use of Lands and Resources for Traditional Purposes (CULRTP) was added as a new Valued Component in Section 8.5 of the Application/EIS, which includes fishing as an indicator for the assessment as it related to First Nations stakeholders.	
Socio-Economics	<ul style="list-style-type: none"> Socio-Economic considerations remain a key topic of interest for various regulatory groups. With respect to “other additional issues that need to be fully addressed” provided by SSN, concern raised regarding KAM's consideration of Employment and impact/economic benefits. 	<ul style="list-style-type: none"> COK TNRD CEA Agency 	<ul style="list-style-type: none"> Meeting Letter E-Mail 	<ul style="list-style-type: none"> KAM has undertaken engagement activities with relevant stakeholders; results will be presented in Section 7. The assessment of potential economic effects is presented in section 7 of the Application/EIS and includes the following Valued Components: <ul style="list-style-type: none"> Economic Growth (Section 7.1); Labor Force, Employment and Training (Section 7.2); Income (Section 7.3); Business (Section 7.4); Property Values (Section 7.5); and Economic Diversification (Section 7.6). Section 2.7 of the Application/EIS discusses Project benefits, using the statistics available from provincial ministries. The Project is expected to make a positive contribution to social and economic conditions in the City of Kamloops (Kamloops) and the surrounding area, as well as within the Province of British Columbia (BC). The magnitude and nature of these benefits will differ between the Project phases (i.e., construction, operation, decommissioning and closure, and post-closure). During the construction and operation phases, the Project is expected to create substantial employment, business activity, and income around Kamloops and in the Thompson-Nicola Regional District (TNRD). Aboriginal groups in the vicinity of the Project, including Tk'emlups te Secwepemc and the Skeetchestn Indian Band (jointly known as Stk'emlupsemc of the Secwépemc Nation [SSN]), also stand to benefit from employment, training, and other economic aspects of the Project. Economic indicators for SSN are not dissimilar from those for Kamloops but unemployment rates are higher for SSN communities than for Kamloops. 	<ul style="list-style-type: none"> KAM has maintained ongoing engagement with relevant regulatory WG members. Although further meetings were held with COK and TNRD (outlined in Section 7) KAM held day-long Socio-Economic Impact Assessment follow-up workshops with the TNRD on September 29, 2014 and September 30, 2015 with COK representatives. While further information accumulation was undertaken, initial findings and the methodology and timelines for the SEIA were presented to stakeholders. The Socio-Economic VC assessment results were presented to all working group members at the July7-9, 2015 WG meetings in Kamloops. Further exploration of findings was made available during the Social Sub-Working group breakout session on July 8, 2015. Technical information and further discussion will be presented in the Application/EIS under Section 7.0 while Section 2.7 will discuss Project Benefits. Planned consultation activities during the Technical Review Stage are presented in Section 4.7.3 of the Application/EIS.
Wildlife and Wildlife Habitat	<ul style="list-style-type: none"> With respect to “other additional issues that need to be fully addressed” provided by SSN, concern raised regarding KAM's consideration of a study on health of the wildlife population. With respect to “other additional issues that need to be fully addressed” provided by SSN, concern raised regarding KAM's consideration of terrestrial resources. 	<ul style="list-style-type: none"> CEA Agency CEA Agency 	<ul style="list-style-type: none"> E-Mail E-Mail 	<ul style="list-style-type: none"> Potential effects of the Project on wildlife, -including habitat alteration and loss, disturbance and displacement and mortality-, and measures to mitigate potential adverse effects are described in Sections 6.11 to 6.17 of the Application/EIS. Effects on wildlife will be monitored through the implementation of the Wildlife and Vegetation Monitoring Plan. Current Use of Lands and Resources for Traditional Purposes was added as a new Valued Component in Section 8.5 of the Application/EIS, which includes hunting/trapping as an indicator for the assessment. 	<ul style="list-style-type: none"> Results were presented to all working group members at the July7-9, 2015 WG meetings in Kamloops. The results of the technical studies will be presented in the Application/EIS under Sections 6.11-6.17. Planned consultation activities during the Technical Review Stage are presented in Section 4.7.3 of the Application/EIS.
Water Quality/Quantity	<ul style="list-style-type: none"> Concerns were raised regarding potential reductions in flow for downstream water license holders on Jacko Lake. Water bailiff accesses to water management structure an important consideration. Concerns regarding water quality 	<ul style="list-style-type: none"> FLNRO MOE CEA Agency 	<ul style="list-style-type: none"> Meeting E-Mail 	<ul style="list-style-type: none"> In order to address concerns regarding assuring water volumes for downstream license holders, and the need for flow control access and management, KAM developed and designed the Peterson Creek Downstream Pond (PCDP). This water retention structure will serve to store adequate water for the above noted purposes. Water will remain under the management of the Crown (FLNRO) and the water bailiff. Some key findings relating to water quantity have also been shared with working group members including: <ul style="list-style-type: none"> Expected reduction in Peterson Creek annual streamflow and low flow (of varying magnitude) 	<ul style="list-style-type: none"> Initial discussions surrounding Water VCs as well as the preliminary results and interpretations were provided to relevant Working Group members at November 14, 2014 meeting. Members from COK, MOE, TNRD, FLNRO, attended. An additional meeting to discuss the PCDP and KAM's commitment to downstream license

Topic	Key Government Issue/Concern/Comment	Stakeholder	Manner Raised	KAM Response	Status of Resolution
	<p>implications of surface and groundwater quality.</p> <ul style="list-style-type: none"> With respect to “other additional issues that need to be fully addressed” provided by SSN, concern regarding KAM's consideration of water management and water quality for human use. 			<p>during all phases of mine life.</p> <ul style="list-style-type: none"> KAM reaffirmed that existing irrigation license requirements will continue to be met through operation of the aforementioned PCDS. Expected decreases in peak flows during Construction, Operation, and Decommissioning and Closure due to operation of PCDS. This has a residual benefit insofar as it reduces potential flooding issues where Peterson Creek is culverted through Kamloops. As for groundwater, the open pit lake is predicted to be a permanent groundwater sink (maximum stable pit lake elevation ~ 684 masl.) With respect to water quality considerations: <ul style="list-style-type: none"> Science Based Environmental Benchmarks (SBEB) and Water Quality Benchmarks (WQB) were developed for Category I parameters. No parameters are predicted to exceed water quality guidelines, WQBs, or SBEBs in Jacko Lake. Baseline concentrations of most Category I parameters contribute the majority of concentrations; mine attributable influences are expected to be minor. Peterson Creek’s flow contribution to the Thompson River is very small, therefore changes to water quality parameter concentrations be undetectable. The effects assessment on human health concludes that with application of the mitigation measures outlined in the Air Quality and Water Quality sections, substantial changes to human health due to the Project are not expected. <p>The mitigation measures described in the Groundwater VC chapter will reduce the potential for changes to the quality of groundwater in the Peterson Creek aquifer, used as a source of domestic water in Knutsford. In particular, these mitigations will control the release of effluent containing trace metals into the environment and subsequent effects to groundwater quality. The mitigation measures recommended for the protection of groundwater in the vicinity of the East Mine Rock Storage Facility (EMRSF) include the following design features:</p> <ul style="list-style-type: none"> East MRSF Pond – located down-gradient of the EMRSF. The primary function of this pond is to intercept seepage and runoff from the ERMSF. The pond will be lined with a synthetic liner, the performance of which is monitored using an under liner drainage system; Foundation preparation under the EMRSF; and Reclamation of the EMRSF. Potential effects on human health are assessed in Section 10.4 of the Application/EIS and include a Human Health Ecological Risk Assessment (HHERA). The assessment considers all potential exposure pathways (including air, drinking water and country foods such as wild meat, vegetation, fish and traditional medicines), for human receptors for Aboriginal and non-Aboriginal people for all age groups and consider sensitive members of the population (young children, the elderly, pregnant women, etc.). 	<p>requirements with FLNRO staff, as well as licensees, was held on June 4, 2015 in Kamloops.</p> <ul style="list-style-type: none"> During the July 7-9, 2015 Working Group sessions KAM presented results of the groundwater assessments. While the high-level findings were presented to all working group members, KAM coordinated a separate session for water quantity and quality topics in a Water VC specific sub-working group question and answer session. Technical information and further discussion will be presented in the Application/EIS under Water Quantity and Quality VCs, Sections 6.3-6.6, while the Human Health VC, Section 10.4 will provide topical information on Human Health assessments. Planned consultation activities during the Technical Review Stage are presented in Section 4.7.3 of the Application/EIS.
Cumulative Effects	<ul style="list-style-type: none"> With respect to “other additional issues that need to be fully addressed” provided by SSN, concern raised regarding KAM's consideration of cumulative environmental impacts. 	<ul style="list-style-type: none"> CEA Agency 	<ul style="list-style-type: none"> E-Mail 	<ul style="list-style-type: none"> Section 5.3 of the Application/EIS presents the assessment methodology for cumulative effects. Cumulative effects are assessed in each of the assessment chapters (Chapters 6 through 10), as required by the BC EAO (2013). The method for assessing cumulative effects follows the same steps as the Project-specific effects assessment, as described in Section 5.2: <ol style="list-style-type: none"> Scoping and identification of potential effects; 	<ul style="list-style-type: none"> Results were also presented to all working group members at the July 7-9, 2015 WG meetings in Kamloops. Planned consultation activities during the Technical Review Stage are presented in Section 4.7.3 of the Application/EIS.

Topic	Key Government Issue/Concern/Comment	Stakeholder	Manner Raised	KAM Response	Status of Resolution
Reclamation and Closure	<ul style="list-style-type: none"> Reclamation and closure plans and intentions have been important considerations for various regulatory groups. Particular interest post-Mt.Polley panel report release, heightened interest in dry vs. wet closure options. With respect to “other additional issues that need to be fully addressed” provided by SSN, concern raised regarding KAM's consideration of reclamation and closure plans. 	<ul style="list-style-type: none"> MEM FLNRO MOE CEA Agency 	<ul style="list-style-type: none"> Meeting E-Mail 	<p>2. Description of potential effects and mitigation measures, with subsequent identification of residual cumulative effects; and</p> <p>3. Identification and characterization of residual cumulative effects.</p> <ul style="list-style-type: none"> Section 3.18 of the Application/EIS includes a Reclamation and Closure Plan. The Project will be designed with closure in mind; progressive reclamation will continue throughout the life of the Project. Security/reclamation bonds will be put in place in accordance with the Ministry of Energy and Mines requirements, and reclamation will continue until requirements are met. Reclamation, water quality and other relevant monitoring will continue until results meet regulatory requirements and further monitoring is no longer necessary. Specific to the TSF, KAM is proposing a dry cap and closure design which will see the reclaimed facility refer water, once water quality benchmarks are attained, southwards to Humphreys Creek. The TSF is predicted to be a Non Positive Acid Generating (NPAG) facility. The main objective of the re-vegetation program presented in the Reclamation and Closure Plan will be to support the equivalent grazing capacity of the grasslands to the pre-disturbance condition. The project is intended to be returned to the Agricultural Land Reserve (ALR) upon successful completion of reclamation plans. Other objectives include providing long-term stability of disturbed areas, preventing invasive species, reducing erosion and dust emission, and providing diverse habitats for self-sustaining ecological communities. Native vegetation is a major component of the existing landscape within the Project footprint. Predominant species include blue-bunch wheatgrass and rough fescue; shrubs such as big sagebrush, rabbit-brush, rose and snowberry; and woody species including aspen, ponderosa pine and Douglas-fir. Grassland reclamation will include both native and agronomic forage species. Fall rye and annual rye grass (agronomic species) will be included to provide quick establishment and ground cover for erosion control, soil stabilization and weed control. Pasture will be established using alfalfa, wheatgrass, fescue and ryegrass. Further details on seed mixes are provided in the Conceptual Restoration Plan (Section 11.18). 	<ul style="list-style-type: none"> Results were presented to all working group members at the July7-9, 2015 WG meetings in Kamloops. The results of the technical studies will be presented in the Application/EIS under Closure and Reclamation, Section 3.18. Planned consultation activities during the Technical Review Stage are presented in Section 4.7.3 of the Application/EIS.
Human Health	<ul style="list-style-type: none"> Significant interest in potential effect from the project on human health. With respect to “other additional issues that need to be fully addressed” provided by SSN, concern raised regarding KAM's consideration of the effects of the mine on the health of people. 	<ul style="list-style-type: none"> CEA Agency EAO HC IHA COK MOE 	<ul style="list-style-type: none"> Meeting Email 	<ul style="list-style-type: none"> A specific Health Pillar was created during the recently concluded AIR/EIS Guidelines revision period in order to address regulatory concerns relating to the appropriate assessment and presentation of Human Health related information. While most information was already being assessed, the pillar model provided a single source location for Health all health related studies, models, and assessment materials. Within the health pillar, potential effects on human health are assessed in Section 10.4 of the Application/EIS and include a Human Health Ecological Risk Assessment (HHERA). The assessment considers all potential exposure pathways (including air, drinking water and country foods such as wild meat, vegetation, fish and traditional medicines), for human receptors for Aboriginal and non-Aboriginal people for all age groups and consider sensitive members of the population (young children, the elderly, pregnant women, etc.). The effects assessment on human health concludes that with application of the mitigation measures outlined in the Air Quality and Water Quality sections, substantial changes to human health due to the Project are not expected. Project activities are not predicted to result in an increase in human health risk although exposure to particulate matter (PM) 2.5 and PM10, exposure of receptors to the criteria air contaminants (CACs) or contaminants of potential concern (COPCs) are expectantly going to see a minor increase via inhalation direct contact/ingestion. Mitigation measures recommended in the Air Quality section will reduce the effects of the Project on 	<ul style="list-style-type: none"> KAM hosted a meeting with relevant Working Group members on November 26, 2014, during which the HHERA assessment inputs, outputs and methodology, including Country Foods, was presented for discussion. Representatives from EAO, CEAA, MEM, IHA, COK, TNRD attended. Human Health results were presented to all working group members at the July7-9, 2015 WG meetings in Kamloops. Further exploration of findings was made available during the Health Sub-Working group breakout session on July 8, 2015. There was significant discussion surrounding both Air Quality and Water Quality inputs to the Human Health Risk Assessment. Technical information and further discussion will be presented in the Application/EIS in Section 10, with Human Health described specifically under Section 10.4. Planned consultation activities during the Technical

Topic	Key Government Issue/Concern/Comment	Stakeholder	Manner Raised	KAM Response	Status of Resolution
				human health by reducing air emissions and dust deposition, as well as reducing potential metal loading to streams and lakes. These measures include: <ul style="list-style-type: none"> design mitigation measures such as installation of covers over coarse and fine ore stockpiles; dust collectors, and use of covered concentrate transport trucks; Haul road-associated dust will be mitigated with use of coarse gravel and aggregate material on road beds and minimizing haul distances; and Other operational mitigation measures include watering haul roads, reducing idling of vehicles and equipment, and maintaining mobile equipment to meet emission standards. 	Review Stage are presented in Section 4.7.3 of the Application/EIS.
Current use of lands and resources for traditional purposes	<ul style="list-style-type: none"> With respect to “other additional issues that need to be fully addressed” provided by SSN, concern raised regarding the EA and KAM’s consideration on the hunting blind complex study. 	<ul style="list-style-type: none"> CEA Agency EAO 	<ul style="list-style-type: none"> E-Mail Meeting Letter 	<ul style="list-style-type: none"> Current Use of Lands and Resources for Traditional Purposes was added as a new Valued Component in Section 8.5 of the Application/EIS, which considers ceremonial traditional uses of the land including ceremonial uses and that considers the hunting blind as a site valued by SSN. A Cultural Heritage Study (CHS) was prepared by SSN and considered in the effects assessment. Further, an updated CHS is being prepared, which will cover the areas further south which were not considered in the initial investigations. 	<ul style="list-style-type: none"> KAM has engaged with the EAO and Agency to appropriately develop this additional VC for inclusion in the Ajax Project Assessment. Technical information and further discussion will be presented in the Application/EIS under the Current Use of Lands and Resources for Traditional Purposes, Section 8.5. Planned consultation activities during the Technical Review Stage are presented in Section 4.7.3 of the Application/EIS.

PUBLIC ISSUES TRACKING TABLES

Issues Expressed by the Public and KAM Responses

(13 pages)

Issues Expressed by the Public and KAM Responses

Topic	Key Issues/Concerns/Comments Raised	Stakeholders/Organizations	Manners Raised	KAM Response	Status of Resolution
Air Quality	<ul style="list-style-type: none"> Potential for the mine negatively contributing to the air quality of the area; Kamloops already has periods of bad air quality, with other industries and natural events such as wildfires and dust storms contributing to the conditions; Geography of the valley, prevailing winds and blowing dust; Proximity of the proposed mine to the City of Kamloops; Large amounts of dust that will be generated and distributed within the Thompson River Valley - dust will contribute to a marked deterioration in the airshed quality of the valley for many kilometers, since the city is subject to huge amounts of wind from the southwest. Potential for airborne distribution of harmful metals and other contaminants; Dust management near Jacko Lake; Dust and chemicals from the TSF affecting hay crops; Nuisance emissions at sub-threshold levels (rural and urban); Potential air quality problems from historical projects in the area that might return if the mine operates; Potential effects of air quality on visitor impressions of the Kamloops area; Concerns about post-closure air quality; Concerns about metals (mercury, arsenic, uranium) contamination in dust from processing and the associated health hazard; Concerns about chemicals used in processing and dust from haul trucks; Potential for deposits of arsenic and toxic chemicals in the air transported to the air in and around Kamloops; Rock/mineral constituents, carbon emissions, and dust (especially PM 2.5) could contribute to poor air quality; Potential effects on air quality from toxic dust and 	<ul style="list-style-type: none"> Public Individuals¹ Kamloops Physicians for a Healthy Environment Society Kamloops Tourism Kamloops Area Preservation Association Grasslands Conservation Council KAM Community Advisory Group 	<ul style="list-style-type: none"> Letter Workshop² Door-to Door Canvassing Drop-in Visit/Casual Meeting E-Mail Meeting Open House³ Phone-Call 	<p>KAM has changed the General Arrangement (GA) and will implement further measures to address dust-related soil contamination concerns.</p> <p>Potential effects of the Project on dustfall and changes in air quality have been modelled in accordance with a detailed Dispersion Modelling Plan approved by the BC Ministry of Environment. Details of the assessment of air quality are presented in Section 10.1 of the Application/EIS.</p> <p>The air quality modelling takes into account varying atmospheric conditions, prevailing winds, and proximity to the City of Kamloops. A three-dimensional CALMET wind field was used to drive the CALPUFF model. The CALMET data are based on surface measurements at four locations in the airshed, plus appropriate upper air data and prognostic meteorological data and was developed by the Ministry. The base case modelling considers existing land based transportation emissions sources and existing non-point sources within the Kamloops airshed. Industrial emissions, including those of existing sources, are considered in the dispersion modelling assessment. The effects assessments also consider linkages between effects related to one VC and potential for effects on other VCs (e.g. air quality effects on country foods or surface water).</p> <p>Project-specific meteorology stations have been established, and data collection is on-going. Results from these stations will be augmented with long-term regional data to derive appropriate estimates of weather conditions.</p> <p>Potential effects on human health are assessed in Section 10.4 of the Application/EIS. The assessment considers all potential exposure pathways (including air, drinking water and country foods such as wild meat, vegetation, fish and traditional medicines), for human receptors for Aboriginal and non-Aboriginal people for all age groups and consider sensitive members of the population (young children, the elderly, pregnant women, etc.).</p> <p>KAM will be required to meet requirements related to air quality in the waste discharge permit issued by the BC Ministry of Environment (BC MOE). KAM will implement an Air Quality Monitoring and Dust Control Plan, including measures to mitigate fugitive dust.</p> <p>In particular, dust will be minimized by:</p> <ul style="list-style-type: none"> covering crushed ore stock piles and conveyors, paving the main access road, and employing best-available dust suppressant technology, including watering and organic binding agents, vacuum collection systems, and covered structures; <p>Emissions will be minimized by:</p> <ul style="list-style-type: none"> reducing haul distances as a result of condensed footprint, and using the latest in EPA-approved diesel engine technology. <p>KAM will also implement a Mine Closure and Reclamation Plan as presented in Section 3.17 of the Application/EIS.</p> <p>The TSF surface will be reclaimed with a cover system designed to ‘store and release’ water, limit infiltration to underlying waste materials and provide a medium for establishing sustainable vegetation cover consistent with the</p>	<p>Technical studies are underway and the results will be presented in the Application/EIS.</p> <p>The public will have the opportunity to review the results during the Technical Review Phase. Planned consultation activities during the Technical Review Stage are presented in Section 4.7.3 of the Application/EIS.</p>

¹ “Public Individuals” can be meeting and workshop attendees or general public stakeholders such as landowners.

² Workshops were held on a) May 30, 2012, attended by general public stakeholders, City of Kamloops, Kamloops & District Fish & Game Association, Kamloops Exploration Group Society (KEG), Lac Le Jeune Conversation Association, Thompson Rivers University; b) June 13, 2012, attended by general public stakeholders, Aberdeen Community Association, City of Kamloops, Grasslands Conservation Council, Kamloops Area Preservation Association, Kamloops Daily News, Kamloops Naturalist Club, Kamloops Stockmen's Association, KAM Community Advisory Group, Public, Lac Le Jeune Conversation Association; and c) June 28, 2012 attended by general public stakeholders, Aberdeen Highlands Development Corp., City of Kamloops, Kamloops Exploration Group Society (KEG), Kamloops Fly Fishers' Association, Kamloops Stockmen's Association, Public, KPMG, and Thompson Watershed Coalition. A workshop was also held on April 18, 2012 – no issues/concerns were identified during this workshop.

³ Open Houses were held on June 24 & June 26, 2014; November 25 & November 26, 2014; September 12, 2013; and January 16, 2013.

Topic	Key Issues/Concerns/Comments Raised	Stakeholders/Organizations	Manners Raised	KAM Response	Status of Resolution
	<p>diesel fumes;</p> <ul style="list-style-type: none"> Potential exceedances in pollution levels and planned mitigation. Concerns about objective measures and assessment of effects; Concerns about sufficiency of studies, modelling, and monitoring stations; Concerns about cumulative and meteorological effects on air quality; 			<p>final land use. The TSF cover system includes a low-permeability layer and overlying growth medium layer including:</p> <ul style="list-style-type: none"> a compacted till (silty clay) layer approximately 30 cm-thick; a non-compacted overburden layer, approximately 30 cm-thick; and a topsoil layer approximately 30 cm-thick. <p>Environmental monitoring plans will be developed to inform the environmental management system and to support progressive reclamation during mining and closure at the end of mine life.</p> <p>The assessment of domestic water quality is presented in Section 10.2 of the Application/EIS.</p>	
Climate Change	<ul style="list-style-type: none"> Concerns about the carbon footprint of the mine. 	<ul style="list-style-type: none"> Public Individuals 	<ul style="list-style-type: none"> Workshop 	<p>The effects assessment for the Greenhouse Gas Management Valued Component is presented in Section 6.1 of the Application/EIS. The proposed Project is anticipated to emit up to 123 kt CO₂eq/yr during the Construction phase and less during the Operation phase. The effects assessment compared the Project-related GHG emissions to provincial and national reported emissions and with comparable mining projects in BC to determine the significance of the residual effect. The Project will increase atmospheric GHG emission even after the application of mitigation measures, though the predicted residual GHG emissions are considered to be negligible and assessed as not significant.</p> <p>The Project will be required to comply with legislated provincial and national reporting and mitigation requirements. The Project will also be required to assess and report on GHG emissions on an annual basis provincially under the BC Reporting Regulation and federally under the Canadian Environmental Protection Act.</p>	<p>Technical studies are underway and the results will be presented in the Application/EIS.</p> <p>The public will have the opportunity to review the results during the Technical Review Phase. Planned consultation activities during the Technical Review Stage are presented in Section 4.7.3 of the Application/EIS.</p>
Human Health	<ul style="list-style-type: none"> Need for more comprehensive health studies, modeling and information; Need to consider health implications and cost; Potential effects from the Ajax Project could lead to poorer health or even early mortality for vulnerable populations in the community, including the elderly, pregnant women, young children or people with asthma or other breathing difficulties; Potential effects on surrounding community and workers' health and safety from lethal gases from underground; Potential health effects on Kamloops residents relating to air (particulate matters) and water quality Exclusion of uranium, chromium and manganese from the list of substances to be studied; The proximity of the mine to schools and the effect of lead on children; Concerns raised regarding metals in deer/cattle; Concerns raised about the effects of dust on children's health within 2 km radius of mine. 	<ul style="list-style-type: none"> Public Individuals Kamloops Area Preservation Association 	<ul style="list-style-type: none"> Meeting Open House Drop-in Visit/Casual Meeting Workshop 	<p>Potential effects on human health are assessed in Section 10.4 of the Application/EIS and include a Human Health Ecological Risk Assessment (HHERA). The assessment considers all potential exposure pathways (including air, drinking water and country foods such as wild meat, vegetation, fish and traditional medicines), for human receptors for Aboriginal and non-Aboriginal people for all age groups and consider sensitive members of the population (young children, the elderly, pregnant women, etc.).</p> <p>The effects assessment on human health concludes that with application of the mitigation measures outlined in the Air Quality and Water Quality sections, substantial changes to human health due to the Project are not expected. Project activities are not predicted to result in an increase in human health risk. With the exception of exposure to particulate matter (PM)_{2.5} and PM₁₀, exposure of receptors to the criteria air contaminants (CACs) or contaminants of potential concern (COPCs) via inhalation and non-carcinogenic COPCs via direct contact/ingestion, resulted in predicted risk estimates (CRs, hazard quotients [HQs]) that were below relevant benchmarks for both Baseline Case and Future Case conditions. Exposures to PM_{2.5} and PM₁₀ that exceed the CR benchmark of 1.0 were predicted for both Baseline Case and Future Case conditions. In both cases the events occur infrequently and the change in inhalation-related health risks between Baseline Case and Future Case is negligible. Thus, a change in human health risks associated with exposures to Project-related PM₁₀ and PM_{2.5} emissions is expected to be not significant. Direct contact/ingestion exposures to carcinogenic COPCs (arsenic) were predicted to result in incremental increase in lifetime cancer risks (ILCRs) that were below the cancer risk acceptability benchmark of 10⁻⁵ for both Future Case exposures.</p> <p>Mitigation measures recommended in the Air Quality section will reduce the effects of the Project on human health by reducing air emissions and dust deposition, as well as reducing potential metal loading to streams and lakes. These measures include:</p> <ul style="list-style-type: none"> design mitigation measures such as installation of covers over coarse and fine ore stockpiles; dust collectors, and use of covered concentrate transport trucks; Haul road-associated dust will be mitigated with use of coarse gravel and aggregate material on road 	<p>Technical studies are underway and the results will be presented in the Application/EIS.</p> <p>The public will have the opportunity to review the results during the Technical Review Phase. Planned consultation activities during the Technical Review Stage are presented in Section 4.7.3 of the Application/EIS.</p>

Topic	Key Issues/Concerns/Comments Raised	Stakeholders/ Organizations	Manners Raised	KAM Response	Status of Resolution
				<p>beds and minimizing haul distances; and</p> <ul style="list-style-type: none"> • Other operational mitigation measures include watering haul roads, reducing idling of vehicles and equipment, and maintaining mobile equipment to meet emission standards. <p>The mitigation measures described in the Groundwater VC chapter will reduce the potential for changes to the quality of groundwater in the Peterson Creek aquifer, used as a source of domestic water in Knutsford. In particular, these mitigations will control the release of effluent containing trace metals into the environment and subsequent effects to groundwater quality. The mitigation measures recommended for the protection of groundwater in the vicinity of the East Mine Rock Storage Facility (EMRSF) include the following design features:</p> <ul style="list-style-type: none"> • East MRSF Pond - located down-gradient of the EMRSF. The primary function of this pond is to intercept seepage and runoff from the ERMSF. The pond will be lined with a synthetic liner, the performance of which is monitored using an under liner drainage system; • Foundation preparation under the EMRSF; and • Reclamation of the EMRSF. 	
Noise and Vibration, including Blasting	<ul style="list-style-type: none"> • Potential effects from noise/blasting given the project's proximity to residential areas; • Potential noise heard by the landowners from blasting and drilling; • Potential effects of blasting on infrastructure and residential houses; • Potential effects from vibration related to processing; • Potential effects and physical damages from blasting on nearby trailers; • Potential change in projected noise and vibration over time; • Potential effects from blasting (shock waves) on wells which can cause them to move and dry up; • Potential effects from blasting on animals/pets; and • Potential effects of blasting on elementary school children; 	<ul style="list-style-type: none"> • Public Individuals • TLC For Pets 	<ul style="list-style-type: none"> • Door-to-Door Canvassing • Drop-in Visit/Casual Meeting • Meeting • Open House • Workshop 	<p>The noise and vibration assessment for potential human health effects covers a broad area with a wide array of residential receptors ranging from urban and suburban to rural and quiet rural locations.</p> <p>Section 10.5 of the Application/EIS identifies and evaluates potential effects of the Project on noise and vibration levels and proposes mitigation measures for all phases of the Project to minimize the identified effects.</p> <p>Noise:</p> <p>Noise baseline studies were conducted in 2012 and 2014 to quantify the baseline sound levels at selected locations within the Project Regional Study Area through field measurements. Potential noise effects will be mitigated by Project design achieved by reducing the noise emission to receptor by increasing buffer distance, reducing equipment usage, and the use of enclosures. Proposed mitigation measures include:</p> <ul style="list-style-type: none"> • conveyor from crusher to plant will be installed inside a gallery to reduce noise emission; • coarse ore stockpile enclosure will provide noise attenuation for equipment activities; • enclose heavy equipment such as mills, secondary crusher, compressors, pumps, and motors will be located inside buildings; • design roads to minimize haul distances; • use large trucks for ore and waste transport to minimize the number of trips required between the source and destination; • ensure that the mobile equipment is equipped with the manufacturer-recommended exhaust mufflers; and • location of plant facilities further from the City of Kamloops boundary. <p>Section 10.4.7 states noise effects from the Construction and Operation phases of the Project are predicted to comply with the BC OGC noise guideline, WHO and Health Canada noise guidance. The noise effect during the Closure and Reclamation phase is expected to be lower than that for the Construction phase.</p> <p>KAM will also implement a Noise Management Plan.</p> <p><u>Vibration:</u></p> <p>Section 10.4.7 states that vibration effects from the Construction and Operation phases of the Project are predicted to comply with the USBM and DFO vibration guidelines, and will be not significant (moderate). The vibration effect during the Closure and Reclamation phase is expected to be lower than that for the Construction phase.</p> <p>With respect to potential vibration effects on the Elementary Pacific Way School, Table 10.4-19 in the Application/EIS presents that the magnitude classification rating during construction and operation phase was rated to be medium, and thus there will be perceptible change from baseline condition.</p>	<p>Technical studies are underway and the results will be presented in the Application/EIS.</p> <p>The public will have the opportunity to review the results during the Technical Review Phase. Planned consultation activities during the Technical Review Stage are presented in Section 4.7.3 of the Application/EIS.</p>

