

TRAFFIC IMPACT ASSESSMENT REVIEW

Appendix 1.0-9_Traffic Impact Assessment

This traffic assessment makes several erroneous assumptions and falls short in measuring the Traffic impact on the Community of Wells. It is not clear why a traffic impact assessment on the community was not done. The local traffic impact is much greater than described in the impact on Hwy 26 as measured on the western edge of the community and westbound from that location.

Specifically there is no traffic data regarding traffic moving through and around the community:

1. The waste rock trucks will be moving on a mine road on the southern perimeter of a residential area, before crossing into that residential and turning out of it again, on the B road.
2. Worker transport traffic will be traveling from the co-opted motels and rv park, as well as apartments and residential dwellings, and heading to and from the minesite daily., but the study does not explore this.
3. Much of this traffic (geologists, admin, consultants,) will be on shifts that vary from the 'shiftworker' traffic but the study does not cover this.
4. Exploration worker and industrial equipment traffic directly related to the minesite, will be travelling to and from 6 km east of Wells(the Ballarat), through the town to both: the mine entrance to access underground drilling, and surface drilling on Island Mountain.
5. Other exploration supply traffic(for drill sites south east of Wells(precipitated by the mine but not directly related to the project proposal) will also be travelling across the town to supply the exploration base station at 'the Ballarat'.

None of this traffic, or its cumulative impact on the residential and tourism components of the community appears to make it into the traffic assessment's measurement, making the document significantly shallow in its assessment.

Furthermore:

Section 1.1.1 Construction

This document erroneously states that 250 workers will be onsite during the construction phase, and that only 12 workers will drive to work. Until the new camp living facility is completed(as part of the construction phase) this would be a physical impossibility. Those workers will have to be housed in camps and accommodation elsewhere in Wells(apt, co-opted motels, rv sites) and at the Ballarat. Therefore they will create a significant daily traffic impact as they move to and from the construction site.

In addition, since the construction phase is proposed for BOTH sides of the hwy for at least the first two years, even if the new camp was the very first thing built, workers will still have to commute to and from the second construction site on the north side of the hwy, on a daily basis.

Therefore the document should be corrected to note that during the construction phase 250 workers daily will be commuting through the town of Wells, to the Hwy 26 intersection noted in the study.

Although the study piles the delivery trucks onto one day for the purposes of the study, without strict scheduling the traffic averages 2 deliveries per day, driving into the community and food and camp supply trucks will be driving deeper into the community. These trucks create significant additional industrial impacts on the life and livelihood of the residential community. Given the volume of supply and delivery traffic already experienced in Wells, it seems unlikely that a two truck/day average will be accurate.

This number also raises further questions:

Where will the fuel depots and industrial supply laydown be? They will have to exist in different locations during both the construction and operation stages. Storage of fuel and materials for a mine of this size will have a significant impact on the community so more clarification is needed regarding supply management.

Also, is there an existing traffic study for exploration? It's not clear from the document how the cumulative effect of the Exploration program traffic(which is already highly impactful on the community) will be exacerbated by the mine program. It appears that the mine will at least double the impact.

In addition, at the Community meeting of September 22 it was announced that the Cow Mountain Bulk Sample permit will extend into the mine construction phase. This will create three active portals, on three different mountains on three different visual aspects of the residential community and significantly add to the deleterious effect of creating an industrial landscape in a residential zone.

The Bulk Sample project will generate additional ore truck traffic through Wells which was not anticipated at the time of the traffic study. In addition, this project, (and presumably the operation or closure of the Bonanza Ledge Mine) will generate its own additional traffic flow through Wells which is not adequately predicted in the assessment.

Finally, the construction of the road, new bridge at Ski Hill Road and upgrading the B road to mine road standards will also generate traffic through the community of Wells residential areas which is not adequately accounted for.

How will this add to existing traffic for the exploration program?

1.1.2 Operations,

This study predicts 25 concentrate trucks per day=50 trips

Osisko has said in public meetings that they would be willing to schedule deliveries by time of day as required by the community.(for instance, only haul from 7 am to 7 pm) Is this type of scheduling still an option?

The advantage to daytime hauling is that it lowers disturbance levels from light and noise in the night. However, the disadvantage is that it piles traffic onto the intersections and road at the times most likely to be used by residents and tourists.

For instance, if the ore shipments only ran 12 hours per day, it's the equivalent of an ore truck every 14.4 minutes, and over the length of the Hwy portion it results in mine commuters, other industrial traffic, RV traffic meeting or passing a minimum of 4 trucks per 65 km of winding hwy with few passing options.

