



OSISKO DEVELOPMENT

# **CARIBOO GOLD PROJECT**

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**PUBLIC ENGAGEMENT REPORT –  
APPLICATION REVIEW**

***November 2021***

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## OSISKO DEVELOPMENT

Barkerville Gold Mines Division

PO Box 250  
3700 Ski Hill Road  
Wells, BC V0K 2R0

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## Appendices

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Appendix A: Public Comment Attachments

Appendix B: Comment #14 Technical Memo



## ABBREVIATIONS

Terminology used in this document has been defined where it is first used, while the following list has been presented to assist readers that choose to review only portions of the document.

Abbreviation	Description
AIR	Application Information Requirements
BC	British Columbia
BGM	Barkerville Gold Mines Ltd.
CCLUP	Cariboo Chilcotin Land Use Plan
CGP	Cariboo Gold Project
CRD	Cariboo Regional District
EA	Environmental Assessment
EAC	Environmental Assessment Certificate
EAO	Environmental Assessment Office (BC)
EPIC	Electronic Project Information Centre
ESA	Environmental Site Assessment
FLNRORD	Ministry of Forests, Lands, Natural Resources Operations and Rural Development (BC)
HHERA	human health and ecological risk assessment
I-O	Input-output
km	kilometre
kV	kilovolt
LOS	Level of service
m	Metre
masl	Metres above sea level
MOTI	Ministry of Transportation and Infrastructure (British Columbia)
MWR	Municipal Wastewater Regulation
OGMA	Old Growth Management Area
PDA	Project Development Area

Abbreviation	Description
Project	Cariboo Gold Project (proposed)
Proponent	Osisko Development Corporation (ODV)
QR Mill	Quesnel River Mill
ROW	Right-of-way
TAC	Technical Advisory Committee
TEM	Terrestrial Ecosystem Mapping
VQO	Visual Quality Objectives

# 1. INTRODUCTION

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## 1.1 Cariboo Gold Project

Osisko Development Corp. (Osisko Development; ODV) is proposing to develop and operate the Cariboo Gold Project (the Project), located in the Cariboo Regional District (CRD) of British Columbia (BC). Osisko Development's vision is to develop a sustainable mining project designed in collaboration with the community, Indigenous nations, and other stakeholders. The Project will be a modern, low-carbon, long-life mining operation designed with high environmental standards and development opportunities for Osisko Development's Indigenous partners and local stakeholders.

An Application for an Environmental Assessment Certification (the Application) was submitted to the Environmental Assessment Office (EAO) on July 28, 2021. Upon submission, the 180-day Application Review commenced. During this period, a 30-day public comment period was held. Comments on the Project were received by the EAO on their website. This document provides a summary of the public comment period, engagement activities and responses to the public comments by Osisko Development.

## 1.2 Public Comment Period

The public comment period began on September 7, 2021 and closed on October 8, 2021. A total of 118 comments were submitted during this time.

Two EAO-led virtual open houses were held for the public comment period. A combination virtual/in-person open house was planned for the public comment period, but due to increasing COVID cases in the region, the in-person open-house session was cancelled and held virtually.

The public comment period and open houses were advertised in the following locations:

- Prince George Citizen;
- Quesnel Observer;
- Williams Lake Tribune;
- Osisko Development's Barkerville Gold Mines Facebook page;
- Posters in common community locations in Wells and along Highway 26; and
- Mail-drop to residents of Wells.

A virtual project information center was created to support the open houses (<http://openhouse.cariboogold.com>). The website included virtual poster boards that provided a summary of the Application and the valued components effects assessment. The virtual project

information center included boards by the EAO outlining the environmental assessment (EA) process and a link to submit public comments.

The first open house was on September 22, 2021 and attended by 33 people. The second was held on September 23, 2021 and attended by 52 people. Both the EAO and Osisko Development presented information about the Project at both open houses. A written question and answer period has held after the presentations and both the EAO and Osisko Development answered questions regarding the Project.

### 1.3 Engagement Activities

Due to restrictions related to the ongoing COVID pandemic, public engagement activities included the EAO open houses, and Facebook posts on the Osisko Development Barkerville Gold Mines Page. Facebook posts related to the Project included an announcement regarding the Application submission, the start of the public comment period, the virtual open houses, and reminders to submit public comments before the close of the comment period.

The Application was available to members of the public on USB drives that could be obtained from the Community Relations Office. A total of five USB drives were distributed.

The Community Relations Office was open and members of the public could visit, as per Osisko Developments' COVID protocols.

A teleconference was held with the District of Wells and Osisko Development on October 29, 2021 to discuss the proposed camp accommodation and share information on the design.

### 1.4 Responses

Public comments and attachments submitted to the EAO are provided in Section 2.0 along with responses to each comment from Osisko Development. If an attachment was submitted as part of the comment, the attachment text has been included in table format to organize responses. Attachments as submitted is provided in Appendix A. A technical memo in response to Comment #14 is provided in Appendix B. Where reference is made to chapters or sections of the Application, readers can find it on the EAO EPIC website for the Cariboo Gold Project: <https://www.projects.eao.gov.bc.ca/p/5d40cc5b4cb2c7001b1336b8/project-details>.

## 2. PUBLIC COMMENTS AND RESPONSES

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### 2.1 #1 – Dave Jorgensen, CAC Member, Wells BC

#### 2.1.1 Comment

Attached is a review of Appendix 7.11-4 Visual Quality Effects Assessment. The assessment has a large number of serious shortfalls, including: Poor location of VQ stations. Use of Panoramic photos to distort distance and hide objects. Lack of orientation for the reader regarding visual items included. Lack of inclusion of significant visual impediments, such as emissions, power line corridors, buildings. Poor choice of seasonality which erroneously magnifies the value of deciduous vegetation in screening. In all, the document underplays the visual impact of the concentrator and its components on the residential and tourism industry. In addition, by failing to include the actions (trucks, dust, emissions) and the supporting road, bridge and equipment infrastructure the assessment gives a passive and unrealistic impression that the eye will rest on the natural landscape in general instead of the contrasting construction artifice and industrial motion that is associated with the mine and more likely to grab the attention of the viewer.

#### 2.1.2 Response

Thank you for your comments. Responses to your attachment are provided in the section below.

#### 2.1.3 Attachment – VQ Effects Assessment 7.11-4


Comments and responses from the attachment are provided in Table 2.1-1.

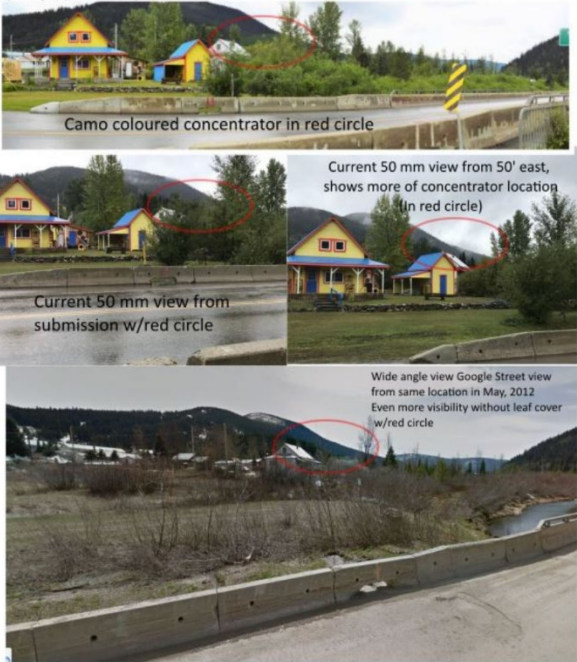
**Table 2.1-1 Comment #1 Attachment - Responses**

Number	Comment	Response
1-1	<p>Visual Assessment.</p> <p>There are a variety of shortcomings of the visual assessment. Building Colour: Selected colours make the assumption that the building can be disguised and that it is against a green or dark background. The reality is that this location receives snowfall 6 to 7 months of the year, so building colour would have to account for seasonal variations.</p>	<p>A complete Visual Assessment report was erroneously omitted from the draft Application and will be included in the revised Application. Visual assessment was provided for spring and summer viewing conditions when most viewers are anticipated to experience the landscape in the Visual Resources study area (e.g., recreational users and tourists).</p> <p>Mitigation measures to address visual effects including the colour of surface treatments to blend in with the natural surroundings will need to consider potential seasonal variations in visual character and visibility. Surface treatments have not been finalized and additional colour schemes will be assessed as required as part of the final design.</p>
1-2	<p>How will Osisko solve the problem of the building being highly visible?</p>	<p>Detailed mitigation measures to address visual effects include progressive reclamation of disturbed areas through re-vegetation by native grasses, trees and shrubs and the colour of surface treatments to blend in with the natural surroundings. Re-vegetation is anticipated to increase in its effectiveness as vegetation matures and would contribute to screening.</p>
1-3	<p>Can you add more VQ analysis of the building in Winter?</p>	<p>A complete Visual Assessment Report will be included in the revised Application which includes analysis of seasonal effects.</p>
1-4	<p>Can you add the power line and poles and sub station to the VQ?</p>	<p>Transmission lines are included in the visual assessment. Simulations are presented in Appendix 7.11-4 and detailed analysis will be provided in the Visual Assessment report that will be included in the revised Application.</p>
1-5	<p>Will there be emissions from the building?</p>	<p>Fugitive dust is discussed qualitatively in Section 7.11 Land and Resource Use. Air and dust emissions related to Project construction and operation are discussed in Section 7.2 Air Quality. During operations, the Project is not anticipated to result in substantial emissions from the Mine Site that would result in a visible plume beyond temporary dust from material handling. A Waste (Refuse and Emissions) Management Plan, which will include a Fugitive Dust Management Plan, will be developed prior to Project construction to manage and mitigate emissions.</p>
1-6	<p>Will there be lighting visible to the public?</p>	<p>Lighting is assessed and discussed in the Section 7.11 Land and Resource Use and a Lighting study to be included in the revised Application. It is anticipated that lights will be visible to the public from</p>

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Number	Comment	Response
		some viewing locations where a direct line of sight is possible (e.g., Highway 26 beside Jack of Clubs Lake).
1-7	<p>If there are steam, smoke, or other emissions how will Osisko mitigate the visual effect?</p> <p>This is an example of a similar sized building in a valley, but with emissions drawing attention to it.</p> 	<p>Fugitive dust is discussed qualitatively in the Section 7.11 Land and Resource Use. Air and dust emissions related to Project construction and operation are discussed in Section 7.2 Air Quality. During operations, the Project is not anticipated to result in substantial emissions from the Mine Site that would result in a visible plume beyond temporary dust from material handling. A Waste (Refuse and Emissions) Management Plan, which will include a Fugitive Dust Management Plan, will be developed prior to Project construction to manage and mitigate emissions. Furthermore, many of the proposed operations equipment and vehicles will be electric, minimizing emissions that may impact visual quality.</p>
1-8	<p>Pg 8 fig 3.0-3</p> <p>Pano taken from curb level. 50' from photographers left, and from the cab height of a pickup, there is a much better picture of the concentrator, with a clear view between the tree.</p> <p>(See sample photo)</p>	<p>Visual assessment was provided for spring and summer viewing conditions when most viewers are anticipated to experience the landscape in the Visual Resources study area (e.g., recreational users and tourists). A complete Visual Assessment report will be included in the revised Application which includes analysis of seasonal effects to evaluate seasonal differences arising from the degree of vegetative screening.</p> <p>Mitigation measures to address visual effects including the colour of surface treatments to blend in with the natural surroundings will need to consider the potential seasonal variations in visual character and will need to consider the potential seasonal variations in visibility. Surface treatments have not been finalized and additional colour schemes will be assessed as required as part of the final design, however the intent is to choose a colour scheme with the least visual impact in relation to the surrounding landscape.</p>

Number	Comment	Response
	 <p>Camo coloured concentrator in red circle</p> <p>Current 50 mm view from 50' east, shows more of concentrator location (in red circle)</p> <p>Current 50 mm view from submission w/red circle</p> <p>Wide angle view Google Street view from same location in May, 2012 Even more visibility without leaf cover w/red circle</p> <p>This image and all other VQ assessments took place at maximum foliage cover. Spring and Winter simulations would be useful, since 8 months of the year we do not have this much vegetation screening.(See May Google Earth street view) Also, consideration of building colour should include winter landscape(see photo below in April). Please redo this simulation in alternate seasons.</p>	<p>The Mine Site is surrounded by a mix of coniferous and deciduous vegetation species which would provide at least partial amount of screening year-round from most viewing angles where screening occurs. Visibility and prominence analysis of the Project from this location will be provided in the Visual Assessment report that will be included in the revised Application.</p>




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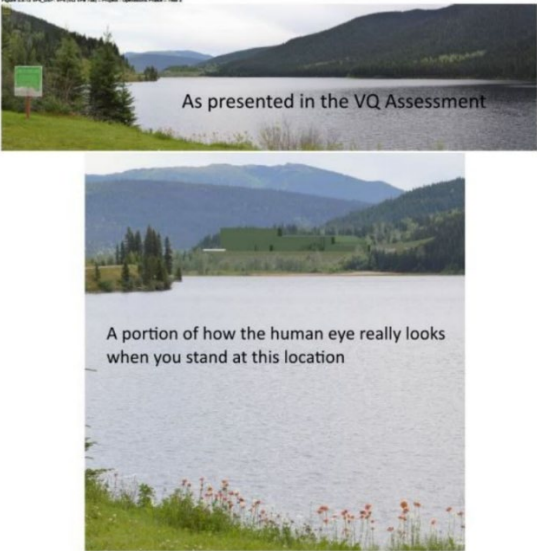
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Number	Comment	Response
	 <p>Feb 12 Hwy 26 Concentrator site in red</p> <p>March 24 ski trail behind Jack O Concentrator site in Red</p>	
1-9	<p>Page 10 fig 3.0-6 What construction does this figure show? It looks like a multi-storey building at the Aurum site near the museum.</p>	<p>This comment is referencing VP2 (Cow Mountain Trailhead) where the visible Project component is the water treatment plant, Mine site pad, and the Island Mountain Portal entrance. This is detailed in Table 7.11-9 of Section 7.11 Land and Resource Use (Sec. 7.11.4.4.6.1) and will be detailed in Visual Assessment report that will be included in the revised Application.</p>
1-10	<p>Page 12 fig 3.0-9 Where is the building visible in figure 3.0-6?</p>	<p>This comment is referencing VP3 (Burnette Ave) where the visible Project component is the transmission structures (i.e., pole and conductors), and the Island Mountain Portal entrance. This is detailed in Table 7.11-9 of Section 7.11 Land and Resource Use (Sec. 7.11.4.4.6.1) and will be detailed in Visual Assessment report that will be included in the revised Application.</p>
1-11	<p>Winter simulations would be useful, since 6 months of the year we do not have this much vegetation screening, and building colour will stand out against white landscape.</p>	<p>A complete Visual Assessment report was erroneously omitted from the draft Application and will be included in the revised Application. Mitigation measures in the Application to address visual effects including revegetation and surface treatment to blend in with the natural surroundings will need to consider the potential seasonal variations in visual character and visibility. Surface treatments have not been finalized and additional colour schemes will be assessed as required in the final design.</p>

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Number	Comment	Response
1-12	 <p data-bbox="226 597 953 683">Compare fig 3.0-6 with this pano photo from the same location in May. Much more of both the concentrator and the Aurum Adit are visible. Please account for this:</p>	<p data-bbox="1010 337 1793 578">The panorama provided is from Google Streetview which was captured in 2012. The images corresponds to VP3 (Burnette Ave) which was taken in 2019 and seems to show the maturation of young trees visible in the Google Streetview image and in Figure 6 of Appendix 7.11-4. There is the potential for increased seasonal visibility. Mitigation measures to address visual effects are identified in the Application including revegetation to blend in with the natural surroundings and will need to consider the potential seasonal variations in visual character and visibility.</p>
1-13	<p data-bbox="226 735 323 797">Page 14 fig 3.0-12</p> <p data-bbox="226 805 953 954">This is a perfect example of the inadequacy of VQ data. Although the wide angle shot accurately depicts the size of the building, the photo doesn't account for the human eyes ability to focus on the anomaly . (Note, for instance, the effect of the sign on the viewer...even in the submission.)</p>	<p data-bbox="1010 735 1793 914">The horizontal extent of panoramic images in Appendix 7.11-4 depicts the landscape context visible to viewers from key viewpoints. As indicated in Appendix 7.11-4, all photos were cropped to a width that represents the field of view which an observer can view in a single viewing direction (a horizontal viewing angle of between 100° and 120°) based on established visual simulations guidelines.</p>

Number	Comment	Response
	 <p>As presented in the VQ Assessment</p> <p>A portion of how the human eye really looks when you stand at this location</p>	
1-14	<p>Human Activity, emissions, dust, also not accounted for Winter simulations building colour will stand out against white landscape.</p> <p>Please indicate how you will mitigate these issues.</p>	<p>A complete Visual Assessment report was erroneously omitted from the draft Application and will be included in the revised Application. The analysis includes evaluation of visual disturbance during Construction, Operations, and Closure / Post-closure. Fugitive dust is discussed qualitatively in Section 7-11 Land and Resource Use. Air and dust emissions related to Project construction and operation are discussed in Section 7.2 Air Quality.</p> <p>Visual assessment was provided for spring and summer viewing conditions when most viewers are anticipated to experience the landscape in the Visual Resources study area (e.g., recreational users and tourists).</p> <p>Mitigation measures to address visual effects including the colour of surface treatments to blend in with the natural surroundings will need to consider to potential seasonal variations in visual character and visibility.</p>