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				<p>With respect to potential vibration effects on structures, Section 10.4.7 states that the predicted air blast levels for all homes, industrial structures and towers were all well below the structural damage (133 dBL) and annoyance levels (120 dBL). The predicted air blast level at the closest residential structure is 112 dBL. Thus, it is also highly unlikely that any air blast can cause any cosmetic or structural damage for this receptor and other similar receptors at further distance.</p> <p>Proposed mitigation measures for potential vibration effects include:</p> <ul style="list-style-type: none"> blast designs were based on the damage threshold at the closest location (i.e. Jacko Lake) while other receptors are located much further away; blast designs were developed to reduce annoyance effects from blast-induced air blast overpressure; maximum explosives mass per time delay for the different blast zones (Z1, Z2, and Z3) decreases substantially from 1020 Kg to 68 Kg as the blasts approach Jacko Lake use of lower explosives per delay in Z3 enables the blast effect to be in compliance with the DFO stipulation at Jacko Lake hole diameter sizes, number of decks, and stemming configurations are designed for different zones; only one hole/delay will be fired on the blast; minimum time delay between holes in all blasts will not be less than 8 millisecond (ms); and row time delays will be incremented from the front of the blast towards the back with 100 to 300 ms. 	
Water Quality and Quantity	<p>1) <u>Water Quality:</u></p> <ul style="list-style-type: none"> Mine's impact on water quality, usage and treatment; Ensure water quality is protected during mine operations; Need for water quality research, assessing potential effects on water quality, and protecting water quality; Usage of water from Kamloops Lake, and potential contamination of this water; Concerns raised regarding water quality, especially potential leakage from piles into Peterson Creek. Concerns raised regarding potential effects from acid drainage from stockpiles. Concern raised about waste from tailings going into Inks Lake. <p>2) <u>Water Quantity:</u></p> <ul style="list-style-type: none"> Concerned about the amount of water to be used by the Project and how much will come from Kamloops Lake; Concerns regarding the pumping station location affecting flow in the southeast arm of Jacko Lake - low flow could cause the arm to become stagnant and there could be serious fish loss in the area; Irrigation if water levels in Jacko Lake fluctuate; Potential effects to Rush Creek (flows once every five years); 	<ul style="list-style-type: none"> Public Individuals Sugarloaf Ranches Kamloops Area Preservation Association Riseform Fishing Kamloops Fly Fishers' Association 	<ul style="list-style-type: none"> Workshop Meeting Drop-in Visit/Casual Meeting E-Mail Open House Phone-Call 	<p>1) <u>Water Quality:</u></p> <p>Potential effects on fish populations and fish habitat are assessed in Section 6.7 of the Application/EIS. The assessment considers potential effects on rainbow trout population abundance and fish habitat utilization in Jacko Lake and Peterson Creek.</p> <p>The Application/EIS identifies measures to avoid or minimize adverse effects on fish and fish habitat, including an offsetting plan to ensure no net loss of productive fish habitat. In addition, KAM will implement a Fisheries And Aquatic Life Monitoring Plan so that measures and controls are in place to minimize potential adverse effects on fish during all phases of the Project.</p> <p>KAM will implement measures to address water concerns, including:</p> <ul style="list-style-type: none"> designing the Project to maintain a negative water balance, designing a robust surface water collection and management system for the site, recycling water to the greatest extent possible, and relocating the TSF out of the Alkali Creek watershed (including Cherry Creek). <p>With respect to potential effects from acid rock drainage, KAM has conducted a geochemical characterization of waste rock to guide blending requirements in the mine waste management plan. These operational management plans, in addition to long-term reclamation plans, are intended to provide long-term geochemical stability. KAM will also implement an Acid Rock Drainage Management Plan, and a Construction Waste Management Plan (refer to Section 11 of the Application/EIS). KAM will also implement a Mine Closure and Reclamation Plan as presented in Section 3.17 of the Application/EIS.</p> <p>The TSF surface will be reclaimed with a cover system designed to 'store and release' water, limit infiltration to underlying waste materials and provide a medium for establishing sustainable vegetation cover consistent with the final land use. There will be no ultimate closure pond and excess water will shed via a channel connecting the TSF to Humphrey Creek (assumed in the Post-Closure phase); in the interim flow will be diverted to the Open Pit. Water collecting in the TSF water management ponds will either be pumped back to the TSF or directly to the Open Pit or gravity drain to the Open Pit in the Decommissioning and Closure phase. In the Post-Closure phase, the water management ponds are expected to operate as evaporation ponds with any flood flow released to the</p>	<p>Technical studies are underway and the results will be presented in the Application/EIS.</p> <p>The public will have the opportunity to review the results during the Technical Review Phase. Planned consultation activities during the Technical Review Stage are presented in Section 4.7.3 of the Application/EIS.</p>

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	<ul style="list-style-type: none"> Concern that drilling could inadvertently connect fractures and cause immigration pattern that would damage the flow of an area. <p>3) <u>Fish and Fish Habitat:</u></p> <ul style="list-style-type: none"> Potential project effects on fisheries, in particular Jacko Lake; Need for protection of water quality and quantity to sustain sockeye salmon and trout in the Thompson River watersheds; Need for protection of water quality and quantity to sustain stocked rainbow trout in Jacko Lake; <p>4) <u>Groundwater Quality:</u></p> <ul style="list-style-type: none"> Potential for groundwater contamination due to mine activity; Potential long-term effects on groundwater of acids produced by weathering, and oxidation of residual sulfides and other minerals; Concerns raised regarding infiltration of residue into the groundwater; Concerns raised regarding potential increase in groundwater issues in Aberdeen; KAM to address climate change relating to water table levels in aquifers; 			<p>environment.</p> <p>2) <u>Water Quantity:</u> The Project is being designed to minimize water use, with water recycled on site to its greatest extent. At peak operation, water use will be less than 0.5% of Kamloops Lake’s lowest inflows. The assessment of effects on surface water and groundwater quantity are presented in Sections 6.4 and 6.6 of the Application /EIS respectively. KAM will also implement a Water Management and Hydrometric Monitoring Plan to protect water quantity.</p> <p>3) <u>Fish and Fish Habitat:</u> Potential effects on fish populations and fish habitat, including potential cumulative effects when appropriate, are assessed in Section 6.7 of the Application/EIS. The effects assessments concludes the following with respect to direct, indirect habitat loss, fish mortality and primary productivity:</p> <ul style="list-style-type: none"> The Significance of direct habitat loss of the northeast arm of Jacko Lake and the section of Peterson Creek within the Project footprint is anticipated to be Not Significant (minor). With the proposed offsetting ratios (habitat loss: habitat gain) and the similarity of the offsetting measures with the historical and ongoing mitigation and management measures in Jacko Lake (fish stocking, installation of outlet dams to raise the water level and increase water storage) the effectiveness of the offsetting plan to address serious harm to fish associated with direct habitat loss in Jacko Lake and Peterson Creek is assumed to be high. The Significance of indirect direct habitat loss in Peterson Creek resulting from reduced flow is anticipated to be Not Significant (moderate). The Probability that the residual indirect habitat loss will occur is deemed Low, since the magnitude of flows during September to April are very small and the difference between the predicted flow and guideline threshold flow is often on the order 0.001 m³/s, which is likely within the resolution of the water balance model and field validation measurements. The Significance of fish mortality on the productivity of the rainbow trout population within Jacko Lake from Blasting and from installation of the sheet pile dam is anticipated to be Not Significant (minor). The Probability that there will be a measureable change on the productivity of the rainbow trout population is deemed Low. The Significance of changes in primary productivity on the productivity of the rainbow trout population Peterson Creek is anticipated to be Not Significant (minor). The Probability that there will be a measureable change on primary productivity is deemed Low, since the magnitude of flow changes are likely within the resolution of the water balance model and field validation measurements. <p>KAM will implement a Fisheries And Aquatic Life Monitoring Plan so that measures and controls are in place to minimize potential adverse effects on fish during all phases of the Project.</p> <p>With respect to potential effects from blasting on fish, blast designs have been developed to protect marine life in Jacko Lake during the spawning period, by complying with the maximum allowable levels of ground vibration and airblast stipulated by the Department of Fisheries and Ocean Canada.</p> <p>With respect to Thompson River, the effects assessment states that changes in flow in the Thompson River downstream will be negligible and that there is no reasonable expectation that there will be an effect on Fish and</p>	

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				<p>Fish Habitat.</p> <p>4) <u>Groundwater Quality:</u> Detailed results of the assessment of potential effects on surface and groundwater quality are presented in Sections 6.3 and 6.5 of the Application/EIS. Section 10.2 of the Application/EIS presents the effects assessment of the Domestic Water Quality Valued Component. Based on preliminary numerical groundwater flow and particle tracking simulations groundwater is not predicted to migrate across the boundary between the Cherry Creek and Peterson Creek watersheds. KAM will monitor water quality on an on-going basis throughout the life of the Project and will implement Surface Water and Groundwater Quality Management and Monitoring Plans to ensure human and environmental health is accounted for through all phases of the Project development (Section 11).</p>	
Accidents and Malfunctions	<ul style="list-style-type: none"> Concern raised regarding accidents and malfunctions specifically regarding any effluent ending up in Peterson Creek or in the little water course that runs out of Makaoo Lake; Concern raised about waste from tailings going into Inks Lake; Concern that KAM will not have a contingency plan and fund in place in case of a malfunction of the TSF. Concern raised regarding where would effluent go in the event of a TSF breach; Concerns regarding malfunctions and what would be affected by a release; Concerns about the August 4, 2014, failure of a tailings storage dam at Imperial Metals' Mount Polley copper mine and the Ajax Project. Potential effects of the mine on the Kinder Morgan Pipeline and the possibility of a rupture 	<ul style="list-style-type: none"> Public Individuals Grasslands Conservation Council 	<ul style="list-style-type: none"> E-Mail Phone-Call Open House Meeting Workshop 	<p>Makaoo Lake is located outside of the catchment affected by the Project, and thus potential effects are not expected on this lake and water course.</p> <p>The location of the TSF in the updated GA avoids Inks Lake. The TSF embankment design will be in accordance with the Canadian Dam Association Dam Safety Guidelines. Stability analysis will be completed as part of geotechnical design TSF embankments. This information will be provided as supporting documentation to the Application/EIS. Accidents and Malfunctions are assessed in Section 17.6 of the Application/EIS. The assessment includes scenarios for TSF failure. KAM will implement an Accident and Malfunction Management Plan (including consideration of potential effects on the Kinder Morgan pipeline). Further, the Kinder Morgan pipeline will also be realigned to avoid mine facilities.</p> <p>The proposed Ajax Project TSF dams will utilize downstream construction buttressed with excavated mine rock. The company intends to use best-available technology and has committed to adopt best practices emerging from ongoing investigations and inquiries of the Mount Polley dam failure. The proponent continues to explore the nature of best-available tailings storage technology, including, thickened, paste and filtered or dry stack tailings storage. A full assessment of options is included in the Application/EIS.</p> <p>Section 3.17 of the Application/EIS includes a Reclamation and Closure Plan. The Project will be designed with closure in mind; progressive reclamation will continue throughout the life of the Project. Security/reclamation bonds will be put in place in accordance with the Ministry of Energy and Mines requirements, and reclamation will continue until requirements are met. Reclamation, water quality and other relevant monitoring will continue until results meet regulatory requirements and further monitoring is no longer necessary.</p>	<p>Technical studies are underway and the results will be presented in the Application/EIS.</p> <p>The public will have the opportunity to review the results during the Technical Review Phase. Planned consultation activities during the Technical Review Stage are presented in Section 4.7.3 of the Application/EIS.</p>

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Aerial Surveys	<ul style="list-style-type: none"> Concern expressed about low-level magnetic aerial survey (March 2014) and the timing of the flights, as they were scheduled to happen at the peak of calving season, a time when pregnant cows become exceptionally skittish to disturbance; Concerns raised regarding potential effects from noise and vibration on horses due to airborne geophysics survey (field work). 	<ul style="list-style-type: none"> Public Individuals (e.g. landowners of Knutsford area) 	<ul style="list-style-type: none"> Letter Phone Call E-Mail 	<p>KAM delayed the aeromagnetic survey by more than six weeks to allow the calving season to conclude. As well, the company agreed to fly only between the hours of 8 a.m. and 5 p.m. weekdays only, to limit potential disturbances to people. Letters notifying of the flights were hand-delivered to area landowners.</p> <p>With respect to potential effects on horses from airborne geophysics survey, the concern was passed on to the KAM program lead and the property near Separation Lake was avoided as much as possible.</p>	Resolved.
Access	<ul style="list-style-type: none"> Concerns raised regarding potential effects of the closure of Goose Lake Road for use by local landowners; Concerns raised regarding access to Jacko Lake. 	<ul style="list-style-type: none"> Public Individuals 	<ul style="list-style-type: none"> Open House 	<p>The effects assessment of land and resource use is presented in Section 8.5 of the Application/EIS. KAM is committed to developing a site Access Management Plan, which will address overall access to the site for resource users, including ranchers, for the construction, operation and decommissioning of the Project. The Access Management Plan's primary objective will be to maintain public safety and worker safety, while allowing for continued use and enjoyment of areas in proximity to the Project. The Access Management Plan will:</p> <ul style="list-style-type: none"> Identify activities likely to be affected by the Project; Identify what continued land uses will be permitted and where those activities can occur; Identify what control measures might be necessary to ensure continued public and worker safety; and Commit KAM to timely and on-going communication with affected land and resource users to enable continued use of the area where safe and appropriate to do so. <p>As a part of this, KAM is committed to working with ranchers on an annual basis to understand their plans for ranching activities in proximity to the site, including the timing and nature of those activities. This will include KAM providing updates on the Project's construction and operation, and any changes to the availability of lands for ranching purposes. If so desired by ranchers, this annual information sharing process can also provide results of other monitoring programs, so as to address any concerns ranchers have regarding things such as air quality, water quantity, noise and vibration, etc. The sharing of information, both on behalf of KAM and of the ranchers will allow for adaptive management if there is variation from the predicted Project effects. This may include developing enhancement measures within KAM's private lands (e.g., clearing areas to permit improved access, developing new water access, etc.) to support on-going ranching activities. KAM has indicated in meetings to date with local ranchers and water licence holders potentially affected by the Project that KAM will work with ranchers to ensure sufficient mitigation measures are present where Project-related adverse effects impact the ability to sustain cattle operations.</p>	Access Management will be subject to ongoing consultation between KAM and land users.
Non-Traditional Land and Resource Use (Environment and Environmental Appreciation)	<p><u>Recreation:</u></p> <ul style="list-style-type: none"> Potential effects on recreation opportunities in Inks Lake, and mitigation for loss of recreational pursuits; Land-based effects on outdoor recreation activities (such as skiing and fishing). Potential for lost or compromised recreational opportunities, primarily those associated with Jacko Lake, Inks Lake, Goose Lake, and Goose Lake road; <p><u>Cattle and Grazing:</u></p> <ul style="list-style-type: none"> Concerned that deer population in the current TSF area will move into landowner's haying 	<ul style="list-style-type: none"> Public Individuals Sugarloaf Ranches Kamloops Tourism KAM Community Advisory Group 	<ul style="list-style-type: none"> Workshop Meeting Open House Letter 	<p>KAM followed-up on concerns raised by landowners by conducting for example direct visits to landowner homes and properties to discuss issues, concerns, and future plans. KAM also hosted a ranching event was held at a KAM-owned property in Knutsford to discuss ranching concerns.</p> <p><u>Recreation:</u></p> <p>Section 8.6 of the Application/EIS presents the effects assessment on outdoor recreation. Potential effects related to reduced opportunities as a result of changes in access will occur from the start of construction through operations. The effect is expected to be of medium magnitude as circumstances will differ substantially from the baseline condition. Goose Lake and Goose Lake Road will both be taken out of recreational use and the northeast arm of Jacko Lake will no longer be available for fishers. Blasting activities will place some restrictions on recreationalists accessing Jacko Lake, particularly up to approximately Year 13 of operations. Project-related traffic could also potentially impact some recreationalists (e.g., cyclists using Lac Le Jeune Road). Mitigation measures (e.g., development/enhancement of alternate outdoor recreation activities) will be in place to offset the loss or alteration of these opportunities. The potential effect related to reduced opportunities resulting from changes in access are expected to be Not Significant (Moderate).</p>	<p>Technical studies are underway and the results will be presented in the Application/EIS.</p> <p>The public will have the opportunity to review the results during the Technical Review Phase. Planned consultation activities during the Technical Review Stage are presented in Section 4.7.3 of the Application/EIS.</p>

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	<p>fields once TSF has been built;</p> <ul style="list-style-type: none"> Potential effects to cattle, in particular cows and calves; Metals in deer/cattle; Potential for cattle to eat drilling mud or bentonite; Mine proximity on location of cattle grazing; Potential project effects on ranching and cattle movement; <p><u>Other Non-Traditional Land Uses:</u></p> <ul style="list-style-type: none"> Potential effects of mining on land use rights of others; Potential damages to property gates of Sugarloaf Ranches; Location of the mine in relation to Sugarloaf Ranches property; Concern regarding the proximity of the mine to the landowner's property, and effects on their water well; Concern raised regarding past project fieldwork activities such as archaeological work and drilling for water on landowner's property without permission; Potential effects of mine on ranching activities during construction and operation; Concern raised regarding proximity of TSF to the landowner's property. 			<p>Potential effects related to diminished quality of experience are expected to be Not Significant (Moderate). Individual outdoor recreationalists may experience a reduced quality of their experience. This would be most likely for fishers on Jacko Lake (e.g., as a result of blasting activities) and hikers accessing areas where some potential effects related to other VCs may occur (e.g., visual impacts). Assessed over the broad range of activities and locations however, it is anticipated that mitigation measures and the opportunities presented in other locations will help to offset the potential effects.</p> <p>Potential effects related to reduced opportunities resulting from changes to resources are expected to be Not Significant (Minor). The Jacko Lake fishery has not expected to be adversely effected. Trapping within the Project footprint area has not been undertaken for a very long time. Hunting activities (on private land) have been generally restricted by the need to ask for permission to access the land for hunting purposes.</p> <p><u>Cattle and Grazing:</u></p> <p>The effects assessment of land and resource use presented in Section 8.5 of the Application/EIS states that potential effects related to changes in current ranching practices will occur from the start of construction through operations. The effects are expected to be of minor magnitude as circumstances will differ from the average value for baseline conditions. The Project will alter the way in which existing ranching activities occur by removing some grazing lands in the immediate vicinity of the mine site, altering access to lands currently used for ranching, and altering the movement of cattle between grazing sites and across KAM property as a result of Project activities. The effects assessment concludes that the residual effects related to the changes to current ranching practices are expected to be Not Significant (Minor). Despite the loss of some lands and access to and across KAM lands, it is anticipated that both the mitigation of contributing VCs (air quality, water quantity, noise and vibration) and the implementation of the Access Management Plan will help to off-set the identified effects. KAM's ongoing commitment to ranching and the ranching community is expected to help enhance resiliency within the community.</p> <p>KAM has also indicated in meetings to date with local ranchers and water license holders potentially affected by the Project that KAM will work with ranchers to ensure sufficient mitigation measures are present where Project-related adverse effects impact the ability to sustain cattle operations.</p>	
<p>Visual Aesthetics/ Dark Sky (Project Related)</p>	<ul style="list-style-type: none"> Potential adverse effects on visual/aesthetic features; View obstruction caused by the power line and waste rock storage facility; Concern regarding visual aesthetics of tourism corridors and driving routes; Size and visibility of the waste rock and tailing piles (from landowner properties); Potential effects to dark sky from light pollution (mining being conducted 24/7); Potential blockage of the sun and wind by project components (affecting solar and wind energy used for homes). 	<ul style="list-style-type: none"> Public Individuals Kamloops Tourism 	<ul style="list-style-type: none"> Letter Workshop Meeting Open House Phone Call 	<p>Section 8.4 of the Application/EIS presents the assessment of potential Visual Impact and Aesthetic Features effects. In the assessment, the Construction and Decommissioning and Closure Phases were assessed together with the Operations Phase, as the effects during those phases will not be substantially different nor greater than the effects during the Operations Phase. During these phases, the Project will alter the visual quality of the landscape. Mitigation measures including progressive re-vegetation will be applied, but residual effects on the landscape from some viewpoints will remain as presented in Table 8.4-13. The construction and use of the mine rock storage facilities and overburden and topsoil stockpiles will continue throughout the Operations Phase, and the parts of those Project components that are in use cannot be re-vegetated. Landscape viewing locations closer to the Project will be affected to a larger degree than those further away, as the Project components will occupy a larger portion of the view of the landscape. All Project components will be re-vegetated at closure which will minimize the long-term effect on visual quality during the Post-Closure phase. The effects assessment concludes that both the Project-specific and cumulative residual effect (reduction of visual quality) is predicted to be Non-Significant (Moderate).</p> <p>Section 8.2 of the Application/EIS presents the effects assessment on the Dark Sky Valued Component.</p>	<p>Technical studies are underway and the results will be presented in the Application/EIS.</p> <p>The public will have the opportunity to review the results during the Technical Review Phase. Planned consultation activities during the Technical Review Stage are presented in Section 4.7.3 of the Application/EIS.</p>
<p>Geology, Landforms, Soils</p>	<ul style="list-style-type: none"> Concerns raised regarding changes to the topography of the land and the effects of those changes, and soil stability. 	<ul style="list-style-type: none"> Public Individuals 	<ul style="list-style-type: none"> Workshop 	<p>Section 6.2 of the Application/EIS presents the effects assessment for the Geology, Landforms and Soils Valued Component. The residual effect (alteration of baseline landforms) was rated as not significant (minor) during Construction, Operations and Closure Phases of the Project. As a result of the Project, change at the landscape level will occur. The Project will affect slope gradients and topographic function of the landscape. The development of</p>	<p>Technical studies are underway and the results will be presented in the Application/EIS.</p>

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				<p>a compact Project footprint and the eventual reclamation of the site would reduce the overall effect of the Project. The original distribution of baseline topographic conditions would not be re-established; however, upon reclamation, a fully functional landscape would be developed to support the reclamation goals. Following implementation of mitigation measures, residual effects, in the form of new topographic features and water bodies, are expected to remain for the alteration of landforms indicator.</p> <p>Stability analysis was completed as part of geotechnical designs of the waste rock storage facilities and TSF embankments. This information is provided as supporting documentation to the Application/EIS.</p> <p>Section 3.17 of the Application/EIS includes a Reclamation and Closure Plan. The Project will be designed with closure in mind; progressive reclamation will continue throughout the life of the Project.</p>	<p>The public will have the opportunity to review the results during the Technical Review Phase. Planned consultation activities during the Technical Review Stage are presented in Section 4.7.3 of the Application/EIS.</p>
Consultation	<ul style="list-style-type: none"> Concern raised regarding how the community can be kept informed about monitoring progress and upholding commitments; Concerns raised regarding the need to provide more concrete project details to the community. 	<ul style="list-style-type: none"> Public Individuals 	<ul style="list-style-type: none"> Open House Phone Call 	<p>Planned consultation activities during the Technical Review Stage are presented in Section 4.7.3 of the Application/EIS.</p> <p>As outlined in Section 3.17.9 of the Reclamation and Closure Plan, monitoring during the closure period is required under section 10.7.30 of the Code and the Environmental Code of Practice for Metal Mines (Environment Canada 2009) to demonstrate that reclamation and environmental protection objectives are being achieved. Monitoring activities will be carried out by qualified technicians and the results provided in annual reclamation and environmental monitoring reports.</p>	<p>Consultation between KAM and public stakeholders on monitoring results will be ongoing.</p>
Closure and Reclamation	<ul style="list-style-type: none"> Concerns raised about the scope of reclamation plans and remediation of the site after mine closure. Concerns raised regarding the ability to restore grasslands and recreate natural habitat; Concerns raised regarding need to monitor reclamation phase, in particular Knapweed would be a major issue; Concerns raised regarding the potential for reclamation to not be completed if the mine goes bankrupt; Concerns about quality of reclamation work in northwest corner of property that used to belong to George (now KAM's); Concerns raised regarding effectiveness of weed control during reclamation, and use of proper seed mixes. 	<ul style="list-style-type: none"> Public Individuals 	<ul style="list-style-type: none"> Workshop Meeting 	<p>Section 3.17 of the Application/EIS includes a Reclamation and Closure Plan. The Project will be designed with closure in mind; progressive reclamation will continue throughout the life of the Project. Security/reclamation bonds will be put in place in accordance with the Ministry of Energy and Mines requirements, and reclamation will continue until requirements are met. Reclamation, water quality and other relevant monitoring will continue until results meet regulatory requirements and further monitoring is no longer necessary.</p> <p>The main objective of the re-vegetation program presented in the Reclamation and Closure Plan will be to support the equivalent grazing capacity of the grasslands to the pre-disturbance condition. Other objectives include providing long-term stability of disturbed areas, preventing invasive species, reducing erosion and dust emission, and providing diverse habitats for self-sustaining ecological communities. Native vegetation is a major component of the existing landscape within the Project footprint. Predominant species include blue-bunch wheatgrass and rough fescue; shrubs such as big sagebrush, rabbit-brush, rose and snowberry; and woody species including aspen, ponderosa pine and Douglas-fir. Grassland reclamation will include both native and agronomic forage species. Fall rye and annual rye grass (agronomic species) will be included to provide quick establishment and ground cover for erosion control, soil stabilization and weed control. Pasture will be established using alfalfa, wheatgrass, fescue and ryegrass. Further details on seed mixes are provided in the Conceptual Restoration Plan (Section 11.18).</p> <p>Planning diverse habitats for self-sustaining ecological communities will be based on 'Reclamation Treatment Units' (RTUs) that identify areas based on elevation, slope and aspect (solar radiation).</p> <p>The RTUs are simplified capability units that provide the framework for developing treatment regimes that focus on the specific ecological factors that are limiting to the establishment of target plant communities including grasses, forbs, trees, and shrubs. Monitoring and maintenance of re-vegetated areas will continue until self-sustaining vegetation has established and will likely be required into the Post-Closure phase. Monitoring includes presence / absence inspections, mapping of areas identified as containing invasive plants that have been treated with herbicide or physically removed and maintenance of the data base of the 'Invasive and Alien Plant Program' (administered by the Southern Interior Weed Management Committee). Maintenance includes weed control and re-vegetation.</p>	
Traffic	<ul style="list-style-type: none"> Concern raised regarding increased traffic along Goose Lake Road as a result of the Project; Concern raised regarding traffic effects on 	<ul style="list-style-type: none"> Public Individuals KAM Community Advisory Group 	<ul style="list-style-type: none"> Meeting Letter Workshop 	<p>Potential effects on transportation and traffic are assessed in Section 8.1 Infrastructure, Public Facilities and Services of the Application/EIS. Project activities are expected to affect flow of traffic through some interchanges. Overall, the Traffic Impact Assessment (TIA, Opus International 2015) concludes that the Project will affect</p>	<p>Technical studies are underway and the results will be presented in</p>

Topic	Key Issues/Concerns/Comments Raised	Stakeholders/ Organizations	Manners Raised	KAM Response	Status of Resolution
	<p>highway corridors utilized by visitors to Kamloops;</p> <ul style="list-style-type: none"> Concerns raised about increased use of Lac La Jeune Road combining mine use with recreational traffic; Concerns about increased traffic on Hwy 5A and Goose Lake Road during construction. 	<ul style="list-style-type: none"> Kamloops Tourism Grasslands Conservation Council 	<ul style="list-style-type: none"> Meeting 	<p>interchange performance minimally, although some interchanges have pre-existing low level of service. The effect is expected to be not significant (minor). This residual effect is expected to interact with construction of the Trans Mountain Expansion Project (TMEP). Currently, Trans Mountain Pipeline ULC (TMPL) is devising its logistics plans, which makes it difficult to determine the cumulative effects, although interaction is anticipated.</p> <p>A Transportation Plan will be developed by the proponent in conjunction with the Ministry of Transportation and Infrastructure.</p>	<p>the Application/EIS.</p> <p>The public will have the opportunity to review the results during the Technical Review Phase. Planned consultation activities during the Technical Review Stage are presented in Section 4.7.3 of the Application/EIS.</p>
Compliance and Enforcement	<ul style="list-style-type: none"> Concern raised regarding compliance and enforcement, as well as the accountability of the proponent for following appropriate guidelines and requirements. Concerns about the legacy of mining, as exemplified by problems encountered with historic mines in other jurisdictions. 	<ul style="list-style-type: none"> KAM Community Advisory Group 	<ul style="list-style-type: none"> Meeting 	<p>The Project has undergone a number of design changes, including relocation of tailings and mine rock storage facilities, which were moved farther south and away from Kamloops neighborhoods. KAM will meet or exceed Ministry of Energy and Mines and other regulatory requirements regarding noise, dust and other operational aspects, and the Project will follow best management practices and adaptive management strategies.</p> <p>Section 3.17 of the Application/EIS includes a Reclamation and Closure Plan. The Project will be designed with closure in mind; progressive reclamation will continue throughout the life of the Project. Security/reclamation bonds will be put in place in accordance with the Ministry of Energy and Mines requirements, and reclamation will continue until requirements are met. Reclamation, water quality and other relevant monitoring will continue until results meet regulatory requirements and further monitoring is no longer necessary.</p>	<p>Technical studies are underway and the results will be presented in the Application/EIS.</p> <p>The public will have the opportunity to review the results during the Technical Review Phase. Planned consultation activities during the Technical Review Stage are presented in Section 4.7.3 of the Application/EIS.</p>

Topic	Key Issues/Concerns/Comments Raised	Stakeholders/Organizations	Manners Raised	KAM Response	Status of Resolution
Socio-Economics	<ul style="list-style-type: none"> • Need for a comprehensive socio-economic study to be completed so that potential effects on tourism, property values, professional recruiting, staffing and training for locals, etc., can be evaluated; • Concerns about the perceived “marginal grade” of the Ajax Project and mine viability, and the danger of commodity swings and boom and bust; • Concerns about whether local residents who seek Ajax Project employment will be trained; • Concerns about the possibility that some people might move to Kamloops just to work at the mine even though they have no connection or commitment to the community; • Concern raised regarding the proximity of new layout of the power line to landowner's property and potential effects of mine on landowner's lifestyle; • Concern raised regarding change in viewscape affecting tourism and therefore economics in Kamloops; • Concern raised regarding potential effects on future business plans and expansions; • Concern raised regarding location of mine on area businesses; • Concern raised regarding potential effects on infrastructure, housing and recreation; • Concerns raised regarding jobs from the Project for Kamloops residents; • Potential of decline in property value near mine; • Potential of increase in crime due to increase in population; • Potential of increase in taxes; • Concern raised regarding potential effects on city image, tournament branding and recruitment/retention of professionals. 	<ul style="list-style-type: none"> • Public Individuals • TLC for Pets • KAM Community Advisory Group • Sugarloaf Ranches • Kamloops Tourism 	<ul style="list-style-type: none"> • Letter • Meeting • Drop-in Visit/Casual Meeting • Phone Call • E-Mail • Workshop 	<p>KAM is committed to building strong and lasting partnerships in the community, to hiring employees locally, and to identifying partnerships with education and training organizations and institutions to develop the expertise required.</p> <p><u>Potential effects on business:</u></p> <p>Potential effects of the Project on Business are presented in Section 7.4 of the Application/EIS. In summary, the residual effect related to increased labor competition is expected to be Not Significant (Minor). No mitigation is proposed as it is expected that the businesses will be able to manage effectively through their own planning. No cumulative effects are anticipated.</p> <p><u>Potential effects on property values:</u></p> <p>Potential effects on property values are assessed in Section 7.5 of the Application/EIS. Section 7.5.5.6 states that during the construction and operations phases of the Project, the Project activities are expected to have a Not Significant (Moderate) effect on perceived changes in residential and agricultural property values. It is assumed that mitigation measures for other disciplines, such as air quality, noise and vibration, and visual impacts and aesthetic features will minimize potential Project effects on residential and agricultural property values. After the implementation of mitigation measures, the Project is still expected to have two residual effects: Perceived changes in residential property values, and Perceived changes in agricultural property values.</p> <p>The cumulative effects assessment concludes that after the implementation of mitigation measures, a cumulative effect will likely remain. There may be a perceived cumulative change to agricultural property values, especially during and immediately following construction of the Trans Mountain Expansion Project (TMEP).</p>	

Topic	Key Issues/Concerns/Comments Raised	Stakeholders/Organizations	Manners Raised	KAM Response	Status of Resolution
Wildlife and Wildlife Habitat (including Grasslands)	<ul style="list-style-type: none"> Concerns raised about displacement of local wildlife and loss of natural habitat, particularly grasslands; Concerns raised regarding the ability to restore grasslands and recreate natural habitat; Concern regarding the amount of grasslands affected with the new GA. Concern about what will happen to waterfowl using the tailings pond. 	<ul style="list-style-type: none"> Public Individuals Grasslands Conservation Council KAM Community Advisory Group 	<ul style="list-style-type: none"> Workshop Meeting Open House 	<p>Potential effects of the Project on migratory birds, including effects on birds landing on the TSF, are assessed in Sections 6.16 of the Application/EIS.</p> <p>Potential effects of the Project on wildlife, -including habitat alteration and loss, disturbance and displacement and mortality-, and measures to mitigate potential adverse effects are described in Sections 6.11 to 6.17 of the Application/EIS. Effects on wildlife will be monitored through the implementation of the Wildlife and Vegetation Monitoring Plan.</p> <p>KAM acknowledges the importance of grasslands as sensitive ecosystems that support large number of species. Potential effects of the Project on grasslands and measures to mitigate adverse effects are described in Section 6.10 of the Application/EIS.</p> <p>Grasslands link to numerous other valued components, including most vegetation and wildlife species listed as value components, recreation, and land use. The interrelationships between grasslands and these valued components are discussed in each VC.</p> <p>In addition to terrestrial habitat mapping (which classifies the grassland communities), grassland priority mapping from the Grasslands Conservation Council of BC has also been considered when determining effects to grasslands. Grassland priority mapping considers rare ecosystems, habitat for species at risk and terrain types, as well as other benefits such as improving air, water, and human health.</p> <p>Permanent destruction of grasslands will be avoided where possible. Re-establishment of grasslands during progressive reclamation may be proposed as mitigation</p> <p>Security/reclamation bonds will be put in place in accordance with provincial requirements</p> <p>Should the Ajax Project be approved and proceed, a variety of management and mitigation plans will be implemented to avoid or minimize adverse effects on grasslands, including:</p> <ul style="list-style-type: none"> Wildlife/Vegetation Monitoring Plan; Air Quality Monitoring and Dust Control Plan; Transportation/Access Management Plan; and Surface Water Management/Monitoring Plan. <p>Potential effects on outdoor recreation will be assessed and described in the Application/EIS.</p> <ul style="list-style-type: none"> Access to Jacko Lake will be maintained during operation. However, use of Jacko Lake and surrounding land will be restricted during blasting for public safety. Advance notification, when possible, of proposed blasts. Peterson Creek flows will be maintained downstream of the project area. <p>Mitigation and offsetting approaches for potential effects on fish habitat are being evaluated as part of the Application/EIS. The Outdoor Recreation VC will consider potential effects on recreational fishing and present potential mitigation measures.</p>	<p>Technical studies are underway and the results will be presented in the Application/EIS.</p> <p>The public will have the opportunity to review the results during the Technical Review Phase. Planned consultation activities during the Technical Review Stage are presented in Section 4.7.3 of the Application/EIS.</p>
Mine Design (Project Related)	<ul style="list-style-type: none"> Concern about distance of KMP pipeline from the Project berm and pit; Concern raised regarding the location of the tailings pond and where will the ore be milled. Concern raised regarding the proximity of East Waste Rock Storage Facility (EWRSF) to landowner's property. Concern regarding mine site location and safety issues associated with the new GA; Concerns regarding extent south of industrial disturbance; Ditches needed around facilities; 	<ul style="list-style-type: none"> Public Individuals Grasslands Conservation Council 	<ul style="list-style-type: none"> Workshop E-Mail Meeting Open House Phone Call 	<p>The updated GA brings key facilities closer together reducing air emissions. This change responds to health concerns related to dust and noise generation. The TSF is also proposed at a new location, which avoids Inks lake and prevents the TSF from being visible from the Coquihalla Highway.</p> <p>The pit will be located at least 50 m from the pipeline.</p> <p>KAM intends to process ore on site and ship a copper concentrate for smelting in other places. There will be no smelter in Kamloops. There will be tailing storage facilities on site, but the safety of Peterson Creek and neighboring Jacko Lake will be a major priority. KAM will design structures and processes with the watershed's safety in mind.</p>	

Topic	Key Issues/Concerns/Comments Raised	Stakeholders/ Organizations	Manners Raised	KAM Response	Status of Resolution
	<ul style="list-style-type: none"> • Concern about long-term effectiveness of tailings pond dyke materials; • Concern raised regarding the new location of Mine Rock Storage Facility (MSRF) and proximity to nearby property; • Concerns raised with the location of the Project and suggestions to relocate the mine. 				