According to the public presentation of Sept 22, by Osisko, the ore sorter will produce 1900 tpd of waste rock of which 87% is surface stored. This is the equivalent of 41 Forty tonne waste rock trucks per day travelling in the opposite direction from the ore trucks, along the edge of Lowhee Creek to the Bonanza Ledge. These trucks will be passing along an elevated roadway within 150 m of the nearest residence before turning in a residential area at Ski Hill Drive, and climbing a hill above a residential area. If those trucks followed the same 12 hour schedule proposed for the Ore trucks it is the equivalent of a truck crossing the bridge into or out of town every 8.8 minutes. Presumably this traffic will be supported by road maintenance, sanders, plows and other vehicles, but none of this traffic is accounted for in the traffic assessment study.

On September 22, 2021 in the same public presentation, Osisko announced that a separate access road would be built to connect the workers camp with the community. This connection was initially described as being independent of industrial road for ore and waste trucks. Later it was described as an extra lane for non-commercial traffic, on the waste rock haul bridge that will be built at the top of Lowhee Drive.

Can Osisko better describe this concept including the bridge dimensions that would allow 50 tonne waste rock trucks in both directions and have a separate lane for camp traffic?

The construction of this alternate camp access will require shift change traffic and other supply traffic to travel through the entire residential area of south Wells, negatively impacting those neighbourhoods, and impact the intersection on Hwy 26, near Camel Drive. This will further impact tourism accommodation in that area, through noise and activity. This is especially important because of the scheduled activity noted in the traffic assessment which co-incides with recreational and rest activity at tourism accommodations. However, this new traffic is not discussed in the traffic impact assessment. How will Osisko correct this oversight, and mitigate the un-intended effects of this design change announced on September 22, 2021?

Section 4.1:

In the absence of data for Hwy 26 the authors have attempted to extrapolate Hwy 97 growth rate percentages to Hwy 26. This methodology is flawed by the dilution process in so far as more traffic travels for more reasons on Hwy 97 than on Hwy 26. Doubling the traffic volume of any particular sector would not result in a significant change as a percentage of the whole, on hwy 97. However, doubling the traffic volume of certain sectors of Hwy 26 would result in considerable percentage changes. For instance, one of the study years, (2018), saw a major construction project take place at Barkerville Historic Site. Service and worker traffic for that one project could have significantly raised road trip measurements relative to the following year, creating a false data set related to growth.

PREDICTED PEAK TRAFFIC HOURS:

As the study notes, peak traffic hours for shift changes do not appear to coincide with tourism traffic. Although may be advantageous in terms of traffic safety on Hwy 26, it actually extends the traffic, noise, dust disruption period for residents and local accommodations, which is an overall negative effect. This is not explored in the Traffic Assessment study.

Overall, the Traffic Assessment falls far short in exploring the traffic impact on the community and tourism assets of Wells. By limiting measurements to mine-specific traffic trips and measuring from the western edge of the community only, the study misses the most important information to the residents of Wells, which is; How will mine-related traffic IN THE COMMUNITY affect the safety, comfort and quality of life within the community itself.

In addition, in the Construction phase, the study makes assumptions about worker access to the worksite from imaginary accommodations that do not match with the physical reality and geography of the project.

It's clear from the extrapolation of the data provided by Osisko that truck traffic within the boundary of the audio-visual bowl of the community will be extensive. It's not clear how modifying trucking times or limiting trucking to specific hours will positively affect the quality of life in the community. ODV needs to provide a more detailed traffic study that shows the daily impact of traffic from all sources, on all roads in the community itself, instead of only a portion of the hwy outside the community.

It's worth noting that, if the mine were located on the south side of Cow Mountain, (in the alternate location studied in section 1.7 Alternate Means of Carrying out the Project), then the project would exit 5 km west of town and that the Traffic Assessment would much more accurately represent the facts.

In addition putting the mine at the Alternative Cow site means:

- during the construction phase, zero worker traffic would occur across the hwy to the Aurum Portal,
- Exploration traffic could reach the minesite from the existing A road, 5 km west of Wells, instead of traveling through Wells, and
- during the 16 year operational phase Waste Rock traffic would be eliminated from the town. Also,
- the mine could improve operational efficiency by operating on a 24 hour schedule instead of trying to impose a flawed 12 hour trucking schedule on the community.

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