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Number	Comment	Response
		Surface treatments have not be finalized and additional colour schemes will be assessed as required in the final design.
1-15	<p>Pg 16 fig 3.0-16 Should include power line and sub station. Some of the landscape has been cropped out of this photo for some reason(an entire mountain in the background behind the Taco stand): This viewpoint also includes the activity at the Aurum. Although it is difficult to include such a wide panorama in the image, the fact remains that viewers in the area of the visitor information center have a panoramic view. In Year 2, a person standing here would also view activities at the Aurum, the intersection and bridge at the hwy, access road activity as well as the water treatment tower, concentrator and ventilator shaft. Please also include a VQ from this location of the Aurum, Bridge, and power line. Will there be emissions in the visual field? This VQ assessment is inadequate, please provide more details.</p>	<p>This comment is referencing VP5 (Taco Stand) where the visible Project components include surface infrastructure (i.e., Services Building, Water Treatment Plant), transmission structures, and the Mine site pad. Review of the simulation presented in Appendix 7.11-4 confirms that transmission line components are visible and the substation is screened from this location. The horizontal extent of panoramic images in Appendix 7.11-4 were cropped to a width that represents the field of view which an observer can view in a single viewing direction (a horizontal viewing angle of between 100° and 120°) based on established visual simulations guidelines. Fugitive dust is discussed qualitatively in Section 7-11 Land and Resource Use. Air and dust emissions related to Project construction and operation are discussed in Section 7.2 Air Quality. During operations, the Project is not anticipated to result in substantial emissions from the Mine Site that would result in a visible plume beyond temporary dust from material handling. The Visual Quality assessment was completed as per standard and approved industry and ministry guidelines.</p>
1-16	<p>pg 18 fig 3.0-18 Also fails to include new intersection, power lines ascending the hill. The 69 kv line indicated in this photo is a 70' pole structure. More of these should be shown in the photo.</p>	<p>This comment is referencing VP6 (Highway 26 / Wells). As indicated in Appendix 7.11-2, surveyed viewpoints included a viewing location at the entrance to the Project access road (PID10 in Appendix 7.11-2) which is located beyond (southwest) of this viewing location and outside of the field of view represented in the simulation. The transmission structures and right-of-way clearing are visible within the simulation presented in Figure 13. Based on available information and sub-transmission design standards used for the modelling, the 69 kV transmission structures will be single wood poles or H-Frame structures of approximately 15 – 21 m in height, and will be located within a 35 m area of vegetation clearing.</p>

Number	Comment	Response
		
1-17	<p>The lawn-belt ascending the mountain doesn't have a top. I would like to see the rest of this powerline corridor from this location.</p> <p>In addition, the distortion from the wide angle view of this photo, makes the lawn-belt look under 35 deg, but in fact, this is currently almost a cliff. The distortion shrinks the truck(which in reality is only 150m from the viewer, and falsely moves the adit back from Pooley Street.</p>	<p>The extent of panoramic images in Appendix 7.11-4 were prepared for presentation on A3 paper size (i.e., 11 by 17) and cropped to represent the field of view which an observer can view in a single viewing direction (a horizontal viewing angle of approx. 100° and a vertical viewing angle of approx. 27°). The images were not designed for scaled viewing and are developed to support visual assessment and reporting. The view of VP6 is focused on the most prominent Project components visible at this location (i.e., Island Mountain Portal and Transmission route). It would be possible for up to 55° of vertical angle to be visible in a scaled simulation, which would include additional visibility of the right-of-way clearings and transmission structures. It's not expected that this would change the assessment results that identify the Project as dominant feature within the</p>

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Number	Comment	Response
		<p>landscape. Visual Contrast analysis of the Project from this location will be provided in the Visual Assessment report that will be included in the revised Application.</p>
<p>1-18</p>	<p>Assuming that the adit door is a minimum 10' tall, and that the benches are 20' tall the trees on the landscape are too big for year three. Below is an example of a nursery grown tree, transplanted as a large tree, and 21 years old. Despite being selected for hardiness by a local Quesnel nursery, and being planted in fertile soil in a protected location, it has only just attained the height of the trees (7 m) in the photograph.</p> 	<p>This comment is referencing VP6 (Highway 26 / Wells) and potentially other simulations with revegetation included in Appendix 7.11-4. Mitigation measures in the Application to address visual effects include revegetation to blend in with the natural surroundings. Modelling of revegetation is based on the potential sourcing of mature nursery stock and is estimated at approx. 6.5 m in height for Year 1 – 3 as represented in Appendix 7.11-4. Re-vegetation is anticipated to increase in its effectiveness as vegetation matures and would contribute to screening and is represented as approx. 18 m in height in images for Year 15 represented in Appendix 7.11-4. Long-term effectiveness of revegetation and visual impacts are further addressed by the development of monitoring and management procedures for reclamation activities to address potential visual effects over the life of mine and post-closure (see LRU Sec. 7.11.5.1.2.2.)</p>
<p>1-19</p>	<p>At best, the trees in the VQ example will have been in the ground for 2 years. Can you confirm that that there are about 500 trees in fig 3.0-18?</p>	<p>Simulations included in Appendix 7.11-4 are developed based on available conceptual design information and assumptions (general species, priority planting areas, etc.) to provide a representation of the potential visual extent and characteristics of Project components within the existing landscape. They are intended to support the assessment of potential visual impacts and the identification of appropriate mitigations and follow up programs as part of the Project Application process.</p>

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		<p>Detailed landscape design including elements such as soil handling, species mix, planting prescription, and maintenance will be need to be completed as part of the final Project design.</p> <p>As indicated in Section 7.11 Land and Resource Use, Section 7.11.5.1.2.2, Osisko Development has undertaken efforts to communicate the design and appearance for the Mine Site with stakeholders. On-going discussions will be organized with the community of Wells, as well as potentially affected residents, stakeholders and Indigenous nations, to address potential effects on the local landscape and the viewing experience.</p> <p>The exact number of trees indicated in Figure 3.0-18 is unknown, however, tree selection, spacing and siting have been controlled to represent a reasonable depiction of the landscape.</p>
1-20	<p>Will you be benching each terrace with fertile topsoil?            What is the estimated height and depth of each bench?            What is the approximate slope angle of the power line right of way?            Can you show the right of way where it turns and runs across the mtn?            How do you anticipate achieving these spectacular results with planting as shown in the VQ?</p>	<p>Simulations included in Appendix 7.11-4 are developed based on available conceptual design information and assumptions (general species, priority planting areas, etc.) to provide a representation of the potential visual extent and characteristics of Project components within the existing landscape. They are intended to support the assessment of potential visual impacts and the identification of appropriate mitigations and/or follow up programs as part of the Project Application process.</p> <p>Detailed landscape design including elements such as terrace benching, bench height and depth, slope angle, as well as, species mix, planting prescription, and maintenance will be need to be completed as part of the final Project design.</p> <p>As indicated in Section 7.11 Land and Resource Use, Section 7.11.5.1.2.2, Osisko Development has undertaken efforts to communicate the design and appearance for the Mine Site with stakeholders. On-going discussions will be organized with the community of Wells, as well as potentially affected residents, stakeholders and Indigenous nations, to address potential effects on the local landscape and the viewing experience.</p>
1-21	<p>GENERALLY SPEAKING:            All overhead figures(such as 3.0-7, 13, 18) should at least show all the items the VA is trying to</p>	<p>A complete Visual Assessment report was erroneously omitted from the draft Application and will be included in the revised Application. The analysis includes a description of the landscape modelling process and data sources, and an illustration of modelled features. The modelling</p>

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	include. The concentrator is drawn on these aerial maps, and the camp, but not the second, (and third?) large buildings illustrated in fig 3.0-9 and fig 3.0-15, That would be useful to help the viewer orient themselves to the projections. In addition, it would be useful to include the 80,000 white propane tanks and infrastructure at the ventilator, or substation.	included all major Project components such as landform modifications, vegetation clearing and proposed planting, and built features to be located on the terrain at the Mine Site and along the Transmission Line Route.
1-22	PLEASE ADD MORE VQ ASSESSMENT STATIONS	As indicated in Appendix 7.11-2, almost 50 locations were surveyed as part of the visual inventory process to gain an on-the-ground familiarity with the potential visible area of the Project from an observer's perspective and to gather photographic images. From this, a representative group of key viewpoints were selected from a variety of viewing angles and distances, and types of land use sites (e.g., residents, roads, recreation sites, etc.). Selection of viewpoints was based on established viewpoint identification criteria (see LRU Sec. 7.11.3.3.3 and Appendix 7.11-2) and best practices.  A complete Visual Assessment report was erroneously omitted from the draft Application and will be included in the revised Application. This report include details about viewpoint selection.
1-23	<b>#1 VQ STATION</b> For 2 km in length, (the 1 mile bridge to West Pooley street) the entire Island Mountain will be in view to westbound traffic. Can we see a visual mockup take from near the 1 mile bridge that includes all the visual impacts current and proposed, including the 2 power corridors, ventilator shafts, current and future drill pads and roads?	Although there are numerous locations across the landscape where the Project may be visible, the key viewpoints selected for the visual assessment aim to provide a representative sample to understand the potential visual effects of the Project from a variety of viewing angles and distances, and types of land use sites (e.g., residents, roads, recreation sites, etc.).  The Island Mountain Portal is the focus of VP6 (Highway 26 / Wells) where the Project was identified as a dominant feature within the landscape.
1-24	If a particular mine asset is hidden, it would be helpful to have that labelled so that we know it has been included and is screened.	Acknowledged. Where possible, and applicable, Figures may be updated to add such labels in the revised Application.



Number	Comment	Response
		
<p>1-25</p>	<p><b>#2 VQ STATION</b></p> <p>For 1 km from the Recycle Depot to the new proposed 4 way, the viewscape includes the entire panorama of disturbed site on the B road, the Concentrator Area, the Aurum Adit and the Power infrastructure.</p>  <p><b>Traveller's viewscape:</b>  <b>Concentrator, Aurum Adit, Two power line corridors,</b>  <b>Not shown: B road to left of concentrator</b></p> <p>Given that it is impossible to recreate the human experience with a pano this large, I would like to see an aerial shot of these components, and then panos of each of them in succession, so we could imagine the working environment of the mine from the town.</p> <p>One suggested location would be the high traffic location at the corner of Camel Drive.</p>	<p>Although there are numerous locations across the landscape where the Project may be visible, the key viewpoints selected for the visual assessment aim to provide a representative sample to understand the potential visual effects of the Project from a variety of viewing angles and distances, and types of land use sites (e.g., residents, roads, recreation sites, etc.).</p> <p>The selection of viewpoints was based on established viewpoint identification criteria (see Section 7.11 Land and Resource Use, Sec. 7.11.3.3.3 and Appendix 7.11-2) and best practices. This includes viewpoints that provided the least obstructed views where possible.</p>
<p>1-26</p>	<p><b>#3 VQ STATION</b></p>	<p>VP3 (Burnette Ave) is located 350m west from the proposed location.</p>

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	<p data-bbox="226 337 961 391">A third location should be done from East Pooley Street in front of the old Jack O Clubs Hotel.</p> 	<p data-bbox="1012 337 1787 513">Although there are numerous locations across the landscape where the Project may be visible, the key viewpoints selected for the visual assessment aim to provide a representative sample to understand the potential visual effects of the Project from a variety of viewing angles and distances, and types of land use sites (e.g., residents, roads, recreation sites, etc.).</p> <p data-bbox="1012 558 1734 670">The selection of viewpoints was based on established viewpoint identification criteria (see Section 7.11 Land and Resource Use Sec. 7.11.3.3.3 and Appendix 7.11-2) and best practices. This includes viewpoints that provided the least obstructed views where possible.</p>

## 2.2 #2 - John Irving, C.F.O. Sims Group of Companies, Prince George, B.C.

### 2.2.1 Comment

Our company has been working on the BGM property in Wells since 2002. Over the years we have done contract underground and open pit mine construction and civil construction at Wells and the QR mill site. We currently provide camp accommodation in Wells for other contractors employed by BGM. Our experience has been generally favourable. We believe that the area will benefit from the activities of BGM. At times in the past Wells has had a population of in excess of 3000 people when there were active mines in the area. In the winter of 2013 when we acquired the motel for accommodation there were 218 winter residents in Wells with more people during the summer months. Sure, there will be some times when the economic activity of the mine development may inconvenience people, or displace tourist activity, but in the longer term we believe the area will benefit from the mine development. John Irving C.F.O. Sims Group of companies.

### 2.2.2 Response

Thank you for your comments and ongoing support of the Project. The Project is expected to employ 459 people in full-time positions with 75% of the people hired from the Cariboo region. Osisko Development has a Sustainable Workforce Initiative to train workers for the Project, and other mining opportunities in the region.

## 2.3 #3 - Anonymous

### 2.3.1 Comment

Benefits of Municipal tax revenue. Re Chapter 7.10 Employment and Economy. Osisko claims that the tax revenue impact is very high for municipalities. The inflated do not seem like a reasonable expectation. Table 7.10-41 describes total economic impact of the Cariboo Gold Project. Osisko/KPMG estimates that municipal tax revenue over the 20 year project will be \$36 million. It is not clear from the description that follows, exactly how they could come up with such an inflated figure. In the public meeting of Sept 22, Osisko revealed that their current tax contribution to the municipal land tax was approximately \$60,000. Of that amount, approximately 45% is collected by the municipality on behalf of hospital/police/school/CRD/Province. As a result, only about 55% or \$33,000 was raised by the municipality for the municipal budget. If Osisko was able to build 50 new houses to add to the tax base, and according to Table 7.10-28 (average tax rate by municipality) total municipal tax revenue could increase by approximately \$40,000 after provincial fees are removed. If property values were to increase, (which is debatable given the impact of the project on the quality of life) and taxes were to double over time, municipal income from taxation could rise to not more than \$150,000/yr. Assuming that new home construction, increases in land value grow over time, the best case scenario is that about \$2 million in Municipal taxes in Wells could be raised over 20

years. If Osisko caused the construction and property development of 200 extra homes throughout the Cariboo region, then it's conceivable that total regional municipal income could increase by another \$200,000/year or \$4 million/life of project as a best case scenario. There does not seem to be a proper explanation in this document regarding how the figures used by Osisko were derived. What rationale does Osisko use to credit an additional \$30 million in supposed tax revenue to the municipalities of the Cariboo? How much of the revenue does Osisko forecast would be directly attributable to the Wells municipal tax base?

### 2.3.2 Response

Section 7.10 Employment and Economy, Table 7.10-41 includes the total estimates of economic impacts of the Cariboo Gold Project (Direct, Indirect and Induced) based on results from BC Stats' Input-Output (I-O) model. The results of I-O Model run shows that tax revenues are estimated to reach \$694 million for the government of BC, \$483 million for the government of Canada and \$36 million for municipal governments over the Project life.

The estimate of \$36 million in municipal taxes includes \$2.9 million during exploration, \$4.8 million during construction and \$28 million during operations. Each of which includes direct, indirect and induced taxes.

These estimates are based on the project costs provided by Osisko Development and detailed in the Preliminary Economic Assessment financial modelling (NI 43-101 Technical Report, effective as of April 2020). It is noted that estimates of economic impacts could vary upwards or downwards depending on actual investment/spending figures, on actual investment/spending structure, as well as the actual location of employees and suppliers.

According to the Government of BC, the BC Input-Output Model (BCIOM) is used to generate regional economic dependency figures, as well as employment and revenue multipliers. It can also be used to assess the regional impact of various projects and economic events. It is part of the EAO regulatory requirements. Here are some helpful definitions within the BCIOM and which are relevant to this discussion:

**Direct impact:** The direct impact measures the impact on BC industries supplying goods and services directly used by the project. For example, direct impacts for a typical construction project would include impacts in industries supplying cement, lumber, or engineering.

**Indirect impact:** The indirect (supplier industry) impact measures the impact on BC industries that are further back in the supply chain. The indirect impact is cumulative, and includes transactions going all the way back to the beginning of the supply chain. Indirect impacts for a typical construction project would include impacts in industries supplying a wide range of goods and services, such as janitorial services, accounting, transportation, logging, and mining.

**Induced impact:** The induced impact measures the effect that spending by workers (those employed by the project, or by direct and indirect supplier industries) has on the economy.

Induced impacts for a typical construction project would include impacts in industries that sell goods and services to consumers, such as retailers, food services, accommodations, etc.

**Estimates of Tax Revenues:** The model also generates estimates of tax revenues associated with a change in demand for one or more commodities, or a change in the output of an industry. These tax revenue estimates include personal and corporate income taxes, as well as taxes on commodities. There are 19 different tax types which potentially are paid on each of the 492 commodities. Although the structure of the model is based on 2017 data, tax revenue and employment estimates generated by the model are based on more up-to-date information. Tax revenue estimates reflect the current tax structure and existing tax rates. Employment estimates generated by the model are calculated using information on average earnings in 2020.

Source: About the B.C. Input-Output Model - Province of British Columbia (gov.bc.ca)

## 2.4 #4 - Shawn Nicholls, Manager, Cariboo Propane Ltd, Quesnel

### 2.4.1 Comment

We have been working with BGM for many years supplying them with propane to different sites in and around the Wells area. Their policies and enforcement of safety protocols is second to none which is re-ensuring for our staff when going on site. This project will be great for not only Wells but the surrounding area by creating jobs for individuals and contractors. BGM is big on supporting local small business which is great for this area especially during the pandemic. We are a huge supporter of BGM and this project.