PROJECT DESCRIPTION ISSUES TRACKING TABLE

Public Comment Period June 8 To July 11, 2011

(14 pages)

KGHM AJAX MINING INC.
AJAX PROJECT

PROJECT DESCRIPTION ISSUES TRACKING TABLE
PUBLIC COMMENT PERIOD JUNE 8 TO JULY 11, 2011

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Comment #	Date	Name	Location	Comment	Issue for Consideration																				
					Air Quality / Dust	Noise	Vibration	Light pollution	Fish & Fish Habitat	Surface Water Quality	Surface Water Quantity	Groundwater Quality	Groundwater Quantity	Wildlife	Grasslands / Ecosystems	Aesthetics	Human Health / Safety / Well-being	Recreation	Tourism / Investment	Economy / Employment	Land and Resource Use	Infrastructure	Terrain / Soil Stability		
1	08-Jun-11	Personal Information Withheld	Knutsford, BC	The noise level, 24hr, 7days per week from the mine crushing 60,000 tonne of rock a day, blasting, use of haul-trucks and multi engines, will be excessive and damaging to property owners, recreation site users and wildlife. The 2500 ha. of sensitive natural grassland will have a high rate of reclamation failure. As well as the chemical residue from recycled water and tailings having the potential to seep into surface and ground sources. The Kamloops valley is prone to wind and inversions. The mine will add particulates, toxins and exhaust fumes to an already saturated environment. The mine will require a high voltage power line that will extend directly through residential areas and be a major consumer. Presently a 50% increase is predicted for residence over the next few years while the mine will be receiving a subsidy. The city of Kamloops and the surrounding communities were not established as a mining town environment. The massive amount of overburden from the mine will cover a significant area of southern hillsides changing this environment forever.	1	1																			
2	08-Jun-11	Personal Information Withheld		To Whomever it may concern: 1. With Canada's poor environmental record in the rest of the world, is there any concern about allowing a giant size strip mine, partly within the city limits of 85,000 people. Has this ever been done before? 2. We live at the highest point in Kamloops with a view over the valley and have watched the air quality deteriorating every year to the point where it is starting to be a health hazard to even live in Kamloops. 3. What amount of fine particles and what kind of chemicals is this mine going to put into Kamloops already fragile air shed? 4. With climate change happening and the concern for fresh water, is it wise to jeopardize the future water supply from Kamloops Lake, for the benefit of a Polish strip mine? 5. Allowing this mine to go ahead will influence the health of the majority of Kamloops 85,000 people. WHY WAS ENVIRONMENT CANADA CREATED IN THE FIRST PLACE?	1																				
3	09-Jun-11	Marjorie Ponne	Knutsford, BC	I am not in agreement to the agenda of the Ajax mine. I believe it will cause inevitable damage to the surrounding area and lakes, especially Jacko Lake as it is a favorite wilderness spot to kayak and photograph nature. The noise and pollution will not be welcome by locals or tourists as they pass through this region.	1	1																			
4	09-Jun-11	Derek Fisher	Kamloops, BC	Although I am not opposed to resource extraction and am well aware of our society's growing demand for copper and other resources, I have several concerns regarding this project. 1. The Government of British Columbia (A GIS Based Water Quality Assessment of Thompson Region Watersheds, Samantha Cooper) has identified the Peterson Creek Watershed as the highest risk small watershed in the region based on the local landscape (ie, cement channels, location through town) and water extraction licenses. The proposed diversion will further aid in the destruction of the water quality and ecosystems in this watershed. 2. Mining activity in close proximity to Jacko Lake. Associated activity including toxic tailings via surface and subsurface runoff will surely have negative impacts on water quality. The lake is a popular destination for recreational fishers, and long term effects of the toxic substances can accumulate in the aquatic food chain, and in turn be transferred to humans via fish consumption. 3. The use of Inks Lake as a toxic tailings runoff pond. The lake and area is a popular all-season recreation area. In summer, the area is frequented by hikers, bikers, and used as livestock grazingland. In winter, the lake is one of the most popular pond-hockey and snowshoeing spots in the area. All recreation in the area will be eliminated. 4. Local wildlife. Aberdeen and Pineview Valley is faced with an increasingly troubled bear-human issue. The scale of this project will surely lead this animal's habitat destruction, and force more bears into these urban areas. 5. Urban Sprawl. Kamloops is faced with a challenging terrain for urban development. Each year, the City is expanding outwards and upwards into the surrounding highlands. Air quality, noise, and habitat destruction are a few of the issues that plague the City each year with urban sprawl. 6. Kamloops Lake water intake system. Water for mining process is proposed to come from a pump house located at Kamloops Lake. An extraordinary amount of energy and emissions will be associated with this process. Water extraction in such a large volume should always be a concern.	1	1			1	1	1	1	1	1	1	1	1	1	1	1	1	1	1		
5	12-Jun-11	Mary Hill	Kamloops, BC	The proposed Ajax mine is partially within the city limits and too close to the general population. The noise, dust, odors and toxins produced will have a huge negative impact on the lives of people in the city. Peterson creek runs right through Kamloops to the river and there are plans to relocate it, but what about the toxins it will ultimately carry? How much water will a mine that handles 60,000 tons of rock per day drain from Kamloops Lake (where there are plans to put in a marina). It is a horror for tourism. I have seen a badger in the grasslands south of Kamloops and it is an endangered species. As well burrowing owls have been reintroduced to the east of the proposed mine site. Both roughed and sharp tail grouse use the area, which contains loks. There are little ponds full of life and driving on Goose Lake road has always been a delight, plus people have fished Jacko Lake forever. The environmental impact is huge as both precious grassland and treed areas will be destroyed	1	1																	1		
6	15-Jun-11	Personal Information Withheld	Kamloops, BC	Hello, As a concerned Kamlopsiens, I wish to voice my opposition to this project. When as moderate a group as the Kamloops Naturalist Club has serious reservations about the project proceeding, that is a fair indication that a longer period for public input is required. I urge authorities to consider prolonging the period for public input and to make the Kamloops public more aware, through the various media outlets, of the nature of this project. Thank you for considering this request																					
7	17-Jun-11	Personal Information Withheld	Aberdeen, BC	I currently live in the Aberdeen area and don't know too much about the proposed Ajax Mines project. I attended the public forum June 16/2011 to try and gather more information to educate myself in order to make an informed opinion. I was very interested to hear some of the comments, especially from those that live close to the proposed project. I would like to request that a brochure/survey information package be distributed to Kamloops residents regarding proximity, noise levels, operating hours, footprint, etc. etc. I have several friends in the Aberdeen area who are unaware of the proposed project. It is your job and the proponents job to inform the residents/public of Kamloops of the potential impacts. If you believe your communication efforts to date are effective, you are wrong. The people are not aware, especially the Aberdeen, Pineview, Dufferin and Sahali areas. There is a significant demographic of young families in the areas mentioned who are very busy with daily lives, school ending, summer holidays etc. As a result, the majority of people are unaware of this public comment process and/or the potential impacts of this mine on their future lifestyle, surroundings, finances, etc. There needs to be written information distributed directly to the resident of Kamloops!!																					
8	17-Jun-11	Personal Information Withheld	Aberdeen, BC	This project should absolutely not proceed. To put a mine such as this next to city limits is irresponsible. Two kilometers from existing major residential areas is bad enough but now there will be no expansion of the city towards this boundary. With the mine in place, where will the city of Kamloops expand? There is no where else to reasonably go. To say, as the proponent did at the July 16th forum, that the noise level is within the acceptable limits of the city bylaws (120 db le equivalent to a loud rock concert) is ridiculous, NOT 24 HOURS PER DAY 7 DAYS A WEEK, that is not reasonable to assume it is acceptable. First Nations have been consulted, that's great and I assume they will be paid by Ajax as New Gold has also done, that is good for the bands and that is good for Ajax, but who is going to pay the residents and/or their children for their rights?? If the EAO approves this then there is something seriously wrong with our system. EAO has a long track record of approving all such applications which puts into question what the real considerations are?		1																	1		
9	17-Jun-11	Paul Dagg	Kamloops, BC	I have numerous concerns about this project that are either not addressed or only briefly touched on in the project report. 1) Proximity to residential areas - although the report indicates that the project will be 10 km west of Kamloops in fact it appears by the map that the centre of the project including the pit and the processing facility will be within 2 km of residential areas in Kamloops - and even closer to areas currently anticipated for future residential development. 2) The processing facility will be operated 24 hours a day, 365 days a week. There is no comment on the noise that such a plant generates. 3) The only reference to noise is in section 7, where the report only speaks about the health impact of high noise levels - it does not address at all the impact of lower grade noise that could be 24/7 on the quality of life of people living in nearby residential areas, who did not anticipate living near an industrial site. 4) Air quality and dustfall - given the anticipated traffic, and intensity of activity the impact of this on the city as a whole needs to be clarified. 5) Sandhill cranes frequently stop over near Knutsford during their spring migration - what will be the noise and activity impact on this species - they are not listed in the report. 6) Aesthetics - the first impression visitors gain if Kamloops is very important, for our future growth and tourism industry. For people flying into Kamloops, the visual impact of an open pit mining operation of this magnitude in such close proximity to the city and underneath a common approach path used by commercial flights into the city, could significantly damage their impression of our city and impact upon future growth in areas outside of the mining sector. Overall, despite the economic benefits, the negative impact on the city could be substantial and needs to be more clearly articulated and estimated. The impact on housing value in two large areas of the city (Aberdeen and Pine Ridge) could be substantial.	1	1								1	1								1		
10	17-Jun-11	Personal Information Withheld	Kamloops, BC	I am a current resident of the Aberdeen area in Kamloops and would like to express my concern about the proposed Ajax Mine development. I attended the public hearing meeting on June 16th and I do believe the issue of proximity to city limits was expressed and I would like to echo that most Kamloops citizens are under the impression that this mine would be located 10 km southwest of the city (even as per the EAO project description), not within 1.5 km of our residences. As a professional working in Natural Resources, I have a good understanding of the mineral extraction industry and am personally not against it. However, I am unaware of any open pit mine of this magnitude in B.C. that is situated this close to a populated area, especially to a community that is already heavily burdened by the side-effects of a pulp mill. The Kamloops area and especially the highlands experience tremendous winds at most times of the year and although the proponent indicated that dust control would be a priority, I can't imagine that the entire mine site would not produce significant dust during a 38 degree windy day. The water consumption just to keep the dust down during a typical Kamloops summer would be staggering! I have confidence that the federal and provincial E.A process will adequately assess the environmental impacts here, but I have doubts that the social/economic aspects of this project will be addressed. I understand the 400 jobs will be valuable to Kamloops but what about the losses to tourism and the property values for people living adjacent to the mine? I recently moved my family to upper Aberdeen to experience the peace and quiet and proximity to nature and now I am mortified that there may be a mine within 1.5 km of my house and two elementary schools. I am familiar with the "not in my backyard" mentality that many Canadians have regarding development but I think you would agree this is just a little too close for comfort? Will the mine be compensating us for lost property values as well? During your review process, please carefully consider how this project will impact the residents of Kamloops. Thank you for your time.	1																		1	1	
11	17-Jun-11	Glenn Dreger	Knutsford, BC	I wish to express my concerns and opposition to the diversion of Peterson Creek as part of the proposed Abacus/Ajax mine proposal. The stretch of Peterson Creek that will be lost presently flows through a shallow valley. It has been dammed in several places by beavers, and has matured into the epitome of what we imagine when organizations like Ducks Unlimited expound the virtues of wetlands as sanctuaries for a vast array of wildlife, purifiers of our fresh water supplies and carbon sinks that remove tons of carbon from the atmosphere and store it as future coal supplies. Some may say wildlife will find other places to live, but all thinking people realize that we must do everything we can in BC and Canada to protect our fresh water supplies, and to mitigate the effects of climate change. Peterson Creek is doing that job. When I talked to the representatives at the open house June 16th, they assured me that the mine would "create" a stream virtually the same as the original creek. I believe the mine has the equipment to "create" a stream bed, and even duplicate beaver dams, but they will never create a wild set of marshes with aspens, willows, bulrushes and all the other plants and wildlife that presently exist in Peterson Creek. That will be lost forever if they are permitted to divert the creek.										1	1										
12	17-Jun-11	Personal Information Withheld	Kamloops, BC	After attending an informational meeting about the proposed Ajax mine yesterday, I was not reassured about the project. I am worried about numerous issues related to the Ajax mine. I'm concerned about the ecological consequences of destroying Inks Lake, rerouting Peterson's Creek, and destroying the pristine grasslands ecosystem. I'm concerned about the effects this project will have on the aesthetics of the Kamloops area, as large waste rock dumps and a massive tailings pond would likely greatly damage Kamloops' tourism industry and also create eyesores for residents. I'm also concerned that this project would greatly hamper city development, as I believe further residential building was planned to occur south of Aberdeen. However, as a recent homeowner in upper Aberdeen, my primary concerns relate to what effects this project will have on the living conditions of myself and my family. I believe a "mega mine" inside the city limits and kilometers south of residential areas in Aberdeen and Pineview Valley will have numerous deleterious effects. I worry about the health effects of dust and particulate matter that would be generated from the construction and operation of the mine. Additionally, the sound and vibration caused by mine operations, including but not limited to blasting, could be very disturbing to myself and other residents in the area. The Project Manager for the Ajax mine stated that tests on sound and vibration had been conducted; however, these blasts were a fraction of the size that they would be in the operational mine and only thirty blasts or so were conducted, minimizing their validity. Also I believe low cloud cover could increase noise. Sound and vibration tests should not be done in ideal conditions, but rather in worst-case conditions, so the possible effects can be fully known. In addition to significant risks to the health and well-being of nearby residents, the existence of a mega-mine, so close to residences, would very likely be disastrous for home values in the area. As a house is typically the largest investment that a person ever makes, this would be economically devastating to thousands of homeowners, even as it economically benefits hundreds of miners. In short, I believe this mine to be simply too large and too close to residences in Kamloops. While there would be an economic benefit to a few if this project continues, there would be a guaranteed environmental cost, and probable health, social, and economic costs for many who already live in the area.	1	1	1							1	1	1	1	1	1	1	1	1	1	1	
13	17-Jun-11	Personal Information Withheld		After reviewing the project description and attending the public meeting held in Kamloops on June 16th, I would like to offer my thoughts and comments on the proposed Ajax copper-gold mine. First of all, I should state that I live at "Personal Information Removed by EAO" in the Aberdeen area of Kamloops, about 3.5 km from the proposed open pit since 1988. I would also like to state that I worked in the mining industry from 1969 to 1992 as a chemist in assay laboratories doing quality control and environmental management (15 years at Brenda Mines, 4 years and Hemlo Gold Mines in Ontario and 4 years at the Samatsum copper-silver-zinc mine near Johnson Lake here in BC). It was stated last night that consultations are ongoing with both the Kamloops and Skeetchestn Indian Bands. If so, why weren't they at the meeting to indicate their support (or not) of the project? I have a number of technical concerns about the project that I would like to see addressed in the more detailed environmental impact assessment; o Where we live, we can sometimes here noise from the trains moving through Kamloops, particularly in the winter, even though they are 10 km away. I believe that we would hear noise from the trucks, shovels and drills in the open pit and possibly even the crushers that would be unacceptable and disturb our quality of life. o There would be dust generated from the open pit, the crushed ore stockpile and the tailings disposal area that would drift into Aberdeen, Pineview and Dufferin. It has been said that these areas could be kept wet for dust suppression, but what about between November and March? All one has to do is look at Highland Valley Copper where they had to construct gigantic dust cover domes for the crushed ore stockpiles in order to try to solve their dust problems. o Mr. Whittaker stated on June 16th that the pit will eventually be 450 m deep. This indicates to me that the bottom of the pit will be well below the Aberdeen, Pineview and Dufferin subdivisions and that the shock waves from blasting will be travelling upwards towards these populated areas. I have visions of cracked concrete foundations and drywall, not to mention the noise from each of the blasts. What is this going to do to our property values? Are to proponents prepared to guarantee each home owner that they won't decrease in value? o What effect will the blasting have on the historical groundwater issues that have been present in the Aberdeen subdivision? The City of Kamloops has done a lot of work over the years to mitigate this problem, but I'm concerned that the open pit blasting may introduce new flows and exacerbate the problem all over again. o The project description states that "acid mine runoff" is not expected. What about alkaline mine runoff? Brenda Mines closed in 1990 but they had to construct a wastewater treatment plant to treat the alkaline runoff coming off their waste rock piles, mainly due to dissolved molybdenum contamination. There is currently no end in sight as to how long this will be required. At the Samatsum Mine that I worked at, acid mine runoff was not expected to be a problem. It is and they also had to construct a wastewater treatment plant when the mine closed in 1992 and again it continues to operate. o I'm concerned about runoff from the waste rock piles and tailings being contaminated with not only blasting residue (nitrates and ammonia) but dissolved minerals. Is this water going to be collected and treated or just pumped into Inks Lake. If it is going to be treated, where will it be discharged? o What gives the proponents the right to announce that Inks Lake is basically being sacrificed for mine & mill operations? What about the cattle and wildlife that graze in this area and drink out of the lake? I'm afraid I can't buy the proponents statement that no sediments will be introduced into the lake. All it will take is one process upset or tailings line malfunction and we all know where the sediments will go. o How much water is going to be drawn from Kamloops Lake? I understand that New Gold and Ajax are both going to use the old Alton Mine pump house. How does the proposed combined volume of water intake compare to what was allowed under the old Alton water license? o Where will the garbage and sewage generated at the mine be disposed of? o What will be used as a potable water source for mine employees? o Having previously worked in an assay laboratory, I know that a lot of chemical fumes can be generated from the acid digestion processes used to analyze the ore and concentrates. What is going to happen to these fumes? o If and when the mine commences operation, exploration for additional ore bodies nearby will likely be ongoing. What will happen to Jacko Lake if more ore is discovered underneath it? Will it also be sacrificed and drained? Will the ongoing blasting caused rock fractures that could result in leakage from Jacko Lake into the open pit? o The project description states that there will be road kill, construction and blasting wildlife mortalities. To me, a statement like this is totally unacceptable and this issue needs to be addressed. As you can see, I have a number of concerns that I would like to see addressed. After reading the project description a couple of times and attending the June 16th meeting, I really can't support this project. I have visions of the Aberdeen subdivision looking like Kalgoolie in Western Australia or Bingham Canyon in Utah and all of our property values and quality of life diminished. The bike rides I've been able to enjoy along Goose Lake Road and the hikes up Coal Hill will be gone forever. I look forward to seeing my concerns addressed.	1	1																		1	1
14	18-Jun-11	Personal Information Withheld	Aberdeen, BC	We thought this land, which also falls within the City of Kamloops, was in the ALR; how can there be open pit mining here, so close to many residential neighbourhoods, including a new Seniors Home. It is a windy area, noise and pollution will affect a huge area. Transportation along Lac Le Jeune Road (a road not built for such traffic) will affect recreational areas used in summer and winter. The grasslands and wildlife will never recover from such an onslaught. There are so many other areas away from the City suitable for such a project. As to the jobs created, how shortsighted when they come at such a huge cost to the residents of Kamloops, a City that prides itself on tourism and all the recreational and sports facilities built at great cost and supported by the taxpayers. There has obviously been much planning done in secret, proving that it will be a controversial project for Kamloops. Please examine this very carefully.	1	1																	1	1	

KGHM AJAX MINING INC.
AJAX PROJECT

PROJECT DESCRIPTION ISSUES TRACKING TABLE
PUBLIC COMMENT PERIOD JUNE 8 TO JULY 11, 2011

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Comment #	Date	Name	Location	Comment	Issue for Consideration															
					Air Quality / Dust	Noise	Vibration	Light Pollution	Fish & Fish Habitat	Surface Water Quality	Groundwater Quality	Groundwater Quantity	Wildlife	Grasslands / Ecosystems	Aesthetics	Human Health / Safety / Well-Being	Recreation	Tourism / Investment	Economy / Employment	Land and Resource Use
15	18-Jun-11	Personal Information Withheld	Kamloops, BC	To whom it may concern, Unfortunately, I was unable to attend the public meeting last night regarding this mining application due to a previous commitment. I wanted to take the time to let you know my thoughts regarding the proposed Ajax mine project. I live in Aberdeen about 2000 meters from the proposed mine. Had I any indication that we could have a mine less than a 20 minute walk from our front yard, there is no way I would have chosen to live here. Our home is a higher end property and part of the reason we bought here is the "green belt" afforded by the agricultural land behind the development. Unfortunately, I think this development has the potential to cause damage to our waterways, our air quality (which is already frequently severely impacted by smoke in the summer), and our water reserves/ground water. Please assess very carefully any increase in particulate when making your decision as in the last few years it has been routinely hard for people who don't have respiratory illnesses (and impossible for those that do) to go out and exercise in our city due to the particulate generated by forest fires. We are opposed to anything that could cause further erosion of our air quality. The wind comes directly down from the mountains onto our home. The flow of air is predominantly from the South or Southwest. We do not agree with any project that could increase particulate in this air. There are also many underground streams in our area that originate at the top of the mountain. We have all read about the damage to the ground water that can occur with mining operations, and do not want to be exposed to any potential toxins via the ground water. As far as I can gather, the only benefit to Kamloops of this mining project is via job creation and tax revenue. Though money can be seductive it is certainly not the most important consideration. I urge officials at all levels of government to consider whether or not you would support this project if you lived in this neighbourhood. If the answer is no, ask yourselves why, and whether or not imposing an industrial project of this scope (essentially within a residential area) is an appropriate choice. It is my belief that "economics" like GDP and tax revenues are only one measure of success of a society. A better measure of success and progress is the population's health and happiness. What we stand to gain in jobs and tax revenue has no meaning in the long term if it erodes our living environment and quality of life. I am strongly opposed to this proposed Ajax mine and I hope that our government has the	1															
16	18-Jun-11	Glenn Dreger	Knutsford, BC	The proponents for the mine have said that the preservation of Jacko Lake and Peterson Creek are of prime importance to them. They do not believe that Jacko Lake will drain into their pit. I do not believe they can make that statement with 100% certainty. In any venture such as this, there will be the possibility of error. I would expect the mine to be able to indicate the degree of certainty they have in their statement that the lake will not be drained.																
17	19-Jun-11	Marvin Beatty	Chase, BC	Well, Kamloops...this is a little more than a silly zipline, huh? I have family that live very near the site of this proposal and will myself be in Kamloops for the next two years attending TRU. Given the choice between long-term environmental damage (there can be no other word for what will happen with this mine) and the economic impact, I stand with those opposed to the Ajax Mine. If it were not to be undertaken, would Kamloops simply dry up and blow away in the semi-arid desert air? Of course not. Air quality, watersheds and grasslands cannot simply become something we continue to significantly affect in negative ways. Change is inevitable, yes...but what needs to change is our approach to preserving and protecting the natural world that sustains us all. Mark me down as opposed to the Ajax Mine.	1															
18	19-Jun-11	Jenny Perry	Lac Le Jeune, BC	It seems that Kamloops is being encouraged to passively accept the proposed Ajax Mine Project with the promise of new jobs for the area over the next 20 or so years, but at what cost to the environment and quality of life for those living in the area? Kamloops residents closest to the mine location will lose the very reasons they probably chose to live here—the scenic beauty, the wildlife, the peace and quiet, the healthful benefits of clean air and water. There is no real guarantee that the positions promised by mine proponents will be filled by local Kamloops residents and at best those positions are projected to last only about 20 years. Kamloops appears to have a comparatively healthy economy at present it can afford to take the time to carefully seek out new business and economic opportunities for the community—those that do not have such a negative environmental impact so many people in what is now a very desirable city in which to live and one that tourists are encouraged to visit. Whatever short term monetary gain Kamloops area residents think they will be getting will most definitely be offset by the long term destruction of the environment by Ajax Mine Project.																
19	19-Jun-11	Personal Information Withheld	-	What are the plans to suppress the dust from the course ore stock pile. HVC is just completing a cover over the three piles, not only for dust suppression, but the recovery of huge losses of copper. If possible the surge pile may be designed in an excavation to avoid the cost to cover an above ground design. The prevailing wind is from the south-west and could cause huge problems for Ajax down the road. I am not aware of the intended tailings location, however in a couple of years this will be a major problem for the company. Unfortunately tailings pond dust cannot be controlled as the flow wanders all over. Highmont tailings and the HVC tailings pond dust goes for miles during the summer. However there is no Kamloops down wind. I was a General Mine Foreman for 8 years at the Jeffrey Mine, C.J.M. Asbestos, Que. and 24 years developing Lorne-HVC and operations. The person who will be responsible for the operation of the mine when you start production should be included in the initial design. As a career miner I wish you nothing but the best. It will be great for the area. It would be nice if you could just move the ore body 10 miles in the bush. The pit blasting and noise will not be a problem, just keep the blast time the same hour every day. Good Luck and may the price of copper remain stable.	1															
20	19-Jun-11	Personal Information Withheld	Kamloops, BC	Good day, I wish to relay my families total opposition to the proposed Ajax mine, south of Kamloops. We believe that this proposed mine will destroy vital habitat for wildlife, including fish, waterfowl and other species. Jacko lake is a prized trophy fishing lake, and the areas surrounding to the East and West, are utilized daily by the citizens of Kamloops for hiking, dog walking, cross country skiing, ice skating and other natural activities. Approving this proposed mine would be environmentally irresponsible on the behalf of our government officials. Air quality in the Kamloops area has been significantly impacted over the last few years, and continues to be increasingly so. Every year, forest fires cause severe respiratory issues for residents, and the proposed mine function will significantly compound the situation. To allow a large operation so close to residential areas is truly negligent. Noise impact and property devaluation are other considerations that give further evidence to the negative impact that this proposal would have on present, and future, residents and development in this area. Please strongly consider the views of the residents that this project will impact. While I am in support of mining ventures in general, I could never support one so close to vital wildlife habitat as well as residential areas. This proposal is one that cannot be accepted.	1	1			1							1			1	
21	19-Jun-11	Personal Information Withheld	Kamloops, BC	Hello, I live in Pineview Valley which as stated by the proponent will be 2 kilos from the north waste rock dump and 4 kilos from the Ajax Pit. I have a number of issues that I would like to be addressed by the proponent. They are as follows: Pollution - noise, air and vibration. At the open house on June 16th, 2011 the proponent stated they had conducted test blasts to measure vibration. These blasts were of a size that is well under the normal production blasts that would be carried out during mining. Can the proponent not conduct test blasts of the size that would be used on a day to day basis. If so could residents that are close by also be notified when these test blasts would happen so they could be at home to monitor the noise and vibrations themselves. This way the residents would be able to judge for themselves the type of noise and vibration that may occur on a daily basis — or there may be none would help give assurance to near by residents that there would be no impact to them. Dust pollution is another issue that as a resident of Pineview Valley I would be very concerned about. How will dust be controlled and what systems would be put in place if dust from the mine became an issue for the residents of neighboring residential areas. As stated at the open house this mine is very close to residential areas and any type of disruption of residents being able to have quiet enjoyment of their living spaces will be a major concern. We all have families with young children and must be able to sleep at day and at night. We are concerned for our health which could be affected by noise, dust and vibration from the mine. I believe the proponent must be held accountable to meet guidelines to ensure residents of Kamloops will not be affected in a negative manner from this mine being within city limits. Another concern is the proponent I believe is going to currently mine the Ajax pit. What future plans do they have to mine closer to residential areas. And what safeguards will be in place if they decide to put a pit yet closer to residential areas. Thank you.	1	1	1													
22	19-Jun-11	Ray	Lac Le Jeune, BC	I do not think that using the Lac Le Jeune Meadow Creek road for the transport of ore is a good idea. Because of all the pine beetle kill in our area, the road was taken under siege by logging trucks this past year. There was one truck that overturned right by the entrance into Lac Le Jeune. Many residents have complained about near misses and being run off the road. Come spring time there are weight restrictions on this road. What would the ore trucks do then? Also, the pavement on this road is not in the best of shape, and all that heavy truck traffic will only make it worse. The other safety issue is that this road goes by four parks and is a school bus route. Please find another route or another place to mine.															1	
23	19-Jun-11	Susan Cairnie	Kamloops, BC	As a concerned student and citizen of the Kamloops area, I am strongly opposed to the open pit mine project. Through standing together we spoke up and successfully defeated the planned creosote burning project. We as a community are capable of saying no to this mine, which will result in a far greater negative impact on our community, environment, health and quality of life. I ask you, is this really the direction we want our city to take, a city which takes pride in being the Tournament Capital of Canada? How does this fit into Kamloops' vision of increasing its tourism and being seen as a regional center, which attracts people from all over? We already have a pulp mill, and adding this mine will further decrease the quality of our air, making us less attractive to tourism, investors, and athletes. While I understand the draw to create more jobs, in 23 years these jobs will be gone, leaving us with hundreds of displaced workers with families to support, and devastating environmental consequences which will remain with us far longer than any economic benefits. It is the citizens of Kamloops who will be left to deal with the increased toxins in our air and water, the destruction of natural habitat, grasslands, forested areas, and lakes. Our children will still be breathing this air, long after KGHM mining has moved on. KGHM is an international company which has no ties to this area or the people who live here, and thus little incentive to conserve our resources and quality of life. Kamloops needs to create jobs which are sustainable and long-term, and to prioritize our community's health, quality of life, and environment over the short-term financial benefits this mine could bring. We have a right to choose which direction our city takes, and we do not have to stand by and accept this mine. We have the power to create the community we dream of.	1															
24	19-Jun-11	Isabel Cairnie	Kamloops, BC	I am a 17 year old student at South Kamloops Secondary, where myself and many of my friends are deeply concerned about this proposed project. We are the generation who will have to live with the future consequences, and we believe that the short term benefits of this mine are heavily outweighed by the negative long term consequences on the economy, environment, community and health. We have been told that Peterson Creek will be rerouted, and assured that this can happen without negative impact which is blatantly untrue. Rerouting the creek will destroy habitat, introduce toxins, and cause major changes to our ecosystem. Myself and my friends grew up playing in Peterson Creek - why shouldn't future generations have to same right? There has never been a project like this approved within 2 miles of residential areas - why should this one be different? This open pit mine is 24 hours a day, and living in Aberdeen, we will be able to hear drilling and blasting constantly. This is not to mention the noise, sound, light, air, and water pollution. The mine will destroy ecosystems, grasslands, ponds, and tree areas. It will emit pollution, toxins, dust, and odors. There is also the issue of chemical runoff into lakes and ponds. Toxic substances can be retained in fish which are then eaten by humans, birds, and other animals. Do we really want to risk our health and that of future generations and species? This mine will handle 60,000 tons of rock every day, using huge amounts of water taken from Kamloops Lake. We do not want a mine in our backyard - do you?	1	1		1	1	1	1	1	1	1	1	1	1	1	1	1
25	19-Jun-11	Personal Information Withheld	Aberdeen, Kamloops, BC	An additional comment. The map used is way out of date; the housing developments now extend much closer to the proposed mine, also the new Seniors Residence is on Iron Mask Road.															1	
26	20-Jun-11	Glenn Dreger	Knutsford, BC	I am echoing the comments made by others, regarding the control of dust from the waste rock and tailings. The proponents are planning several square kilometers of exposed surfaces that would create dust problems. At the meeting on June 16th, the proponents brushed off these concerns by saying they had to look out for the welfare of their employees, therefore there would be no dust problems for the people downwind of the mine. This is not good enough. The employees could be protected with respirators, leaving the rest of us to deal with the dust, toxic or not. Several square kilometers of exposed rock and tailings to control, coupled 5 months of sub zero temperatures at that elevation where spraying with water is not a solution, they will need some very innovative plans to convince me that there will not be health problems and reduced quality of living in Kamloops due to increased dust in our air.	1															
27	20-Jun-11	Personal Information Withheld	-	Lyle first let me say glad you came to Kamloops for the environmental presentation. By why of a suggestion have your calling cards printed in a larger typeface...virtually impossible to read!! Lyle it's Fathers Day today that I am writing you ...as I am very concerned about the future legacy for my son grandson and hopefully his family in the future. I stood up the other night and expressed my concern about this proposed mine. The area which will change for hundreds of years is a very beautiful grassland setting. The drive to and from Edith Lake is a delight...and can and should be for generations to come. There is no monetary dollar sign to it's value...in a very real sense like Stanley Park. The low grade ore coupled with the volatile copper prices may very well leave a ruined landscape. Interesting to read the Reuters article June 15th 2011 about KGHM in Poland. The Polish government has a 32% stake in the company and just forced through a doubling of the dividend. This was contrary to managements plans to invest more into operations. Reading and watching the videos of NewGold's operations in Mexico at the Cerro San Pedro Mine and it's environmental track record is very unsettling. There is a cost to our tourism potential in Kamloops...yes we win the Beautiful City Award regularly...oh Tournament Capital Of Canada...oh 1 million overnight visitors so far on Rocky Mountaineer Trains...oh lets see we have a huge charter bus tourism and what will visitors see when this mine gets going... I don't have a pension...my income is from investments and I wouldn't touch this!!!																
28	20-Jun-11	John Schliermacher	Kamloops, BC	The public open house for the Ajax mine was a huge disappointment. The venue was much too small to hold the 350 attendees. Many people for forced to stand in the hallway and were unable to hear or see the three presentations. The question period was much too short which resulted in many attendees unable to ask their questions or express their concerns. Both government agencies quickly ran out of handouts, again leaving most attendees disappointed. My questions is: Did the government agencies and proponents of the Ajax Mine fail to anticipate the huge public out cry about the impact of the project or was this an attempt to save money on the open house?																
29	20-Jun-11	Personal Information Withheld	Kamloops, BC	To whom it may concern: As a resident of Upper Aberdeen in Kamloops, it was with some interest that I attended an Open House pertaining to the proposed new mine within the city limits of Kamloops. What other open copper mines are within 2.2 kms of a residential area in Canada. What kind of an environmental impact will the open-pit mine have not only on Aberdeen, Knutsford but also upon Pineview. Given the winds that sometimes blow in the area, what guarantees does the region in question have that the dust will not medically affect people with respiratory problems, not to mention the dust that will coat our yards and houses. I recognize the fact also that there are no guarantees that the grass lands, rivers and lakes in the area will be protected from pollution. Finally, I note that your mine and one other mine in the area will be drawing water from Kamloops Lake. How are you going to protect the lake from environmental pollution.	1															
30	20-Jun-11	Rob Lucas	Kamloops, BC	Hello, I am a Contractor located in Kamloops and have worked at many mine sites throughout BC. Although this Ajax Mining venture seems to be an economic booster for the City of Kamloops I believe there are more important issues at stake. The biggest being the environment. Jacko Lake is the main water source for Peterson Creek. Without Jacko Lake Peterson Creek will cease to exist. That creek is home to a great variety of wildlife which includes, beavers, fish, bears and countless numbers of bird species. The proximity of the Ajax pit is directly adjacent to Jacko Lake. If there is any sort of geological failure to the pit wall Jacko Lake will be drained. Believe me, after working in and around mining for 25+ years I have seen many engineering flaws and unexpected cracks in open pits. Too much risk.																
31	20-Jun-11	Personal Information Withheld	-	We just wish to give our support for the Ajax mine proposed for the Kamloops area. We trust that government environmental regulations will be followed and think that industry should be encouraged in our city. Too much emotional concerns seem to be constantly put into these type of proposals. Other mines have flourished in this same area and industry has done its best to be aware of environmental/aesthetic concerns. Though we are not experts on scientific areas we trust that our government agencies will ensure proper compliance with all rules/regulations/laws. Thank you																
32	20-Jun-11	Personal Information Withheld	Kamloops, BC	Ajax Mine Kamloops: Continuation of Canadian Gullibility The typical Canadian attitude toward resource development is either a mix of naïveté or innocence. Perhaps it is foolishness. I tend to have a harsher view and stupidity comes to mind. The Ajax proposal calls for the removal of thousands of tons of copper and gold all of which will be shipped in raw form to offshore buyers. It will be processed in manufacturing plants in those countries and then some of it will be sold back to Canada. The procedure is referred to as economic colonialism. It was the basis of the fur trade, the India Far East Company and is the modus operandi for the oil industry and other resource companies in Canada. It is a form of rape with little satisfaction for the afflicted party. One glaring example is Inco, the International Nickel Company. It remove the resource from Canadian soil then ships it a thousand miles south to Huntington West Virginia where for the last half century it has created as many as twenty thousand jobs in manufacturing, engineering, management and R & D to the benefit of our American cousins and owners. Our Canadian mentality, which is vested in our government bureaucrats, the news media and in the minds of politicians, has it that this procedure is good because it creates jobs. Well that is certainly true, but for every job Ajax will create in the Kamloops region there will be another four jobs created out of the country. So here is the picture. We will suffer the environmental hazards, and there will be many in exchange for 400 or so jobs. We will experience the disruption of our wonderful mountain environ with its peaceful tranquility in exchange for explosions, grinding gears and pollution. And in return we will get the short end of the economic stick. Now that is a bargain...for the owners of the mine. But not the good folks of Kamloops and the region. Economic development is great. But is not acceptable when the cost is an environment that is so contaminated people cannot enjoy their community and its natural setting. The risk is simply too great. What the mine will bring to the region is a giant scar that can never be restored. Displacing Peterson Creek, extinguishing our placid lakes and building a huge tailings pond and bank is simply too high a price to pay. The loss will never be recovered, particularly when most of the benefit will go to others who live far away and care little for our interests.																

