Request for Supplementary Information Information Request No. 5

Project Assessment 2017-0083

BMC Minerals Inc. Kudz Ze Kayah Project



March 13, 2020

Prepared by Executive Committee Yukon Environmental and Socio-economic Assessment Board

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1.0 INTRODUCTION

1.1. Information Required

The Executive Committee has reviewed comments submitted to date as part of the current public comment period. The Executive Committee has determined that supplementary information is required regarding the proposed project before it can prepare its final Screening Report. This report identifies what supplementary information is required.

1.2. Current Comment Period

At the end of the current comment period, scheduled to close on May 31, 2020, the Executive Committee will examine all submitted comments over a period of up to 21 days. At the end of this 21 day review period and if additional information needs are identified, the Executive Committee will issue a new information request.

The Executive Committee continues to give full and fair consideration to comments received to date and will also give full and fair consideration to comments received during the remainder of the current comment period.

1.3. Process

Although the current comment period has been extended until May 31, 2020, the Executive Committee is issuing this information request during the comment period because:

- It has determined it requires additional information to complete the screening report.
- A multiple month delay in issuing this information request would improve timeliness and increase transparency.

Upon receipt of a response to this information request, the Executive Committee will commence a 21-day review period to review the response. If necessary, this review period will be concurrent with one of:

- the current public comment period;
- the 21-day period to review submitted comments; or
- a separate information request, or review thereof, resulting from submitted comments and information.

If the response to this or a future information request is insufficient or results in identification of new information requirements, a new information request will be issued up to 21 days after the response is submitted.

The Executive Committee notes that the current comment period may result in subsequent determinations that additional information is required. The Executive Committee will commence drafting its final screening report only when it determines that it has sufficient information to do so.

2. REQUEST FOR SUPPLEMENTARY INFORMATION

Finlayson Caribou Herd

- R5-1 To increase confidence in the effects prediction and characterization for caribou, if there is any newly available caribou survey data relevant to the project, please provide it.
- R5-2 If there are any known nearby sites where calving caribou show site fidelity, provide the distance to the mine site and describe the location and the potential for sensory disturbance resulting from the project.

Roads

- R5-3 Extend the road access management plan to account for the post operations and post active closure phases of the project, including:
 - a. Possible decomissioning methods
 - b. Access control methods
 - c. Predicted effectiveness of any proposed mitigations
- R5-4 Additional mitigations relating to highway transport are provided in Appendix G of BMC's 2nd response to Information Request #4. These include identification of additional pull out locations and where increased brushing may increase sight lines. Describe the location of existing pull outs and current visibility limitations along portions of the Robert Campbell Highway that would be used by ore trucks.
- R5-5 Locate and describe proposed borrow sites for improvements to the access road and airstrip.

Air Quality

- R5-6 Characterize predicted metals in dust and provide predicted concentrations of NH₃, VOCs, PAHs and diesel PM concentrations resulting from the project.
- R5-7 Describe any additional potential air quality mitigations that would be implemented if air quality indicators exceed 2020 Canadian Ambient Air Quality Standards.

Human Health

R5-8 Describe proposed mental health supports for workers on site, as well as any off site resources specifically available to workers and their families.

Administrative

Government of Yukon has requested a list of all proposed proponent mitigations. For readability and clarity, the Draft Screening Report does not highlight a number of these mitigations where they are not instrumental to an effect's characterization or significance determination. However, a singular list of measures, organized by VESEC or project component, may be a method to more clearly highlight and present the extent of proposed mitigation measures. These could be incorporated into the final screening report as part of the project scope.

R5-9 Provide a singular list of all proponent mitigations.