### 2.4.2 Response

Thank you for your comments and ongoing support of the Project. Osisko Development commits to partnering with local businesses to supply goods and services, creating economic potential in the region, where it has the most effect. Osisko Development aims to hire 75% or more of its workforce from the region.

## 2.5 #5 - Dave Jorgenson CAC member, Wells, BC

### 2.5.1 Comment

TRAFFIC IMPACT ASSESSMENT REVIEW Appendix .0-9\_Traffic Impact Assessment

Please see the attached PDF document for a complete description of my concerns with this 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. Dave Jorgenson CAC member.

### 2.5.2 Response

The traffic study analyzed the worst-case scenario for the construction and operation phases. Capacity analysis was completed for day-to-day operations and during shift changes. The analysis completed for the shift changes/turnover identify the maximum possible impacts on traffic operations at key intersections due to the Cariboo Gold Project. Key intersections are expected to operate at Level of Service (LOS) A (<10s delays) at the peak hour during shift changes. This means that during all other hours and all other scenarios with less staff, the impacts on traffic on the road are even lower. The intersections also have significant available capacity to handle any potential fluctuations in traffic volumes prior to reaching significant delays.

The Level of Service (LOS) of a two-lane undivided rural highway depends on traffic volumes, the terrain, truck traffic, and passing opportunities. Based on the Highway Capacity Manual (an industry standard and approved guideline), a rural two-lane highway in rolling terrain with high truck traffic can support up to 13,900 vehicle per day prior to experiencing some platooning (LOS B). A review of the 2017 (August and September) historical traffic counts on Highway 26, conducted by BC Ministry of Highways and Infrastructure (MoTI), indicates that the traffic volumes on Highway 26 were approximately 800 vehicle per day in both directions. In addition, there are climbing lanes provided along Highway 26 to minimize any delays and platooning by allowing faster moving vehicles to safely pass slow moving vehicles/trucks on the inside lane. With the low traffic demand and provisions of climbing lanes along Highway 26, it can be concluded that the highway is operating well below its capacity and has minimal delays, if any.

Overall, when considering the additional traffic generated by future development, it is important to take into account the current and available capacity the existing roadway/intersections have to support the additional traffic volumes. Based on the current traffic demand on Highway 26, it

is anticipated that the addition of traffic from the Cariboo Gold Project will have minimal impacts on the highway and key intersections as they are operating well below their capacity.

### 2.5.3 Attachment – EPIC - Traffic Study Assessment

Comments and responses from the attachment are provided in Table 2.5-1.

Table 2.5-1 Comment #5 Attachment - Responses

Number	Comment	Response
5-1	<p>Appendix 1.0-9_Traffic Impact Assessment</p> <p>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.</p> <p>Specifically there is no traffic data regarding traffic moving through and around the community:</p> <ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>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'.</li> </ol> <p>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.</p>	<p>The access point to the Mine Site was specifically selected west of Wells to ensure that there will be minimal, if any, traffic entering the community. The traffic study analyzed impacts on the intersection at the mine access point as well as Pooley Street West as these intersections will experience the most impacts, if any, due to Cariboo Gold Project. As there will be minimal mine traffic going through the community, a traffic study though the community is not necessary.</p> <ol style="list-style-type: none"> <li>1. Truck traffic including waste rock trucks will not utilize the public roadways in Wells west of the mine sites. Mine-related traffic will turn into the Mine Site at the bypass, which is located before the community of Wells. Mine traffic, including all waste rock trucks, between the Mine Site Complex and Bonanza Ledge will be on the Mine Access Roads. Figure 1.1-3 in Chapter 1.0 Project Overview – Cariboo Gold Project (July 2021) shows that B Road does not connect to Wells residential areas.</li> <li>2. Workers will be staying in the camp accommodation and not the local hotel accommodation. Workers who live in Wells will travel to their work location, as happens now for current activities. The study focused on the worst case scenario (described below). It is important to note that construction activities will slowly ramp up in 2022 (Early Work targeted to start in Q4/2022), reach its peak in 2023 and begin to taper down in 2024 as the mine begins operations. As such, the maximum 250 workers is not expected to be on site from day 1 at the beginning of the construction phase. It is expected that Early Work will require 25% of manpower working over 2 shifts or 32 workers per shift. During construction period, the traffic study analyzed the peak construction activities, 250 workers maximum on Wells sites and 23 at the mill working over 2 shifts, for the worst case scenario. By analyzing the worst case scenario (during shift change where all staff were assumed to enter / exit the site at the same time), the traffic study assessed the maximum possible impacts at key intersections. Key intersections are expected to operate at LOS A (less than 10s delays). This means that in all other scenarios or different time of day with less demand from the sites, traffic on the roadways will experience even less delays. The intersections</li> </ol>



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Number	Comment	Response
		<p>also has significant available capacity to handle any potential fluctuations in traffic volumes prior to reaching significant delays.</p> <ol style="list-style-type: none"> <li>3. The 273 positions identified include all workers needed to complete the project include management, admins, human resources, health and safety, contractors, technical staff, etc.).</li> <li>4. Exploration traffic has been captured in the data collected for the traffic study. As such, the traffic study has built-in exploration related traffic in the baseline conditions analysis. It is important to note that there were additional exploration activities occurred in August 2021 to meet milestones. However, exploration activities are expected to be reduced substantially during the Cariboo Gold Project peak construction and operation phases. During operations exploration activities will be underground.</li> <li>5. Exploration traffic has been captured in the data collected for the traffic study. As such, the traffic study has built-in exploration related traffic in the baseline conditions analysis.</li> </ol>
5-2	<p>Furthermore: Section 1.1.1 Construction</p> <p>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.</p> <p>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.</p>	<p>It is important to note that construction activities will slowly ramp up in 2022 (Early Work targeted to start in Q4/2022), reach its peak in 2023 and begin to taper down in 2024 as the mine begins operations. As such, the maximum 250 workers is not expected to be on site from day 1 at the beginning of the construction phase. It is expected that Early Work will require 25% of manpower working over 2 shifts or 32 workers per shift. Details pertaining to Project phases and Project Schedule are provided in Section 1.5 of Chapter 1 of the Application.</p> <p>In addition, to minimize impacts on the community, construction of the camp has been prioritized to ensure that when construction has reached its peak, the traffic-related impacts due to workers are significantly reduced by providing on-site accommodations. By prioritizing the construction of the camp, any potential traffic impacts due to construction of the Project is largely restricted to the Early Work stage (while the accommodations at the Mine Site are under construction) and not the full 1 year of the Construction Phase.</p> <p>It is important to note that while 250 workers are expected when construction has reached its peak, these are the total workforce for two shifts. In addition, the traffic study analyzed the maximum impacts at key intersections during the shift change of those 250 workers and have found that the intersections are expected to operate at LOS A (&lt;10s delays).</p>

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5-3	<p>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.</p>	<p>Truck traffic will not utilize the public roadways in Wells. The access point to the Mine Site was specifically selected west of Wells to ensure that there will be minimal, if any, traffic entering the community.</p> <p>Truck deliveries are expected once or every 2 weeks. The number of deliveries were determined based on the requirements for this specific site. The study already assumed the worst case that these trucks will make deliveries on the same day for maximum impacts.</p> <p>The number of trucks delivering consumables was determined based on the needs for this site specifically. Truck delivering consumables will not enter the community. Truck traffic will enter the site traveling eastbound on Highway 26 and make right-turn movements at the site access (west of Wells) or exit the site access and turn left traveling westbound on Highway 26.</p>
5-4	<p>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.</p>	<p>All surface infrastructure for the Project will be located on the Project footprint. The footprint for the Mine Site is shown in Chapter 1 Project Overview, Figure 1.4-2.</p>
5-5	<p>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.</p>	<p>Exploration traffic has been captured in the data collected for the traffic study. As such, the traffic study has built-in exploration related traffic in the baseline conditions analysis. It is important to note that there were additional exploration activities occurred in August 2021 to meet milestones. However, exploration activities are expected to be reduced substantially during the Cariboo peak construction and production phases.</p>
5-6	<p>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.</p> <p>The Bulk Sample project will generate additional ore truck traffic through Wells which was not anticipated at the time of the traffic study.</p>	<p>The Cow Mountain Bulk Sample is not part of the Cariboo Gold Project. It is understood that there will be minimal additional staff for the Cow Mountain Bulk Sample work, if any, as the work will be handled by the current operations staff.</p> <p>The workers for the construction of the roads are accounted as part of the 250 workers in the construction phase.</p> <p>The access road from the bypass at Highway 26 to the Mine Site is a priority for Early Works (called the Camp Access Road in Figure 1.4-2)</p>

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	<p>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.</p> <p>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.</p> <p>How will this add to existing traffic for the exploration program?</p>	<p>Construction equipment will arrive along Highway 26 and then access the Mine Site along the Camp Access Road.</p>
5-7	<p>1.1.2 Operations, This study predicts 25 concentrate trucks per day=50 trips</p> <p>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?</p> <p>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.</p> <p>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.</p>	<p>To ensure there are minimal impacts on the community, Osisko is open to working with Wells residents on selecting the appropriate schedules for the ore deliveries.</p> <p>A review of the 2017 (August and September) historical traffic counts on Highway 26, conducted by BC Ministry of Highways and Infrastructure (MoTI), indicates that the traffic volumes on Highway 26 were approximately 800 vehicles per day in both directions or 400 per direction. The maximum one hour traffic volumes on Highway 26 were 80 vehicle per hour in both directions. This means that there is approximately 1 vehicle per minute on Highway 26 on the busiest one hour of the day while the remaining 23 hours experience even less traffic volumes. While the Cariboo Gold Project will add traffic to the existing highway, it is important to take into account the current and available capacity of the highway to support additional traffic demand. Even with the additional traffic from the Project, the highway will still operate well below its capacity.</p> <p>In addition, there are existing passing/climbing lanes along Highway 26 between Wells and Quesnel. The provision of the passing/climbing lanes ensure that there are minimal delays and platooning by allowing faster moving vehicles to safely pass slow moving vehicles/trucks on the inside lane.</p>
5-8	<p>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</p>	<p>Mine traffic between the Mine Site Complex and Bonanza Ledge will be on the Mine Access Roads as shown on Figure 1.1-3 in Chapter 1 – Project Overview of the Application.</p> <p>The route is along existing access at the current ODV site, and then up the B-Road. The route does not travel into a residential area along Ski Hill Drive.</p>

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	<p>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.</p>	<p>The scope of the Traffic Study was to determine Project impacts on Highway 26. Traffic between the Mine Site Complex and the Waste Rock Storage Facility at Bonanza Ledge was outside of the scope of the Traffic Study, as no public access will be on this route.</p> <p>Regular road maintenance will be part of Project activities.</p> <p>Our simulations showed that we need three Sandvik Z50 Electrical Truck. They will haul between 600,000 to 800,000 tonnes per year of waste material. It should be noted that part of the waste generated from ore sorting and development will return underground as cemented rockfill.</p> <p>The average need shows that the Project requires 2.5 trucks for hauling waste full time. For 600,000 tonnes per year of waste the Project requires two trucks for a total of 33 trips per day (17 trips per truck per shift). A trip is from the Services Building to the Waste Rock Storage Facility and back. For 800,000 tonnes per year of waste it is three trucks for a total of 44 trips (15 trips per truck per day).</p>
5-9	<p>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.</p> <p>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?</p>	<p>A separate access road will not be constructed to connect the workers camp to the community. There is existing access past the ODV office to the core farm, where the camp will be located. This area is part of the Project Footprint. This existing access along with the B-Road will be upgraded to haul waste rock to the Waste Rock Storage Facility at Bonanza Ledge. This route was chosen as it was on existing roads and was setback from the community.</p> <p>The bridge over Lowhee Creek will support trucks hauling waste rock from the Services Building to the Waste Rock Storage Facility at the Bonanza Ledge Site.</p>
5-10	<p>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</p>	<p>There is no alternative camp access road proposed for the Project.</p> <p>It is important to note that construction activities will slowly ramp up in 2022 (Early Work target to start in Q4/2022), reach its peak in 2023 and begin to taper down in 2024 as the mine begins operations. As such, the maximum 250 workers is not expected to be on site from day 1 at the beginning of the construction phase. It is expected that Early Work will require 25% of manpower working over 2 shifts or 32 workers per shift. In addition, to minimize impacts on the community, construction of the camp has been prioritized to ensure that when construction has reached its</p>

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	oversight, and mitigate the un-intended effects of this design change announced on September 22, 2021?	peak, the traffic-related impacts due to workers are significantly reduced by providing on-site accommodations. By prioritizing the construction of the camp, any potential traffic impacts due to construction of the Project is largely restricted to the Early Work stage (while the accommodations at the Mine Site are under construction) and not the full 1 year of the Construction Phase.
5-11	<p>Section 4.1:</p> <p>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.</p>	<p>Traffic growth are typically due to population and development growth. As such, using the Highway 97 growth rates is a conservative assumption as it is likely that there are more growth along Highway 97 due population, developments and the connectivity of Highway 97 to other municipalities while Hwy 26 ends at Barkerville.</p> <p>When considering the additional traffic generated by future development, it is important to take into account the current and available capacity the existing roadway/intersections have to support the additional traffic volumes. Current annual average daily traffic volumes on Highway 26 are 1,000 vehicle per day or less. Based on the Highway Capacity Manual (an industry standard and guidelines), a rural two-lane highway in rolling terrain with high truck traffic can support up to 13,900 vehicle per day prior to experiencing some platooning (LOS B). This means that Highway 26 is operating at well below its capacity (10% of the capacity prior to reaching LOSB) even without taking into consideration the additional capacity provided from the climbing lanes by allowing faster moving vehicles to safely pass slow moving vehicles/trucks on the inside lane.</p>
5-12	<p>PREDICTED PEAK TRAFFIC HOURS:</p> <p>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.</p>	<p>The traffic study analyzed the traffic impacts at the maximum volumes generated by the development. In doing so, the maximum possible impacts on traffic operations due to the development were identified. Key intersections are expected to operate at LOS A (less than 10s delays). This means that in all other scenarios or different time of day with less demand from the sites, traffic on the roadways will experience even less delays. The intersections also have significant available capacity to handle any potential fluctuations in traffic volumes prior to reaching significant delays.</p> <p>Section 7.2 Air Quality addresses Project effects due to dust and Section 7.3 Acoustic addresses Project effects due to noise.</p>

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5-13	<p>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.</p>	<p>The access point to the Mine Site was specifically selected west of Wells to ensure that there will be minimal, if any, traffic entering the community. The traffic study analyzed impacts on the intersection at the mine access point as well as Pooley Street West as these intersections will experience the most impacts, if any, due to the Project. As there will be minimal mine traffic going through the community, a traffic study though the community is not necessary.</p>
5-14	<p>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.</p>	<p>It is expected that Early Works will require 25% of manpower working over 2 shifts or 32 workers per shift. In addition, to minimize impacts on the community, construction of the camp has been prioritized to ensure that when construction has reached its peak, the traffic-related impacts due to workers are significantly reduced by providing on-site accommodations. By prioritizing the construction of the camp, any potential traffic impacts due to construction of the Project is largely restricted to the Early Work stage (while the accommodations at the Mine Site are under construction) and not the full 1 year of the Construction Phase.</p> <p>Mine-related traffic will turn into the Mine Site without entering the community of Wells. Mine traffic between the Mine Site Complex and Bonanza Ledge will be on the Mine Access Roads as shown on Figure 1.1-3 in Chapter 1 – Project Overview of the Application.</p> <p>Section 7.2 Air Quality addresses Project effects due to dust and Section 7.3 Acoustic addresses Project effects due to noise.</p>
5-15	<p>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.</p> <p>In addition putting the mine at the Alternative Cow site means:</p> <ul style="list-style-type: none"> <li>during the construction phase, zero worker traffic would occur across the hwy to the Aurum Portal,</li> </ul>	<p>The scope of the Traffic Study was to identify the effects of the Project as proposed and described in Chapter 1 – Project Overview.</p> <p>The Traffic Study was completed by a Professional Engineer who specializes in Transportation Planning. The study followed standard methodology and used data supplied by the Ministry of Transportation and Infrastructure. A traffic count was completed to collect baseline traffic information.</p>

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Number	Comment	Response
	<ul style="list-style-type: none"><li>• Exploration traffic could reach the minesite from the existing A road, 5 km west of Wells, instead of traveling through Wells, and</li><li>• during the 16 year operational phase Waste Rock traffic would be eliminated from the town. Also,</li><li>• 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.</li></ul>	

## 2.6 #6 - Trent Bilodeau, Prince George BC

### 2.6.1 Comment

Our company, Star West Petroleum, has been the exclusive fuel supplier to the BGM project for the last 6 years. We are locally owned and operated and employ 40 people throughout our company. We have a strong, respectful partnership with the Lhtako Dené Nation also. We also have lubricants distribution agreement with the Taylor Supplies group in Quesnel BC which supplies the BGM project with our Phillips 66 Lubricants. We have always found the BGM group works in respectful manner with the local Wells community and is has insured engagement with our company to insure we are mitigating our environmental footprint

### 2.6.2 Response

Thank you for your comments and ongoing support of the Project. Osisko Development commits to partnering with local businesses to supply a proportion of its goods and services, creating economic potential in the region during construction, operations, and closure phases. Osisko Development aims to hire 75% or more of its workforce from the Cariboo region.