KGHM AJAX MINING INC.
AJAX PROJECT

PROJECT DESCRIPTION ISSUES TRACKING TABLE
PUBLIC COMMENT PERIOD JUNE 8 TO JULY 11, 2011

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Comment #	Date	Name	Location	Comment	Issue for Consideration																					
					Air Quality / Dust	Noise	Vibration	Light pollution	Fish & Fish Habitat	Surface Water Quality	Groundwater Quality	Groundwater Quantity	Wildlife	Grasslands / Ecosystems	Aesthetics	Human Health / Safety / Well-being	Recreation	Tourism / Investment	Economy / Employment	Land and Resource Use	Infrastructure	Terrain / Soil Stability				
33	20-Jun-11	Personal Information Withheld		To Whom It May Concern: I am a homeowner and resident in the Pineview Valley area just north of the proposed Ajax Mine site. Can you please let me know what type of environmental impact we can experience in the Pineview Valley when the mine is in operation. Will we have to deal with vibrations, dust, pollutants from the site? If everything is approved as quickly as possible when can we expect the mine to be in full operation?	1	1	1																			
34	20-Jun-11	Personal Information Withheld		THE CONCERN IS: 1. LOCATION: Kamloops is mostly built on the side of a mountain where the soil contains a percentage of volcanic ash and is unstable in certain areas. Putting a giant size mine on the mountains above the city poses a significant risk to the structural integrity of buildings and homes. When asking whether a mine this size has ever been put above a city of 85,000 people. THE ANSWER WAS "NO". The unstable structure of the soil has always been a major concern to building on the hillsides of Kamloops. Locating this massive mine 3 Km from homes and on top of this mountain is extremely risky since there will be significant vibration from the daily blasting of this mine. They promise only one blast a day but we know that will be huge. 2. AIR QUALITY: The air quality in Kamloops is poor on most days and people's health is already being compromised. The cancer rate in Kamloops is higher than in most cities in Canada, not talking about all the children using inhalers. Ajax mine will only add to this overburdened air shed.	1																					
35	20-Jun-11	Personal Information Withheld	Kamloops, BC	The public open house for the Ajax mine was a huge disappointment. The venue was much too small to hold the 350 attendees. Many people for forced to stand in the hallway and were unable to hear or see the three presentations. The question period was much too short which resulted in many attendees unable to ask their questions or express their concerns. Both government agencies quickly ran out of handouts, again leaving most attendees disappointed. My questions is: Did the government agencies and proponents of the Ajax Mine fail to anticipate the huge public out cry about the impact of the project or was this an attempt to save money on the open house?																						
36	21-Jun-11	Dr Henk van Zyl	Kamloops, BC	I find it disturbing that such a large open ore project is launched so close to town, ruining the beautiful grasslands and areas around Aberdeen. One of the main attractions of that drew me to Kamloops is the great variety of outdoors activities and the area designated will destroy a large amount of beautiful landscape I frequently enjoy on a bike and I'd hope to share with my kids in the future. I understand the financial incentives and the job creation aspect is always quoted, but quality of life is a large drawing card for any town and city. Kamloops has been working extremely hard promoting and "selling" this town as the tourism capital of Canada, in the hope of creating a sport and activities centre draw towards Kamloops. Placing a huge open ore ugly mine right on the edge of town goes against everything the town is working towards. Our focus should be trails, hikes, mountain bike and dirt bike trails. In the modern internet era, more and more people are leaving big cities to come and stay in town like ours as they can still run their business online but have a great quality of life...If we are on the top layer of the edge of town we will the gosse that lays the golden eggs...a beautiful countryside. I think it is completely the wrong direction to take at this point in time. The world is becoming greener, no-one wants a mine on their doorstep, it'll destroy the improving image this town has been working on so hard. We want those who want to enjoy the great outdoors and enjoy their sport to settle and visit. Allowing a large mine on the edge of town is just crazy. I completely oppose this project and hope to inspire everyone I speak to, to voice their concerns as well.																						
37	21-Jun-11	Personal Information Withheld	Kamloops, BC	I am a resident of Aberdeen in Kamloops, BC and live approximately 3 KM from the proposed mine site. While I am supportive of mining in BC, I am very concerned about how this proposed mine may affect one of the premiere living locations in Kamloops and property values in the area. I am particularly worried about blasting and the noise / dust (air quality) associated with such activity. If we are subjected to noise from daily blasting, then the value of our property will decline and the quality of living will drastically be altered. The Pineview sub-division is even more at risk as it is closer than the rest of Aberdeen. Will blasting be a part of the mine operation and if so, what steps will be taken to ensure the sound will be reach Aberdeen and the rest of the city? I am also worried about how Jacko Lake will be affected by such a project. It appears that the mine will encompass the lake, so will anglers lose one of the most popular lakes in the area. Also, how will the proposed mine protect the quality of the lake for future generations? How will the increased trucking access the mine and has any consideration been taken on he toll of the roads due to the increased congestion of the roads?	1	1			1	1																
38	22-Jun-11	Personal Information Withheld	Kamloops, BC	I find it disgusting, though not surprising that once again we entertain the idea of money over health and environment. As a resident of upper Aberdeen I feel that the proposed Ajax mine will ruin the beauty of the area, cause incredible air pollution, disrupt wildlife, harm water resources, etc., etc. After reading other comments on this board, it seems to be the common consensus of the residents of Kamloops, is that we are against this proposed mine. Please listen to the people that live here and love where they live. We need to maintain our integrity as an environmentally conscious city, the beautiful "Tourism Capital" that would not look so beautiful to visitors driving in when the first thing they see are enormous mountains of waste rock behind the Aberdeen hills.	1																					
39	22-Jun-11	Ross & Bev Lorimer	Kamloops, BC	Registry File Number: 11-03-62226 Thank you for the opportunity to submit comments on the Ajax mine proposal for the Kamloops area. We reside in the Lac Le Jeune area, south of the proposed mine. At the public open house on June 16, it was disclosed that up to 14 ore trucks per day would access the Lac Le Jeune Road, near Inks Lake, and haul uphill to the Walloper interchange at Highway 5. There is an existing interchange at Inks Lake that would be much safer and less costly in the long run. We have several concerns with the hauling proposal as presented: Safety: Our major concern is safety. The Lac Le Jeune Road is a 2-lane road used by a mix of traffic including residents, tourists, school buses and some industrial traffic. In recent years there have been several incidents involving industrial vehicles, such as a collision between a logging truck and a passenger vehicle this past winter. We are opposed to an increase in heavy industrial traffic on LLJ Road and believe the Inks Lake interchange is a better long term solution. Traffic delays: The loaded trucks hauling uphill will be travelling at a very slow speed on the LLJ Road. This will cause significant delays to road users. There are limited passing opportunities that may cause "risky" driver behaviour as vehicles attempt to pass slow moving trucks. Road Strength: The Lac Le Jeune Road undergoes seasonal load restrictions (to 70% legal axle load) on a yearly basis in the spring. This restriction can last up to 2 months and means that industrial use is limited. The mine proposal indicates operations 365 days per year, but that would not be possible with load restrictions. Road Condition: The LLJ Road is part of the public sideroad network and is not in great condition. The additional wear and tear on the road will accelerate the deterioration of the pavement. The loaded trucks hauling uphill and the associated forces on the road will result in increased costs to maintain the road. Access: The current access from the mine to LLJ Road has limited visibility. The intersection would likely have to be relocated. The funding would be better spent upgrading/constructing the present road that gives access from the mine to the Inks Lake interchange on Highway 5. Snow removal: During a heavy snowfall LLJ Road is cleared after Highway 5 is safe and clear. This sometimes results in quite a delay for using the secondary road. We think these factors are significant and provide a sound rationale for the construction of an all season access road from the mine site to Highway 5 at the Inks Lake interchange.																						
40	22-Jun-11	Geramy Powell	Delta, BC	I have just been informed of the proposed Ajax Mine Project and generally I am pleased with increased economic activity for the Kamloops region. However I am greatly concerned about the increased truck traffic on Lac Le Jeune Road. I have read portions of the project proposal that I feel would affect my use and enjoyment within the region and although the loss of Jacko Lake is significant, I am sure there will be compensating improvements for fishing activity close by. I have also heard that there may be increased truck traffic on Lac Le Jeune Road to the Coquihalla Hwy at the Logan Lake interchange. The proposal states that the current mine road running perpendicular to LLJ Road will be used to transport materials. This is the only acceptable transportation link. LLJ Road is used primarily recreational users, local residents, ranchers and campers/vacationers. It is not designed or suitable to be a transportation corridor for mining or hauling trucks. It is simply not safe and would have a huge impact on the quality of our life in the area. We chose to live and recreate in this area because it is quiet and away from traffic. We have suffered enough with the devastating pine beetle that has caused our forests to be defoliated and increased traffic noise in the area from the Coquihalla Highway immensely. I urge you to continue with the proposed transportation route from the mine site to the Coquihalla Hwy, that is along the old mine road, parallel to the railway. Thank you for the opportunity to express my opinion. I shall be monitoring the continuing project implementation.																						
41	22-Jun-11	Hal Peterson	Kamloops, BC	I am opposed to the proposed AJAX mine. My reasons are several and include: (1) Use of water from Thompson River system. The Thompson/Fraser system is already subject to massive salmon kills due to insufficient water flows and related high water temperatures. The additional draws by AJAX would only exacerbate this problem. (2) Loss of habitat for wildlife and humans. This area is home to many animal and bird species. Rock dumps, tailings ponds, mine digs will surely destroy the wildlife currently using these many acres. (3) Loss of Jacko Lake. I am one of hundreds of people that enjoys fishing Jacko Lake. Whether or not the lake accidentally drains out due to some unforeseen crack or fault line, as suggested by some, this lake will be lost to me. I would not fish the lake with all this industrial activity so close at hand. (4) Noise. The AJAX mine site is very close to my home in Aberdeen. I am sure the noises usual to any mine worksite (haul trucks, diggers, various engines, dynamite blasting) would be heard in my neighbourhood. Presently, at night I hear the coyotes and the cows. I would not enjoy the industrial noises. (5) Dust, fumes. At the Public Meeting, I heard Jim W. - mine proponent - provide assurances that dust would be controlled. But how could they suppress all the dust for such a huge area? Summer evaporation and winter freezing surely would make this task impossible. And, so far as fumes, there can be little control. Diesel fumes from many machines would have to escape the mine site. The mine would be south west of my home. The prevailing winds in Kamloops are south westerly. I can see the dust and smell the fumes already! (6) Loss of property values. For the reasons mentioned herein, I believe my property value would decrease, along with the values of other Aberdeen and Pineview homes. This does not seem right to me.	1	1			1	1	1	1														
42	22-Jun-11	Thomas Caine	Kamloops, BC	As a developer who has tried in the past to develop in Aberdeen and has been discouraged due to ground water issues in the area I believe a ground water study should be completed for the project that would specifically address the tailings pond. In our attempts to develop in Aberdeen, we heard concerns over the potential leakage from sprinkler heads and underground services. Surely the tailings pond would pose a greater threat.																						
43	22-Jun-11	Personal Information Withheld		June 21, 2011 Environmental Assessment Office RE: Comments on Line *Names removed by EAO to protect the privacy of the individual* are ranchers whose property is located within close proximity to both New Gold and Ajax Mining proposed tailings ponds. Our concern is the noise and dust from these tailings ponds. 1. Now that Ajax has acquired the old Afon Mine Site and tailings pond, who is responsible for the proper reclamation of this property? And who sets the standards for this reclamation? 2. Is there an environmental safety requirement regarding how close a tailings pond can be located to your private residence or work place as in my situation both New Gold's tailings pond is located approximately 750 meters and Ajax's proposed tailings pond 2.5 to 3 km from our residence and work place. 3. What is the health risk of long term exposure to tailings pond dust? 4. Loss of good air quality and loss of property value... Anyone to take responsibility for that? 5. Heavy duty equipment working at night causing loss of sleep... Any compensation for that? 6. The spillway from Ajax's proposed tailings pond will be allowed to flow into Alkali Creek, which is the same water shed that supplies our domestic water. Will this contaminate our domestic water supply? 7. On all the maps of the mine area we have seen, there is NO indication of any homeowners' residences which are located in the immediate vicinity. If possible, we would like a representative from your office to view the area surrounding these mine sites as they affect many personal residences and work sites. Thank you.	1	1																				
44	22-Jun-11	Personal Information Withheld		June 20, 2011 Concerns re: Proposed AJAX Mining Project Kamloops, B.C. I am a citizen of Kamloops who attended the public input meeting initiating the Environmental Assessment Review process for the Ajax Project. My husband and I chose to live in Kamloops 47 years ago. We raised our family in the community and now have grandchildren growing up here. We came because we loved the arid climate, fragile grasslands, and clean lakes and rivers as well as the opportunities to set up successful professional practices. I believe the proposed Ajax mine will jeopardize the future of this pristine environment and negatively affect citizen lifestyles (and potentially health). In addition the economic benefits will be short lived. Our community has dealt with a reputation of being, "that smelly pulp mill city". In recent years we have overcome some of those perceptions by focusing on our numerous tourism opportunities, higher education institutions, and incredible civic recreational facilities... all things that encourage folks to settle in this region. An open pit mine 25 square kms. in size and partially within the Kamloops city limits will have just the opposite affect. I would like to focus on a number of concerns that I hope will be considered in the scope of the environmental assessment. 1.The Fragile Grasslands: Once the grasslands are destroyed they are gone forever. What took hundreds of years to form, gone in an instant. The proposed mining area contains flora and fauna that people in this region enjoy for hiking, birding, snowshoeing, etc. I have worked for one of the largest open pit mines in the world and reclamation/mitigation is NEVER a way to restore the landscape to the way it was before a mine is commissioned. 2.Water: In the past this very dry region has experienced a lowering of the water table in times of drought. Future projections from hydrologists predict this will only get worse as global warming increases. Will there be enough water to sustain such a mining project? At what cost...to agriculture, to citizens (particularly ranchers), to fishing lakes and streams in the area? What are the limits on demand? If water is to be shared, as well, with another mining company (which I believe is the plan) who will have priority rights if shortages occur? 3.Health: We are a medical family and have definite concerns about the health hazards that might be associated with the mining project. These could include everything from chemicals used in processing, dust, noise, and general stress. What studies have been done in other similar operations to assess these impacts? Once again, having worked onsite at an open pit facility, I know first hand that risk management must include contingencies for a variety of emergencies...fires, electrical outages, weather crisis, etc. Such events can often result in catastrophic health hazards. 4.Employment and the Economy: Yes, there will be jobs created in the construction phase of the project and also for the projected 23 years after the mine is commissioned. Let us assess this for a moment. The mine will only operate as long as the company is making money. If the price of copper falls below a certain level the mine will no longer be viable. We saw this in the past with Afon. Many of the jobs would be filled by workers from outside the region because of the need for specialized skills. However, the big issue is how many people will lose their jobs because of the project...in tourism, ranching and other new industries that decide not to come to, "that city with the mine beside it". This is a zero sum game. I hope the scope of this assessment takes more than a 23-year focus! So many decisions are made without the next generation and beyond in full view. The pulp mill located in Kamloops is a perfect example of "short term gain for long term pain". The increased tax base in this type of project is often a mirage, as we have seen from the demands by the pulp mill for special tax relief. The biggest winner from this project will be the offshore proponent from Poland that owns 51%. I see no long-term financial benefit to our local community. 5.Decision Making Process and Political Issues How much say does the City of Kamloops have in the decision making process? As the projected mine site is partially within the city boundaries is there not an issue of municipal zoning? As a citizen, I am happy to be involved in this early part of the assessment process but involvement does not mean influence nor does it give the power to actually affect the final decisions. I find it distressing that the people who will be most affected by the decisions (the community) are the ones with the least power to influence those decisions. I believe the citizenry should be better represented in this entire process. 6.Monitoring and Enforcement Environmental assessment and subsequent approval to proceed to commissioning and full operation are simply the opening scenes in any project. If adequate monitoring is not done on a regular basis and by an independent monitor then the assessment guidelines and limitations are useless. As well, if there is not subsequent enforcement after monitoring then it still remains useless. I have worked with companies over the years, both here in Canada and off shore, which employ EIA processes. I have found two glaring problems that weaken this chain of events. First, government regulators are spread so thin with layoffs and staff cut backs that it is in some cases impossible to do adequate monitoring and enforcement. Unfortunately, this leads many companies to stray from agreed on guidelines. What guarantee do we have that that will not be the situation with Ajax? If a lax process of monitoring and enforcement were to take place we, the citizens, would pay the price. Will the company operate at the internationally accepted standards of ISO 14001? Will it seek ISO 14001 certification? 7. Visual Impact The visual impact of this huge project will be an "eyesore" for at least the life of the mine. Mitigation must be guaranteed and thorough. An adequate bond should be put in place. This becomes even more important if the price of copper plummets and the company deserts the project mid stream because it is no longer financially viable to continue operation. We have seen that this can happen. People form their opinions on first impressions. Is this mine the image we want to present to the world? THE BOTTOM LINE Two final questions: What is the benefit of this project and for whom? What kind of a community do we want to leave as a legacy for our children and grandchildren? Thank you for the opportunity to be involved in this process. I hope your group will see fit to expand the parameters of the assessment so that an enlarged focus will pay more attention to the social, lifestyle, and health issues of the citizens of Kamloops and the surrounding area. Those citizens will ultimately be most affected by the decisions that you make.																						
45	22-Jun-11	Glenn Dreger	Knutsford, BC	When I view the aerial photos of the land the mine will occupy, showing their planned pit, waste rock managements sites, roads and tailings pond, I see a barrier to wildlife travel that is 10 kilometers wide. There is a large population of deer and other wildlife living south of the mine, that migrate north, into the Iron Mask and Kenna Cartwright park area for their winter range. The planning of the mine is such that there is no reasonable corridor for wildlife to travel their annual routes between summer and winter range. Not only will the mine eliminate the wildlife on the 5000 acres of grasslands they destroy, their effect will stretch many kilometers to the south as ungulates starve because they cannot access their traditional winter ranges.																						
46	22-Jun-11	D. Leblanc	Kamloops, BC	I am strongly opposed to the Ajax mine project. There are many reasons for my opposition, first being that it is completely ridiculous to have a project of this magnitude so close to a thriving neighbourhood. As a local resident I am deeply concerned about noise, dust, blasting, air quality, aesthetics and property values. All Kamloops residents, not just those in Aberdeen will be affected by the added pollutants. Kamloops is a beautiful place to live and we need to keep it that way. If we were aware of this project we certainly would not have chosen to live in Kamloops. The hills of Aberdeen are home to some of the best trails Kamloops has to offer as well as an abundance of wildlife. The Environment will be affected, how could it not be. When we blast, drain lakes and reroute water flow, it no doubt will have a domino affect upon the environment. The economic benefits do not justify the total cost to our environment and neighbourhood. This mining corporation comes with lots of money behind it and unfortunately our government tends to cater to that. It is time however that our environment take precedence over economy. The consequences are far to great.	1	1																				

KGHM AJAX MINING INC.
AJAX PROJECT

PROJECT DESCRIPTION ISSUES TRACKING TABLE
PUBLIC COMMENT PERIOD JUNE 8 TO JULY 11, 2011

M:11010024608A(Data)Public Comments 1(Public Comments Tracking)Table 1 Ajax Project Public Comments Rev 0.xlsx(AJPD)

Comment #	Date	Name	Location	Comment	Issue for Consideration																				
					Air Quality / Dust	Noise	Vibration	Light Pollution	Fish & Fish Habitat	Surface Water Quality	Surface Water Quantity	Groundwater Quality	Groundwater Quantity	Wildlife	Grasslands / Ecosystems	Aesthetics	Human Health / Safety / Well-Being	Recreation	Tourism / Investment	Economy / Employment	Land and Resource Use	Infrastructure	Terrain / Soil Stability		
47	22-Jun-11	Personal Information Withheld	Kamloops, BC	I am extremely concerned about the negative effects of the Ajax Mine on Jacko Lake. The 46.7 hectare Jacko Lake is a very popular fishing lake due to its location on the outskirts of Kamloops, in an area renowned world wide for its excellent fly-fishing. The quality of fishing brings in many people to the area and is a great benefit to the local economy. The lake is particularly popular because of its low elevation resulting in one of the first lakes to be ice free in the spring and one of last to freeze up late in the fishing season. The quality and size of the fish are above average and accessibility to the lake is easy, being only a few metres from the city boundary. My concerns are: (1) page 41 of the Ajax Mine Project Description indicates that 1/2 hectare of fish habitat of the northwest arm of Jacko Lake will be destroyed to accommodate the western arm of the pit. This is a particularly fertile part of the lake and greatly favoured by flyfishermen; (2) The Proponent is unable to assure the public that 23 years (8400 days) of continued blasting within meters of the lake would not affect the bedrock and eventually lead to the draining of the lake. This of course is a benefit to them as there is a large body of ore below the lake. The construction of the Ajax Mine will lead to the eventual destruction of Jacko Lake and should be considered to be an environmental disaster.					1																
48	22-Jun-11	Unhappy	Kamloops, BC	I have been a resident of Aberdeen for 3 years (and Kamloops for 30) and I love the atmosphere of the area. Unfortunately, that will disappear almost instantaneously, along with clear(er) air, the quiet and our health if the Ajax mine opens. It is unfortunate that the "economic boom" this will supposedly bring has become more important than maintaining the value of a city, a beautiful grassland region (and lake), the health and support of the residents and the value of property in the areas of Aberdeen, Pinerview and Knutsford. As mentioned by others, the instability of the soil in this region should alone be enough to make one question the viability of a mine situated not only above an elementary school, but numerous neighbourhoods and the rest of the city. One ill-timed blast (coupled with environmental circumstances) would be all we need to have everything come crashing down. The devastation to the landscape, and the city and its residents, is not worth the mine. I DO NOT support this mine. I hope others will speak up as well. I would relocate if it goes through, which is too bad because I love where I live.	1	1									1								1		
49	23-Jun-11	Personal Information Withheld	-	To Whom it May Concern We are opposed to the proposed Ajax Mine. We ranch in the area adjacent to the mine, and at this time we have had no assurances from the mine that it will not adversely affect our operation. Our concerns include the following: -dust pollution from blasting and tailings "pond", contaminating our pastures and hayfields. -leaching of contaminants into the soil surrounding the tailings area. -the amount of water used from Kamloops Lake and ground wells in the area. -use of Inks Lake as a settling pond. -noise pollution from blasting and crushing of the rock. -loss of property value -increase of traffic on the Lac Le Jeune Road, the road is not built for heavy ore trucks, and is currently patched in many places and is breaking up in other places. We trail our cattle from one part of the ranch to another using the road. This will become almost impossible with the increased number of ore trucks, mine personnel, and supply trucks. -changing the course of Peterson creek and potential damage to Jacko Lake from the main pit of the mine. -loss of wildlife habitat, with the tailings area being the spring and fall range of Mule deer. -loss of the way of life we have had for the last century—we were told we could always get a job at the mine. We hope that the Agency will look very closely at the mine and it's impact on the Environment and how it will directly affect many people. The number of jobs it will create sound good, but, in the end we have to have a clean world to live in and food to eat.	1					1	1	1	1	1	1								1	1	
50	23-Jun-11	Personal Information Withheld	Kamloops, BC	Dear Mr. Milobar, As a representative from the City was not present at the first public meeting held last Thursday on the proposed new copper-gold mine site, 50% of which is within city limits, I am writing to provide some input for your consideration. The presentations from the Federal and Provincial Environmental departments were very informative but only dealt with the effect of mine operations on the environment. A major concern from the many people attending the meeting was how would mine operations affect the health of everybody living in Kamloops. In your message on the City's home page it is stated how Kamloops offers a "fit and healthy lifestyle". It became quite clear from questions being raised in the meeting that our health could be seriously affected with this new mine being only two kilometers from the nearest residences at Aberdeen and Pine Valley. To date the impression of the general public was that the mine site was a long way from the City and residences and it would not affect our daily lives, particularly as the Company states in its literature that the site is 10 km from city limits. This is incorrect and in the meeting their representative admitted they measured the distance from the Petro-Canada station! Much of the environment destruction is well known and documented but as this mine will be right next to and part of our City its daily operations for the next 23 years will significantly affect our health, climate and daily lives. A Provincial senior scientist and biologist has projected that Jacko Lake will be dead within five years notwithstanding that the company states the lake will not be affected and they will protect it. The lake will be right next to the large open pit mine and inevitably will become polluted if not destroyed by the blasting. Peterson Creek originates from Jacko Lake and likewise will become polluted with toxins and waste from the mine which will then be carried to our Downtown and eventually into the South Thompson River from which we get our drinking water. The company states they will do their best to control dust from the mine. The majority of all prevailing winds here come from the South or South West direction. Thus inevitably our air quality will be adversely affected by dust from the mine. If strong winds occur as we experienced last week any efforts to control dust will be futile. Already our medical clinics are filled with people suffering from sinus and asthma problems. Weather inversions periodically occur over the city and these would trap any pollutants from the mine in the air making the situation very poor. These do happen at the Logan Lake mine and can last many days. We have all visited that mine and the many inches of dust affecting a large area emphasizes the problem and what will happen to the upper Aberdeen and Pine Valley areas. This could cause a population decline which would negate any economic benefits of the Ajax low grade mine. The company states that their water requirements to be taken from Kamloops Lake will not affect the Lake levels. The very large ongoing amounts of water required by an operating mine are considerable and reliable sources indicate this is not the case and water levels will be affected. For nine months of the year when water flows are low if the level of Kamloops Lake drops it could have a serious effect on the South Thompson River, communities downstream, and the salmon runs. Although the economic benefit of some 400 additional jobs in the community may be attractive a large mine site on our door step could have the effect of Kamloops being branded a polluted dirty mining town instead of the vibrant healthy community your comments on the web site portrays. Tourists travelling here will have a first impression of a large mine operation and huge mountain of a waste dump instead of a pristine wilderness with beautiful lakes and a beautiful community. I have lived here for the past 26 years and seen Kamloops grow from a mill town reputation to a large healthy diversified community. We owe it to our children and grandchildren to keep our City where they would want to live. Thank you for your consideration and service to us all.	1					1	1					1	1						1		
51	23-Jun-11	Personal Information Withheld	Kamloops, BC	My wife and I, long time residents of Kamloops and currently residing in the Aberdeen subdivision of Kamloops, strongly oppose the development of an open pit mine and associated facilities partially within the City of Kamloops. The proposed Ajax Mine is, in our opinion, far too close to homes, schools, recreation facilities and community activities. We believe the mine will have short term and long term negative effects on our quality of life. We are of the opinion that the mine will also have a negative impact on the lives of citizens of Kamloops. Consequently, we urge you and the authority vested in provincial and city officials to oppose (do not approve) this development. CC Kevin Kruegar, MLA Kamloops Terry Lake MLA Kamloops-North Peter Milobar, Mayor City of Kamloops BC																			1		
52	23-Jun-11	Personal Information Withheld	-	I have to wonder if this has been thought through. There are so many concerns with this it is not funny. Wildlife, air quality, property values, and the list goes on and on. Does anyone not care about what the residents of kamloops think. We will only suffer from this, not benefit.	1										1								1		
53	23-Jun-11	Gordon Lloyd	Kamloops, BC	My wife and I, long time residents of Kamloops and the Aberdeen subdivision, strongly oppose the development of a large open pit mine in such close proximity to houses, schools, recreation facilities. We believe the mine and mine facilities, if allowed to go ahead, will have a very negative effect of our lifestyle and on our community.																					
54	23-Jun-11	Personal Information Withheld	Kamloops, BC	this proposed mine on the outskirts of kamloops will do many things to the detriment of the residents life styles ...property values in the entire city will decrease likely by 40% to 50% . and the visitors to kamloops will instead of considering it as a nice place to live, will continue on to either vancouver or kelowna ...the dust and noise which is a part of mining , will impact everyone ...except the owners of the mine who will continue to live far away ,and not be worried about the environment , or the health issues that the mine will bring to the area...the probable loss of jacko lake would be a tragedy , because it is a tremendous tourist attraction ,but , if the mine does go ahead , we would be able to do away with our tourism offices, cut staff at city hall, and see houses offered for sale in aberdeem , sahal , south and north kamloops at a fraction of their costi can not conceive any other city in B.C. even remotely considering a mine adjoining the city boundaries ...except kamloops , we moved here from the coast 50 yrs. ago , raised a family , and enjoyed the peace and tranquility of the area ...we were saddened by the loss of mission flats beach when the pulp mill arrived , with the "smell of money" and in the many years that we have had the smell, are assured that they are working on it..but every time the environmental people complain about emissions , the mill says we can't afford that , and we'll have to shut the mill down ...so the environment department says oh we can't have that..and that will likely be the same response to complaints about the dust and noise coming from the ajax mine ...once this mine is here, kamloops is done as a destination for anyone looking for a place to live and raise a family .	1	1										1	1							1	
55	23-Jun-11	Personal Information Withheld	-	Please take the time to look at these videos! This is THE TRACK RECORD OF AJAX MINE in their Mexican operation. http://www.youtube.com/watch?v=w1aQ71S4ZZA&feature=player_embedded Is this what is going to happen to Kamloops if we let Ajax proceed? What do you think is going to happen to the equity you built up in your house? How do you think this mine operation is going to effect your families health? Do you think anyone is going to move to Kamloops "THE MINING TOWN" except people that work for the mine, with an increase in an already deteriorated air quality, including fine dust everywhere, increase in emphysema and lung cancer? The list goes on and on, YOU HAVE THE INTERNET, EDUCATE YOURSELF, TALK TO YOUR FRIENDS AND FAMILY!	1											1								1	
56	23-Jun-11	John Burgher	Kamloops, BC	The believe the Ajax mine project will have an affect on aberdeens homes due to blasting. Residents will defintly feel shock waves from blasting of hard rock, not to mention nose,dust and water pollution. I think the project is way to close to the city.	1	1	1				1	1											1	1	
57	23-Jun-11	Glen Littlejohns	Pinerview, BC	I have sent an email 10 days ago to Ajax and have had no reply regarding the environmental impact on the Pinerview Valley (just North of the proposed mine site). What will be the impact on our neighborhood? Will there be noise, vibrations, toxic dust/fumes, threat of flooding from leaking tailing lakes? No one seems to have clear definitive answers. Will the environmental assessments better explain the risks of the mine site to nearby residential neighborhoods? Better yet will this information be made public?	1	1	1				1	1													
58	23-Jun-11	Personal Information Withheld	Aberdeen, BC	I have read the comments in this section with interest. I estimate that more than 95% of the comments are strongly in opposition. In a knee-jerk fashion I agree with all of them. I wondered whether that was enough. Am I being selfish or short sighted in opposing a project that will create jobs? Should I oppose this simply because it will have a negative effect upon me? After reading the thoughtful and detailed letter from the retired assay scientist I have concluded that it is enough. The problems he articulates so clearly have convinced me that I - for one - do not want to live here if the mine is approved. Will this mine be able to avoid all of the problems that have been described? The answer is almost certainly no. Even if they are somewhat successful at dust suppression, noise abatement water protection etc, there will be negative impact upon the community. Is that worth 400 jobs? No. The effect of this mine will be a loss of many other people like me, who bring employment to this community. The net increase in jobs will be offset by the many people who - like me - say this will be the last straw. I believe we will suffer a net loss of jobs if this mine comes in. I live in Aberdeen because it affords me gorgeous views and relatively clean air compared to the rest of the city. The proximity of the subdivision to the city center (where I conduct my business)and to my kids activities makes it my preferred location. There are other nice areas of the city but they don't offer all that. The drive to Westside or Valleyview is too long given the activities my kids are involved in. If I want to return to the office in the evening it is a short five minutes away from Aberdeen. I want to live there despite the long winters. We already have a significant shortage of doctors here. If we undermine the livability of our community will that help us to attract more? No. Does that mean that the people they would have employed will have to look elsewhere for employment? Yes. The tourism industry is a mainstay of our local economy. Will this mine hurt that business? Of course it will. Does that mean that the people employed in tourism jobs may have to look elsewhere for employment? Yes. The same thing can be said for the agricultural industry, already in trouble. And then there is me. I am a self employed professional. I have two university degrees. I am analytical by nature. I chose to move to this city from the Okanagan, after careful consideration and much to the astonishment of my friends there. "Kamloops stinks," they said. "It's windy and dirty," they said. "There's no lake," they said. What I saw, however, was a good sized, thriving city in the midst of relatively unspoiled country. I was willing to accept the loss of the Okanagan because it made good business sense for me to come here. And at the end of the day I could return to a lovely quiet home on the hillside. This mine will end that. And for me, it will be the last straw. I can earn my living wherever I choose to live. So I will leave. Period. In leaving, I will have to lay off the 3 people I employ in jobs that pay well. A direct loss of 3 jobs. My accountant will lose our family business and my company business. My business landlord will have another empty space to fill. My dentist and my doctor will both lose 5 patients. My insurance broker will lose business. So will my gym, my mechanic, my hairdresser and all the other businesses I frequent with the large discretionary income I have been fortunate enough to earn over the years. I have spoken with three other self employed people in this community and they are also considering this leaving if this mine gets approval. If 100 people like me leave this city will lose more than it can ever gain through this mine. If one mid sized company chooses not to relocate here because of the poor lifestyle we will be in a net loss. We can plant flowers on marigold miles until the cows come home. If we are surrounded on all sides by dirty noisy industry, our quality of life will suffer. Kelowna will continue to compare itself favorably to Kamloops and will continue to attract the doctors and self employed people who will not sacrifice lifestyle for a foreign owned mine. Our city will regret this forever once the real economic and lifestyle costs are added up. When I say "our" city, I hope it will still be mine as I really love it here. But for me, this will be the last straw. If you build it, I will go.													1	1					1	1	
59	23-Jun-11	Jean Humphries	-	Dear Environmental Assessment Panel: Amidst the concerns being raised about this massive Ajax mine project is the fact that this operation will decimate a large area of fragile grasslands, which are at a premium in this province and can never be replaced. I'm participating in a 5 year survey project for the BC Breeding Bird Atlas and a large section of my UTM square lies in the projected mining area. During my survey work I have been amazed at how many bird, animal, and plant species occur here. Many of them are indigenous to grasslands, which means that they cannot just go somewhere else. A number of ranchers are reliant on the grasslands in this area, and they are justifiably concerned over the major impact such a large mining project will create. They love where they live and provide locally raised cattle and sheep for the market. There are rules about overgrazing and environmental stewardship which most are happy to comply with, and yet in one fell swoop, some foreign mining company can come in and totally decimate the same environmental surroundings.. Mining today is on a massive scale, which totally changes a landscape. "Reclamation" never can take the place of the original ecology, which has developed over a long period of time. Since the almighty dollar usually dictates what replacement plantings will be done, native grasses and plants are rejected in favour of cheaper, non-indigenous ones which grow fast and look good, but lack what is needed by the species who make the area their home. Is it really worth destroying an environment one cannot put a price tag on for the sake of short-term gain which, arguably, may really not benefit BC very much in the long run? I think not, and neither do those who live in the area and who stand to lose something very precious.												1								1	
60	23-Jun-11	John Schlemmer	Kamloops, BC	The proponent of the Ajax mine has already shown little regard for the quality of life, health issues and effect of property values for residents surrounding the mine. It is also obvious that they have little regard for safety issues. Although the mine property covers a huge area within the city limits and just outside the City of Kamloops, the mines representatives insist on constructing the Explosive Storage Facility in an area south of the Goose Lake Road within metres of homes on both Goose Lake Road and Edith Lake Road. The facility will result in numerous trips per day across Goose Lake Road, a public road which is a popular recreation area just south of the city limits. The items stored in the facility include bulk ammonium nitrate and bulk emulsion which will be transported to the open pit across Goose Lake Road for the life of the mine, a total of 8400 days. The storage and transportation of explosives will result in significant risk to nearby homeowners and public traffic on Goose Lake Road over the 23 life of the Ajax Mine.																				1	1
61	23-Jun-11	Mary Star Mahara	Kamloops, BC	I wish to register my strong opposition to Ajax mine project proposed for the Kamloops area. Its potential negative impact on the environment surrounding Kamloops is undeniable. The resultant destruction of the surrounding lands will also run our city's desirability to new residents and businesses - both during the operation of the mine, and forever afterwards. Finally, the supposed consultation meeting last week in Kamloops was not consultation at all - but the mine representatives going through the motions so they can say that they "consulted". That such a project could be in line to be approved shows me that the government processes in place to protect the environment, the livelihood of the residents of our city, the ranching community, and our local tourism industry, are merely a sham and this it makes me embarrassed to be a citizen of BC and Canada.																			1	1	
62	23-Jun-11	Personal Information Withheld	Kamloops, BC	This should not be approved. It is ridiculous. Just too close to the residents of Kamloops. No where in North America is a mine so close to a city this size. They will ruin Jacko Lake and the beautiful surrounding grasslands. Kamloops already has an air quality problem which the dust from this will only add to. Not worth it for a mere 23 years of jobs.	1																			1	

KGHM AJAX MINING INC.
AJAX PROJECT

PROJECT DESCRIPTION ISSUES TRACKING TABLE
PUBLIC COMMENT PERIOD JUNE 8 TO JULY 11, 2011

M:\110100246\08A\Data\Public Comments 1\Public Comments Tracking\Table 1 Ajax Project Public Comments Rev 0.xlsx\AJPD1

Comment #	Date	Name	Location	Comment	Issue for Consideration																		
					Air Quality / Dust	Noise	Vibration	Light Pollution	Fish & Fish Habitat	Surface Water Quality	Groundwater Quality	Groundwater Quantity	Wildlife	Grasslands / Ecosystems	Aesthetics	Human Health / Safety / Well-being	Recreation	Tourism / Investment	Economy / Employment	Land and Resource Use	Infrastructure	Terrain / Soil Stability	
63	25-Jun-11	Carolyn Dymond	Kamloops, BC	To whom it may concern, I am writing to express great concern over the proposed Ajax mine within the city limits of Kamloops, British Columbia. We purchased our home in the Aberdeen area of Kamloops specifically because it was so near the grasslands and was the most quiet and pristine part of Kamloops. We love nothing better than to sit on our deck or in our garden and breathe the fresh air that the constant breezes carry and to listen to the crickets and the distant lowing of cows in pastures at the top of the hill. If the Ajax mine were to go into operation within two short kilometres of our home our quality of life would be drastically affected. As a light sleeper I would no longer be able to sleep at nights with the constant drumming of heavy equipment and intermittent blasting going on through the night. Our air would no longer be clean and I would be concerned for my daughter playing outside and breathing the dust and fith being produced so close to our house. The grasslands are what define Kamloops' topography and this massive, ill-thought out mine would destroy huge quantities of this sensitive ecosystem. Waterways would be rerouted, compromised and polluted. It fills me with fear to know that some far away people are planning to destroy the home that I have worked for so many years to acquire, the home where I plan to raise my family, grow vegetables in the garden and enjoy the serenity of our peaceful hills. I will do everything possible to make my voice and the voices of all of my neighbours heard with regard to the ignorance and greed that are guiding this mine's progress. It is my hope that Ajax will realize how unwelcome they are here and that quality of life far outweighs a few short-lived jobs and revenues.																			
64	25-Jun-11	Terry Maslasz	Knutsford, BC	You have got to be kidding, a mine in city limits. We can't have a pit fire in our yards in Kamloops because we want clean air but hell we need another mine. We have garbage cans coming out our butts because we want to be green. We keep hearing about the jobs that will be created but what about the ones that will be lost through tourism. It has been difficult already to attract doctors to our pulp mill/mine city with all the pollution just think how quick they will want to come to Kamloops with the Ajax mine. People need to think about the long term and the damage that can't be reversed. I hope the citizens of Kamloops take the time to think about the damage that will be done. Noise/ Pollution?	1																		
65	26-Jun-11	Mike and Penny Gikler	Kamloops, BC	You can add our names to the chorus of protests against the proposed Ajax Copper/Gold mine on the southern border of Kamloops for the following reasons. a) Destruction of sensitive grasslands. Once the grassland has been destroyed attempts at reclamation will never re-create the natural ground cover again. b) Blasting, crushing and noise from heavy machinery at the site, as well as along Lac Le Jeune road during hauling will adversely affect residents and wildlife. c) Dust and toxins from tailings and waste rock rock dumps will be airborne and negatively affecting residents and homes nearby. d) Potential for serious damage to Inks, Jacko and Kamloops Lakes as well as Peterson Creek. e) Wildlife habitat and migratory corridors will be destroyed. f) Living conditions of the residents of Aberdeen and Pineview Valley. These are residential areas that should not be subjected to 24/7 noise and dust pollution as well as the negative effect on property values. g) The long term effects on the growing importance of the tourism/service economy. The mine jobs are a short term gain for long term environmental and economic pain. In conclusion the proposed mine is an inappropriate venture too close to the city of Kamloops. The mine is not sustainable in the long term and poses too many health, pollution and environmental risks.	1	1																	
66	26-Jun-11	Paula Pick	Knutsford, BC	I would like an answer to my question: How many hectares of the 2500 hectare Ajax mine footprint, is native grassland now, how much grassland would be destroyed if the mine was approved. I have had a tour of the proposed mine site and been to a public meeting. My first point is that I think it is a huge mistake to build a mine within the boundaries of Kamloops. It is short-sighted, Kamloops will need to grow and the old mine site, on already disturbed land might be suitable for residential development. The proposed site is much too close to Aberdeen and Pineview Valley subdivisions. Those residents will be exposed to dust, air, pollution and noise 24/7. It seems to me to be ridiculous to build a mine right in a big city. If this was Kelowna, it would be unthinkable. BC is a very large province with sources of copper all over the place. The tailings pond is probably under-sized. And what a ugly sight to see as you come into the Kamloops area. What impact will that have on tourism? My second area of concern is protection of native grasslands. Jim Whitaker, spokesman for Ajax had no knowledge of native grasslands and did not know that once disturbed, it is near impossible to restore/reclaim the land to its original condition. Bunchgrass, the predominant plant, does not recover from being disturbed. 100 years after the homesteaders, the land they tried to put crops on, is still missing bunchgrass and tends to be weedy. After the mine has closed, sure they can reseed with introduced species like Russian crested Wheatgrass. It can be seeded, it will spread, not allowing native species to be started. Cattle will eat it. So you can achieve restoration of grazing for cattle. but you have lost native grassland. "British Columbia contains the largest remaining area of North America's Intermountain Grassland ecosystem...Grasslands are the most threatened ecosystem of British Columbia, even more threatened than old growth coastal rainforests". (Chris Harris Spirit in the Grass, p.12). Only 1% of BC was native grassland and only about a 1/3 of that remains in its original ecological condition. And in that 1% reside 30% of the BC endangered plant and animal species, including the badger, burrowing owl, Lewis' Woodpecker, western rattler, and spidefoot. The environmental studies however, cannot just look at individual endangered species but must look at the entire fragile grassland ecology. The land around the old Teck mine is pristine native grasslands. A burrowing owl was seen there a few weeks ago. This is high quality burrowing owl habitat. Blasting effects fish and birds, so even outside the 2500 hectare mine site, wildlife will be disturbed. I have a question: how much of the 2500 hectares proposed by Ajax will be native grassland? For low quality copper ore, it is an abomination to think that Ajax mine could destroy 10 square miles of land half of which is within Kamloops and much of it pristine native grasslands. Reading: The Grasslands of the Southern Interior of British Columbia, E.W. Tidale. Published in Ecology, vol.28, No. 4 (Oct. 1947), pp.346-362.	1	1																	
67	27-Jun-11	Personal Information Withheld	Kamloops, BC	Ensure that the BC Environmental Assessment will include an analysis of the toxins contained in the dust generated from the mine. A comparison site in a neighbourhood 2 Km away could certainly be made available to you, to show the difference between the existing dust, and that that will be created by the proposed mine.	1																		
68	27-Jun-11	Robert Mayer	Kamloops, BC	I would like to say I support the proposal if the environmental impacts can be monitored, reasonably mitigated, and mitigation measures strongly enforced. Every big project has impacts and it's better for the environment overall if we have developments near communities than off in the hinterlands. I remember when the Coquihalla Highway was proposed and that had many more impacts to ecosystems, wildlife, and fisheries than a site specific mine that can be carefully controlled. Yet most people wanted the Highway because it saved an hour in travel time. Kamloops City should be provided with benefit sharing revenue directly from the mine. Just like First Nations will get. Too many people complain about the City, taxation, crime and lack of good jobs yet say not in my back yard. Any direct proven significantly adverse impacts to homeowners should be financially compensated. The B.C. interior desperately needs foreign investment and resource development. Otherwise our grand kids will be left to carry bags, clean rooms and serve fast food for the foreign peoples that allowed resource development. Please figure out a way for the mine to proceed it will benefit Kamloops and all of B.C.																			
69	27-Jun-11	John Schlemmer	Kamloops, BC	The proposed Ajax Mine will have huge negative impact on our ungulate populations. The vast area of the mine plus the waste rock and tailings facilities will be an unnatural barrier to the migration of large herds of mule deer as well as some white-tailed deer and moose to their natural wintering grounds. The herds travel from their summering areas at Lac Le Jeune, Hull Mt. etc., during the fall breeding time to settle around Sugarloaf Mt., Iron Mask Mt. and Coal Hill to spend the winter. If the mine goes ahead, it will be impossible for the animals to reach these areas, which will lead to starvation and decimation of the herds. The eight-foot fence spanning the Coquihalla Highway will be an impassible barrier to the west and the community of Knutsford to the east will stop migration to their natural wintering grounds. As Chairperson of the Wildlife and Wildlife Habitat Committee for the Kamloops & District Fish and Game Association from 2001 to 2009 I was head of a crew of volunteers that spent over 150 man-days improving wildlife habitat in the Kamloops area, much of it in the proposed Ajax Mine area. The Association worked in partnership with The British Columbia Ministry of Environment and the Public Conservation Assistance Fund to improve ungulate habitat by removing unnatural hazards, such as abandoned barbed wire, and invasive plant species. Since the old Afton Mine closed in the late 1990's until now, it is noticeable that the health and numbers of the herd has improved substantially and it has never been in better condition. It is undetermined at this time whether it was the closing of Afton Mine or the hard work by volunteers to improve the habitat, or a combination of both, that is responsible for excellent condition of the herds. We do know, however, that the Ajax Mine will destroy an important wintering ground for the ungulates resulting in starvation and death of these fine animals.																			
70	27-Jun-11	Personal Information Withheld		Fact of distances using Google Earth so you can double check if you want. Abbeyleigh Way is 1.75 km from edge of Waste Rock (Tailing Storage, told it is going to be the height of a 12-story building = dust = emphysema and lung cancer), and it will be 2.33 km from the edge of Ajax Pit. Pineview, will be 1.75km from edge of north waste rock. City Hall to edge of mine = 6.45 km; North side of bachelor to edge of mine = 10 km; Logan Lake distance to Highland Valley Mine is 15 km to center of mine to center of Logan Lake. I have been told that Logan Lake have dust problems created from the mine! I appreciate an answer to this question: We have a 13 ft. Alcan Block retaining wall and we paid thousands of dollars to engineers to test the soil. We were told to be very careful of watering too much, as the whole hillside is very fragile for sliding. I have quite extensive experience when it comes to explosives and know all about the vibration associated with them. If you give the go ahead for a mine of this size, this close to buildings that are built on a fragile hillside, who is going to pay for the damage? I again appreciate an answer to this question.	1																		
71	28-Jun-11	Justin MacKenzie	Ucluelet / Kamloops, BC	To whom it may concern, As a former resident of Kamloops, who had to move because of a poor economy, it makes the most sense to our family to, if there is going to be mining in BC, to do so in a location that has already previously been mined.																			
72	28-Jun-11	Pat Henelly	Kamloops, BC	I believe the idea of such a massive mining development so close to a major population is ludicrous! The impact on air quality, water quality, grass lands, wildlife and general quality of life for residence of Kamloops and especially Aberdeen. The city of Kamloops has invested in infrastructure to attract tourism with the "Tourism Capital" initiative and has gone to lengths to attract such companies as Rocky Mountain Rail Tours. What will this mine do to the reputation and beauty of Kamloops and surrounding areas. Kamloops must decide if it is a town that will pursue tourism or heavy industry. We can decide to be Hamilton or Kelowna. The government of British Columbia should be ashamed of trying to put heavy industry within Kamloops city limits, without the proper environmental impacts. I will be one resident of Kamloops who will not only vote against any party who approves this mine, but will also actively campaign for the opposition.	1																		
73	28-Jun-11	James Piper	Kamloops, BC	We in Kamloops don't have forests or oceans bordering our city, we have landscapes, rare and precious grasslands landscapes. That's all we have. We also have an ethical responsibility to future generations to leave them with the natural wonder of the grasslands surrounding the city, not to mention our responsibility to the plants and animals that live in these rare zones. We want a clean and healthy earth surrounding us. We don't want to burden future generations with 25 square kilometres of rubble and mine waste to look at. We don't want another one-time resource development to further degrade our city giving it an "industrial, resource-based" label. Moving forward, Kamloops will need a good clean and green reputation as a city to attract business and talent in the future, in an age of competitive globalization where people and business can locate anywhere. The life of the mine is only supposed to last 23 years. That is less than one-third of a life time. When the mine is finished, those 400 promised jobs and boost to the city's tax base will be long gone. We'll still have 25 kilometres of waste on the edge of our city that won't go away. That is so little return for such a high ecological price to pay. We have the opportunity now to make important choices that will have major effects far into the future. In this case, let's make the right choice. This mine should not happen...																			
74	28-Jun-11	Personal Information Withheld	Kamloops, BC	I would like to state my view of the new Ajax mine proposal for the Kamloops area. I do not want to see the mine project move forward for several reasons. The idea of relocating a portion of Peterson Creek really concerns me, if that needs to happen then there are more issues and concerns with this mine than we are even now being told about. Also I do not trust that Jacko lake will come out of this mine unscathed. I live in Sahali and do not want a mine outside my backyard so to speak as there is NO guarantee of control of odors, pollution to our waters or toxins to our bodies. If the mine had been here when we moved I would have seriously considered not purchasing the property that I did, which leads to another concern which is the potential decreased value to our property. The location of the mine is too close to comfort for me. I am a health professional and significant health problems are far too often found in hindsight no matter how reassuring the "experts" might be as to the safety of the project. As far as jobs go, if we need to destroy our valuable land for the sake of gold and copper then we need to employ 2 generations of people to find alternatives to such products rather than setting up a mine for the same purpose. Having lived here for 15 years and dealt with the odors from Dornier over the years I see no good reason to potentially increase that issue by including the south shore. People who do not live in Kamloops who visit us observe the smell when they are here as a real negative (we don't notice it as much now, gotten used to it I guess) and being downwind from the proposed site will not be good. I strongly oppose the development of the Ajax mine.	1																		
75	29-Jun-11			Although I am generally in favor of projects that will bring jobs to the community, I am opposed to this particular project as I don't believe the estimated economic benefits justify the potential impacts. My areas of concern are: Air Quality - dust control in mines is a difficult prospect (see attached) - even if the operator takes all available measures to control dust emissions, at best they would simply be reducing it; as a resident of Aberdeen, I can attest first hand to the strong winds that regularly howl through the area, so I don't see how the mine operator could reasonably be expected to prevent this from affecting the Aberdeen/Pineview areas. Noise - blasting, coupled with around-the-clock industrial activity 3km away on a plateau - I can't say for certain if this would be heard from my home (I think it's reasonable to say yes)....but that's not something I want to find out after the project has been approved and it's too late. Property Stability - homes in the Aberdeen area have covenants applied to restrict the amount of water used for irrigation - specifically because of ground stability issues - having such a large scale operation happening in this area, using that much water, coupled with blasting, makes me wonder what effects this will have on the stability of properties - especially in the long term. Property Values - as a home buyer, I wouldn't even consider buying a home 3km from an open pit mine...and I'm sure I'm not the only one - therefore perception alone will likely suppress property values (I suspect the fact this project is being considered at all is likely already affecting those values); if there turns out to be tangible ill effects (dust/noise pollution, ground stability issues) this would further decrease values. Keeping all of that in mind, the operator believes they can minimize or eliminate these risks/impacts - however, if once the project is operating, it is found that the noise is in fact disruptive, dust is in fact blowing into these neighborhoods - what then? What recourse, if any, is available to the affected residents? My expectation is that if the project goes ahead, and there are impacts, that those of us living in those neighborhoods will simply have to absorb the lost value of properties, put up with the noise/dust/potential health issues, and potentially pay out costs associated with any ground stability problems. That said, I don't see how any of the residents here can consider that to be an acceptable risk.	1	1																	
76	29-Jun-11	John Schlemmer	Kamloops, BC	According to the Project Summary report completed by Knight Piésold Consultants prepared for the proponent of Ajax Mine, a 1500 metre section of Peterson Creek just below Jacko Lake will be diverted to make room for the open pit as well as a small section downstream to make room for the East Waste Management Facility. This will be done at considerable risk to the environment. Firstly Peterson Creek is a fish-bearing creek, in the matter of fact during the second week of June a fisheries biologist for the province of BC counted over 300 rainbow trout spawning in the section just below Jacko Lake in an area slated to be diverted. The 1500 metre diversion will go directly through the old Afton Mine tailing facility. Any toxins, impurities, sand etc. will be washed down stream and pour into the Thomson River just upstream of both Pioneer Park and Riverside Park, both popular City of Kamloops recreation sights frequently used by swimmers during the summer months. Peterson Creek has many water licenses below the diversions and the users of the creek are at risk of loosing this vital resource. The Thomson River hosts a numerous amount of salmon runs, the most notable being the Adams River run which has its spawning grounds approximately 60 kms upstream of the mouth of Peterson Creek. The Adams River Sockeye run alone hosts between 2 million and 6 million returning spawning salmon each year. The mature salmon, which also include coho and chinook, hold in many areas including the mouth of Peterson Creek on the way to the spawning grounds. Most importantly the salmon fry will hold at the mouth of the creek as they work their way to the Pacific Ocean. Knight Piésold Consultants confirmed in their report that salmon fry were captured at the site in July and August 2008 and both coho salmon and rainbow trout were captured there in September 2008. The greatest risk to Peterson Creek, however, is the possible draining of Jacko Lake. The proponents of the mine are unable to assure the public that 23 years (8400 days) of continuous blasting just metres from Jacko Lake will not damage the bedrock, which could lead to the eventual draining of the lake and the destruction of Peterson Creek. The diversion of Peterson Creek will not only negatively affect the fish habitat in the creek itself, but also create risk to water license users, affect the water quality of the recreational sites within the city of Kamloops, and could also have a potential negative affect of the salmon runs using the Thomson River system. On page 40 of Knight Piésold Consultants report the writers acknowledge that fish habitat will be lost if the diversion is allowed. They and the proponent must also acknowledge the many other negative effects on the environment and users of the Peterson Creek and stop the mine at once.																			
77	01-Jul-11	John Schlemmer	Kamloops, BC	A review of documents relating to the purchase of my home in Aberdeen located approximately 2 kms from the proposed North Waste Rock Management Facility indicates that when I purchased my home in 1981, I was required to sign a Covenant with the City of Kamloops. The Covenant pursuant to Section 215 of the Land Title Act indemnifies the City against any losses that may incur to me as a result of any movement, slippage, settlement, or other failure due to unstable soil conditions of the land my home was built on. The Covenant was obviously registered against my property due to the unstable soil conditions in the area just below the proposed Ajax Mine. I am deeply concerned about the affect on my home and surrounding homes from the billions of tons of waste rock to be piled in the North Waste Rock Management facility just above this unstable area. I am also very concerned about the negative affect of this massive weight on the water table and the numerous underground springs that flow from the facility down through the already unstable ground in Aberdeen and Pineview Valley. It will be impossible to predict the scope of any potential damage to homes and property until the mine is allowed to open and then it will be too late. The values of our homes will be faced with a huge decline if the mine is allowed to go ahead. Homeowners will also have no recourse against the City of Kamloops when the damage occurs due to the Covenant we were all forced to sign.																			
78	03-Jul-11	Personal Information Withheld	Knutsford, BC	According to the Ajax mine project map, the proposed east waste rock pit will border the north/south fence line of my property from Goose Lake road to the City's south boundary & since I rely entirely on solar & wind for my power supply, I suspect the 300 foot high (or possibly higher) "berm" surrounding the rock pit will interfere with the solar panels, cutting off my power source by about mid-day, particularly in winter when the sun is already low in the sky. Do you have a solution for this? If the proposed 300 foot high (or higher) "berm" should interfere with the prevailing southwest winds (on average 20-30 miles/hour - mostly all day every day) thereby reducing my power supply even further, would you have a solution for this?																			