## 2.7 #7 - Francis Chachula, Quesnel BC

### 2.7.1 Comment

Quadra Chemicals has local representation in the city of Quesnel that directly supports the mining operations in BC and the Cariboo region. Barkerville Gold has committed to safe environmental practice and will mine in a sustainable manner that will create very good long term careers in our area. The economic benefit of mining operations in our area will help to diversify our economy and provide a significant amount of spin off benefits for the Cariboo and BC. As a supplier to BGM we have worked with the operation to ensure products are delivered safely and efficiently. Osisko has a long term plan that will turn the Cariboo project into a world class operation.

### 2.7.2 Response

Thank you for your comments and ongoing support of the Project. ODV will continue creating economic potential in the region, adding employment opportunities by partnering with local businesses to purchase a proportion of its goods and services during construction, operations, and closure. Osisko Development has committed to developing a local procurement policy for the Project. Osisko Development will develop and implement a local hire policy and work with local service providers to provide training opportunities for local residents.



## 2.8 #8 - jar transport ltd, quesnel bc

### 2.8.1 Comment

this project so far has added number of jobs in our area...my own company has had to put on a full time person...they are very diligant in all the rules and regulations

### 2.8.2 Response

Thank you for your comments and ongoing support of the Project. ODV is committed to creating economic potential in the region, adding employment opportunities by partnering with local businesses. ODV aims to hire 75% or more of its workforce from the region.

## 2.9 #9 - Anonymous / CAC Member, Wells, BC

### 2.9.1 Comment

I'm concerned to what extent Osisko can be trusted to mitigate the negative effects of the Cariboo Gold Project as proposed, given the company's track record during the Exploration phase in Wells, in particular drilling noise. I'm also concerned to what extent their activities will be monitored and applicable regulations will be enforced by regulatory agencies. More information in the attachment.

### 2.9.2 Response

Osisko Development recognizes that there have been concerns raised in the community regarding noise related to the on-going Exploration program. Concerns raised regarding the Exploration program are being addressed and are outside of the scope of this environmental assessment.

As part of the environmental assessment (EA) process, the BC Environmental Assessment Office (EAO) will develop a draft EA certificate (EAC) which will contain legally binding conditions that Osisko Development must follow for the life of the Project, should the certificate be issued. Some of the conditions are procedural requirements common to all certified projects; others are project-specific and intended to prevent or reduce adverse impacts. Failure to comply with the EAC may result in a non-compliance order and may result in enforcement action. Further information on the EAC can be found in the *Environmental Assessment Certificate Policy* (EAO 2021a).

The EAO has a compliance and enforcement branch which conducts inspections, complaint reviews, investigations and enforcement to support oversight of EA projects. Information on compliance and enforcement of EA projects can be found in the *Compliance and Enforcement Policy and Procedures* (EAO 2020). Additional information on compliance and enforcement can be found on the EAO's website: <https://www2.gov.bc.ca/gov/content/environment/natural-resource-stewardship/environmental-assessments/compliance-and-enforcement>.

In addition to the EAC, the Project will require approvals from regulatory agencies as outlined in the *Regulatory Coordination Plan for the Cariboo Gold Project* (EAO 2021b) and also described in Chapter 2, Section 2.5 of the Application. The Project will require numerous permits and approvals before construction can start. Regulatory agencies, such as the Ministry of Energy, Mines and Low Carbon Innovation, also conduct regular inspections to ensure that permit holders are meeting the requirements of their approvals.

### 2.9.3 Attachment – Public-comment\_drill-noise\_Wells

Comments and responses from the attachment are provided in Table 2.9-1.

Table 2.9-1 Comment #9 Attachment - Responses

Number	Comment	Response
9-1	<p>In the past couple of months, Osisko/BGM has received complaints about constant and relentless noise from 24-hour exploration drills on mountains adjacent to Wells, affecting residents' quality of life in a town where quiet is valued. Without redress to date.</p> <p>Osisko was asked about about drilling noise at the Cariboo Gold Project's EA Virtual Open House on Sept. 23, 2021, during a written q. and a. period:</p> <p>a) 'ODV/BGM has ca.11 exploration drills around Wells now which means drilling noise 24/7 in Wells.</p> <p>This contravenes the Wells Noise Bylaw which calls for quiet from 10 pm – 7 am. If you're not honouring the Wells Noise Bylaw, how do we have any confidence you'll honour other assurances you're making in your mine application?'</p>	<p>Osisko Development recognizes that there have been concerns raised in the community regarding noise related to the on-going Exploration program. Osisko Development takes these concerns seriously and has taken steps to ensure that the exploration program is being undertaken in accordance with the approved Notice of Work, which was issued to Osisko Development on September 27, 2021. The Notice of Work has been issued through a regulatory process that is separate and distinct from the environmental assessment for the Cariboo Gold Project. As a result, concerns relating to the exploration program are not within the scope of the environmental assessment for the Cariboo Gold Project.</p>
9-2	<p>Similarly:</p> <p>b) 'Can you tell us how we can trust the information that you are telling us today, when your Explorations group is not honouring the rights and following the law, within the District already?'</p>	<p>Osisko Development would have to comply with the conditions as set out in the Environmental Assessment Certificate (EAC), if issued, which is a legally binding document. Osisko Development would also have to comply with the requirements set out in all permits and approvals obtained to construct and operate the Project. Failure to do so may result in enforcement taken against Osisko Development by government regulators, including the EAO and permitting agencies.</p>
9-3	<p>Osisko's Vice-President of Project Development, Francois Vezina, stated the company was in compliance. At first, he said the company's operations fell under Cariboo Regional District regulations and the continuous drilling noise was a permitted use. When he was corrected - - that this activity is within District of Wells jurisdiction -- he still asserted it was a permitted use, and fell under Exemption 6.g where the Noise Bylaw is not enforced for anyone 'conducting reasonable business and commercial activities.'</p> <p>In fact, Exemption 6.g of Bylaw 202-2021 does not apply to all night drilling noise by a private company and ODV/BGM has just recently been ticketed by the District of Wells for Noise Bylaw infractions.</p>	<p>See response to 9-1.</p>

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	<p>The company's actions are extremely concerning. First, they break the District's Noise Bylaw and then claim compliance through a generous and incorrect interpretation what they think is a loophole.</p> <p>The Cariboo Gold Project has a million moving pieces with numerous potential impacts for residents of Wells. If Osisko's Exploration activities are not honouring the Wells Noise Bylaw, how can we trust any of their claims to mitigate negative impacts of the Project?</p>	
9-4	<p>Other examples of violations are found here: <a href="https://fredinwells.wordpress.com/2021/07/26/what-is-your-ideal-corporate-guiding-philosophy/">https://fredinwells.wordpress.com/2021/07/26/what-is-your-ideal-corporate-guiding-philosophy/</a>.</p> <p>It should also be noted that at Osisko's Malartic open pit gold mine in Quebec, residents initially welcomed the development.<sup>1</sup></p> <p>After a few years, residents launched a multi-million dollar class action suit for damages related to noise, dust and explosions.<sup>2</sup> While the Cariboo Gold Project would be underground, there are substantial above-ground structures and activities. And once underway or built, there's no going back.</p>	<p>The Canadian Malartic Mine Project is outside the scope of this environmental assessment.</p> <p>In 2014, the Canadian Malartic Mine Project was purchased from Osisko Mining Corporation by Agnico Eagle Mines Limited and Yamana Gold Inc. The lawsuit against the Canadian Malartic Mine was filed in 2016 by a small group of Malartic residents, two years after the mine was sold to the current owner. Osisko Development has no involvement in Agnico Eagle Mines Limited or Yamana Gold Inc. or the current operations of the Canadian Malartic Mine Project.</p> <p>The project was welcomed and supported by the vast majority of the population of Malartic, as it brought back much needed economic support and development for the town<sup>1</sup>. The population had concerns and conditions to be met related to noise, dust and vibration from blasting operation. With discussion and exchanges, the Canadian Malartic Mine launched several research and innovation programs to improve their performance related to noise, dust and vibration. The programs started in the early days of the operation were successful and the Canadian Malartic Mine is renowned worldwide for its innovative best practices in the industry and Osisko to be the visionary behind this success.</p>
9-5	<p>At the Sept. 23 Open House Mr. Vezeina also said: 'We are not the bad guys. We are good people. We have good core values. We care about the community.'</p> <p>I very much want to believe that, since this town needs an economic boost and the diversity a mine could provide. Indeed, Osisko's contributions to some Wells infrastructure projects and to Barkerville's summer season are appreciated. Further needed benefits are expected under a Community Benefit Agreement.</p>	<p>Osisko Development has committed to the development of a Noise Management and Monitoring Plan for the Project. The Noise Management and Monitoring Plan details mitigation, management, and monitoring measures for noise-related adverse effects from mining activities. It defines mitigation measures to control noise effects from the Project and identifies current noise criteria that would trigger further potential contingency and adaptive measures if exceeded.</p>

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	<p>But some of ODV's activities during the Exploration phase, such as unrelenting drilling noise, don't inspire confidence about impact mitigation during the mine's Construction and Operation phases. (And noise impact is not something to be traded away for other community benefits).</p>	<p>In addition, Osisko Development will also be developing a Socio-Economic Monitoring Plan. This plan will be a high-level strategic plan that describes an approach to monitoring and managing the potential social and economic effects of the Project, with a specific focus on:</p> <ul style="list-style-type: none"> <li>• Community health and well-being</li> <li>• Community safety</li> <li>• Community development and housing</li> <li>• Economic diversification</li> <li>• Community feedback mechanisms; and</li> <li>• Monitoring of social and economic outcomes as a measure of mitigation and management effectiveness</li> </ul> <p>Both plans will be provided to the District of Wells for comment. As part of the EA Certificate, Osisko Development expects that there will be conditions related to the development, review and approval of management plans.</p>
9-6	<p>It also doesn't inspire confidence when the Minister of Mines reportedly told District of Wells representatives at a recent UBCM Ministerial Meeting that 'while he understands the concerns of impacts such as noise and dust, he believes Osisko Development is owned and operated with a history of very high standards. Osisko has stated to the Ministries that they will mitigate the impacts.' It already appears the Ministry of Mines will take the company at its word.</p> <p>I fear Wells residents are entering years of continuing negative impacts and constant vigilance that regulations regarding Valued Components are upheld.</p> <p>Thank-you for the opportunity to comment.</p>	<p>Mitigation measures proposed for the Project are summarized in Appendix 20.1-1 of the Application. These include industry-standard best management practices and project-specific measures.</p> <p>Osisko Development is committed to enhancing benefits and minimizing adverse social or economic effects of the Project in general, and in particular on the District of Wells.</p> <p>The Project will be required to follow the conditions in the EA Certificate, if issued, as well as the requirements of any regulatory permits and approvals issued to construct and operate the mine.</p>

Notes: <sup>1</sup><https://www.globenewswire.com/en/news-release/2013/07/10/1456619/0/en/Osisko-Deposits-Study-Reporting-Local-and-Regional-Economic-Impact-of-the-Canadian-Malartic-Mine.html>

## 2.10 #10 – Ed Coleman, Long-term Quesnel Resident, Quesnel, BC

### 2.10.1 Comment

This is an excellent project and will have short and long-term positive impacts for Indigenous communities, Cities and Regional Districts in the entire Cariboo Area and beyond.

### 2.10.2 Response

Thank you for your comments and ongoing support of the Project. Short-term and long-term positive impacts from the Project include the following:

#### Short-term positive impacts (During construction)

- The Project is amongst the 10 most important investment projects announced in the Cariboo Economic Region in terms of construction expenses. To complete the Project, ODV intends to invest and spend \$3.2B, 4.8% in the exploration phase (2016-2021); 13.4% over the Construction Phase (2021-2023). Project's investments represent an opportunity for the region to diversify its economic base and generate wealth. This includes enhancement of arts, culture, and tourism which are of interest to the District of Wells.
- The Project will create employment opportunities and associated increases in income for local and regional residents and others. The Project will create 273 jobs during construction. Job opportunities include both skilled and unskilled labour at the Mine Site, QR Mill site, and Quesnel. Up to 75% or more of the construction and operations workforce will be hired within the CRD and the remainder will come from outside this area.
- The Project will meet its demand for goods and services from within the Local Assessment Area and Regional Assessment Area during construction. This will improve the capacity of local and regional services.
- Labour income will increase and will, depending on spending decision, improve quality of life (i.e. when spend to improve housing, education, and recreating activities).
- Both employment and contracting opportunities are likely to attract new professionals and skilled labour to the area.
- The Project will provide education and training opportunities to enhance local and regional workforce's participation in employment and contracting opportunities.
- The Project will identify employment barriers (i.e. lack of day care and drug addiction) and facilitate employment of individuals who have faced challenges in the past through means such as training and individual and community counselling services.
- Based on results from B.C. Stats' Input-Output (I-O) model: Direct, indirect and induced wealth creation in BC is estimated at \$122 million over the exploration phase, \$231 million for the pre-construction.

- Osisko Development's workforce policies and programs are provided in Appendix 1.0-14.
  - Osisko Development will hire a variety of contractors for construction. Contractors generally have a core group of workers (e.g., trades people, labourers, operators) and hire locally as required to support their existing workforce. For sourcing, key assumptions were that 75% of required workers would be hired from the Cariboo Region and that those working for Osisko Development would transition from their current responsibilities to the Project.
  - Cariboo Gold Project Hiring Program is currently being developed and will be incorporating recommendations and mitigative measures outlined in the Application where appropriate. This includes, but is not limited to, the following:
    - Providing training opportunities to residents, as appropriate, to increase the skills of the local and regional workforce to enable Osisko Development to maximize hiring from the local and regional area. This will also help expand the pool of potential employees and will help facilitate hiring of individuals from segments of society generally not well represented in mining projects.
    - Holding a community open house to inform people about the types of opportunities, requirements, and training available.
    - Encouraging contractor companies to hire local or regional residents; and
    - updating and further developing proactive employment policies and programs.
    - Osisko Development will work to communicate employment opportunities through a variety of communication means

#### Long-term positive impacts (During operations)

- Unlike many other resource development projects in northern BC, the construction workforce for the Project is smaller than the operations workforce. Given the duration of the operations phase, 16 years, this will create longer economic benefits than other developments in the area.
- The Project will generate revenue for local, provincial, and federal governments through increased tax assessment values. Additional revenues may support improvements and expansions to governmental services necessary to accommodate population and economic growth in the area.
- To complete the Project, Osisko Development intends to invest and spend 81.8% over the Operations Phase (2023-2039). Wealth creation during operations is estimated at \$4.87 billion, \$270 million annually over the operation period.
- The Project will create employment opportunities and associated increases in income for local and regional residents and others. The Project will create 459 jobs during operations. The equivalent of 19,312 person-years, Average of 805 jobs annually over 24 years

- Job opportunities include both skilled and unskilled labour at the Mine Site, QR Mill site, and Quesnel.
- Up to 75% or more of operations workforce will be hired within the Cariboo Region and the remainder will come from outside this area.
- The Project will meet its demand for goods and services from within the Local Assessment Area and Regional Assessment Area during operations. This will improve the capacity of local and regional services.
- Labour income will increase and will, depending on spending decision, improve quality of life (i.e. when spend to improve housing, education, and recreating activities).
- Both employment and contracting opportunities are likely to attract new professionals and skilled labour to the area.
- The Project will provide education and training opportunities to enhance local and regional workforce's participation in employment and contracting opportunities.
- The Project will identify employment barriers (i.e. lack of day care and drug addiction) and facilitate employment of individuals who have faced challenges in the past through means such as training and individual and community counselling services.
- Based on results from B.C. Stats' Input-Output (I-O) model: Direct, indirect and induced wealth creation in BC is estimated at \$4.87 billion over the Operations Phase (or \$270 million annually over the operation period).
- ODV's workforce policies and programs are provided in Appendix 1.0-14.
  - Cariboo Gold Project Hiring Program is currently being developed and will be incorporating recommendations and mitigative measures outlined in the Application where appropriate. This includes, but is not limited to, the following:
  - Providing training opportunities to residents, as appropriate, to increase the skills of the local and regional workforce to enable Osisko Development to maximize hiring from the local and regional area. This will also help expand the pool of potential employees and will help facilitate hiring of individuals from segments of society generally not well represented in mining projects.
  - Holding a community open house to inform people about the types of opportunities, requirements, and training available.
  - Encouraging contractor companies to hire local or regional residents; and
  - Updating and further developing proactive employment policies and programs.
  - Osisko Development will work to communicate employment opportunities through a variety of communication means

#### Sustainable benefits (after closure)



- Education and training, provided by the Project along with the new skills that workers will learn while on the job, provide sustainable economic benefits that can be used upon mine closure to get jobs elsewhere and sustain livelihoods.
- The Project's commitment to cover the demands for goods and services from within the Local Assessment Area and the Regional Assessment Area will expand the capacity of local and regional business and give them a sustainable economic benefit to participate in other similar opportunities upon mine closure.
- Construction and operations workforce will gain transferable skills that they can employ, elsewhere, upon mine closure.
- Project's activities will result in new and improved infrastructure in the Local Assessment Area and the Regional Assessment Area. Infrastructures expansion/improvements have sustainable benefits to the communities in the Local Assessment Area and the Regional Assessment Area.
- Improve education and training attainment
- Expand the capacity of local and regional businesses
- Gain transferable skills
- Expand and improve existing Infrastructure

## 2.11 #11 – Eric Andersen, Wells BC

### 2.11.1 Comment

I'm really looking forward to the Cariboo gold project! I moved to wells for work with the mine in 2009 and have been here ever since. I have two businesses operating as a direct result of the mine the first being the Jack O Clubs General witch is a community-minded general store with the post office groceries and much more, employing 16 full and part-time employees. With the instability of the tourism industry these days we are only able to keep open due to the increased mining activity in our area. The other business works directly for BGM in the construction field with 11 full-time and part-time employees. As a business owner, I understand the importance of doing our best to hire locally to help with keeping the local economy going and that is what I have seen from BGM. I'm happy to be a part of their projects.