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AJAX PROJECT

PROJECT DESCRIPTION ISSUES TRACKING TABLE
PUBLIC COMMENT PERIOD JUNE 8 TO JULY 11, 2011

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					Air Quality / Dust	Noise	Vibration	Light pollution	Fish & Fish Habitat	Surface Water Quality	Surface Water Quantity	Groundwater Quality	Groundwater Quantity	Wildlife	Grasslands / Ecosystems	Aesthetics	Human Health / Safety / Well-being	Recreation	Tourism / Investment	Economy / Employment	Land and Resource Use	Infrastructure	Terrain / Soil Stability	
79	03-Jul-11	Personal Information Withheld	Knutsford, BC	Since the location of the proposed processing plant has been moved due to the depth of bedrock - do you plan to review the core samples for bedrock depth in the north & east waste rock pit? What would you do if the waste rock compacts, settles, & therefore becomes unstable? Will this be monitored on a regular basis? -- & by whom?																				
80	03-Jul-11	Personal Information Withheld	Knutsford, BC	Because the proposed east waste rock pit is planned for construction so close to my property line - what guarantees are in place pertaining to the stability of the 300 foot high (or higher) "berm". Is there a restriction on height? What are the requirements for the distance of set-back from my property line? What precautions would be taken for seismic occurrence up to maximum magnitude? What if damage was caused thru an engineering error? Are inspections done on a regular basis? -- over the entire life of the project -- by whom?																				
81	03-Jul-11	Personal Information Withheld	Knutsford, BC	The proposed Ajax mine pit, 2-1/1-3 km distant from my home & the east waste rock pit next to my fence line, make my home on 30 acres of prime bunch grass grazing land, totally worthless at this time. I have owned this property for many years, have invested a considerable amount on its development, on my "retirement" home, & taxes. Besides destroying the "peaceful enjoyment of my own property" I find that home insurance would not cover any damage incurred thru mining operations - so TAKE NOTE - This applies to everyone! Insurance coverage is void if damage is caused by any mining operation, ie vibration, dust, toxins, water seepage. Is Abacus or KGHM prepared to produce a written agreement providing for compensation to home owners for any property damage incurred as a result of your operations? Otherwise, what would you plan to do about this serious problem?	1	1	1				1						1							
82	03-Jul-11	Personal Information Withheld	-	Apparently the Aberdeen groundwater problem is susceptible to large scale instability under adverse conditions of slope, ground water pressures & geology. Groundwater pressure is the key variable which may alter stability over time. Since blasting vibration & waste rock pressure could drastically alter the present situation, what would you do if this should occur?											1							1		
83	03-Jul-11	Karie Ghering	Kamloops, BC	My husband and I moved here from Vancouver 6 years ago and chose the Aberdeen area to live in Kamloops because it offers peace and quiet compared to other areas of the city. There are no railroad tracks, no major highways, no ambulance or fire stations with their sirens, and no airport traffic noise. We are not only definitely not interested in having our solitude destroyed but also our land devalued, air quality affected, or the environmental distortions that will occur with tailings ponds, grassland destruction, animal migration and feeding grounds destroyed, or lakes and creeks altered!! We feel violated in that we feel that the city of Kamloops has sold out the residents of Knutsford, Le Jeune, and the Aberdeen area of Kamloops by trying to slide this development under our noses without taking our valid concerns into serious consideration before moving forward with this project. This proposal definitely weighs on the side of negative as opposed to the positive benefits it may bring to the Kamloops economy. There is much to be said for the quality of life we enjoy in this community and the quality will definitely be downgraded for many citizens who have chosen this wonderful haven to invest in homes and raise their children.	1	1					1	1				1	1				1	1		
84	03-Jul-11	Jane Steele	Kamloops, BC	In Kamloops, I went to the first public meeting on June 16th regarding the Ajax Mine proposal. I was shocked and delighted to see so many people in attendance and concerned over the proposed mine. I live at the top of Aberdeen and it soon became apparent that I should be educated about what could be happening in my own neighbourhood. The first concern I have is that the proposed mine is exceedingly close to where I live. This was not apparent from the maps but became so as the Proponent gave an overview of the location of the mine and what to expect. Through questions from the audience, I learned and realized that the proposed mine will diminish the pristine area where the mine is to be located and the surrounding area. I frequent the Lac Le Jeune Road throughout the year taking in many outdoor activities. I find it saddening that this area will be scarred for life and the many habitats of birds and wildlife will be changed. It disturbs me that Jacko Lake along with Inks Lake, will disappear along with a great fishing lake. It would be a shame to lose what is very important to most of the people of Kamloops - a beautiful tranquil grasslands area which is home to many species. It should be noted the pollution my neighbourhood will be exposed to such as noise, air, water and light pollution makes me worried. The proponent did not satisfy my concerns when the audience asked what they plan to do about these pollutants. When he said two holes were blasted to hear the effect, he said it was within the guidelines. Yet, there will be holes blasted all day and night, consequently, not just two holes. This does not sound like a relevant or equivalent comparison. All of these negative repercussions for low grade ore are unacceptable to me. I understand the need for progress and helping Kamloops grow with new industry. The mine lifespan of 23 years is a long time and to me, not a good compromise for Kamloops. After the meeting, I thought about what I had heard. One of the first things that came to my mind was that I wanted to move. I cannot see how anyone would want to listen to noise pollution for 24/7 or breathe the dust filled air. I moved to Kamloops for the peace and quiet of a small city and the easy access to the rural area where I could enjoy all kinds of outdoor activities. That will be taken away from me if this proposed mine is accepted by the Federal and Provincial governments. I am obviously not a supporter of the Ajax mine. Please consider the concerns of Kamloopians when making your decisions about whether the Ajax Mine is a plus or negative to this community, not just meeting and fulfilling the rules laid down for it to proceed. Thank you for your considerations.	1	1					1					1	1		1	1				1
85	03-Jul-11	Personal Information Withheld	Knutsford, BC	Abacus Comments to the Environmental Assessment My husband and I have been involved in agriculture and employed in ranching for most of our lives. We have also lived in close proximity to an active and post production mine and know very well what goes with living there. We have seen how the dust rises from an active haul road, heard the constant beep, beep, beep, of the backup alarms on the machinery, the chugging of the cats and loaders working on the waste dumps, and lost dogs to the panic that they feel from the daily blast. With a view to eventual retirement but still wanting to be active in agriculture, producing both lamb and beef, we bought acreage in the Knutsford area. We were aware at the time that the grasslands in the area were for sale as acreages. While we were sad that the large expanse of native grasslands would be lost, we expected that there would be others moving into the area who would likely be interested in agriculture. We were also very aware of the mining which had been active in the area and knew it to have been abandoned due to low grade and low prices. We did not ever expect to have mining become locally active and especially not on the scale that is now being proposed. Having been involved with the KamPlan meetings we were aware of the plan for the city of Kamloops to be expanding in a southerly direction and knew of development plans and proposals in the works. The Pacific Way Elementary school and the new fire hall were built, both of which were planned to be centrally located in the southwest community area, not at the very outskirts of the homes. All these plans are threatened by the proposed mine going in just two kilometres over the hill from the present houses. We add our concerns to all those already listed by others in regards to the environmental, wildlife, grasslands, loss of agricultural land, safety, noise, pollution, property value, tourism, way of life, and health concerns. We have a few specific concerns we would like addressed: We have been told at the meeting that the waste rock is "just rock" and does not pose any environmental threat. Yet at the same meeting we were told that they have to build a ditch around the perimeter of the waste rock to catch any runoff water and contain it. We are aware that sediment and iron oxides are possible contaminants, and we understand that all blasted rock was contaminated with residue from the blast. We would like to know where they are going to direct this contained water to, as it is all uphill to the processing plant, and downhill to Peterson Creek. We would also like to know just what the explosives are that are being stored south of the Goose Lake road in the explosives storage facility. These are the materials which will be transported to the site daily crossing the Goose Lake road which is a public road down which school children are transported. What kind of a crossing will be required there? What safety measures will be taken to protect Peterson Creek when it is being crossed? In regards to the sludge tailings they propose to use, where else in Canada is this technology being used at this time and how successful is it? How can they say there will be no dust, when all the research we have done tells us there will always be dust. What kinds of chemicals will be in the tailings which may become airborne in the dust? With regards to landowner rights, when purchasing property in a rural area what are a landowners rights to "quiet enjoyment" of their lands?? We believe the level of noise considered pollution is less in the rural areas than in the city. And how can Jim Whitaker state that it's "not a problem" to remove this pristine grasslands from the ALR, when most ordinary property owners have quite a hard time even subdividing property within the ALR, never mind removing it! While some landowners in the immediate neighbourhood of the mine have not even been contacted, others have had "strong arm" tactics used on them in negotiations. What resources do landowners have to deal with intense pressure to sell? "Fair market value" was a phrase used by the mines negotiators, should these landowners not be offered a premium for their lands as they will be losing their homes, livelihood, peace of mind and heritage, causing extreme stress due to pressures of the decision to sell or stay. And if landowners decide to stay there is the very real possibility of loss of property value. If they have invested time, hard work and money in their property how are they to be compensated for that? How are they to be compensated for the loss of the peace and tranquility of living in a rural landscape once it's industrialized? While the city of Kamloops residents are all being given water meters to decrease water usage, the mine will be using millions of litres of water out of Kamloops Lake just downstream! This is the water that was saved by the homeowners in Kamloops so that it can be sucked out of the lake, and won't benefit the salmon in any way! And Mayor Milobar writes columns talking about protecting the Kamloops "Aishsh", when the dust from all the crushers, blasting, waste dumps, tailings, and access and haul roads will be blowing down over the hill into Kamloops 24/7! The movement of Peterson Creek from its present course will require it to be routed through old blasted rock which contains residue from the Afton mining of the Ajax pit, how will it be sealed to prevent contact with the waste rock? And how do they plan to compensate for the loss of riparian areas all along the creekbed?? As I sit here writing this I hear a multitude of birdsong, the crowing of my rooster in the henhouse and the ewe's calling to their lambs, but thankfully no sound of heavy equipment working or the constant sound of rocks falling from the crusher, and I hope to keep it that way!	1	1					1	1				1	1		1	1				1
86	03-Jul-11	Personal Information Withheld	Kamloops, BC	The proponents of the mine made no mention of a Corporate Social Responsibility plan at the Public Information Meeting. I am wondering if they have one, and if so, what type of activities they plan to support or initiate.																		1		
87	03-Jul-11	Glenn Dreger	Knutsford, BC	When the mine prepares the areas for the waste rock piles, there will likely be a lot of disturbed ground and piles of soil reserved for future reclamation. I am concerned about the growth of invasive and noxious weeds on this disturbed soil, and would like to know how the proponents plan to handle this problem.																		1		
88	03-Jul-11	John Schlemmer	Kamloops, BC	The destruction of the huge area of wildlife habitat to make room for the proposed Ajax Mine will have a significant negative affect on numerous species of wildlife. The numbers and health of many animals and waterfowl will be negatively impacted by the destruction of grasslands, forests and ponds. Much of the wildlife to be negatively impacted is considered to be "at risk" by the Province of British Columbia. Some of these species have been identified as "at risk" on page 37 of the Project Summary completed by Knight Piesold Consultants for the proponents of the mine include: - Badger (Provincially Red-listed, SARA schedule 1 Endangered) - Great Blue Heron (Provincially Blue-listed) - Swainson's Hawk (Provincially Red-listed) - Peregrine Falcon (Provincially Red-listed, SARA Schedule 1 Threatened) - Barn Swallow (Provincially Blue-listed) - Great Basin Spadefoot (Provincially Blue-listed, SARA schedule 1 Threatened) - Western Toad (SRA Schedule 1 Special Concern) Other species also spotted in the area of concern include the Burrowing Owl (a species at risk) and the Sharp-tailed Grouse (columbianus subspecies) which is Blue-listed and is considered vulnerable and at risk. The Sharp-tailed grouse is of major concern to local biologists of the Province of BC. The area to be destroyed by the mine is home to three LEKS or Dancing Grounds, which are essential to the reproduction and well being of this "at risk" species. The leks cannot be moved and the affects destroying them cannot be mitigated. A major concern of the mine is that a vital environmental negative impact was overlooked in the report completed by Knight Piesold Consultants and that destruction of this important resource is one of many reasons that Ajax Mine is an environmental disaster and should not be allowed to go ahead.																			1	
89	04-Jul-11	Personal Information Withheld	Kamloops, BC	Due to the length of the comment, it is not possible to include the text in its entirety in this issues tracking table. Please refer to the EAO website (http://a100.gov.bc.ca/appspdata/epic/html/depolyepic_project_doc_list_382_p_pub.html) for the complete comment submitted on July 4, 2011. The following provides a summary of concerns presented: • Water consumption - references article 'Water Consumption in Copper Mines in Arizona' and states that at 60,000 tpd, water consumption would equal 2.5 billion US gallons of water pumped from Kamloops Lake each year. • Tailings Storage - references mine in Butte Montana which is part of the largest superfund hazardous waste cleanup in the US to cite concern over potential tailings-related problems in the future, particularly as terrain slopes downhill to Kamloops Lake and there exists an extensive network of springs and little creeks. • Environmental Impact Assessment Approach - recommends that provincial and federal government use Folchi Method to assess impacts associated with the Project.	1																		1	
90	04-Jul-11	Personal Information Withheld	Kamloops, BC	In the "concerned citizens meeting" Mr. Whitaker basically stated none of the below noted situations will arise or even revealed could be a problem. We are all human and know accidents, malfunctions, miscalculations, failures, catastrophes, misjudgements, what you say or what you want to happen does not always happen or is the truth. With this project impacting a vast land mass, homes, livelihoods and especially the people who each year faithfully pay TNRD or City taxes deserve straight forward answers. Over these years we have all developed and created our own ways of living life to its fullest extent, peacefully and with a sense of enjoyment. Ajax Mines comes in with little regard to the neighbourhoods and residents of the Lac Le Jeune / Knutsford / Kamloops areas by only generating jobs for maybe 23 years (not even with certainty Kamloopians) however destroying valuable natural grass land and habitat for EVER and EVER. We the (TNRD residents / Kamloopians) would like in writing and with guarantees that these and many more WHAT IF'S will not happen over the life of the mine and rehabilitation years! - What if our peaceful, healthy and fulfilling lifestyle is affected? - What if Jacko Lake DOES drain or a fish kill transpires due to vibration or contamination to this popular fishing lake? - What if Peterson Creek which eventually drains into the Thompson River does become contaminated? - What if the EAST and NORTH waste rock pits slip or become unstable due to the depth of bedrock or ground water drainage or seepage? - What if a FULL mine blast not a "small" TEST blast does cause noise and damage due to vibration to homes in Knutsford, Aberdeen, Pine Valley or other areas? - What if the South or South West prevailing winds do carry mine dust into the communities of Knutsford, Aberdeen or Pine Valley? - What if the endangered Sharp Tail Grouse, possible burrowing owls, deer and other wildlife are displaced from their original habitat? - What if "Grazing Grasslands and hayfields" NOT in the 6400 Acres of pristine territory destroyed by the mine become unusable for the remaining ranchers due to dust and the contaminants? - What if "Rush Creek" does drain, flow, or leaches through the tailings pond onto ranch hayfields or Jacko Lake does have overflow runoff water running into the present Inks Lake which eventually will become extinct? - What if "Acid Rock mine drainage" or if not acid rock "Alkaline mine drainage" does become a problem at some point over the years or even into the "rehabilitation years"? - What if your "Open Pit" does end up with water seepage issues that do exist to some extent in the present mine pits in the local area? These are only a few of the "WHAT IF" situations that may arise and we are sure other groups can add many more to this list which to this date have NOT been addressed, shown any concern or regard for, almost a "DON'T Care" if it happens attitude, acknowledgement problems could happen or a written contingency plan brought forward to deal with these circumstances. We (TNRD residents / Kamloopians) would like to hear from Ajax their truthful explanations to the "WHAT IF'S" and assurances from our GOVERNMENTS OF WHO, HOW LONG for a response and the complete and once again truthful SOLUTIONS to a "WHAT IF!"	1	1	1				1	1	1	1	1	1	1	1	1	1	1	1	1	
91	04-Jul-11	Colin Covington	Kamloops, BC	I'm not going to pretend to be an expert on mining nor the environment, but I don't really need to be, to understand the problems associated with the proposed mine. First there's the obvious pollution of the air with dust and chemicals. Then there's the noise. Nearby residents may not necessarily notice the noise of blasting and heavy equipment, but it will be there and we all know about the harmful effects of long term noise pollution. Aberdeen has a history of underground water problems. Houses and private and public property have been damaged. The city has spent millions of dollars dealing with it. Can you really guarantee that the mine will not cause any changes to the aquifers that eventually flow under Aberdeen, and also pollute the water in them? Next it will be flat out ugly - a big hole, a tailings pile and so on. I'm sure that the fish in Jacko Lake, and the moose, deer, bear, foxes, coyotes, marmots, birds, and other animals that I've seen during my more than 30 years residing in Aberdeen won't like it any more than I do. I realize that the economics of the project probably isn't part of your mandate, but allow me to touch on this too. Of course there will be a tax benefit to the city of Kamloops, wages for the employees, and the spinoffs. What about the loss in tourism? Judging by the plans I have seen in the paper, the Coquihalla Highway will bring drivers right past the tailings pile. How will that attract tourists? What about lost property taxes if people stop moving to Aberdeen and maybe even start moving away. Let's not forget the increased medical costs for the people whose health will be affected! The possible economic benefits of the mine are far outweighed by environmental and other concerns. Please do not approve the project.	1	1					1				1	1			1	1				1
92	04-Jul-11	Personal Information Withheld	-	Please enter my name in opposition to the Ajax project on environmental grounds. I expect the billions of gallons of water the project will consume will find its way into the water system; ground water, rivers, streams etc along with the arsenic, heavy metal and other contaminants. The noise pollution, as the mine is proximate to the city and to the people living in the area, will create ongoing stress and make a contribution to the sociological difficulties that will only be compounded by air pollution too. I would estimate that the mine may directly and indirectly contribute to a number of serious injuries, if not deaths because of stress and pollution. To that end there is also the issue of biased information being delivered to our constituency by the owners of the mine. It is their objective to profitably remove copper and gold and not to attend to the long range welfare of the people in the area. Thus their presentations, promises and covenants cannot be regarded with any seriousness. Nor can governments guarantee anything, given the short term attention elected officials have. Hopefully our departmental officials, including yourself are not persuaded by any economic considerations too! The advantage is all to the developers of the mine. They will appreciate revenues in excess of \$7 billion while the region will gain about \$300 million (after taxes) as a contribution to the local economy over the 23 year life of the venture. Moreover I understand that the BC government will make a contribution of 30% of the \$600 million expenditure for the mine. It seems more equitable to me should the government contribute their 30% - \$180 million to Kamloops to stimulate entrepreneurial development that would likely create one thousand jobs and more of comparatively clean light manufacturing and services.																			1	
93	04-Jul-11	John Schlemmer	Kamloops, BC	The proposed Ajax Mine will require a huge amount of water to be pumped from Kamloops Lake to its Tailings Storage Facility at the western end of the project. The Tailings Storage Facility is located within the City of Kamloops on a plateau above the subdivisions of Aberdeen and Pineview Valley. Although the mine will attempt to reuse much of the water, a significant amount will seep into the water table above the Aberdeen and Pineview Valley. Both areas are already subject to water problems from underground springs resulting in flooded basement and shifting of soils. Furthermore many of the homes in the areas are subject to a Covenant pursuant to Section 215 of the Land Title Act that indemnifies the City against any losses that may incur as a result of any movement, slippage, settlement, or other failure due to unstable soil conditions of the land just below the proposed Tailings Storage Facility. The additional water introduced to the water table to the already unstable soil conditions below the proposed could lead to significant damage to homes and properties below the proposed Ajax Mine.																			1	

KGHM AJAX MINING INC.
AJAX PROJECT

PROJECT DESCRIPTION ISSUES TRACKING TABLE
PUBLIC COMMENT PERIOD JUNE 8 TO JULY 11, 2011

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Comment #	Date	Name	Location	Comment	Issue for Consideration																				
					Air Quality / Dust	Noise	Vibration	Light pollution	Fish & Fish Habitat	Surface Water Quality	Surface Water Quantity	Groundwater Quality	Groundwater Quantity	Wildlife	Grasslands / Ecosystems	Aesthetics	Human Health / Safety / Well-being	Recreation	Tourism / Investment	Economy / Employment	Land and Resource Use	Infrastructure	Terrain / Soil Stability		
94	04-Jul-11	Personal Information Withheld	-	Since your proposal includes 24/7 operation I have major concerns about all the accompanying noises, in particular the constant backup warning signals on vehicles working in the mine pit & east waste rock pits, which would be in very close proximity to my home. This will not only seriously affect those of us in the immediately adjacent areas, but the almost constant prevailing winds from the southwest will undoubtedly carry this high pitched, aggravating, incessant sound well into the Aberdeen & Pineview Valley residential areas. For this to carry on continuously 24 hours/day, everyday, would be absolutely intolerable. How would you propose to deal with such an unreasonable situation?		1																			
95	04-Jul-11	Personal Information Withheld	Knutsford, BC	If this mine proposal should be approved what plans do you have to prevent dust outfall from any areas of operation? Since the east waste rock pit would be in very close proximity, I would be extremely concerned about dust filtering into my home		1																			
96	04-Jul-11	Personal Information Withheld	Knutsford, BC	Plans for the proposed east waste rock pit appear to be immediately adjacent to the septic field on my property. If it should be compromised in any way, through blasting vibration, or water seepage, how would you deal with the matter?		1		1																	
97	04-Jul-11	Personal Information Withheld	Knutsford, BC	Because the proposed east waste rock pit would be in very close proximity to both my underground water development & cistern, I have considerable concerns about the safety of my water supply. What would you propose to do to protect my water supply if any damage was caused by blasting vibration &/or water seepage or contamination?				1						1	1										
98	05-Jul-11	Personal Information Withheld	Kamloops, BC	I am a resident of Pineview Valley and am very concerned about the location of the proposed Ajax mine which I understand would be only 2 km from our community. Pineview is a thriving development with a large number of young families and seniors. I am most concerned about dust, air quality and noise. I have nothing against mining and the economic benefits it would bring, but the bottom line is it is located too close to city limits. Please take a close look at current city maps (this community has grown and developed significantly over the last few years and continues to grow) and ask yourself if you could support this project if it were located outside your backyard.		1	1															1			
99	05-Jul-11	Mary MacGregor	Kamloops, BC	The most important concerns that should be addressed in the environmental assessment of the Ajax Mine proposal, should be: (1) effect on surface water and groundwater sources in the vicinity; (2) all the potential steps that could be taken by the proponents to enhance grassland resources in the vicinity, in mitigation of the grassland that will be affected by mine operations; (3) effect of dust on agricultural production in the vicinity as well as on near-by residential developments; (4) actual proven ability to reclaim for agricultural purposes, the agricultural land used or affected by mining operations; (5) safe routes for vehicles involved in mine operations; and (6) all the potential steps that could be taken by the proponents to reduce the effect of mine operations on adjacent agricultural operations.		1					1	1	1	1	1	1	1	1	1	1	1	1			
100	05-Jul-11	Gordon Gillespie	Kamloops, BC	I am writing to question how an industrial installation of this magnitude could be considered so near to Kamloops. First let me say that in general I am in favor of mining. I appreciate the jobs, the taxes, and I am aware that most of the products that I use come at least partially from the earth with some environmental cost. In fact, this mine would very likely be of direct economic benefit to me. However, I also believe it is possible to locate a mine too close to a population center of 85,000 people. Environmental impacts that may be tolerable 50km away from a city are not necessarily tolerable when located 2km from a city. These concerns are coming from an intelligent person with a scientific background who believes in rational analysis and comment, not groundless hysterical blather. Yes, I live in Aberdeen but I believe many of the impacts will affect other areas of Kamloops as much or more. I hike and run in the area bounded by Highways 5 and 5A, the Goose Lake Road, and Aberdeen several days a week, year round. I also travel extensively in the Chuwahls, Greenstone, Inks areas. I believe I have a fairly good idea of the conditions and topography of the area. I understand the Ajax group will be providing details on plans for mitigation of environmental impacts resulting from the mine, rock crushers, waste rock piles, tailing ponds, water supply, blasting, trucking, etc. Clearly Ajax will be attempting to minimize the apparent impact as part of this process. I would hope to see the specific plans for mitigation publically posted for review by all. Several of my concerns are as follows: Dust: The mine will be a massive generator of metallic ore dust from the blasting and crushing operations. Also, the many hundreds of daily trips by the ore trucks will generate immense dust plumes if roads are dry. The wind blows vigorously toward the east and north east almost every through the valley between Jocko Lake and Coal Hill. This constant wind will carry all metallic ore dust, blasting fumes, and exhaust from vehicles toward South Kamloops, Valleyview, Dallas, etc. and will deposit at least the dust in those areas. I believe much of this wind may also often circle around to blow back into town across Sun Rivers. Each person who is interested in the impact from this mine should take a drive out to Highland Valley mining operations to see the dust there. Drive up to the office parking lot where you can see the daily accumulation of metallic dust. Rub some of it on your fingers to see that it is not just normal 'dirt' dust - it doesn't come off. Stop on the side of the road 1km, 2km, 4km, and 8km from the main processing area and look at the impact of the dust in forest. I think everyone should see the widespread impact of all this dust. Kamloops already has a severely compromised air-shed due to the pulp mill. Do we really need another major source of air pollution? Waste Water: I assume that much of the mitigation for the dust created by the mine will revolve around water spraying on roads and ore removal operations. Also, the stunning amount of water used in the various ore processing operations will all be released back into the environment. Unfortunately, the area of the mine has very limited water outflow options. All of the water that is pumped up the hill from Kamloops Lake will of course eventually return to the river. The many square kilometers of destruction that will be formed by the tailings ponds will be with us for many more years than the 23 year proposed lifespan of the mine. Again, a quick trip out to the Highland Valley will show the stunning impact. Or perhaps a drive by Craigmont mines - 30 years after the close of the mine the tailings ponds are still an ugly scar. All of this water must flow downhill into one of Cherry, Alkali, Guerin, or Peterson creeks. Much of the runoff will flow into the urban Peterson Creek where it will flow right through the center of town. How does Ajax propose to preclude the total death of these stream systems? How much of the daily millions of gallons will join the already troublesome groundwater flow down through Aberdeen? How can this properly be assessed? It seems that Ajax will be permitted to alter the course of Peterson Creek for several hundred meters. I find this interesting in light of recent rulings by DFO where not so much as one meter of alteration can be permitted in Peterson Creek where it flows through downtown Kamloops. The waste rock piles will be hundreds of feet high and many kilometers long. Many people think they will be only an unsightly byproduct of the mine. However, from February until July each year melt water will run off and through the waste piles collecting metals and poisons. The resulting toxic stream will flow down via the Alkali and perhaps Cherry Creek systems to the river. The attached photo (sorry about the poor quality) shows the brilliant orange run-off from the waste piles at Gibraltar mine. This water then flows untreated into the surrounding watershed. I have seen this sort of runoff at several BC mining operations. What is to stop the same runoff here in Kamloops? Tourism: Unfortunately, Kamloops is already known as a smelly mill town. It seems that discharge from the Domtar mill is acceptable to MOE but it is not acceptable to many residents and certainly not for tourists. The visual impact of the mine from the Coquihalla will be striking but not a tourist draw. The impact on the air-shed will only strengthen the perception that Kamloops is a smelly, polluted place. Does Kamloops really want to be perceived as another Trail or Sudbury? Seismic: I really don't know anything about this but I question the impact of thousands of explosions over many years located a scant 3.5 km from many houses. Who will be attesting to the safety of this - Ajax? I would like to see the environmental assessment process more open so that the citizens of Kamloops can feel like a proper evaluation will be made. There is no question that people in Victoria, Ottawa or Poland will not have to live with the impact of this mine. It will be borne by you and I and our children. To: Nicole Virette, Project Assessment Manager Government of B. C., Department of the Environment P.O. Box No. 9426 Stn. Prov. Govt, Victoria, B. C. V8W 9V1 Lyle Thompson, Project Manager, Government of Canada Canadian Environmental Assessment Agency, #410 - 701 West Georgia Street, Vancouver, B. C. V7Y 1K8 Copies: The Honourable Cathy McLeod, Member of Parliament, The Honourable Christy Clark, Premier, MLA Kevin Krueger, MLA Dr. Terry Lake, Minister of the Environment, His Worship, Mayor Peter Miobara, Mayor of the City of Kamloops, Ministry of Transportation and Infrastructure, Interior Health Authority, Okanagan and Thompson Region From: Kamloops, Resident Taxpayers of Pineview Valley Re: Federal and Provincial Environmental Assessments of proposed Ajax Mine Project Date: July 5, 2011 We are registering our vehement opposition to the implementation of the proposed Ajax Mine Project. As stated at the public meeting on June 23, 2011 by the Ajax Project Manager, Jim Whittaker, KGHM Polska Miedz SA is a mining company - this is what they do, and will go ahead with the project even in the face of opposition from the residents of the affected city. In their initial feasibility study some years ago, no doubt the proximity of goods and services, and an existing highway, made this a very desirable project from the company's point of view. The usual cost of this infrastructure had already been paid by the citizens of B. C. The suggested benefit to the city, a 7 million annual payroll, would barely cover the cost of advertising promoting the HST, already spent by the Provincial government. This illustrates the "drop in a bucket" that 7 million would represent. However, the costs to the community would include: 1. Health care, with the increase in respiratory and allergy issues as a result of the increased dust and toxins in the air, water and ground. 2. Highway maintenance - daily heavy trucks along Lac Le Jeune and the Coquihalla 3. Decimated property values in the neighbouring ranches, Aberdeen, Pineview Valley and Knutsford 4. Landslides will most likely occur where homes are built on the steep slopes of hills impacted by the daily blasting vibrations, which would exacerbate the instability of some ground due to water issues - resulting in higher insurance costs 5. Much heightened possibility of forest fires in the urban forest surrounding Aberdeen Pineview and Knutsford, with the projected 1,000 workers during the proposed Construction phase. The environmental cost would be absolutely irreplaceable, as has been well addressed by the many persons who have already registered their objections, which we strongly support. We are requesting replies on five issues: 1. From the Environmental Assessment Office: An aerial display/map/photo of the proposed mine site, including the ranches, neighbourhoods and highways for a five km corridor around the area, to be made available to all concerned parties and displayed at further public meetings. 2. From the Minister of Transportation and Infrastructure: The projected cost of further maintenance of the highways impacted by increased heavy trucking. 3. From the Interior Health Authority: a report covering what issues would need to be examined to determine the health effects resulting from increased airborne dust, toxins and water and ground contamination. 4. From Kamloops-North Thompson MLA, Dr. Terry Lake, and Minister of the Environment: An explanation as to his public support of this project, when the Environmental Assessment process governed by his ministry, had barely commenced. 5. From the Provincial Fire Safety Authority: What kind of plan is in place to allow the Province to charge KGHM/Abacus/Ajax with the costs of fire fighting and the loss of homes and infrastructure in the event of a fire originating from the proposed mine site? In your position as Project Assessment Manager, would you kindly address these questions with the officials of the agencies mentioned above, or whichever authority is appropriate. Thank you for your attention.		1																			
101	05-Jul-11	Personal Information Withheld	-																						
102	05-Jul-11	Personal Information Withheld	Knutsford, BC	On the front page of today's Kamloops Daily News Tuesday July 5th 2011, there is an article that our BC Environment Minister, Mr. Terry Lake agrees to and quotes on a report released from a 'Government' appointed Task Force to study at risk (wildlife) species. The report feels saving individual species at risk is not as valuable as an approach to 'SAVING THE ECOSYSTEMS'. Mr. Lake also agrees with the report that says laying out an important framework that will help BC develop a plan to make on the ground differences for species at risk. He also says "we have this great diversity that needs to be protected but it will take some time to get it right". There is more to this article but he can start making his plan RIGHT "VERY VERY QUICKLY" by protecting the ECOSYSTEMS OF ORIGINAL Natural Grasslands in Knutsford, Kamloops along the Lac Le Jeune area that could be affected, riparian areas of Peterson Creek, Jacko Lake, the at risk species specifically the Sharp Tail Grouse and other wildlife and areas that John and Glen have posted information about previously. After Mr. Lake's comments today as the Environment Minister Mr. Terry Lake HAS only one decision and that is to say NO!! and strongly recommend to anyone else making the decision the answer has to be NO!! to ABACUS, KGHM and the AJAX Mine project. Will this happen, as approximately three weeks ago Mr. Terry Lake was on the local radio station's 'talk back' show not coming out and supporting the mine out right, suggesting though local ranchers could and possibly may have to supplement their income by getting Abacus (AJAX) Mine Jobs. (The Task Force was even comprised of some ranchers) Yes, we realize Mr. Lake has other voters to look after however as the Environment Minister his Environment portfolio should be his most important concern. ** Thanks to 'The Daily News' Kamloops BC, Tuesday July 5 2011 Article on front page titled >>>Environment B.C. accused of dithering on species at risk.																					
103	05-Jul-11	Matt	Kamloops, BC	I have several concerns about this new mine. 1. Economic impact is limited to the life expectancy of the mine. Can we be assured that the economic impact (jobs, tax revenue, etc.) will be greater than the economic cost of the mine (health costs, environmental clean-up, lost property values in Aberdeen, lost tourism from fishing lakes, etc.)? 2. What is the image that Kamloops desires? Do we want to be known as an industrial city, with smoke stacks and potential dust clouds? I can appreciate the necessity for jobs, but I also want to make sure that projects do not deteriorate our beautiful city. A beautiful clean city attracts tourists who spend money. 3. Once approved, what power does our government have to limit the mine. If pollution becomes too great, can we step in and shut the mine down? More jobs are always a welcome addition for our city. However, a mine offers a very limited time-frame for employment, so we need weigh short-term boost versus long term impact for this project. Think of the Mission Hill development as an example. A great high-rise condo development created at the height of the construction boom in Kamloops. One market shift (and mismanagement by a developer) and now we have this ugly eye-sore that our city is responsible for. Will the mine follow a similar path? Can we be assured that we will get a long term economic impact, that will leave us with a good legacy, rather than an environmental/economic nightmare? Thank you for reviewing my concerns																					
104	05-Jul-11	Personal Information Withheld	Knutsford, BC	There was an earlier comment regarding the Coquihalla highway being protested but accepted once it was in place. The comparison of a significant piece of infrastructure within the province, to the proposed Ajax mine project, in my opinion, is not even remotely similar. The highway provides long term jobs for maintenance crews, improved the safety of users to get between Kamloops and Vancouver compared to Highway 1 through the canyon which was often blocked due to avalanches and or accidents. The highway provides lifetime benefit to users, the mine does not. The proposed mine will have a lifespan of 23 years during which yes, there will be jobs and economic spin offs for Kamloops but at what cost. The Provincial government (AKA taxpayers!!), will contribute approximately \$180 million dollars to KGHM/Abacus just for start up. Why?? To encourage foreign investment? Could that \$180 million be directly spent to create some small business opportunities for locals as opposed to leaving the country to profit foreign business? What other potentially negative economic issues will crop up? Will there be an increase in health issues due to dust (ie. respiratory issues?) that will tax our local health care system? Assurances have been made by the proponent that all dust will be controlled however (if it isn't?) I drive by Hyland Valley Copper every day and there is considerable dust. They have been in operation for a long time, follow the same worker health and safety guidelines set out in provincial (WCB) or federal regulation, yet they still have a dust issue. To the point there are structures (dome like) being built to further control the dust. Water has been discussed many times however I believe is worth repeating. Water metres for Kamloops residents, to hopefully get them all to use less, yet the proposed project will take BILLIONS of litres per year for its operations. Where does it all go? I understand there are natural components like arsenic within the soils surrounding Kamloops. In a relatively inert state (in the ground undisturbed) all is good. What happens to it being concentrated in a dry (only 30% moisture content) tailing pile? Will there be the possibility of leaching? Catchment/containment areas will be set up to "mitigate" environmental impact. The environmental impact is the loss of Inks lake that many people use to camp at, skate, etc. There are many things to think about and the economics are certainly one of them. But we need to figure out the true economic benefits, look at long term what will the proposed Ajax mine "create" for the city of Kamloops. Will it have a legacy effect or will we be looking to fill the hole with garbage when the project is completed and all foreign investment is back with it's investors.																					
105	05-Jul-11	Personal Information Withheld	-	Is this Ajax mine going to set a precedence in Canada, whereby any mine can start a massive strip mine, partially within a city border? Our subdivision is 1.7km from the border of the mine, not 10km as the mine officials claim, and is located on a very fragile hillside. Who is going to pay for any damage that will probably result from a mine being this close to our homes. How can our homes not be damaged from daily massive explosions? This would mean it is not safe to invest money in private property as most of one's investment could be lost to mining interests. What does this do to the growth of cities in Canada? The mining laws need to be changed with respect as to how close a mine can operate to any city. Highland Valley Copper Mine is 15km from the town of Logan Lake and they have major dust problems at that distance.																					
106	06-Jul-11	Sean Templeton	Kamloops, BC	I live near the top Aberdeen, my wife and I moved to Kamloops and bought our house in 2009. My concerns about the proposed mine are both selfless and selfish- OUR environment, my family's health and the value of my property and my neighborhood. There seems to be a lot of hard working people going to be directly impacted if this mine is built and I believe that the net effect on Kamloops will be a loss. I am not sure EA process will quantify quality of life, city brand/ reputation (e.g. The Tournament Capital), regional aesthetics, environmental quality (air, water, flora/fauna) etc., but I hope that for the sake of our individual interests/concerns that there is a way to aggregate and represent them accurately on a balance sheet. I have little faith that anything but big business and lobbying will prevail in this matter and that the people of Kamloops will be forced into a permanent relationship with a mining operation that will benefit some at the cost of many and expose all in the region to a massive environmental debt. But I support the environmental assessment process as presented to the people of Kamloops at the public meeting on 16 June 2011. Thank-you for the opportunity to express my concerns with this project.		1																			

KGHM AJAX MINING INC.
AJAX PROJECT

PROJECT DESCRIPTION ISSUES TRACKING TABLE
PUBLIC COMMENT PERIOD JUNE 8 TO JULY 11, 2011

M:\11\100246\08A\Data\Public Comments\1\Public Comments Tracking\Table 1 Ajax Project Public Comments Rev 0.xlsx\AJPD1

Comment #	Date	Name	Location	Comment	Issue for Consideration																				
					Air Quality / Dust	Noise	Vibration	Light pollution	Fish & Fish Habitat	Surface Water Quality	Groundwater Quality	Groundwater Quantity	Wildlife	Grasslands / Ecosystems	Aesthetics	Human Health / Safety / Well-being	Recreation	Tourism / Investment	Economy / Employment	Land and Resource Use	Infrastructure	Terrain / Soil Stability			
117	07-Jul-11	Kamloops Flyfishers Association		Due to the length of the comment, it is not possible to include the text in its entirety in this issues tracking table. Please refer to the EAO website (http://a100.gov.bc.ca/appsdata/epic/html/epic_project_doc_list_362_p_pub.html) for the complete comment submitted on July 7, 2011. The following provides a summary of concerns presented: <ul style="list-style-type: none"> Jacko Lake is important to flyfishers, close to the city and one of the first area lakes to ice-off in the spring. Berm at east end of Jacko Lake touches the lake and there are stability concerns How will continuous blasting, noise, and dust in the pit affect fish and food sources? Will fishing restrictions be imposed? Recreational use at Inks Lake is a concern Will Ajax Pit Lake be turned over for recreational purposes following filling? 	1	1																			
118	08-Jul-11	Personal Information Withheld	Kamloops, BC	Since Goose Lake road is a well travelled "thru" road directly to the LaCLeJeu road, used extensively by residents, as well as recreationists (cyclists, motor bikers, joggers, hikers, dog walkers, etc.) Mine vehicles could constitute a serious hazard when crossing against the traffic flow to the "explosives storage". By what method would the "thru" traffic be warned of vehicles crossing? How many times per day would this crossing occur? What would the plans to maintain in good condition this portion of Goose Lake road? What type of crossing would be planned for Peterson Creek at this point? What would be done to prevent toxic dust or other pollutants of the vehicles from entering Peterson Creek at this crossing? The road leading to the "explosives storage" appears to be approximately 1.5 km. In length over valuable grasslands--would this road be fenced? Would this road be paved to prevent erosion & dust?	1																				
119	08-Jul-11	Personal Information Withheld	Kamloops, BC	If this project should be approved, what company would be hiring the 1000 labourers for the 2-year construction period, & the 385 workers for the 23-25-27 years? Can you guarantee these workers would be hired from the Kamloops area, from B.C., or Canada? Would you plan to hire workers through the Federal Gov't Temporary Foreign Workers Program? & if so would KGHM immigrate their own employees?																					
120	08-Jul-11	Personal Information Withheld	Kamloops, BC	In an excerpt from the March 2009 "Resource World", Doug Fulcher, Pres/CEO, is quoted as follows: "In addition to the Ajax area there are several other areas of known mineralization on the 8000 Ha property that will be developed at a later date, including the Monte Carlo, Rainbow & DM/Audra prospects..." "We see a New Gold model that exists below the old open pits at Ajax west & east. I think we can expand the open pit as we go to the northeast of our defined resource." Also, the Crescent Zone is mentioned as an area for further exploration. Please explain where these four development sites are located, & give the details of what is meant by "several other areas...that will be developed at a later date including the Monte Carlo, Rainbow & DM/Audra prospects" (also include the Crescent Zone)																					
121	08-Jul-11	Personal Information Withheld	Kamloops, BC	To whom it may concern, I am exercising my right to voice my opinion, while I still can. I and my family, are residents of the Aberdeen neighborhood. My children are 5 & 6 years old and both attend Pacific Way Elementary. I can see the school from my kitchen window. Several weeks ago I was informed of the plans to open the Ajax Copper mine, pretty much directly behind the school. My husband and I are completely against this mine going in. We are extremely concerned about the impact to environment, as well as the health and well being of all neighborhood residents. I understand that industry growth is important for a growing city, but why chose a site so close to a thriving, wonderful family neighborhood? has this been carefully thought through? Is it safe? The 400 jobs the mine will create, is not more important than the over a 1000 residents living up here. And so close to a childrens elementary school! Now whenever I look out my window, all I can envision, is dust, smoke and pollution rising up from the hill behind my kids school. I just really need to know, will this be safe for environment and all?	1																				
122	08-Jul-11	Personal Information Withheld		Hello, This letter is in regards to the proposed Ajax Mine, to be located (as the crow flies) 2 Km from our home in a densely populated area of Kamloops. Having been in the mining industry for 25 years I can assure you that the negative consequences of this mine going into production will far out weigh any employment or monetary gains that they can promise. I'm a little disappointed that the entire process has made it this far. Thanks for your time																					
123	08-Jul-11	Personal Information Withheld		I speak against permitting this project, even in a scaled-down form																					
124	08-Jul-11	Sharon Antoniak	Knutsford, BC	The Environmental Assessment of the Ajax Mine in Kamloops and Rural Area The immediate economic gains from this proposed Ajax Mine will largely leave Canada, the province of B.C., and the community of Kamloops to accrue to the proponent, a foreign company. International investment is important, immediate economic gains look good, but not when there are significant adverse effects that cannot be mitigated or reversed. Where is the proof that there is sustainability for the following concerns? <ul style="list-style-type: none"> Economic: The Tourism Industry in the Kamloops and area community and related quality and job opportunities that is dependent on a marketing image that promotes a pristine environmental setting. Ranching and other food production that is specific to the area's climate, water sources, and population. Property values remaining on par with pre-mine assessments. Absorption of increased costs by BC residents that will ensure the maintenance of substantial alterations necessary in the community to accommodate traffic, health care and potential environmental effects. Environmental Stewardship Rare grassland species, wildlife, fish, mammals and habitat that is prolific in this area. The change in the quantity and quality of the water sources in the form of lakes, surface runoff and ground water that are utilized by bird, wildlife and humans of the Kamloops area. The relocation of Peterson Creek. The greenhouse gas emissions will be substantially increased at a time when government seeks reduction. The increase of hydro electric power usage, a new high voltage transmission line, and cost absorption by BC residents. The adverse affects of relocation of the Kinder Morgan oil and gas pipeline to accommodate the mine location. Social, Cultural and Health The Kamloops, surrounding area and the Aboriginal community's core values and defining unique features will change. The areas altered air quality, over a twenty three year period, in an area prone to wind and inversions that will be impacted. The importance of the quality of life and living in the quiet enjoyment of property will present a significant change to residence. The threat of safety issues including waste rock and tailings, explosive storage site and transportation and increased traffic on public roads. The proposed Ajax Mine site would introduce a significant change to the city of Kamloops and area that will not be in the best interest of the present or future. 	1	1																			
125	08-Jul-11	Personal Information Withheld	Kamloops, BC	I have four concerns regarding the possible development of the Ajax Mine in Kamloops. 1) Noise and air pollution. Blasting and rock crushing creates an enormous amount of noise and dust. The city of Kamloops has bylaws regarding these kinds of issues - to some, the issue may be quality of life (peacefulness), to others it may be a medical issue (ex: air quality). 2) Wildlife. Aberdeen and Pineview are at the edge of the city's development at this point. We already have problems with bears in these areas. Because of the spread of the Ajax development (and noise) wildlife, including bears, will enter the city even more. Two examples are last fall, when a bear chased a young man on the Aberdeen golf course and last spring when a bear entered a Pineview family's garage and van. 3) Underground disturbances due to blasting. Aberdeen and Pineview are built into hills. Some areas have already had issues with houses slipping/moving. Blasting can change the way water moves underneath the earth and can change the stability of it also. 4) Tailing ponds toxicity/water quality for the entire city. This project is to last over twenty years, but it's toxic legacy will last a lifetime for the residents of Kamloops and the wildlife (including fish) that we share the area with. Other such projects in the area from the past are long since shut down, but are still needing to be watched for the arsenic content, etc. in the tailing ponds. These are managed by a few people hired by the owner of the company to do a job in the most economical way possible, as the mines are no longer producing, just costing them money. It is on the honour of these people to report when the tailings are not fitting the 'safe' criteria. Should there be leaks, etc, what's to stop the toxic water from leaching into the ground, or run through Peterson Creek to larger human water sources?	1	1																			
126	08-Jul-11	Personal Information Withheld		The Kamloops and District Fish and Game Association (KDFGA) wishes to make the following submission regarding the proposed Ajax Copper-Gold Mine Project near Kamloops, British Columbia. The KDFGA represents some 300 plus individuals in the local area who have a keen interest in the outdoor environment, in particular, the fish and wildlife resources of the area and Province. Our group is also a member of the BC Wildlife Federation which has over 38,000 members in the Province. A number of our members are retired or active fisheries and wildlife biologists, others have decades of experience in the local area including ranching, forestry, guiding etc. The Jacko Lake area and surrounding grasslands and forested area have been a favorite site for fishing and hunting activities for many of our members for decades. In particular the lake is one of the first low elevation lakes to open for spring fishing and one of the last lakes to freeze over for late fall fishing with easy access from the city. The fishing restrictions and stocking programs which our club has endorsed for this lake in co-operation with local stream biologists have produced a quality fishery just out of the city limits. It will be next to impossible to replace this resource if it is lost. We will restrict our comments to the ecological values of the area although members have direct concerns regarding the impacts on the city and area. Our initial impression is the numerous environmental impacts does not support the development of a mine on this site. I am sure you will hear their other concerns. We will present our concerns in point form for ease of reference. We would request assessments be completed on the following concerns: Jacko Lake <ul style="list-style-type: none"> How will the potential drainage of the lake due to underground rock fissures be addressed? Blasting will have a direct impact on the lake through vibrations, what impact may this have on fish and other aquatic life forms? The western edge of the pit will intrude approximately 1.25 ha into the northeast arm of the lake. In its project description, the company makes light of that, saying that it is less than 3% of the lake and has low habitat value because it is shallow and has a silty substrate. However, shallow water usually equates with prime biological productivity and the northeast bay is a popular fishing location on Jacko due to the abundance of insect life and feeding trout. This area is also one of the area's first used in the spring by swans, geese and ducks and later in the season by herons and a variety of songbirds. Dust from blasting and excavation activities will result in some fine particulate which will ultimately settle out on the lake. We are concerned the residuals from the blasting materials and the newly exposed rock with its numerous chemical components present a potential lethal chemical mix. Is there a histogram of the wind patterns for the areas adjacent to the pit and processing site so the areas with the highest potential impacts can be identified? This particulate may very well change the chemistry of the lake affecting the PH and other water properties affecting the fish directly or the aquatic vegetation or insect life. What is being done to record the existing water conditions and what is proposed to be done to monitor and/or ameliorate the changes over the life of the mine? The lake and its riparian areas are valuable sites for birds of prey and a variety of song birds. What steps are being taken to monitor the existing populations and the impacts on these species over time? The lake provides valuable habitat for swans in the initial open water in spring plus habitat for ducks and geese. The open pit and mine workings will need to be securely fenced to ensure wildlife and humans are protected. The mining and processing activities are going to destroy the tranquil nature of the present lake during fishing activities. What steps are being proposed to reduce noise pollution and the visual impacts of the site? What steps are required when blasting is occurring in close proximity to Jacko Lake? Our club worked with the Ministry of Environment to secure access for the public to this resource. Will access of the public be guaranteed in the future with a dedicated public access route and area for recreation? There are also opportunities to enhance the site recreational features with hiking trails along the lake and public viewing areas for the mine activities. Peterson Creek <ul style="list-style-type: none"> It is our understanding that a portion of the creek has to be moved to allow room for a rock disposal site. A new channel for the creek can be readily made by machinery but the ecological conditions for fish habitat with vibrant insect life and plant vegetation cannot be readily replicated and loss of habitat will occur. What is being proposed to mitigate this loss? The rock waste dump is going to be adjacent to the Peterson Creek drainage and any water flow through this material could end up entering the stream channel and be deposited in downstream water users systems or directly into Kamloops City and eventually the Thompson River. Water Impacts on the Thompson River Watershed <ul style="list-style-type: none"> This mine is only one of many projects and cities that draw water from the Thompson River watershed. Every year the river levels of the Thompson system have been dropping which results in low water flows and high water temperatures in the critical summer months which impact migrating salmon. Some of these salmon runs are world class. What is the cumulative drawdown on the watershed with all these water users, mining, irrigation etc. including the City of Kamloops? What level of use is sustainable? What do we do when minimum flows cannot be maintained to support migrating fish stocks? Rock Waste Dumps <ul style="list-style-type: none"> The two proposed rock waste dumps are winter habitat for both Mule Deer and White-tail Deer with some usage by Moose. There will be a net habitat loss for all these species especially in the winter months when animals are at their most vulnerable. There are several Sharp-tail grouse leks in the general vicinity of the waste rock pits. It has also been reported that Sandhill Cranes use this area as a resting and feeding spot on their northward and southward migrations. A concern of members is the reclamation plans for these rock waste dumps as well as the tailings area. What are the reclamation plans for these sites? Tailing Storage <ul style="list-style-type: none"> This operation is also of major concern to our members as the area is a prime wintering and movement corridor for deer and the occasional moose. Other species of wildlife also inhabit the area. With the Coquihalla highway right-of-way being fenced and the mine site plus tailing area behind fencing there will be no means of north-south access for ungulates for some eight kilometers. Will there be some provisions for wildlife movement? There are several small seasonal creeks which flow through the proposed disposal area and exit into range lands to the west of the Coquihalla Highway. There will be a chemical cocktail from the processing and separating of the copper and gold at the plant. This solution will be pumped to the disposal site and the major portion of the water removed but what chemicals will remain in the residual materials as they are deposited? What safeguards are being taken to prevent these materials from leaching into the ground water and potentially into adjacent lands? Although Inks Lake does not have a viable fish population it is an important habitat for waterfowl. This lake is one of the first water bodies to be ice free in the spring and is heavily used by swans. Throughout the remainder of the open water season geese and ducks use this area extensively. It would appear that this area has the highest level of concern for the dissemination of fine particulate into the surroundings. Again has a histogram of wind dispersion been assessed for this area to determine the predominant flow direction? This area when fully developed with a 200 meter thick layer over 2 and 1/2 kilometers appears to be very exposed to the westerly and easterly winds which prevail in Kamloops. What effect will these particulates have on the surrounding vegetation for wildlife and the area cattle ranching community? What effect will particulate have during an east wind with lines blowing across the Coquihalla Highway? Shipping of Concentrate and Mine materials <ul style="list-style-type: none"> At this time it appears the preferred shipping route is south and north along the Lac LeJeune road. This road system is a winding route through prime habitat for wintering deer and the occasional moose. This road system also passes by five well used fishing lakes, a winter cross country skiing area and two Provincial Park sites and will impact the experience for all these users. The Ministry of Environment estimates more than 23,000 angler days are expended on these lakes on an annual basis. It would be our suggestion that a road be linked to the Coquihalla Highway at the Inks Lake exchange to minimize the heavy truck traffic to this secondary highway. The Lac LeJeune road is narrow and winding with limited passing opportunities which will create a potential safety concern unless passing lanes and road realignments are undertaken. Power line Corridors <ul style="list-style-type: none"> The construction of one or more power lines to this development are going to impact wildlife habitat, potentially increase the spread of noxious weeds and impact wildlife species such as raptors due to collisions with wires and pylons. Mitigation and Financial Guarantees <ul style="list-style-type: none"> It is obvious there will be some loss of wildlife habitat and some minor to major impacts on the fisheries values. It is our hope that the following funds should be part of any final agreement: <ul style="list-style-type: none"> A trust fund to be established similar to the Highland Valley Enhancement Fund. These monies would be used to mitigate wildlife losses, fisheries losses and recreational losses in an area some distance from the proposed mine site. A substantial deposit is held on account to mitigate any damages in the case of mine closure or suspension of activities. We wish to thank you for the opportunity to provide input into the environmental review process and look forward to working with you as the project evaluation continues.	1	1	1																		
127	08-Jul-11	Personal Information Withheld	Kamloops, BC	I have been a resident of Kamloops since my birth and I am also a Prospector and I would like to state that I am in favour of the Ajax Copper -Gold Mine Proposal. The economic value that will be brought to Kamloops and area from a Proposal such as this far out weight the value brought in by Tourism. People who work at the mine will make a real wage as opposed to the minimum wage obtained by Tourism related employees. This mine will not only hire employees but will source out it's supplies from the Business located in Kamloops and Area. They will also pay taxes to the City of Kamloops and the Province. We need our Federal & Provincial Governments to ensure that this proposal proceeds will all the Environmental safe guards known to it. Backup plans need to be established so if something does occur that the response to rectify it will be swift and any damages mitigated. I am very interested in hearing how the Proponents will be dealing with all environmental concerns that need to be dealt with. Please ensure that the high powered Environmental Groups and other Fear Mongers do not thwart this proposal as the Proponents will not be able to satisfy everybody. I attended the first Open House and will attend all future Open Houses. Thank you for allowing me to voice my opinion.																					
128	08-Jul-11	John Schleiermacher	Kamloops, BC	The public open house held on June 16 for the Ajax mine was a huge disappointment. The venue was much too small to hold the 350 attendees. Many people for forced to stand in the hallway and were unable to hear or see the three presentations. The question period was much too short which resulted in many attendees unable to ask their questions or express their concerns. Both government agencies quickly ran out of handouts, again leaving most attendees disappointed. I ask that for the next public open house, if one is necessary, be held at a much larger venue and the question period be unlimited to ensure that each and every person has an opportunity to ask questions or express their concerns. An event such as the opening of an open-pit mine close to a residential area that will affect thousands of lives for a quarter of a century needs input from every person affected by it. If our MPs can work all right to deal with the postal strike, the proponent' high priced help can do the same. If a thousand or more attendees make the effort to show up, their questions or concerns should not go unanswered.																					
129	08-Jul-11	Personal Information Withheld		Due to the length of the comment, it is not possible to include the text in its entirety in this issues tracking table. Please refer to the EAO website (http://a100.gov.bc.ca/appsdata/epic/html/epic_project_doc_list_362_p_pub.html) for the complete comment submitted on July 8, 2011. The following provides a summary of concerns presented: <ul style="list-style-type: none"> Distance to Project stated by proponent (10km from some runoff) is open to misunderstanding All measurements should be also provided in Imperial for ease of understanding 3D Mapping should be included Consultants are not familiar to the local community Unclear assessment of impact of ancillary structures including power/water lines and Peterson Creek re-routing Are ranchers rights and traditions being adequately included? Are there alternative ore bodies available in further-removed areas that could be mined instead? Mine employment will create a "boom and bust" situation Tourism in Kamloops will be negatively impacted 																					
130	09-Jul-11	Personal Information Withheld	Kamloops, BC	To whom it may concern: I am a resident of Aberdeen subdivision in Kamloops, B.C. and have been so for 23 years. My husband and I are adamantly opposed to the building and production of Ajax Mine in Kamloops. It appalls me to think that money and big business may come before the impact this will have on our community. There is much talk even by our local MLA that this will bring economic wealth to Kamloops in the form of 400 jobs. What about the jobs that will go elsewhere at our expense? I would venture to say that none of those people will be living in the Aberdeen, Knutsford, Pine Valley and areas surrounding the proposed mine. Those in our outlying areas who have chosen to live there for peace and tranquility will have lost what they so treasure. I believe that the cost to the people of Kamloops will be far greater than the advantages and our quality of life will suffer. Some of the negative impacts to our area and environment are as follows: The removal of precious water from the North and South Thompson Rivers to operate this mine. The displacement of Peterson Creek and disruption of our grasslands. Constant and very bright lights as the mine will operate 24/7. Noise and vibration from the constant moving of heavy gigantic machinery. Vibration and dust from blasting. Constant dust from the moving of heavy equipment and ore. The added noise of traffic on the old Merritt highway as more vehicles go up and down it. (We already have more noise due to the removal of pine beetle kill trees How can Jacko Lake and the fish stocks not be affected permanently when the pit will be within feet of it? I do not doubt that the value of our homes in Aberdeen will go down as the effects of the proximity to this mine are felt. These are only a few of the concerns and it sickens me to think of what our beautiful neighbourhood could become. I hope that those opposed even if not affected by this event will speak out.	1	1	1																		

KGHM AJAX MINING INC.
AJAX PROJECT

PROJECT DESCRIPTION ISSUES TRACKING TABLE
PUBLIC COMMENT PERIOD JUNE 8 TO JULY 11, 2011

M:\110100246\08A\Data\Public Comments\1\Public Comments Tracking\Table 1 Ajax Project Public Comments Rev 0.xlsx\AJPD1