### 2.11.2 Response

Thank you for your comments and ongoing support of the Project. Osisko Development will continue creating economic potential in the region, adding employment opportunities by partnering with local businesses to purchase a proportion of its goods and services during construction, operations, and closure. New employment opportunities will motivate new workers and their families to move to the region.

## 2.12 #12 – Anonymous

### 2.12.1 Comment

I think this is a good project that will help clean up old mining waste as well as bring opportunities and money to the community for more environmental stewardship.

### 2.12.2 Response

Thank you for your comments and ongoing support of the Project. The Project is located in an area that has been historically disturbed by mining activity, and legacy impacts from those activities remain. Osisko Development is working with multiple partners to address these legacy impacts as part of the development, operation and reclamation of the Project. Working together to address legacy issues will enhance environmental quality in the region and augment the environmental stewardship goals of the community. In addition, as Osisko Development aims to hire 75% or more of its workforce from the region, therefore the Project will bring opportunities for new community members to support various environmental initiatives locally.

## 2.13 #13 – Dave Jorgenson CAC member, Wells, BC

### 2.13.1 Comment

Septic Field Concerns. See attached document for my concerns regarding the construction of a 200 person septic field in a wetland adjacent to a creek.

### 2.13.2 Response

Thank you for your comments.

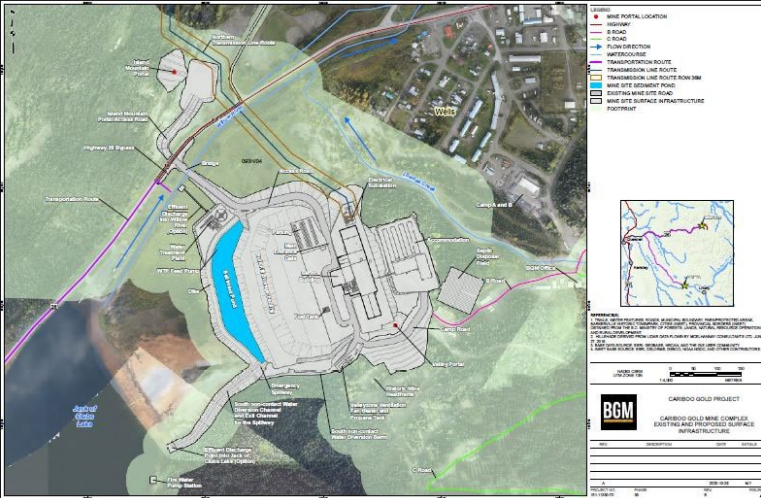
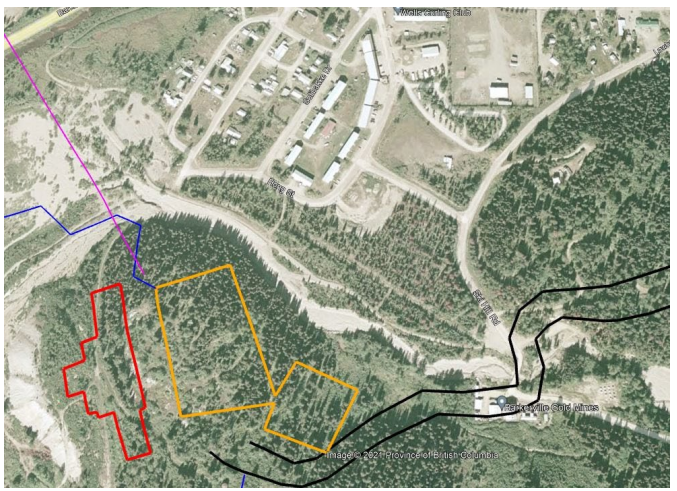
The septic field is shown on Chapter 1 – Project Overview, Figure-1.4-2. The septic field is set back approximately 65 m from the banks of Lowhee Creek. Terrain ecosystem mapping (TEM) was completed for the Project footprint and the area where the septic field is located was not classified as a wetland (TEM mapping is in Appendix 7.7-1). Baseline surveys confirmed this was a forested area and no wetlands were detected during vegetation surveys.

### 2.13.3 Attachment – EPIC Septic Field Concerns

Comments and responses from the attachment are provided in Table 2.9-1.

Table 2.13-1 Comment #13 Attachment - Responses

Number	Comment	Response
13-1	<p>Sewage treatment for the Mine Camp: The Proposal for the mine includes a holding tank and 700 m septic field for the residential camp, that will conform to the Municipal Waste Water Regulation.</p> <p>I have some concerns about the location and size of this facility. A 200 man camp will effectively represent the waste production of the entire community of Wells. The proposal to locate the sewage treatment at the site indicated on the map raises some questions.</p> <p>Presumably a perk test has been done at this site? Currently, it is a low wet bog, at the confluence of three surface and subsurface streams from the mountainside. These streams have a diffuse discharge along the south side of Lowhee Creek, just a few metres from the end of the septic field. As well, Lowhee Creek exhibits some ongoing erosive effects along that section of unprotected bank.</p>	<p>The treatment system for the camp consists of a moving bed bioreactor which provides secondary-level of treatment (i.e., biological reduction in organic matter) before the treated effluent will be discharged to the drainage galleries of the septic field. The septic field was sized to meet the requirements of the Municipal Wastewater Regulation (MWR) for a percolation rate of 15 minutes/25 mm, which takes into consideration the permeability of the soils into which the septic field will drain. The MWR also requires a minimum setback distance of 30 m from water bodies to minimize the potential for the treated effluent to affect surfacewater bodies.</p>
13-2	<p>The District of Wells is in an ongoing flood protection 'dispute' with provincial authorities regarding the armouring of Lowhee Creek. I am concerned that adding the water discharge from a 200 man camp to the already saturated ground in the proposed location may result in additional soil instability which may cause environmental damage or increase the liability of the city or the province regarding stream protection in municipal boundaries. In addition, a significant flood event in the creek could threaten the entire septic system with damage or destruction. Finally, given the ongoing wet draining effect of the existing groundwater, and the short distance to the creek, I am concerned that there may be leaching of bacterial loads into Lowhee Creek above a community recreational swimming area(at the 'Y', or even compromise the community discharge readings from stream flow samples below the community water treatment center.</p>	<p>The septic field was sized to meet the requirements of the Municipal Wastewater Regulation for a percolation rate of 15 minutes/25 mm, which takes into consideration the permeability of the soils into which the septic field will drain. The percolation rate is intended to maintain a minimum depth of unsaturated soil below the septic field (0.75 to 1 m for the quality of effluent that the MBBR will produce). The MWR also requires a minimum setback distance of 30 m from water bodies to minimize the potential for the treated effluent to affect surfacewater bodies.</p>

Number	Comment	Response
	 <p data-bbox="378 844 840 876">Figure 1: Mine/Camp and Septic Field (Square)</p>  <p data-bbox="378 1388 840 1421">Figure 2: Google earth image of wetland at Septic</p>	

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Number	Comment	Response
	<i>site.</i>	
13-3	What assurances does Osisko have that this site is appropriate for the intended use?	<p>The Municipal Wastewater Regulation is prescriptive in the siting and sizing of septic fields. Field studies such as percolation tests were undertaken such that the correct specifications from the MWR were identified for the site.</p> <p>The septic field was sited by a qualified expert to meet regulatory criteria. The location is close to the camp accommodation and as such requires less piping and is more reliable. The area is also fairly flat and close to the access road for future monitoring and maintenance.</p>

## 2.14 #14 – Dave Jorgenson CAC member, Wells, BC

### 2.14.1 Comment

Alternatives Analysis Assessment. The site plan submitted by Osisko cannot help but negatively disrupt the environmental, social, and economic qualities of Wells, Barkerville, and Bowron Lake. The community already has been profoundly impacted by Osisko through the development and exploration phases. The key elements of the new proposal are this: The concentrator area, including ventilator shafts, propane and fuel storage, high voltage electrical power, sub-station, water treatment tower, camp facility, new industrial bridge on one side of town, new industrial road on mountainside above town, and secondary adit on opposite side of highway will create a permanent industrial scar on a community that is reknown for its wilderness residential quality, and which acts as a gateway to touristic activities which depend on wilderness as their signature aspect, including Bowron Lake Provincial Park, Cariboo Mountains Park, and Barkerville Historic Park. The visual impacts of creating an industrial complex in a residential community are not the most significant impact however. Osisko makes no attempt in its submission to describe the ongoing daily activity that the project will generate. It's this motion, including engine noise, mechanical device noise, exhaust, back-up alarms and increased general activity that are not adequately addressed in the submission. A 'typical day' scenario would help Osisko and the community to understand the visual, auditory, and environmental impact of the activity that is required to accomplish the goals of industrial mining at this scale. Such a scenario needs to include the impact of existing exploratory work, development of additional mining infrastructure, support activities for the various camps that it is operating in the region, and consider weather events, and seasonal changes. Osisko also does not address, anywhere in the description, how it plans to operate in the winter, or what the impact on the community will be in that season, let alone the community impact on a typical windy summer day. The plan, as submitted, unnecessarily uses a variety of environmental corridors, especially in the last 5 km in and around Wells, including: 1. Ore trucks and mine supply vehicles using 5 km of hwy west of town, (south side of Island Mountain) on winding constricted route with no shoulders, along the lakeshore, including aggregate traveling from Pinkerton FSR to Wells. 2. Exploration vehicles using 7 km of hwy on winding narrow road with residential settings to access minesite. North and East side of Barkerville Mountain. 3. Mine Road. A new corridor will be widened along the north side of Cow Mountain, enter a residential area, and then climb above the residential area on the northwest side of Barkerville Mountain, before running the length of the mountain to Bonanza Ledge. 4. Power Line corridor will cross the north side of Island Mountain before crossing OGMA on the east side of Island Mountain and descending to the mine site by crossing the hwy in a residential area. 5. Pinkerton Aggregate Mine. Although not described in Osiskos submission, their Pinkerton aggregate mine which will supply gravel to the minesite will impact the lower Jack O clubs watershed on the east side of Cow Mountain. 6. South Side of Cow will have traffic to the intake ventilator, and development for the emergency access road to the Bonanza WRSF Since the alternative

concentrator location on the south side of Wells, which Osisko studied, is shown to be acceptable and desirable in the attached 'Alternatives Assessment' Document, this impact is unacceptable. Osisko's summary statement in section 1.7.3.4.3 is erroneous. Page 19 to 21 of the attached document describe the issues and concerns which Osisko needs to overcome. Also, of significant concern is Osisko's recent non-response in the public meeting of September 23, to the concerns raised by Natural Resources Canada regarding slide potential on Lowhee Creek and mercury contamination. The Waste Rock Haul Road has one of the largest single impacts on the community of Wells and the natural environment and it is not addressed at all in the EA submission. Traffic that utilizes the road, the construction of runaway lanes, maintenance conditions for different seasons, dust, light and noise impacts have no description in the submission, despite the fact that this road wraps around a residential area, and then climbs a hill directly in the entire communities viewscape. At 2.4 km in length, other than the electrical line, this is the single largest installation of the mine plan, even larger than the concentrator site. Osisko has not adequately described the technical aspects of the mine road which will be built to move waste rock from the concentrator to Bonanza Ledge, nor its ultimate decommissioning. In addition, it will have one of the most widespread visual, environmental and audio impacts on our community but it is not included in any VQ analysis.

### 2.14.2 Response

Osisko Development has committed to the development of management and monitoring plans as described in Appendix 20.1. These include a Noise Management and Monitoring Plan and a Waste (Refuse and Emissions) Management Plan, which includes a Fugitive Dust Control Plan and Air Quality Monitoring Plan. Mitigation measures for the Project are summarized in Appendix 20.1. These include mitigation for project effects related to noise, air quality and visual quality.

During construction, the Mine Site will be active with heavy equipment and personnel completing activities such as vegetation removal, site preparation and grading, and building construction. The community can expect noise and activity levels similar to those of an active construction site. During construction, both the Island Mountain Portal and Valley Portal will undergo active development, with waste rock trucks crossing Highway 26 to move material from the Island Mountain Portal to the Bulk Fill Area. Once the underground drift connecting the two portals is complete, activities will shift primarily to underground construction.

Osisko Development has put significant effort in to the design of the Project and Mine Site to reduce and eliminate a majority of impacts from a typical mining operation. All activities will be contained inside the Services Building and the underground infrastructure. The location, orientation and specific attenuation design and material have been included for the Services Building to capture noise and lighting annoyance. We also truly believe we are correcting an important long lasting environmental problem by reclaiming a waste dump and other infrastructure left from the past mining operations which is contaminating the soil and Jack of

Clubs Lake. We are still working on improving the visual impact and will continue engaging with the community of Wells towards an attractive town entrance.

During operations, mining activities will be underground or within the Services Building. Most exploration activities will also be underground at this time. Aboveground activities will consist mostly of trucks moving concentrate to QR Mill from the Services Building, and the transport of waste rock (via electric haul trucks) to Bonanza Ledge along the B-Road. Trucks transporting goods to the Mine Site will also be present, along with workers staying at the camp accommodation. Please note the Transportation Route and access roads between the Mine Site and Bonanza Ledge Site are existing roads used by the public and/or for current operations. Preliminary design for the access road at the Mine Site has been completed. Further analysis and design will be completed for detailed design as part of the permitting phase should an Environmental Assessment Certificate be issued for the Project.

Activities in the summer and winter will be similar, with machinery completing snow removal during the winter months. Osisko Development has an experienced team of mining operators that have worked at several mines within Canada.

Osisko Development would welcome the opportunity to host a community meeting that describes a “typical day” scenario for the Project, including the implications of mitigations for noise, visual and air emissions.

Please also note that neither current exploration activities nor the Tucker Lake aggregate mine are part of the Cariboo Gold Project.

Lastly, the Transmission Line was routed to avoid Old Growth Management Areas (OGMA), however some OGMA were unavoidable. Where crossing an OGMA was unavoidable the routing was designed to cross at a location which would result in minimal area being bisected by the Transmission Line. Existing disturbance was followed as much as possible.

### 2.14.3 Attachment – Simpler Corridor

## Support a responsible mine plan

<p><b>Osisko's Corridor Plan</b></p> <p><b>Concentrator in Wells</b></p> <p>Impacts 4 different corridors, caribou, tourism, forestry, and residential quality of life in Wells</p>	<p><b>Simpler Corridor Plan</b></p> <p><b>Concentrator behind Cow</b></p> <p>Impacts 1 corridor, protects caribou, tourism, forestry, and residential quality of life Wells</p>
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#### 2.14.4 Attachment – Alternative Site Selection Analysis for Cariboo Gold Project

Osisko Development's response to this document is provided as a technical memo in Appendix B.

### **2.15 #15 – Judy Campbell, Wells, BC**

#### 2.15.1 Comment

Attached are my comments on Appendix 07.10 Economic Impact Assessment.

#### 2.15.2 Response

Thank you for your comments. Responses are provided in the section below.

#### 2.15.3 Attachment – Comments on Appendix 7.10

Comments and responses from the attachment are provided in Table 2.15-1.