Comment #	Date	Name	Location	Comment	Issue for Consideration																				
					Air Quality / Dust	Noise	Vibration	Light pollution	Fish & Fish Habitat	Surface Water Quality	Groundwater Quality	Groundwater Quantity	Wildlife	Grasslands / Ecosystems	Aesthetics	Human Health / Safety / Well-being	Recreation	Tourism / Investment	Economy / Employment	Land and Resource Use	Infrastructure	Terrain / Soil Stability			
152	11-Jul-11	Personal Information Withheld		This mine is a bad idea. Its too close to town and would affect air, water and soil stability. You can't seriously think that the people of Kamloops will accept this project in their city. With an inversion prone air shed that already struggles with the pollutants from the pulp mill as well as the dust from the dry hills, we can't afford to load the air with any more particles. I also can't see how you are going to keep the water levels as well as the water quality down stream acceptable. It's bad enough the pulp mill dumps their treated water in the Thompson River. For the sake of the Kamloops people, go dig a hole somewhere else where the population is not as dense and further away. Your company is based in Poland. It's a country built on industrial processes including a lot of coal mining. I'm sure many of these under ground mines and industrial complexes are close to towns. I would think that the health of those folks is negatively affected. The livelihood of many of those polish people depends on these jobs and locations. Luckily, in Canada the situation is different; let's keep it that way.	1																				
153	11-Jul-11	Personal Information Withheld		Hello, We are the Upton family and have lived at Lac Le Jeune for almost 20 years We are solidly opposed to the Ajax Mine development. The planned location of this mine had too much affect on too many people and the environment I am sure you are well aware of the implications of such a mine on our area...and they are NOT POSITIVE!! The small amount of jobs vs. the impact is not negotiable WE ARE AGAINST THIS MINE! STOP NOW!																		1			
154	11-Jul-11	Grasslands Conservation Council of British Columbia		Due to the length of the comment, it is not possible to include the text in its entirety in this issues tracking table. Please refer to the EAO website (http://a100.gov.bc.ca/appsdata/epic/html/depoly/epic_project_doc_list_362_p_pub.html) for the complete comment submitted on July 11, 2011. The following provides a summary of concerns presented: • Ecological and Economic Impacts – 2500 hectares of valuable, sensitive native grasslands will be affected including wildlife species that use the land / development potential in the Aberdeen area will be compromised due to mine proximity and aesthetics / ranchers rely on interconnected network of grasslands for livelihood and culture. • Public Consultation – lack of background information regarding ecological and economic impacts / inadequate mapping and modeling (include 3D modeling)	1	1			1				1	1	1	1	1						1		
155	11-Jul-11	Don Ferguson	Kamloops, BC	I would like to voice my opposition to the proposed Ajax Mine development within the Kamloops city limits. It would be negligent to allow such a massive industrial development in such close proximity to elementary schools, residential housing and outdoor recreation sites. This project will have deleterious effects on the public health of Kamloops residents and a devastating effect on a huge area of grasslands, two drainage basins, a large nature park and turn a valuable local wetland into an industrial cesspool. The project description is deceptive and minimizes several important factors that need to be considered in the review of this proposal. While the proposal states that the project would be located 10 km from the city of Kamloops, it is apparent that the project would be located within a couple of thousand meters of thousands of residential dwellings, primary schools, churches, soccer fields, ball diamonds, a children's waterpark, businesses etc. The proponent has not shown any inclination to acknowledge this fact in their proposal. Kamloops is frequently subject to very strong winds blowing from a southerly direction as we have experienced almost every day for the past several weeks now. These, dry, strong southerly winds will blow the exposed silicates and heavy metal-laden slag dusts directly onto the residents of Kamloops and add to our already severely-compromised airshed. There is no way for the proponent to prevent this dust from blanketing the residents of Kamloops despite the assurances of the proponent. It is simply not possible to guarantee that the hundreds of hectares of slag and pit can be perpetually watered down. Something as simple as a mechanical breakdown of the proposed water pumping system from Kamloops Lake would allow for the site's slag to dry out within minutes in our hot, dry, windy environment. With very limited natural water supply available at the open pit site, it would be impossible for the company to take action to prevent massive clouds of dust to spread across our neighborhoods. If this site was, in fact 10 km away from the City, perhaps this would not be a problem, but this site is within a few thousand meters of neighborhoods filled with young families. The proposal situates the mine site directly over Peterson Creek. There is no mention in the proposal of the vast Peterson Creek Nature Park that is located immediately downstream of this mine site. Peterson Creek Nature Park is a natural area composed of hundreds of hectares within the city of Kamloops. There are over 10km of priceless riparian zone within Peterson Creek Nature Park that will be impacted by such a development. The proposal states on page 32 that "The majority of Peterson Creek within Kamloops city limits is now contained in culverts and channelled in concrete waterways". This is clearly untrue as one can easily see by looking at a map of the area. In fact, the majority of Peterson Creek within Kamloops city limits runs through the vast Peterson Creek Nature Park. The proponent assures the residents of Kamloops that noise will be within allowable city limits. There will be a constant din emanating from this site as it operates 24 hours per day, 7 day per week, 365 days of the year. It is simply not appropriate to subject the thousands of residents living within a few thousand meters to constant, unrelenting noise and vibration. Maybe the noise will be below legislated levels but there will be a lot of noise and it will NEVER stop. Mines are busy, noisy, dusty operations that have no place in the bedroom communities of our City. Please consider my concerns when you render your decision on this project.	1	1	1				1			1	1	1									
156	11-Jul-11	Personal Information Withheld	Kamloops, BC	July 05, 2011 To Whom it may concern: Re: Ajax Mine Proposal The Provincial and Federal government ministries held an open house at Kamloops Towne Lodge Ballroom A, on June 16th on behalf of the Ajax Mine proposed mine reopening. On that occasion I addressed the crowd and now will restate the points made and ask for feedback and a response to our requests. 1 Both of the Federal and Provincial environmental studies quite rightly include water and air quality readings. I asked if they would add to these concerns the quality of darkness of the night skies when doing an environmental appraisal. Darkness is important to both the vegetation and wildlife of an area. This scientific field of study is called Scotobiology and we can provide a presentation if you wish. We want darkness measurements at Stake Lake Observatory recorded before and after the mine operates. 2 Our astronomy club, the Kamloops Astronomical Society (KAS), was given a small observatory. We searched many sites adjacent to Kamloops and chose the plateau directly south of the Ajax Mine site at Stake Lake because of the exceptionally dark sky and because it was in a protected recreation area used by skiers, bikers, and hikers. Here we felt the dome would be relatively safe from vandalism and we would be able to share our passion for astronomy and dark skies with local communities such as Kamloops and Lac Le Jeune at minimal cost. We share this site with the Overlander Cross-country Ski Club which has used this area for many years. Over the past year volunteers have spent time and money to make the observatory operational for our club and the public. Lighting alternatives to minimize light pollution are inexpensive and we ask that this be enforced at the mine. Moreover, during the planning stages, we want to be consulted about the selection of light fixtures planned for the mine site. It would be a shame to have this ignored and the mine bare a needless expense of unnecessary lighting. 3 A Dark Sky committee was formed within KAS this year to work towards having a Dark Sky Preserve designation for the Stake Lake area. This is granted by the Royal Astronomical Society after many stipulations have been met. This is not a legal designation but rather a cooperative agreement between neighbouring communities, companies and individuals to minimize light pollution in an area. Such cooperative agreements are good examples of how people can work together to come up with viable solutions to issues. We ask that if Ajax Mines becomes our neighbour that it plans for lighting as recommended by the Royal Astronomical Society Dark Sky guidelines. A mine representative at the open house was aware of special lighting considerations used in Chile and he stated that world class observatories there successfully share areas with mining operations. We encourage the same considerations be given to lighting for all mines in BC. Locally, light pollution minimization has been worked out between astronomy enthusiasts and other organizations for areas such as the Pyman Road Gravel Pit, and the Overlander Ski Club at Stake Lake which shuts lights off early on occasional winter evenings so that KAS members and the public can enjoy the stars. In conclusion, we want this development to consider environmentally compliant lighting for the mine site as a minimum mitigation effort. However, should the Ajax mine lighting system prove to irreparably damage the quality of darkness at Stake Lake, the Kamloops Astronomical Society with this letter formally requests that the Ajax mine be directed to provide adequate mitigation and that this mitigation be enforced, for the light pollution affects not only our enjoyment of Stake Lake, but also deleteriously affects countless wildlife and insect species. Thank you for the courtesy of asking for community response to the Ajax mine proposal. We await your response to our concerns and requests. Yours respectfully				1															1		
157	11-Jul-11	Personal Information Withheld	Knutsford, BC	From what I've read and understand, open pit mines are one of the most environmentally destructive methods of mining, basically involving the blasting away of massive amounts of the earth and creating a large open pit. Water in these open pits will be contaminated with toxins such as arsenic, sulphuric acid, cadmium, and other acids and minerals. This will eventually contaminate the surrounding areas. It seems that some of these mines are left open and contaminated forever after the gold/copper is gone. I've learned that the process of mining the actual gold/dredges up many harmful chemicals that contaminate the area. Apparently, the process uses lead, arsenic and cyanide, which adversely affects ground water, livestock in the area and agricultural practices. According to my research, for every 37 tons of actual gold taken out of an open pit mine, 3,700 tons of arsenic is unearthed and exposed. Any major storm (Knutsford is known for being a very windy area) is capable of spreading the arsenic to where it can directly leach into various sources of water. The Zortman-Landusky gold mine is a case study of the environmental risks of cyanide heap-leach gold mining and the impacts that these operations can have on communities, water and cultural resources. The Zortman-Landusky mine illustrates how modern mine operations continue to impact landscapes and leave behind massive environmental problems and liabilities. The mine experienced many problems, such as cyanide spills, and surface and groundwater contamination from acid mine drainage. This was one of the first massive heap-leach operations to open, as well as one of the first to close, leaving behind significant pollution and cleanup problems in 1982; 2,953 litres of cyanide-laden solution leaked from a containment pond and a section of piping used in the mine's cyanide sprinkling system ruptured and released 196, 841 litres of cyanide solution onto lands and creeks. The tap water revealed cyanide concentration levels above drinking water standards and the community's local water system was shutdown. Over the next two years, eight separate cyanide spills occurred. Without a permit, in September 1986, 75 million litres of treated cyanide solution was released onto 7 hectares of land when a solution pond was at risk of overflowing after a heavy rainstorm. Following one of the major spills, cyanide appeared in tap water in a mineworker's housing unit, just south of the mine, animals were found dead, and acid mine drainage contaminates nearly every stream drainage that emanates from the mine. Even though there were major environmental problems from the mining, the mining company, Pegasus, received only one fine for \$15,000 in its first 16 years of operation. After years of unsuccessfully trying to clean up the environmental problems at Zortman-Landusky, local citizens and environmental groups sued Pegasus under the Clean Water Act, resulting in a \$6 million settlement in 1996. Even with this settlement, cleanup funds for the mine were inadequate and citizens in the state were left with cleanup liability of tens of millions of dollars. In 1998, Pegasus went bankrupt. Water contamination is not my only concern when it comes to this project. The natural landscape will be stripped and blasted away. This means everything – the destruction of plant and animal life. I would like to know exactly what types of toxins will be produced from this proposed open-pit copper/gold mine – cyanide, mercury and other heavy elements? Does KGHM Ajax Mining Inc. have a method of preventing these toxins from entering the food chain? Does KGHM Ajax Mining Inc. have a method of preventing these toxins from harming the surrounding area? What about radon gas – will we all be dangerously exposed to this with the 24/7 mining operation and blasting of rock. Just another concern, because radon is absolutely known as a cancer-causing agent. The noise from the 24/7 mining operation consisting of blasting, crushing, trucking, etc. is also of major concern. This is going to have a tremendous, negative, impact on the quality of life for people residing in the immediate areas, as well as those living on the other side of Knutsford, and in the neighbouring areas of Aberdeen, Dufferin, Pineview Valley and Sahali. It seems that all methods of mining effect air quality. I have major concerns about the effects of particulate emission, not just on the environment, but how it will effect human health. Kamloops is a windy city, and the amount of particulate matter currently in the air is alarming enough, and no doubt that it, is harmful to our health (lungs, lymphatic system, breast tissue, etc.). What will the particulate matter produced from this open-pit mine be composed of? From what I understand, it can contain contaminants such as arsenic, cadmium and lead. Can KGHM Ajax Mining Inc. guarantee and prove that there will not be any harmful particulates created by this project? I am terribly concerned about this matter, as toxic particulates not only effect human health adversely by contributing to illnesses relating to respiratory tract, but they can also be absorbed into the skin. I do not understand how the Agricultural Land Reserve can allow this land to be destroyed and contaminated, when the very ranchers who own the land are not even allowed to subdivide it, in an effort to sell off smaller parcels? I thought that the ALR protected this land, and deemed it too precious to even allow it to be divided up for resale, for people to have smaller acreages and hobby farms. This project will cause long-term, irreversible, environmental damage! Not to mention the harmful effects that this project will have on our health, both in the short and long term. I am not satisfied in any way, that this can be a safe venture. The only ones who think positively about this project going ahead are of course the ones who stand to make money from it. However, I worry that those who are in favour are either in denial, or simply too ignorant and greedy to see the real price that we all will have to pay with the destruction, poisoning and devastation to not just the surrounding environment, but also to everyone's health	1	1					1			1	1	1								1	
158	11-Jul-11	Michael (Dal) & Jeanette Scott	Kamloops, BC	We attended the introductory meeting of the environmental assessment process for KGHM Ajax Mining Inc.'s proposed Ajax Copper Gold Open Pit Mine and were surprised to learn from Jim Whittaker, that the mine plans to use the existing Lac le Jeune Road as their main transportation route for hauling heavy copper and gold concentrate in large "B" train trucks. As well as heavy concentrate trucks, 400 new employees, freight and product shipments, in addition to continuing existing traffic, will corridor through the middle of their mine site, to and from Kamloops and points south. The Coquihalla Highway The Coquihalla Highway was built to high freeway design and alignment standards in the late 1980's. It is the main highway between Kamloops and Hope and Vancouver. It has an extra passing lane for trucks on hills. It is a well constructed, well maintained, all weather highway, unaffected by spring thaw conditions and has recently been designated a "Long Combination Vehicle Route". It is an ideal road to use for hauling concentrate to Vancouver. It is also an ideal road for employees and delivery trucks traveling to and from Kamloops and the Ajax Mine with a designated break check stop above the long hill down into Kamloops. It is only 2.5 kilometers from the Inks Lake Overpass (on the Coquihalla Highway) to the Lac le Jeune Road, along the existing Inks Lake Road, which leads directly to the adjacent Ajax Mine/mill operation. The Lac le Jeune Road The Lac le Jeune Road is a secondary road, which evolved over the years from a dirt wagon road from Kamloops to Lac le Jeune. Near Lac le Jeune, the road connected with the Meadow Creek Road, a dirt road that ran to a point west of Guichon Creek west of North end of the Highland Valley then down the south side of the Thompson Valley to Spences Bridge. In the early 70's, during construction of the Lorne Copper Mine in the Highland Valley, the road was paved to Lac le Jeune with minimal improvements in alignment, drainage and subgrade. A couple of years later the Meadow Creek Road was paved from Lac le Jeune to Logan Lake without making much in the way of improvements to alignment or subgrade. The Lac le Jeune Road, between Kamloops and Lac le Jeune, is winding and undulating and in areas of poor drainage, wash boarding. It has no passing lanes and very few places where one can pass safely. It has no break check pullouts at the top of hills for trucks to check their breaks before descending steep hills, nor any run away lanes. The pavement, which was installed in the early 1970's, is in various states of breaking up. There are steep stretches on the Iron Mask hill portion of the road, with sharp corners where numerous vehicles have run off the road, near the top of the hill and near the bottom of the hill, below the intersection with Bowers Place. Black ice occurs regularly during winter on the portion of the road in the shade above the Iron Mask Trailer Court. There are weight restrictions on the road each spring while the frost comes out of the subgrade. The road is a school bus route. In KGHM Ajax's proposal, all the additional traffic to and from the mine from Kamloops, will travel through a congested and busy intersection, without traffic lights, between Copper Head Drive and Versatile Drive (near the Versatile Petro Canada Truck Stop) then proceed up the Lac le Jeune Road to the mine site. Industrial Accident Lac le Jeune Road November 15, 2010 Approximately 8:00 am November 15, 2010, on a clear and sunny day with dry and clear road conditions, we were driving towards Lac le Jeune on the Lac le Jeune Road. A "B Train" logging truck (fully loaded) approached driving in the opposite direction from Walker Lake on the Meadow Creek Road. As the truck traveled around a shallow curve its rear trailer whip lashed into our lane, tipped onto two wheels, throwing its logs and rolled over on its side. When the rear trailer rolled, it pulled the other trailer then the tractor unit of the logging truck over and the whole "train" slid (approx 100 m) in an uncontrolled manner on its side, like a freight train coming towards us, in our lane. We drove off the road into the ditch in our Subaru Outback, to try to avoid an accident. The truck was on us in seconds, hitting our car and pushing us along the ditch with him, until he stopped - the grill inches from the drivers face. A picture of the accident with story, was headlined in the November 16, 2010 edition of Kamloops Daily News and is available for viewing on their website titled "Three Injured in Logging Truck Crash". Having survived this accident on what appeared to be a relatively innocuous section of the Lac le Jeune Road, one doesn't need to create the circumstances that will cause other accidents like this one with the additional traffic to and from the Ajax mine and we ask that you reconsider using the Lac le Jeune Road, in its' present condition, as the main access route to the Ajax Mine. Other Options to Consider: 1. Major upgrade to the Lac le Jeune/Meadow Creek road from Copperhead drive in Kamloops to the Lac le Jeune/Coquihalla interchange. This road is approx 28.7 km long and could be upgraded to be a similar standard as the Coquihalla Highway. These roads run virtually parallel to each other. This road is maintained both by the City of Kamloops (within city limits) and the Province of BC (outside city limits). 2. Upgrade the level, dirt, Inks Lake Road, between the Lac le Jeune Rd and the Coquihalla Highway and route industrial truck traffic, to and from the mine on this road. This road leads directly from the Mine operations to the Coquihalla Highway where there is proper access to the highway via a tunnel and lighted on off ramps. 3. Upgrade the level, dirt, Inks Lake Road, between the Lac le Jeune Rd and the Coquihalla Highway and close the Lac le Jeune Rd. between the Kamloops Shotgun Sports access road and the Inks Lake Road that travels through the mine property. There are a variety of reasons, safety, environmental, security, cost of crossings, restrictions to design layout, for not having the Lac le Jeune Road continue as a public corridor through the center of the mining operation. In looking at the layout of the facilities proposed for the Ajax Mine, the Lac le Jeune Road corridor, the Coquihalla Highway Corridor and the two fields at the lower end of the Jacko Creek Ranch, appear to force the design and layout of the tailings and reclaim water facilities into the configuration that was presented in the meeting with a high risk high visibility tailings pond adjacent to and parallel with the Coquihalla Highway. If the Lac le Jeune Road were closed after the Kamloops Shotgun Sports Access Road at the east end of KGHM Property and the Alton Haul Road Overpass at the west end of the KGHM Property and a new road constructed to provide public access and mine access to the Coquihalla Highway west of the mine from Inks Lake interchange along the west side of the Sugar Loaf property connecting to the Lac le Jeune Road, the Lac le Jeune Road corridor through the mine site would cease to be a design restriction and operational liability. It may be possible to relocate the tailings facility further south and rotate it so that it is wider and slopes to the north reducing the visual impact and potential dusting on the Coquihalla Highway. The tailings thickeners could be located immediately north of the waste dumps shortening the tailings pipelines from the mill. Respectfully submitted for consideration.																				1	1
159	11-Jul-11	City of Kamloops	Kamloops, BC	Due to the length of the comment, it is not possible to include the text in its entirety in this issues tracking table. Please refer to the EAO website (http://a100.gov.bc.ca/appsdata/epic/html/depoly/epic_project_doc_list_362_p_pub.html) for the complete comment submitted on July 11, 2011. The following provides a summary of concerns presented: • Project Description – location description is misleading / are storage areas fully defined and designed for winter conditions? • Direct Impact on Neighbourhoods – What are the impacts to public health / What will dust levels be in existing neighbourhoods / Is there potential for acid-rock drainage and vaporization of chemicals? / What will the impacts on sunlight/shadowing / dark sky effects from facilities be? / What will noise levels be? / How often will blasting occur and what effect will blasting have on the Coal Hill water reservoir? • Impact on City Infrastructure and Operations – Concerns regarding stability of existing groundwater systems including recharge zones from blasting and general operations / Clarification needed on fire protection, response times and mine rescue plans / more details on haul routes needed, Lac Le Jeune Road does not seem the best option for a haul route / Suggest the proponent complete a Traffic Impact Assessment / What is the plan for solid waste management, including recycling? • Impact on Future Planning (Transportation, Growth, Sustainability and Airshed) – City has developed "TravelSmart" transportation plan, how does mine impact local neighbourhoods from an environmental and aesthetic perspective? / Aberdeen neighbourhood is a significant growth area, how will mine impact this? / how does mining operation abide by the Sustainable Kamloops Plan? / Identify air quality impacts and provide information for the City's Airshed Management Plan. • Socio-Economic Impacts – How will recreation in Jacko Lake, Inks Lake and surroundings be impacted? / better description of employment generation projections needed / what are the long-term socioeconomic impacts and quality of life? • Impacts on Habitat, Fish and Wildlife – how will wildlife and grasslands be impacted by re-routing Peterson Creek / What are wildlife/fish impacts to Jacko/Kamloops/Inks Lakes? / describe mitigation measures for grassland protection and total area impacted • Aesthetics – What are the health/aesthetic/property impacts from power lines? / 3D modeling or artist rendering of views requested • Mitigative Measures – outline aesthetic mitigation measures / will tailings pile be progressively closed? / is alternative waste rock location possible? / describe alternatives	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1

KGHM AJAX MINING INC.
AJAX PROJECT

PROJECT DESCRIPTION ISSUES TRACKING TABLE
PUBLIC COMMENT PERIOD JUNE 8 TO JULY 11, 2011

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Comment #	Date	Name	Location	Comment	Issue for Consideration																	
					Air Quality / Dust	Noise	Vibration	Light pollution	Fish & Fish Habitat	Surface Water Quality	Groundwater Quality	Groundwater Quantity	Wildlife	Grasslands / Ecosystems	Aesthetics	Human Health / Safety / Well-being	Recreation	Tourism / Investment	Economy / Employment	Land and Resource Use	Infrastructure	Terrain / Soil Stability
160	11-Jul-11	Personal Information Withheld		Reference: Ajax Mine Project - Canadian Environmental Assessment Registry file number 11-03-622251 am writing to express my significant concern about the potential development of the Ajax Mine in Kamloops, BC. My concerns include the following: 1. Proximity of the mine to the fastest growing residential area in Kamloops, which means that any environmental or health impact will be multiplied by the significant growth that is occurring just over the hill in the Aberdeen area. 2. Air quality. Our family specifically chose to live in Aberdeen as three of us have asthma, and two of the three have required the use of prednisone to control our lung disease. Kamloops air quality is already at risk, and air quality changes in a neighbourhood that is known for decent air quality may significantly impact people who have lung disease or are at risk for developing it. Again proximity to the mine is a major concern. 3. Impact on land and water table. Our upper Aberdeen neighborhood, established in the mid 90's on the Guerin Creek area, is currently experiencing unusual shifts like large cracks in driveways, as well as massive shifting and water issue under 2 of our neighbours homes. Aberdeen is a heavily managed area and shifting and water table issues have been an issue. The impact of blasting and water table changes could impact many homes in the Aberdeen area. 4. Kamloops Lake water levels and relocation of Peterson Creek- what will the impact be given the impact on these natural waterways? Overall- mines are not for cities- please consider the potential impact on our health and homes.	1																	
161	11-Jul-11	Personal Information Withheld		I am writing to express distress re the proposed Ajax copper/ gold mine within and on the boundary of my city, Kamloops. My major concerns are as follows: 1) Destruction of sensitive grasslands that provide habitat for a number of species 2) Destruction of wildlife habitat and migratory corridors 3) Noise pollution due to the blasting, crushing and use of heavy trucks hauling the product to market 4) Airborne environmental pollution due to the dust and toxins inherent in the tailings/waste rock dumps within our city limits with resulting health issues 5) The destruction of Inks, Jacko, Kamloops Lake and Peterson Creek in one form or another as we know them today 6) The incredible volume of water needed for the operation of this mine and the concomitant waste water with it's risk of contamination to our community 7) The residential areas in close proximity to this proposed mine ie. Pinewood/ Aberdeen who will be subjected to 24/7 noise pollution 8) The long term economic effects to our beautiful City due to the impact on our tourist and service sector 9) The track record of this company and it's subsidiaries world wide (see specifically New Gold @ San Pedro, Mexico) which leaves much to be desired as corporate citizens I know that these issues have been voiced by many other concerned citizens of Kamloops. I hope that these concerns will be given due consideration during this assessment process.	1	1																
162	11-Jul-11	Frances Vyse	Kamloops, BC	Due to the length of the comment, it is not possible to include the text in its entirety in this issues tracking table. Please refer to the EAO website (http://a100.gov.bc.ca/appsdata/epic/html/dep/epic_project_doc_list_362_p_pub.html) for the complete comment submitted on July 11, 2011. The following provides a summary of concerns presented: Attached are my comments on the Ajax Mine proposal in the south side of Kamloops. I submitted through the website, but am not sure I trust that my actual file went through! As I was writing another note to my local MP, I remembered a point I had forgotten to add in my submission: All maps and diagrams of the proposed mine MUST include the boundary of the City of Kamloops and the Goose Lake Road. Many Kamloops residents don't realize just how close the mine will be to Aberdeen and Pinewood, and few realize how far south of those two communities the City boundary actually is. Goose Lake Road is familiar to a lot of residents, but not the upper reaches of Peterson Creek. Hence both are needed to put the proposal in it's complete context. Thanks. Grassland Ecosystems – commitment needed for a thorough study of native species • Waste Rock Piles – proponent needs to address leaching concerns on Peterson Creek habitat, species and irrigation water supply / are saline-lake values protected on Wallender Lake? • Tailings Facilities – more details needed on tailings management, aesthetics, dust control • Inks Lake – more details required on drainage management to Inks Lake • Artist Sketches – sketches will help community visualize Project components • Air, light and noise impacts – What are impacts to ranchers, sky watchers • Public Use of Lac. Le Jeune Road – Access and recreational concerns	1	1																
163	11-Jul-11	Personal Information Withheld	Kamloops, BC	I question if and/or how much of what people write is actually read in entirety. I am a TOTALLY OPPOSED to this MINING MONSTROSITY. This is the wrong place to build a mine of this magnitude. It is an environmental disaster waiting to happen! The OIL PIPELINE is something no one has spoken out on. If they did, I missed it. It is a critical issue. It has the potential of causing an unbelievable amount of damage. KGHM Abacus Ajax has made light of it, saying they'll move it. Not! The pipeline runs directly through the mine's planned pit. They act like it's no big deal as though moving it resolves everything. It is a big deal and it does not resolve anything other than it puts it out of their way and opens a whole world of possible environmental damage. I have numerous questions about this as well as it has potential for major damage and consequence. As far as I know, there is no known precedent of a large pipeline in such close proximity to a mine of this magnitude. The first maps that went around did not even show the pipeline. Previously known as "Trans Canada Pipeline", the Kinder Morgan line is not a small line, it is under pressure, and it is old. Apparently KGHM's intent is to swing it around the west side of the intended pit area - between the pit and Jacko/Jocko Lake, with virtually no clearance between either. How much pressure is in these lines? How much oil will be spilled in relocation? How much lost oil will leach into Jocko Lake, surrounding area and ultimately its tributaries - Pedersen Creek? How long will it be before ground vibration and movement from blasting, digging, hauling, and crushing, etc. disturbs or ruptures this line? Is there precedent regarding close proximity of pipelines of this sort? I think not. To "humanize" this, take your home washing machine. If it is pushed up against the clothes dryer, even when in "perfect" balance, vibrations from the washer spinning will, over time, wear the enamel surface of the dryer. The vibrations can also cause electrical, water and drain lines to move, separate, or break over time. With this mine, there is also an issue of ground compaction after/during relocation of the pipeline. According to their map, it is very close to shoreline, which means water, which means ground movement, which means more potential for rupture or separation. This company is far from having made consideration of too many issues. They are uneducated about the local geology and natural diversity. At the public meeting they knew nothing of the ground instability and underground water issues in the Aberdeen area. Pipelines are quite easily moved on paper, but not in reality. This is a true concern which must be addressed in full. When I moved to Kamloops 30+ years ago, I worked as a Civil Engineering Technician for one of the larger engineering firms in Kamloops. Being new to Kamloops and area, when we were required to go off-site or to another site, the man I worked with took a different route so I could learn my way around. We were stationed in Upper Sahali for the most part, but also worked all over the City from time to time. As we drove, he would stop and point, "See that?". He would then explain why they could NOT build on the area. Today, I can't think of one of those places where they haven't built. Several of them have had problems already. Aberdeen Hillside was one of the areas he pointed out, saying there were stability and underground water issues. Lo and behold, and surprise, surprise when the basements of homes on the ridge cracked and flooded. At considerable expense, the City now operates over 100 wells and drainage lines to deal with the underground water from this unplanned consequence. The Aberdeen developments were supposed to have had thorough research and studies done prior to approval and construction. Another personal incident took place when I was working for another company. The head engineer insisted my partner and I do the survey and design for a property subdivision despite the fact the area was unstable. Perhaps needless to say, I left this company for ethical reasons. With 20 years experience in engineering, I can honestly say this mine is a disaster waiting to happen. Even if slight, there is potential for damage to Knutsford, Aberdeen and Pinewood communities and there are thousands of residents. When the Alton/Tech conglomerate was doing core samples of this area some years ago, they operated 24/7. They were only taking cores, not moving 60,000 tonnes of earth per day/night all through the year. Drilling kept me awake many nights. It was akin to constantly being subjected to a dentist drill. Ear plugs were useless because the 'sound' came from underground. Ear plugs cannot cut out underground vibrations because they are felt more than they are heard (depending on the source). This mine would affect the physical and mental health of all the people who live near it. I include mental health because poor and disrupted sleep can cause serious mental illness and physical problems. This is not "white noise" we'd be dealing with, and it would not be a small amount of residents. There are thousands of people living on the hillside alone. Many of them have several children. The lives and health of these children are at risk. These problems also become SOCIAL PROBLEMS. Alton's old main pit disrupted the sleep of some of the people in these areas. I can hear New Gold underground at night. Myself and others near the proposed mine will be much closer than we are to Alton. After aforementioned samples were assayed, I was told there wasn't enough ore to mine. This was prior to KGHM purchasing the property. Enter KGHM a global company with perhaps questionable ethics. In my opinion, their "screw you" attitude toward some of the attendees of the public evening and several local groups lead me to think they really don't care about anything, person or creature that is in their way and leaves me feeling their ethics are questionable. I've made mistakes in my life. I can't go back and redo things. No one will be able to fix the problems caused by this mine. The City of Kamloops, Province of B.C. and Canada will have to live with its consequences forever. An oil spill could damage the entire ecosystem. There could be damage to thousands of homes in Aberdeen and Pinewood. Agricultural lands will be lost. Native grasslands will be lost. Wildlife habitat will be lost. Native plants will be lost. Calochortus macrocarpus, a.k.a. Mariposa Lily is an endangered species and grows throughout the area in question. Dust will not be completely controllable. Air quality will deteriorate, and medical costs will rise. Disrupted sleep patterns will have mental, physical, social and financial costs of untold proportions. Why are we so ignorant that we should give a company who isn't even located in Canada full rights to do as they please? They don't get my vote in any way shape or form. There is nothing they could do that would make me feel this project would be of any value to anyone but themselves. I could go on at length about lost wildlife and bird habitat, lost native grasslands, lost economy of local ranchers, poor health of the people that live in this area, but am sure others have covered it. I am concerned for all of those things, the same as others have pointed out. KGHM seems to be confusing the issue by mixing measurements. Their stats talk about metric tonnes, pounds and ounces. Mixing measurements makes it harder to calculate the results of the super low grade ore deposits. Roughly calculate it to work out at approx. 2% ore ... or is that .02%? As I attempt to bring this letter to a close, the questions don't seem to end. Perhaps this is a question for the City of Kamloops but, if they are planning to use Lac. Le Jeune Road as the main access road, who is going to pay for the rebuilding of it? The lower portion is in poor condition. Even if it's only used by daily workers and not equipment and hauling, it will have to be redone. They patch it every year. Six months later it's crumbling somewhere else. It is structurally questionable. I concur with the opinions of others who have spoken out against this project. My property value has taken a severe hit. At this point I think I'd be lucky if I could pay someone to take it off my hands. No one in their right mind would want to live where I do. I see absolutely NO good coming out of a project of this size and magnitude. It would forever change the landscape and culture of Kamloops, making "Beautiful British Columbia" far less beautiful. If this mine goes in, we can say good bye to our town that has tried to set itself as a clean, welcoming city. Please do NOT approve this project.	1	1	1															
164	11-Jul-11	Personal Information Withheld	Aberdeen, BC	I am writing to express my significant concern about the potential development of the Ajax Mine in Kamloops, BC. My concerns include the following: 1. Proximity of the mine to the fastest growing residential area in Kamloops, which means that any environmental or health impact will be multiplied by the significant growth that is occurring just over the hill in the Aberdeen area. 2. Air quality. Our family friends specifically chose to live in Aberdeen as three of them have asthma, and two of the three have required the use of prednisone to control our lung disease. Kamloops air quality is already at risk, and air quality changes in a neighbourhood that is known for decent air quality may significantly impact people who have lung disease or are at risk for developing it. Again proximity to the mine is a major concern. 3. Impact on land and water table. Our upper Aberdeen neighborhood, established in the mid 90's on the Guerin Creek area, is currently experiencing unusual shifts like large cracks in driveways, as well as massive shifting and water issue under 2 of our friends' neighbours' homes. Aberdeen is a heavily managed area and shifting and water table issues have been an issue. The impact of blasting and water table changes could impact many homes in the Aberdeen area. 4. Kamloops Lake water levels and relocation of Peterson Creek- what will the impact be given the impact on these natural waterways? Overall- mines are not for cities- please consider the potential impact on our health and homes. I sincerely hope that the upcoming federal environmental assessment will look seriously and hard at the risks, the track record of the company in question which is proposing this mine(which is quite shoddy), and make the health of our citizens a priority over other possible economic benefits.	1																	
165	11-Jul-11	Personal Information Withheld	Kamloops, BC	There was an earlier "comment" to the effect that homeowners insurance would not cover damage that might be caused to our homes as a result of the mining operation. I have checked with my own insurance co. & find that is most certainly true. (This will apply to everyone) Its hard to believe that our government could allow an off-shore company to come to our country, destroy our way of life, our environment, our valuable & endangered grasslands, devalue our property, & there is not even any compensation for any damage they may cause us--then pack up, take their profits & leave us & future generations with a huge irreparable mess to take care of into eternity--what a great deal!																		
166	11-Jul-11	Anne Grube	Kamloops, BC	I am opposed to the Ajax Mine. I participated in a tour of the area and was astounded at the sheer magnitude of the project, and especially the proximity of its various components to Jacko Lake, Inks Lake, and the City of Kamloops itself. The mine would have a detrimental impact on both the City and the natural environment. Grasslands such as those that would be destroyed can never be replicated. Regarding the argument that we need jobs, yes, people need gainful employment. But at some point we must realize that we live in a finite environment, and we cannot simply continue to extract resources from the earth to provide jobs and to manufacture more and more "stuff". See www.thestoryofstuff.com I wish to go on record as opposing the Ajax Mine Project.										1						1		
167	11-Jul-11	Aberdeen Highlands Development Corp	Kamloops, BC	Due to the length of the comment, it is not possible to include the text in its entirety in this issues tracking table. Please refer to the EAO website (http://a100.gov.bc.ca/appsdata/epic/html/dep/epic_project_doc_list_362_p_pub.html) for the complete comment submitted on July 11, 2011. The following provides a summary of concerns presented: • What are the impacts to current/future residents and wildlife from noise, dust and light pollution? • What form of blasting will be used? • What is the hydrology at the mine site and further north of the mine (including groundwater regime, disaster plan, compensation) • How will tailings storage facility be designed and managed and have pilot plant tests been done? • How much water will be extracted from Kamloops Lake and how will this affect fish, wildlife and water levels? • What will the impacts be to Makao Lake and Guerin Creek? • How will mine facilities affect aesthetics to current and future residential areas? • What are the environmental and wildlife impacts in grassland areas? • How will land and property values be impacted?	1	1	1	1														
168	11-Jul-11	Personal Information Withheld	Kamloops, BC	Due to the length of the comment, it is not possible to include the text in its entirety in this issues tracking table. Please refer to the EAO website (http://a100.gov.bc.ca/appsdata/epic/html/dep/epic_project_doc_list_362_p_pub.html) for the complete comment submitted on July 11, 2011. The following provides a summary of concerns presented: • Existing pollution in the valley bottom in Kamloops is poor due to Dornier mill operations, diesel fumes, wood and smoke, vehicle exhaust, tree sprays and dust. • Ajax Mine will disturb fish habitat and local watercourses, use lots of energy, destroy grasslands and wildlife habitat, emit dust and contribute to health problems.	1	1	1	1														
169	11-Jul-11	Kimberley Goodall	Kamloops, BC	I believe that if we were able to put a dollar figure on quality of life and understand the true value of our natural ecosystems (flora and fauna) and finite resources (fresh water) a cost/benefit analysis that took all factors into consideration would show that the development of this proposal will do little but create short term financial gain for a very few at a cost that ultimately cannot be measured. I apologize if the following article has been already posted - but I think it is something people need to consider. Thank you for the opportunity to voice my concern. Province failing in inspections and enforcement to protect environment by Calvin Sandborn and Maya Stano, Times Colonist July 2, 2011 The current mining boom is sparking controversy across British Columbia. On Vancouver Island, a debate rages over a proposed Fanny Bay coal mine. First Nations have sued to suspend northeast coal exploration that threatens caribou. The plan to drain and kill Fish Lake triggered massive public resistance. Reasonable people can disagree on the merits of particular mine projects. But most British Columbians would be shocked to discover just how weak our mine regulatory system has become. There is an urgent need to reform this environmental protection regime. A recent Environmental Law Centre study found: - The legal rules set out in Environmental Assessment certificates are often actually drafted by the mining company, can be vague and unenforceable and are not monitored over the life of the mine. - The number of government mine inspections in 2008 was only half the number of inspections carried out in 2001. - The number of provincial staff dedicated to mine reclamation issues has dropped by more than 50 per cent. - Since 1998, Ministry of Environment staff have been reduced by more than 25 per cent. - From 2006 until 2010, MOE took only six enforcement actions for coal and metal mine violations. Five of those penalties amounted to less than \$600 each. - The province's chief inspector of mines failed to file the legally required 2009 and 2010 annual reports on enforcement and other issues - and cited lack of staff as a reason. This ramshackle enforcement regime is not good enough for an industry that can create environmental and financial catastrophes. Acid mine drainage can release toxins for centuries. Taxpayers paid \$69 million to clean up the Britannia mine that killed Britannia Creek and affected millions of salmon in the Squamish estuary. After the Mount Washington mine destroyed the Tolum River fishery, taxpayers paid \$6 million to restore the river. It can get far worse - taxpayers paid \$436 million to clean up the Yukon Faro Mine and \$399 million to clean up the Giant Mine in the Northwest Territories. Yet the system to ensure that companies pay for their own mess is broken. In 2003, the province's auditor general pointed out that financial security being taken under the Mines Act is inadequate to remediate the known mines sites in B.C. where contamination exists. Some action has been taken since then, but not enough. In 2010, the government's public accounts acknowledged almost \$600 million in net liability for B.C. mines. Yet tens of millions of that amount remains unsecured. Some B.C. mines have posted security for less than \$5 million - when a water treatment system alone can cost over \$25 million. Lack of security is a problem for such a volatile industry. It leaves taxpayers at risk to pay for massive cleanups - or to not pay, and endure serious environmental damage. Security rules must be revamped to ensure that companies, not taxpayers, clean up their own mess. In addition, the B.C. regime needs to be reformed to provide compensation for victims of mine pollution. Under the current system, if a mine pollutes and then goes broke, neighbours and others (shellfish growers, fishers, tourism operators) are likely out of luck - and out of pocket. Government should require the mining industry to fund a program to protect such innocent third parties. The provincial and federal governments have both endorsed the polluter-pays principle. Now they need to actually implement it. A mining boom is sweeping the province. But before any more mines are approved, there needs to be comprehensive law reform. We need to ensure that mining provides long-term benefits to communities - and also protects the ecosystems we depend on. At a minimum, we need to enact laws to provide the highest level of environmental protection; ensure government has enough staff to actually enforce those laws; and ensure that companies - not taxpayers and Mother Nature - pay for the environmental and financial damage caused by a mine. We must act to protect the wild salmon and trout, eagles and bears. We must act to protect our pristine streams and sparkling lakes. Finally, we must act to protect mine neighbours, the provincial treasury and taxpayers. Calvin Sandborn is legal director and Maya Stano a geological engineer and graduating law student at the University of Victoria Environmental Law Centre. © Copyright (c) The Victoria Times Colonist											1	1						