Table 2.15-1 Comment #15 Attachment - Responses

Number	Comment	Response
15-1	<p>Comments on Appendix 07.10 Economic Impact Assessment Prepared by Judy Campbell, M. En. Des. (Planning)</p> <p>I am commenting as a member of the Community Advisory Committee, and also as someone who has professional experience with the methodology of Economic Impact Assessment, particularly on the community level.</p> <p>There is one aspect of this the KPMG study that is misleading and has already been misinterpreted within the community. This is in relation to the projected \$36 million in revenues that will accrue to ‘municipalities’. Many people are interpreting this to mean that literally Wells (or Wells and Quesnel) as the major municipalities within the area will somehow receive \$36 million in revenues from the project. And regrettably, in recent public dialogue, ODV officials have not dispelled this misconception.</p> <p>The computer models that are used to generate an economic impact assessment such as the one presented here are based on certain assumptions, particularly about how revenues may be accrued and distributed. These assumptions are based on averages derived over time from more detailed studies. These may be regional, provincial, national or even international averages or a combination thereof. Unfortunately, the assumptions used in the model are not transparent to the reader of the resulting study, and sometimes not even to the user of the model. When looking at very small local economies we often find that these assumptions just don’t apply.</p> <p>This is true for the projected municipal revenues.</p>	<p>Section 7.10 Employment and Economy, Table 7.10-41 includes the total estimates of economic impacts of the Cariboo Gold Project (Direct, Indirect, and Induced) based on results from B.C. Stats’ Input-Output (I-O) model. The results of I-O Model run shows that tax revenues are estimated to reach \$694 million for the government of BC, \$483 million for the government of Canada and \$36 million for municipal governments over the Project life.</p> <p>The estimate of \$36 million in municipal taxes includes \$2.9 million during exploration, \$4.8 million during construction and \$28 million during operations. Each of which includes direct, indirect, and induced taxes.</p> <p>These estimates are based on the project costs provided by Osisko Development and detailed in the Preliminary Economic Assessment financial modelling (NI 43-101 Technical Report, effective as of April 2020). It is noted that estimates of economic impacts could vary upwards or downwards depending on actual investment/spending figures, on actual investment/spending structure, as well as the actual location of employees and suppliers.</p> <p>According to the government of BC, the B.C. Input-Output Model (BCIOM) is used to generate regional economic dependency figures, as well as employment and revenue multipliers. It can also be used to assess the regional impact of various projects and economic events. It is part of the EAO regulatory requirements. Here are some helpful definitions that the BCIOM has and are relevant to this discussion:</p> <p><b>Direct impact:</b> The direct impact measures the impact on B.C. industries supplying goods and services directly used by the project. For example, direct impacts for a typical construction project would include impacts in industries supplying cement, lumber, or engineering.</p> <p><b>Indirect impact:</b> The indirect (supplier industry) impact measures the impact on B.C. industries that are further back in the supply chain. The indirect impact is cumulative, and includes transactions going all the way back to the beginning of the supply chain. Indirect impacts for a typical construction project would include impacts in industries supplying a wide</p>

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Number	Comment	Response
		<p>range of goods and services, such as janitorial services, accounting, transportation, logging, and mining.</p> <p><b>Induced impact:</b> The induced impact measures the effect that spending by workers (those employed by the project, or by direct and indirect supplier industries) has on the economy. Induced impacts for a typical construction project would include impacts in industries that sell goods and services to consumers, such as retailers, food services, accommodations, etc.</p> <p><b>Estimates of Tax Revenues:</b> The model also generates estimates of tax revenues associated with a change in demand for one or more commodities, or a change in the output of an industry. These tax revenue estimates include personal and corporate income taxes, as well as taxes on commodities. There are 19 different tax types which potentially are paid on each of the 492 commodities. Although the structure of the model is based on 2017 data, tax revenue and employment estimates generated by the model are based on more up-to-date information. Tax revenue estimates reflect the current tax structure and existing tax rates. Employment estimates generated by the model are calculated using information on average earnings in 2020.</p> <p>Source: About the B.C. Input-Output Model - Province of British Columbia (gov.bc.ca)</p>
15-2	<p>In each of the Tables 3, 5, 7 and 9, municipal revenues are projected for the exploration, construction, operation, and closure stages respectively. In each table revenues are predicted to accrue to municipalities from taxes on products and taxes on production. Each of these has an explanatory footnote. The footnote for Taxes on Products reads (bold is mine):</p> <p>Includes provincial taxes on environment, trading profits, gas, land transfer, PST, aboriginal trading profits and other provincial tax. For the federal government, it includes trading profits tax, gasoline tax, excise tax, air transport tax, import tax and GST. <b>At the municipal level it includes municipal land transfer tax, sales tax and Property, Business and Other taxes</b></p> <p>The footnote for Taxes on Production reads (bold is mine):</p>	See above.

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Number	Comment	Response
	<p>Taxes on production consist of taxes payable on goods and services when they are produced, delivered, sold, transferred or otherwise disposed of by their producers plus taxes and duties on imports that become payable when goods enter the economic territory by crossing the frontier or when services are delivered to resident units by non-resident units; they also include other taxes on production, which consist mainly of taxes on the ownership or use of land, buildings or other assets used in production or on the labour employed, or compensation of employees paid. <b>At the municipal level, this includes property taxes.</b></p>	
15-3	<p>The only tax that actually applies to the District of Wells is property tax. This is the only direct tax revenue the District of Wells will receive from the Cariboo Gold Project. This will be sum of property taxes collected on any mine development within the boundaries of Wells. It would also include taxes on any improvements made to existing properties in Wells. It would not include taxes on properties that the ODV has purchased that were already part of the tax base. However, an increase in taxes because of an increase in assessed value due to improvements made to the property could be included as a benefit.</p> <p>Understandably, KPMG did not make an attempt to separate out the economic impact to Wells from the results generated by the computer model. The smallest economy they assessed was the Cariboo Regional District. Neither have they specified which municipalities would be the recipients of the projected revenues. This is left for the reader to interpret, which as mentioned above, has led to considerable misunderstanding.</p> <p>There should be more detail provided on anticipated municipal tax revenues, with a more detailed analysis of what taxes would apply, how much would be generated, and for which community.</p> <p>In addition, for Wells, there should be a reasonable and detailed projection with transparent assumptions of tax revenues that can be expected to accrue over the life of the project.</p> <p>Any analysis of economic benefit to Wells should take into consideration the 'leaky' nature of the local Wells economy. Because of</p>	<p>Section 7.10 Employment and Economy will be updated to include more information specific to Wells.</p> <p>BC EAO regulations requires the use of BC Stats' Input-Output (I-O) model to estimate the national, provincial and regional economic effects of the proposed project. The Model has multipliers to provide those estimate but does not allow the calculation at a community level since there are no local multipliers for that purpose. Therefore the smallest economy that was assessed was the Cariboo Regional District.</p> <p>Results of Model run show that tax revenues are estimated to reach \$694 million for the government of BC, \$483 million for the government of Canada and \$36 million for municipal governments over the Project life.</p> <p>The estimate of \$36M in municipal taxes includes \$2.9 million during exploration, \$4.8 million during construction and \$28 million during operations. Each of which includes direct, indirect and induced taxes.</p> <p>The Model also generates estimates of tax revenues associated with a change in demand for one or more commodities, or a change in the output of an industry. These tax revenue estimates include personal and corporate income taxes, as well as taxes on commodities. There are 19 different tax types which potentially are paid on each of the 492 commodities. Although the structure of the model is based on 2017 data, tax revenue and employment estimates generated by the model are based on more up-to-date information. Tax revenue estimates reflect the current tax structure and existing tax rates.</p> <p>At the moment, Osisko Development cannot provide estimate of property tax to the District of Wells since improvements to existing properties in</p>

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	<p>the lack of services in Wells, only a small percentage of every dollar earned in Wells is spent in Wells. Much of the benefit of dollars earned in Wells is accrued in Quesnel and Prince George.</p> <p>This is the type of detail I would have expected to find in the section specific to Wells, but did not.</p>	<p>Wells is currently under progress. At a later stage, and as more progress is achieved, more details will be provided on anticipated municipal tax revenues.</p>

## 2.16 #16 – P Scheck Industrial Electric LTD, Quesnel BC

### 2.16.1 Comment

BGM is a very important employer for both the Wells and Quesnel communities, their upcoming projects are coming at a most critical time. With the major losses we have suffered in the forest industry it is crucial to our local economies that new industry comes. Industry is the backbone of our communities; without it our towns will go away. We look forward to working with BGM in the future.

### 2.16.2 Response

Thank you for your comments and ongoing support of the Project. Section 7.11 presents information on employment by industry for the Regional Assessment Area from 2016 to 2020. As shown, over that time, employment increased in the health care and education and other services industries and decreased in the forestry, fishing, mining, quarrying, oil and gas, and construction and manufacturing industries.

By committing to partnerships with local businesses to supply a proportion of its goods and services, Osisko Development will be creating economic potential in the region during construction, operations, and closure phases. Osisko Development aims to hire 75% or more of its workforce from the region.

## 2.17 #17 – Katelyn Escott, Wells BC

### 2.17.1 Comment

The community already has been profoundly impacted by Osisko through the development and exploration phases. The key elements of the proposal are this: The concentrator area, including ventilator shafts, propane and fuel storage, high voltage electrical power, sub-station, water treatment tower, camp facility, new industrial bridge on one side of town, new industrial road on mountainside above town, and secondary adit on opposite side of highway will create a permanent industrial scar on a community that is reknown for its wilderness residential quality, and which acts as a gateway to touristic activities which depend on wilderness as their signature aspect, including Bowron Lake Provincial Park, Cariboo Mountains Park, and Barkerville Historic Park. The visual impacts of creating an industrial complex in a residential community are not the most significant impact however. Osisko makes no attempt in its submission to describe the ongoing daily activity that the project will generate. It's this motion, including engine noise, mechanical device noise, exhaust, back-up alarms and increased general activity that are not addressed in the submission. A 'typical day' scenario would help Osisko and the community to understand the visual, auditory, and environmental impact of the activity that is required to accomplish the goals of industrial mining at this scale. Such a scenario needs to include the impact of existing exploratory work, development of additional mining infrastructure, support activities for the various camps that it is operating in the region, and consider weather events,

and seasonal changes. Osisko also does not address, anywhere in the description, how it plans to operate in the winter, or what the impact on the community will be in that season, let alone the community impact on a typical windy summer day. Overall, I have had concerns about this project and the recent detailed submission showing an industrial complex being built on the perimeter of a tourist and residential area is unacceptable.

### 2.17.2 Response

Osisko Development has committed to the development of management and monitoring plans as described in Appendix 20.1. These include a Noise Management and Monitoring Plan and a Waste (Refuse and Emissions) Management Plan, which includes a Fugitive Dust Control Plan and Air Quality Monitoring Plan. Mitigation measures for the Project are summarized in Appendix 20.1. These include mitigation for project effects related to noise, air quality and visual quality.

During construction, the Mine Site will be active with heavy equipment and personnel completing activities such as vegetation removal, site preparation and grading, and building construction. The community can expect noise and activity levels similar to those of an active construction site. During construction, both the Island Mountain Portal and Valley Portal will undergo active development, with waste rock trucks crossing Highway 26 to move material from the Island Mountain Portal to the Bulk Fill Area. Once the underground drift connecting the two portals is complete, activities will shift primarily to underground construction.

Osisko Development has put significant effort in to the design of the Project and Mine Site to reduce and eliminate a majority of impacts from a typical mining operation. All activities will be contained inside the Services Building and the underground infrastructure. The location, orientation and specific attenuation design and material have been included for the Services Building to capture noise and lighting annoyance. We also truly believe we are correcting an important long lasting environmental problem by reclaiming a waste dump and other infrastructure left from the past mining operations which is contaminating the soil and Jack of Clubs Lake. We are still working on improving the visual impact and will continue engaging with the community of Wells towards an attractive town entrance.

During operations, mining activities will be underground or within the Services Building. Most exploration activities will also be underground at this time. Aboveground activities will consist mostly of trucks moving concentrate to QR Mill from the Services Building, and the transport of waste rock (via electric haul trucks) to Bonanza Ledge along the B-Road. Trucks transporting goods to the Mine Site will also be present, along with workers staying at the camp accommodation.

Activities in the summer and winter will be similar, with machinery completing snow removal during the winter months. Osisko Development has an experienced team of mining operators that have worked at several mines within Canada.

Osisko Development would welcome the opportunity to host a community meeting that describes a “typical day” scenario for the Project, including the implications of mitigations for noise, visual and air emissions.

## 2.18 #18 – Anonymous

### 2.18.1 Comment

The impact of the mine on the eco system is a huge concern. The economy, and bringing jobs to an area is understood but there are no explanations on how the company will offset the impact on this to the fragile ecosystem we see in Wells. Not only will it be ugly scar on the land, have huge noise pollution issues but also waste management problems to the fragile water system are deeply worrying. Once again human "need" or corporation greed, is being placed first over the needs of the land and nature if this goes ahead.

### 2.18.2 Response

Characterization of the existing conditions and the potential effects of the Project on the biophysical environment Valued Components are described in the following sections:

- Section 7.2 Air Quality
- Section 7.3 Acoustic
- Section 7.4 Surface Water
- Section 7.5 Groundwater
- Section 7.6 Soils
- Section 7.7 Vegetation
- Section 7.8 Wildlife
- Section 7.9 Freshwater Fish
- Section 7.11 Land and Resource Use (includes Visual Quality)

Each section characterizes the existing conditions, identifies the potential effects from the Project and mitigation measures to minimize or reduce Project effects. Residual effects and cumulative effects are also identified for each Valued Component. Mitigation measures are also summarized in Appendix 20.1-1.

Osisko Development has committed to the development of a Noise Management and Monitoring Plan for the Project. The Noise Management and Monitoring Plan details mitigation, management, and monitoring measures for noise-related adverse effects from mining activities. It defines mitigation measures to control noise effects from the Project and identifies current noise criteria that would trigger further potential contingency and adaptive measures if exceeded.



Osisko Development has also committed to the development of a Waste (Refuse and Emissions) Management Plan. The Waste (Refuse and Emissions) Management Plan provides guidance for waste management strategies to be followed during construction, operation, closure, and post-closure at all ODV projects in BC.

The Waste (Refuse and Emissions) Management Plan includes the following:

- The proper handling, transport, and disposal of non-hazardous domestic and industrial solid waste and domestic sewage sludge.
- The management of air contaminants (emissions and fugitive dust) from ODV project activities, including the provision of industry BMPs to control air and fugitive dust emissions and reduce potential adverse effects to people.

The Waste (Refuse and Emissions) Management Plan has two key purposes:

- Protect workers, the public, and the environment from potential adverse effects associated with waste refuse management and potential adverse effects from air and fugitive dust emissions.
- Minimize the risk and cost associated with the recycling, storage, handling, removal, and disposal of waste from all aspects of ODV properties. A material is considered a waste when it can no longer be used for its original purpose.

The objectives of the Waste (Refuse and Emissions) Management Plan include the following:

- Identify waste reduction, minimization and segregation measures that are to be implemented.
- Identify appropriate waste handling and storage practices.
- Describe containment and other control measures to be implemented for wastes that have the potential to cause adverse environmental effects.
- Establish waste transportation and disposal requirements, including record-keeping requirements.
- To provide a framework with measures to be taken to prevent and minimize fugitive dust emissions through all phases of ODV projects.
- Ensure that relevant personnel are aware of their respective responsibilities for the management of wastes and air contaminants, as applicable.
- Ensure compliance with regulatory requirements.

This plan also includes Project-specific Fugitive Dust Control procedures, air emissions studies, and an Air Quality Monitoring Program. A Project-specific Energy and Greenhouse Gas Management Plan will be added to this plan to manage greenhouse gases.

Management Plans will be developed prior to Construction to provide details on Surface Water and Groundwater mitigation measures, implementation methods, and schedule. Developing these management plans prior to construction and operation is standard practice for projects.

Monitoring will occur during all phases of the Project according to environmental management plans developed for the Project and permitting requirements.

## 2.19 #19 – Anonymous

### 2.19.1 Comment

I have had concerns about this project showing an industrial complex being built on the perimeter of a tourist and residential area is unacceptable. Please make a greater effort to accommodate the well being of our precious community.

### 2.19.2 Response

The location of the former Cariboo Gold Quartz Mine was selected as the location of the Mine Site based on numerous criteria. The site was selected based on a number of technical, environmental, social and economic considerations which includes but is not limited to the following:

- Proximity to the ore zones and surface topography. The Mine Site Services Building is located directly above the Valley Zone and is central, relative to the Mosquito, Shaft, and Cow zones.
- Reducing the need for further underground development, which would result in more waste rock needing to be stored on surface.
- Development of as much of the Project on existing brownfield sites as possible. As part of the Project, reclamation activities will be undertaken during the operation, decommissioning and closure phases.
- Minimizing greenfield site surface disturbance, in the form of a longer transmission line and additional road building.
- Minimizing the volume of water that needs to be managed, resulting in less disruption to natural hydrologic processes, which was one of the resource protection objectives used to guide the design of water management approaches.

An alternative analysis for the Project was completed and is provided in Chapter 1 – Project Overview, Section 1.7. A further description of the selection process in relation to the Services Building location is provided as a response to Comment #14.

Osisko Development has been working with the community to address concerns regarding the location of the Mine Site and Services Building. The Services Building was redesigned to reduce the overall height and landscaping design concepts have been developed to further reduce the visual impact. Osisko Development is continuing to refine the building appearance to be more

aesthetically pleasing. Osisko Development welcomes community ideas on the building aesthetics to maintain community character and be attractive to tourism.

Osisko Development has committed to various management and monitoring plans to mitigate effects and respond in an adaptive manner. The management plans are described in Appendix 20.1

## **2.20 #20 – Kerry Fitz-Gerald, Quesnel BC**

### **2.20.1 Comment**

I have been on both sites for over 20 years and seen the early development of the QR mine which was then called Kinross and all the previous owners of the Wells site. The new owners, Osisko Development Corporation, has done much more than any of the past owners with almost no visible impact to the area. As a matter of fact, I don't think most people could find their office in Wells or their mining site without the signage they provide. This combined with the economic benefits should resolve any environmental concerns in an area that has been mined for over a century.

### **2.20.2 Response**

Thank you for your comments and ongoing support of the Project. By committing to hire 75% or more of its workforce from the region and partner with local businesses to supply a proportion of its goods and services, Osisko Development will create economic potential in the region during construction, operations, and closure phases.

In 2020, Osisko Development committed to contributing more than \$500,000 to the District of Wells for planned renovations to the Wells-Barkerville Culture and Recreation Centre. Osisko Development is proud to support initiatives that benefit the communities in which they operate in.

## **2.21 #21 – Anonymous**

### **2.21.1 Comment**

comments attached in .pdf.

### **2.21.2 Response**

Thank you for your comments. Responses are provided in the section below.

### **2.21.3 Attachment – COMMENTS – Cariboo Gold Project**

Comments and responses from the attachment are provided in Table 2.21-1.

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Table 2.21-1 Comment #21 Attachment - Responses

Number	Comment	Response
21-1	<p>COMMENTS: CARIBOO GOLD PROJECT 7 October 2021</p> <p>Although Osisko’s documentation is extensive, it is too general. Large gaps remain in the practical details of the proposal. The proposal is untenable as planned.</p>	<p>The Application follows the outline and information requirements as set out in the <i>Application Information Requirements for the Cariboo Gold Project</i> (EAO 2021c). The Application Information Requirements are provided by the EAO to guide proponents on the contents of the environmental assessment to meet the BC <i>Environmental Assessment Act</i> (2018).</p> <p>The Application includes an Application Summary, which provides a plain language summary of the Project, the positive and negative effects and mitigation measures, and a specific section on effects to Wells. The Application is also reviewed by a Technical Advisory Committee (TAC) and participating Indigenous Nation who are given the opportunity to address technical or perceived gaps, requiring further clarification or information prior to final submission of the Application.</p>
21-2	<p>Gap: Misleading use of the term ‘sustainable.’</p> <p>Specific Issues:</p> <p>Osisko describes its project as “sustainable.” The definition of sustainable is: “1: capable of being sustained. 2: of, relating to, or being a method of harvesting or using a resource so that the resource is not depleted or permanently damaged sustainable techniques sustainable agriculture.”</p> <p>As proposed this mine has a 16-20 year life and is extracting a resource that will not be replenished for millions of years. Using the word “sustainable” to apply to the Cariboo Gold Project is a classic case of greenwashing. It is deliberately misleading, and its use in this proposal and all community/First Nations consultation material is done in bad faith.</p>	<p>The widely accepted definition of sustainability was provided by the United Nations World Commission on Environment and Development, who’s 1987 report “Our Common Future” defines sustainable development as: “development that meets the needs of the present without compromising the ability of future generations to meet their own needs” <sup>1</sup> and addresses not only environmental factors, but social and economic as well.</p> <p>References made by Osisko Development in the Application pertaining to sustainable development include commitments to developing the Project in a sustainable manner that respects environmental, social, heritage, and health values while providing economic benefits that the project will create in the Local Assessment Area and the Regional Assessment Area during the Project phases and upon mine closure.</p> <p>Through its economic effects, ODV will create sustainable benefits to the communities including:</p> <ul style="list-style-type: none"> <li>• Education and training, provided by the Project along with the new skills that workers will learn while on the job, provide sustainable economic benefits that can be used upon mine closure to get jobs elsewhere and sustain livelihoods.</li> </ul>

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Number	Comment	Response
		<ul style="list-style-type: none"> <li>The Project's commitment to cover the demands for goods and services from within the Local Assessment Area and the Regional Assessment Area will expand the capacity of local and regional business and give them a sustainable economic benefit to participate in other similar opportunities upon mine closure.</li> <li>Construction and operations workforce will gain transferable skills that they can employ, elsewhere, upon mine closure.</li> <li>Project activities will result in new and improved infrastructure in the Local Assessment Area and the Regional Assessment Area. Infrastructure expansion/improvements have sustainable benefits to the communities in the Local Assessment Area and Regional Assessment Area.</li> </ul> <p><sup>1</sup>World Commission on Environment and Development. <i>Our Common Future</i>. Oxford: Oxford University Press, 1987.</p>
21-3	<p>Gap: Project actively undermines the existing work the community has done to create a tourism and outdoor destination.</p> <p>Specific Issues: Visual and aesthetic damage in prominent locations around the community, especially the infrastructure located at the entrance to the community on the Jack of Clubs Lake.</p>	<p>Osisko Development has redesigned the Services Building to reduce the overall height and is continuing to refine the building appearance to be more aesthetically pleasing. Osisko Development welcomes community ideas on the building aesthetics to maintain community character and be attractive to tourism. Osisko Development has committed to a camp accommodation design that is more aesthetically pleasing and provides a modern facility for workers.</p> <p>Osisko Development has also made the following commitments regarding tourism:</p> <ul style="list-style-type: none"> <li>Work with the District of Wells and local residents to identify ways in which the mine can help promote tourism in the area (e.g., moving the headframe to the community).</li> <li>Work to develop a tourism component that is complimentary to the mine (e.g., visitors center, mine tours, etc.) that may attract people to the area or encourage them to stop while passing through Wells.</li> <li>Develop a strategy to mitigate pressures on recreation and tourism in the Project area due to increased population and visitors.</li> </ul>

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Number	Comment	Response
		<ul style="list-style-type: none"> <li>• Contact industry leaders in the tourism industry at least semi-annually to better understand the impacts on the sector, if any, caused by ODV.</li> <li>• Place signage on recreational trails and public roads if there is the potential for conflicts with Project activities.</li> </ul>
21-4	Increased traffic on roads, including heavy industrial traffic.	See response to Comment #5.
21-5	Buying up accommodation in a community where accommodation can already be difficult to find, especially in the summer.	<p>Osisko Development purchased the Hubs Motel in August 2019 after the property had been for sale for two years. Prior to COVID, Osisko Development made rooms available to interested parties, upon request, with the proceeds from those stays donated to the Wells Community Foundation. Due to COVID, this practice was suspended, but it is our intention to continue this once restrictions are lifted.</p> <p>Accommodation planning for the Cariboo Gold Project does not rely on the continued use of the Hubs Motel, and Osisko Development is open to selling the accommodation at a future date to a new owner who would operate the motel in order to meet and enhance the community goals regarding tourism. Accommodation at the Mine Site has been designed for 200 workers.</p>
21-6	Significantly changing the demographic and cultural composition of Wells as an art and music community.	<p>Osisko Development has donated over \$50,000 to Island Mountain Arts since 2016 to support the annual ArtsWells festival.</p> <p>Osisko Development recognizes that workers who choose to live in Wells will change the demographic composition of the community. However, Osisko Development also recognizes the importance of art to the community and has therefore committed to the following to continue to support the arts and music community in Wells:</p> <ul style="list-style-type: none"> <li>• Host community events to promote and encourage Arts and Culture within the District of Wells.</li> <li>• Support the arts in the District of Wells by continuing to work closely with Wells' arts-related stakeholders and organizations to discuss benefits that can be provided by Osisko Development to support the arts sector and arts infrastructure.</li> </ul>

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Number	Comment	Response
		<ul style="list-style-type: none"> <li>Meet with contact key leaders of the arts sector at least semi-annually to better understand the impacts on the sector, if any, caused by Osisko Development.</li> <li>Promote the arts sector to all workers .</li> <li>Support to Island Mountain Arts to enhance youth programs and encourage participation.</li> </ul> <p>Osisko Development has many current employees who participate in the arts and have showcased their talents at Cabarets, been patrons of theatre and music shows at the Sunset Theatre and purchased local artwork from Island Mountain Arts' Gallery.</p> <p>Discussion of the potential effects and proposed mitigation measures to protect or enhance Wells' arts community is provided in Chapter 7.16 of the Application.</p>
21-7	Threatening environmental health or perceived environmental health of Wells. The community has worked hard to undo the damage done by historic mining.	<p>Environmental health is a key concern for Osisko Development. Both the Mine Site and QR Mill will use a water treatment system to treat all contact water before discharge to the environment. The Project has been sited to maximize use of brownfield sites and limit disturbance to greenfield areas.</p> <p>Osisko Development is committed to providing a safe, physically and geochemically stable, and non-polluting landscape that will meet the following end land use goals:</p> <ul style="list-style-type: none"> <li>Provide safe access for wildlife and people</li> <li>Provide physically and geochemically stable landforms</li> <li>Protect valued ecosystem components</li> <li>Prevent or minimize environmental impacts (e.g., metal leaching/acid rock drainage [ML/ARD]) from mine wastes</li> <li>Reclaim the Project to the targeted end land use</li> <li>Develop reclamation and closure activities with Indigenous partners</li> </ul> <p>Further information on reclamation can be found in Appendix 1.0-13 Reclamation and Closure Plan Summary.</p> <p>As part of the environmental assessment a full Human Health and Ecological Risk Assessment has been completed to understand the baseline conditions, assess the potential effects resulting from this</p>

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		Project, and propose the necessary mitigation measures to manage potential effects. The Human Health and Ecological Risk Assessment is described in Section 7.13 Human and Ecological Health, along with associated appendices.
21-8	Disturbing Caribou habitat. Wells residents have worked together on grassroots initiatives (for example, through the Wells wildlife Facebook page) to monitor Caribou and other wild animal populations. The Cariboo Gold Project threatens recent growth in Caribou numbers in the Wells/Barkerville area through the development of its transmission line and the increase in traffic on the highway	Osisko Development has initiated discussions with the Ministry of Forest, Lands, Natural Resource Operations and Rural Development (FLNRORD) to discuss potential effects to Southern Mountain Caribou, along with mitigation and adaptive management strategies to minimize any effects. Osisko Development will update the current Caribou Mitigation and Management Plan for the Project. Osisko Development is also supporting the Lhtako Dené Nation in the caribou recovery initiative.
21-9	Gap: Compensation for impacts to community insufficient. Specific Issue: Responses to community feedback are ‘tacked on’ rather than thoroughly integrated measures. Responses do not substantively address concerns (eg. Wildlife cameras as compensation for animal migration/habitat disruption resulting from the transmission line).	Mitigation measures have been proposed to address issues raised by the community, Indigenous nations, regulators and other stakeholders. The example cited with wildlife cameras is intended to provide ongoing information on use of the transmission line by wildlife and humans that can be used for adaptive management.
21-10	The construction of a new access road to avoid mine traffic in town does not change concerns about mine traffic on the Barkerville highway, which is the only access the community has to grocery stores, schools, and other essential items. This is a food security and education access issue. The highway is also the only evacuation route in case of disaster, and the only access for tourists coming to Wells. Tourism will be discouraged by the condition of the road and the prospect of interacting with mine traffic.	See the response to Comment #5.
21-11	There is little consideration in the project description for winter conditions, including severe temperature and heavy winter snow loads. There are no plans for road or pathway clearing. It is unclear if the new proposal for employee housing is resilient to heavy snow loads. Promises to reduce idling of vehicles “where practical” is insufficient because it leaves open the possibility of idling industrial equipment for long periods during cold snaps.	Osisko Development has operated year-round in the Wells and there is a thorough understanding of operations in winter conditions. It should be noted that during operations the majority of the activities will be underground and within the Services Building. Snow clearing and maintenance will be completed as the Mine Site as required for operations. The exterior shell of the camp accommodation – a Sprung Structure – has been designed for use in extreme winter conditions. It was



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		<p>specifically chosen as a first-in-class tensioned membrane structure that can and does perform in extreme northern conditions. There are over 13,000 Sprung Structures deployed globally in all regions of the world including interior and northern B.C., and all over Canada's far north. A Sprung Structure has been used as a research centre in Antarctica for 35 years. The Sprung design is naturally 'snow shedding' so that the snow only has to be cleared from around the perimeter of the building. The snow safely sheds continuously rather than accumulating and falling in large volumes. Equipment will be turned off when not in use, and avoid unnecessary idling of motors. Reminders are currently sent to employees monthly throughout the winters about the "Idle Free in BC" initiative as well as the BC Climate Action Charter.</p>
21-12	<p>One-time payments to cultural institutions such as Island Mountain Arts and Barkerville Historic Town are insufficient, considering the lifetime of the mine. Support must be ongoing throughout the project. Promises to 'promote art among employees' are non-specific and unmeasured.</p>	<p>Osisko Development will support the arts in the District of Wells by continuing to work closely with Wells' arts-related stakeholders and organizations such as Island Mountain Arts to discuss benefits that can be provided by Osisko Development to support the arts sector and arts infrastructure.</p> <p>Osisko Development has donated funds to local arts organizations consistently (and as requested) since 2016 and will continue to do so. Recipients have included Island Mountain Arts, the Sunset Theatre, Newman and Wright, and Barkerville Historic Town and Park.</p>
21-13	<p>No specific compensation or accommodation for loss of wild foods, foraging, hunting, and wood collection opportunities. These activities are important facets of food security for locals.</p>	<p>Osisko Development employees support the Wells Community Garden, operated by the Wells and Area Community Association (WAACA). Community engagement to-date has not identified any wild food collection, foraging, hunting or wood collection opportunities in the Project area.</p> <p>Osisko Development would like to further discuss this with the community to understand the concern.</p>
21-14	<p>Gap: Visual impacts inadequately studied and addressed. Specific Issues: Photos for visual impacts taken at one time of year (spring) when foliage is thickest. This does not accurately or adequately convey the visual impact of the structures at all times of year.</p>	<p>A complete Visual Assessment report was omitted from the draft Application and will be included in the revised Application. Visual assessment was provided for spring and summer viewing conditions when most viewers are anticipated to experience the landscape in the Visual Resources study area (e.g., recreational users and tourists).</p>

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21-15	Photos for visual impact often taken at a great distance, and do not accurately convey experience of being in town or living close to the mine.	A complete Visual Assessment report was omitted from the draft Application and will be included in the revised Application. The Visual Assessment was conducted using approved industry standards and guidelines.
21-16	Colour choices (brown, green, rust, etc) blend in during summer, but will detract from the landscape in the summer.	Osisko Development is continuing to refine the building appearance to be more aesthetically pleasing. Osisko Development welcomes community ideas on the building aesthetics to maintain community character and be attractive to tourism.
21-16	No effort has been made to blend in with local aesthetics in the town (which include colourful buildings and large murals). Town aesthetics are key for Wells' identity as well as its tourism industry and major events like Artswells festival.	Osisko Development enlisted two artists from Island Mountain Arts during ArtsWells to paint a mural on the side of the downtown office. Osisko Development also commissioned a piece by a local artist (Peter Corbett) which hangs on the Highway Apartment. The murals that are on the Hubs Motel remain in place as well as the murals on the Blair house.  Osisko Development is continuing to refine the building appearance to be more aesthetically pleasing. Osisko Development welcomes community ideas on the building aesthetics to maintain community character and be attractive to tourism.
21-17	Gap: Demobilization/end of mine plans insufficient Specific Issues: No plan for employee accommodation building. According to the community information night held on September 23rd, Osisko plans to "donate" its employee accommodation building to the community after the mine closes. Wells does not want or need these structures, which will by then be nearly 20 years old and require costly upgrading and maintenance.	The Reclamation and Closure Plan requires that all mine infrastructure be removed and the Project footprint reclaimed to end land use goals. Osisko Development is open to discussing retaining the camp accommodation for the community of Wells, if this is of interest and acceptable to relevant regulatory agencies. The camp could be used for accommodation purposes, which has been indicated as a limiting factor for tourism during community engagement.  During the life of the Project, the camp will undergo maintenance and upgrades as required, and would be suitable for use after the Project closes. The Solace Longhouse is a permanent quality, code-compliant structure (it is not a traditional, modular trailer-style camp). Due to the significant durability of the components – both the exterior shell (a Sprung Structure, tensioned membrane building) and the interiors, designed and fabricated out of Cross-Laminated Timber, these accommodations have a 50+ year lifespan. After 20 years, there will still be in excess of 30 years of life to the building. The quality and durability of the structure allows it to be demobilized, and re-purposed as/if required. The exterior shell can

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		remain in place for a number of different purposes – skating rink, gymnasium, multi-purpose structure. The interiors, if not required for accommodations can be removed and repurposed elsewhere. This facility will have decades of use left after the life-of-mine expires, which represents millions of dollars of value and Osisko Development is eager to share this legacy gift with the community, in a configuration that suits Wells the best, after the Cariboo Gold Project is complete.
21-18	There is no plan for decommissioning the sewage infrastructure for the camp, which is located near Lowhee Creek (a stream that flows through town and is used regularly as a swimming spot for locals).	Lowhee Creek is a tributary to the Willow River that goes subaqueous in the summer and winter months. The Willow River runs through town and is the location of “the Y” which is where residents can swim in the summer and is the confluence of Williams Creek with the Willow River. All Project components and infrastructure will be decommissioned through closure and post-closure phases.
21-19	Gap: Poor past behaviour suggests high likelihood of continued problems under new project. Past behaviour unacknowledged in current project. Specific Issue: Osisko has a well-documented history of violating provincial and district regulations suggesting pattern of behaviour likely to continue under its proposed project.	Osisko Development will comply with all regulatory requirements for the construction, operation and closure of the Project. In regards to past activities, in 2016 there were 428 non-compliances in relation to both mining and environmental permits. In 2016, staff developed the Inspection Orders Registry which saw all non-compliances closed off by Ministries. In developing the registry and working closely with the Compliance and Enforcement Branch, an Inspection Orders Registry/Annual Compliance Report is now required for new mine permits across the province. As of November 2021, 738 non-compliances have been deemed closed by the Ministry and only 2 remain open, demonstrating Osisko Developments’ active commitment to ongoing improvement.
21-20	At the municipal level: continues to violate District of Wells noise bylaws. Failure to comply with its fuel storage permit.	Items related to the current Exploration program are outside of the scope of the environmental assessment. Osisko Development will follow up with the community regarding ongoing activities. Fuel is stored appropriately and there have not been any District of Wells bylaw infractions in regards to fuel storage.
21-21	Provincial Level: Multiple fines for failure to comply with tenure agreement, especially discharge regulations and pollution abatement orders, and failure to submit environmental risk assessments.	Items related to the current operations are outside of the scope of the environmental assessment. Osisko Development is addressing provincial requirements with regulatory agencies.

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Number	Comment	Response
		Osisko Development will follow up with the community regarding ongoing activities.
21-22	Federal level: listed on federal environmental offenders list (under previous name, Barkerville Gold Mines).	Items related to past non-compliances are outside of the scope of the environmental assessment.
21-23	Osisko's poor environmental record is a useful indicator of how it is likely to continue acting in the future.	Osisko Development will comply with all regulatory requirements for the construction, operation and closure of the Project. In order to address non-compliances, Osisko Development has installed a water treatment system at the Bonanza Ledge Site. Osisko Development is currently awaiting permit approvals in order to operate the water treatment system.
21-24	Gap: No specific measures or strategies to ensure change in behaviour. Specific Issues: There is nothing in the current project description that acknowledges past failures or details plans for ensuring they do not happen again.	Items related to past non-compliances are outside of the scope of the environmental assessment. Osisko Development will comply with all regulatory requirements for the construction, operation and closure of the Project.
	Osisko claimed verbally in the September 23rd community information meeting that it has implemented procedures in 2018 to prevent future transgressions but listed no specific measures or strategies for change. No specific measures or strategies for ensuring compliance with municipal, provincial, and federal regulations are listed in the project description.	Information on the Environmental Management System is provided in Appendix 20.1 Summary of Mitigation Measures. The Environmental Management System (EMS) document is a management tool for all of Osisko Developments projects in British Columbia (BC), to be used for all aspects of environmental risk assessment and implementation of mitigation measures, responsibilities, reporting procedures and monitoring, and compliance checks. It consists of EMPs, Project-specific attachments to the EMPs as required (to provide Project-specific management requirements), and Standard Operating Procedures, which outline the plans and procedures in place to achieve compliance with the regulatory requirements and Osisko Developments policies and commitments for the various components and of Osisko Development projects. The EMS, along with Osisko Development's Environmental Protection Policy and Health and Safety Policy, provides the framework for achieving compliance of Osisko Developments project activities with regulatory requirements.

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Number	Comment	Response
		The Project will be required to follow the conditions in the EA Certificate, if issued, as well as the requirements of any regulatory permits and approvals issued to construct and operate the mine.
21-25	Any existing procedure for changing behaviour that does exist is ineffective – Osisko’s violations of municipal bylaws continues to the time of writing, and its last provincial penalty was in the spring of 2021 (for failure to comply with discharge permits at Bonanza Ledge).	<p>Items related to the current operations are outside of the scope of the environmental assessment. Osisko Development is addressing municipal requirements with the District of Wells and regulatory requirements with provincial regulators.</p> <p>It should be noted that the majority of the non-compliances have been for late report submissions. Regarding non-compliances for water quality requirements, this information is reported to regulators by Osisko Development through a self-reporting system. Further information on this is included in the quarterly and annual monitoring reports.</p> <p>Osisko Development will comply with all regulatory requirements for the construction, operation and closure of the Project.</p>
21-26	Destruction and damage to local roads has been an ongoing problem for Osisko. Promises to ‘follow BMPs’ have not helped in past case, but no new or different strategy proposed for the current project.	<p>Items related to the current operations are outside of the scope of the environmental assessment. Osisko Development will follow up with the community regarding ongoing activities.</p> <p>Mine-related traffic will turn into the Mine Site at the bypass, which is located before the community of Wells.</p>
21-27	<p>Gap: Overreliance on Provincial compliance and enforcement.</p> <p>Specific Issues: Osisko depends entirely on the province to monitor environmental impact and enforce compliance with tenure agreements, rather than policing itself or building internal mechanisms.</p> <p>The project description does not include robust plans for environmental monitoring.</p> <p>The project as planned depends entirely on the Province’s already strained compliance and enforcement resources to police its activities.</p>	<p><b>Response is provided by the EAO:</b></p> <p>The EAO Compliance and Enforcement division conduct audits of projects to ensure they are meeting the conditions of their EAC. Compliance and Enforcement Officers also coordinate with other provincial government agencies such as Energy, Mines and Low Carbon innovation which, since 2016, has taken substantial action to improve mining oversight in B.C.</p> <p>In addition, if an EAC is issued, Osisko Development will also be required to monitor its own compliance with its certificate, retain an Independent Environmental Monitor to report conditions to the EAO, and conduct monitoring of various potential impacts as will be described in the draft EAC.</p>
21-28	Gap: Poor reputation in community a barrier to effective collaboration.	As part of the Socio-Economic Monitoring Plan there will focus on community feedback mechanisms and monitoring social and economic outcomes as a measure of mitigation and management effectiveness.

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Number	Comment	Response
	<p>Specific Issues: Osisko's poor reputation in the community means there is little faith in its ability or interest in fulfilling its promises. No specific measures for improving relations with community.</p>	<p>It should be noted that Osisko Development maintains favorable relationships with many community members, organizations, businesses and Indigenous Nations and is an active positive member of the community. Osisko Development will continue to operate the Community Relations Office and hold community meetings and workshops to obtain feedback regarding on-going activities. Senior leadership will continue to be present within in the community to listen to feedback and address concerns.</p>
21-29	<p>Osisko has damaged its relationship with the community to the point that there is little likelihood of collaboration or cooperation in the future.</p>	<p>Osisko Development does not agree with this statement and will continue to discuss current and future activities with community members, provide information sessions and address community concerns in a timely manner. It should be noted that Osisko Development maintains favorable relationships with many community members, organizations, businesses and Indigenous Nations and is an active positive member of the community.</p>
21-30	<p>Current plan is dismissive of community concerns about environmental damage and damage to tourism.</p>	<p>Osisko Development has proposed a Project that incorporates approximately 630 key mitigation measures for addressing concerns and mitigating environmental effects. As part of the Project, Osisko Development will be remediating a brownfield site in the area of Project footprint overlap, where no remediation from past mining activities has occurred to date.</p> <p>Osisko Development has also made the following commitments regarding tourism:</p> <ul style="list-style-type: none"> <li>• Work with the District of Wells and local residents to identify ways in which the mine can help promote tourism in the area (e.g., moving the headframe to the community).</li> <li>• Work to develop a tourism component that is complimentary to the mine (e.g., visitors center, mine tours, etc.) that may attract people to the area or encourage them to stop while passing through Wells.</li> </ul> <p>Osisko Development has been and is currently actively engaged in the processes by which to elicit and receive community feedback pertaining to concerns related to the environment and tourism.</p>

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Number	Comment	Response
21-31	<p>Gap: Engagement with community of Wells insufficient.</p> <p>Specific Issue: Osisko verbally assured participants of the 23 September information session that air and water quality data would be available to them throughout the project, but there is no infrastructure planned for collecting this data, nor for making this data available or readable to people.</p> <p>The current project is missing specific plans either for collecting or distributing this data.</p>	<p>Water Quality monitoring stations are already established within Wells and surrounding area. Three air quality monitoring stations will be established in Wells in Fall 2021. Water Quality monitoring reports are provided to the local libraries.</p>
21-32	<p>At minimum, Osisko should provide ongoing public water quality data for:</p> <ol style="list-style-type: none"> <li>1. the Willow River at its headwater at the Jack of Clubs Lake</li> <li>2. The Willow River where it joins Williams Creek in Moose meadows (popular swimming spot)</li> <li>3. The Jack of Clubs Lake near its effluent pipe</li> <li>4. The Jack of Clubs Lake at the end of its emergency spillway</li> <li>5. Lowhee Creek above Bonanza Ledge</li> <li>6. Lowhee Creek below bonanza ledge</li> <li>7. Lowhee creek where it joins the Willow River</li> </ol>	<p>Osisko Development has water quality monitoring stations in Jack of Clubs Lake, the Willow River and at two locations on Lowhee Creek (one at the discharge location and another 1.5 km downstream). This information can be found in our quarterly and annual water quality reports</p> <p>Additional water quality monitoring stations will be established after Project infrastructure is constructed.</p>
21-33	<p>At minimum, Osisko should provide ongoing air quality data for:</p> <ol style="list-style-type: none"> <li>1. The apartments near Lowhee Creek</li> <li>2. Bowman Crescent</li> <li>3. The visitor centre</li> </ol>	<p>Osisko Development will be installing air quality monitors in Wells. These locations are being discussed with the Ministry of Environment. Your suggestions have been provided to the Air Quality team. Siting of air quality monitoring stations is dependent on various environmental and technical factors to ensure accurate and meaningful data.</p>
21-34	<p>Project staffing plans do not include liaisons or any mechanisms for dealing with community feedback or maintaining relations through the life of the project.</p>	<p>As part of the Socio-Economic Monitoring Plan there will focus on community feedback mechanisms and monitoring social and economic outcomes as a measure of mitigation and management effectiveness.</p> <p>The Sustainability and External Relations Department will continue its work through the life of Project. Currently the department includes a Vice-President, Director of Sustainability, Community Liaisons, and Administrator.</p>

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21-35	Little consideration for seasonal rhythms of tourism and residency in Wells (for example, population fluctuates during the seasons).	<p>Demographics information presented in the Application is based on data from Statistics Canada. Demographics are reported by year and do not include seasonal fluctuations.</p> <p>It is important to note when considering the population of Wells that there are many part-time residents who are not reflected in the Census population numbers. Estimates from local community members and officials indicate that the summer population of Wells can be double to triple the Census numbers. This was acknowledged in the Socio-economic baseline report (Appendix 7.1-1)</p>
21-36	Osisko has already impacted community access to local hiking trails, berry picking locations, fishing spots, bike trails, snowmobile trails, and other important areas on Cow Mountain. The project as proposed will further restrict community access to nearby berry picking and hiking areas, specifically berry picking and skiing trails on Island Mountain.	<p>Mining at Island Mountain will be underground. The Project will use existing roads to access the ventilation raises. Access to existing public roads on Island Mountain will not be restricted.</p> <p>Osisko Development has committed to discuss appropriate mitigation and access requirements with users of recreations trails near the Mine Site.</p>
21-37	Osisko's plan to work with the community on access issues "where practical" is insufficient, non-specific, and non-measurable.	Osisko Development has committed to discuss appropriate mitigation and access requirements with users of recreations trails near the Mine Site (Section 7.11 Land and Resource Use).
21-38	<p>Gap: Engagement with local First Nations insufficient</p> <p>Specific Issues: Capacity to respond to natural resource projects is a known concern for First Nations. Collecting and presenting data to people does not constitute meaningful consultation. Osisko's engagement summaries for First Nations suggest that Osisko has dumped a significant amount of information on people without providing capacity support for interpreting and actioning it.</p>	<p>This is incorrect. Osisko Development has engaged with Indigenous nations on the Project since 2016. Information has been shared with Indigenous nations regarding the Project in an open and transparent manner. Osisko Development has developed a relationship with the Participating Indigenous nations based on trust and providing ongoing benefits to their communities.</p> <p>Indigenous nations have been involved both before and during all stages of the EA Process. Early drafts of the Initial Project Description were provided to Indigenous nations for review and comment. These comments were incorporated into the document submitted to the initiate the EA process. Participating Indigenous nations also provided review and comment on the Reviews of Information, Application Information Requirements and other EA-related documents. Osisko Development also engages with Indigenous nations regarding ongoing permitting and regulatory approvals.</p>



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		<p>Osisko Development has provided funding for the Participating Indigenous nations to hire their own consultants to complete Traditional Land Use and Occupancy Studies, along with funding for the Indigenous nations to hire their own consultants to complete third party technical reviews of the Project. These reviews have been submitted as part of the Technical Advisory Committee.</p> <p>Osisko Development has also entered a Life-of-Project agreement with Lhtako Dené Nation. The terms of the Life-of-Project agreements are confidential, however, they provide benefits to Lhtako Dené Nation through the life of the Project.</p> <p>Negotiations are underway with Xat'sull First Nation and Williams Lake First Nation for Life-of-Project agreements as well.</p>
21-39	Studies show that gold mining in the Wells/Barkerville area drew First Nations from outside the immediate area to use the land. This kind of use has not been considered in the consultation or engagement record.	Information on Indigenous nations use and occupancy of the Project area was informed by the Traditional Land Use and Occupancy studies completed by the Indigenous nations.
21-40	The history of gold mining in the area means that traditional use was disrupted from an earlier date than other areas. Consultation did not account for this history.	Information on Indigenous nations use and occupancy of the Project area was informed by the Traditional Land Use and Occupancy studies completed by the Indigenous nations.
21-41	While the province has provided capacity funding, it is unclear whether Osisko has contributed to capacity funding at this time.	Osisko Development has provided funding for the Participating Indigenous nations to hire their own consultants to complete Traditional Land Use and Occupancy Studies, along with funding for the Indigenous nations to hire their own consultants to complete third party technical reviews of the Project.
21-42	One-time monetary contributions at the outset of the project are not enough, and do not embody sustainable or reconciliatory principles.	<p>Osisko Development has also entered a Life-of-Project agreement with Lhtako Dené Nation. The terms of the Life-of-Project agreements are confidential, however, they provide benefits to the Indigenous nations through the life of the Project.</p> <p>Negotiations are underway with Xat'sull First Nation and Williams Lake First Nation for Life-of-Project agreements as well.</p>
21-43	No plans for continual, ongoing engagement through the life of the mine. Meaningful consultation entails working regularly to community and First Nations over the entire life of the project, not just the beginning.	<p>Ongoing engagement with the Indigenous nations is described in the <i>Indigenous Engagement and Collaboration Plan</i> (Osisko Development, 2021). This plan was reviewed by Indigenous nations.</p> <p>Further engagement with Indigenous nations during the Project is outlined in the Life-of-Project agreement.</p>

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21-44	Osisko's staffing plan does not include commitments to hire environmental monitors or consultants from First Nations, which were specific requests listed in the consultation record.	<p>One of ODV's core values is to recruit and provide training opportunities to local and Indigenous communities. It is our commitment to local communities, Indigenous groups and our Indigenous partners to promote and provide opportunities for qualified candidates to find employment with our Company, while also maintaining adherence to our existing and future agreements. It is our goal to have members be hired, trained and grow within the company, providing long-term employment.</p> <p>In addition, members from Participating Indigenous nations have been offered positions, and hired, to participate in baseline field programs since 2016. There is a Community Liaison from Lhtako Dené Nation who works directly for Osisko Development and similar positions are being discussed as part of our agreement negotiations with Xat'sül First Nation and Williams Lake First Nation.</p>
21-45	Although Osisko's Heritage Resources Overview Assessment recommended a Chance Find Procedure, no procedure exists in project plans. Chance Find Procedures are not considered adequate by many First Nations. Osisko should consider Nation-led training for employees and operators.	<p>A Chance Find Management Plan has been developed for current operations, and this will be updated for the Cariboo Gold Project. The current plan has been reviewed and approved by Indigenous nations as part of the current operations permitting process.</p> <p>Osisko Development is currently developing a cultural training and awareness policy, with the support and guidance of qualified professionals, that will be implemented and enforced in all aspects of the Company's operations and conduct.</p>
21-46	<p>Gap: Employment policy does not benefit locals</p> <p>Specific Issues: Most Wells residents will not be hired by the mine. Osisko defines 'local' hires too broadly (Prince George is not 'local') and most residents in Wells and surrounding First Nations do not have sufficient qualifications to be hired at the mine.</p>	<p>As part of the Workforce Policies, Osisko Development has priority for hiring local and Indigenous Peoples.</p> <p>Osisko Development Corporation will continue to engage with local communities. An important element of the Company values is to maximize local recruitment and actively work to provide local community members the opportunity for employment and training where possible. A critical aspect of this is the ongoing engagement and agreements (underway or in place) with Indigenous communities in recognition of the importance of recruiting and training local Indigenous Peoples.</p> <p>One of ODV's core values is to recruit and provide training opportunities to local and Indigenous communities. It is our commitment to local communities, Indigenous groups and our Indigenous partners to promote and provide opportunities for qualified candidates to find employment with</p>

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		<p>our Company, while also maintaining adherence to our existing and future agreements.</p> <p>Osisko Development has a Sustainable Workforce Initiative which aims to train, hire and retain unemployed and underemployed individuals. The current Underground Mine Training Program, which is starting in November 2021, has 12 participants, of which six are from Participating Indigenous nations.</p> <p>Communication will continue regarding employment with local communities and Osisko Development Corporation will hold or participate in events such as open houses or job fairs.</p>
21-47	<p>No training plan to change the qualifications of Wells residents to increase their ability to be hired by the mine.</p>	<p>As described in Appendix 1.0-14 CGP Workforce Policies and Programs the hiring program for the Project is currently being developed and will be incorporating recommendations and mitigative measures outlined in the Cariboo Gold Project (the Project) Application for an Environmental Assessment Certificate (the Application), where appropriate. This includes, but is not limited to, the following:</p> <ul style="list-style-type: none"> <li>• Providing training opportunities to local residents, as appropriate, to increase the skills of the local and regional workforce to enable Osisko Development to maximize hiring from the local and regional area. This will also help expand the pool of potential employees and will help facilitate hiring of individuals from segments of society generally not well represented in mining projects;</li> <li>• Holding a community open house to inform people about the types of opportunities, requirements, and training available;</li> <li>• Encouraging contractor companies to hire local or regional residents; and</li> <li>• Updating and further developing proactive employment policies and programs.</li> </ul>
21-48	<p>Wells residents likely to be hired only for entry level positions, given low levels of education and experience in the mining industry in town. No opportunity to work at a decision-making level within the company.</p>	<p>Osisko Development will provide training opportunities to local residents, as appropriate, to increase the skills of the local and regional workforce to enable Osisko Development to maximize hiring from the local and regional area.</p> <p>Many employees from the local area have worked their way up through the company from entry level positions to supervisor and management</p>

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		positions and we encourage our local employees to pursue further training and apply for positions that will see career advancement.
21-49	Decision to bus employees in for 2-week shifts reduces tangential benefits to the community (no opportunities for personal investment in the area, no opportunities to recreate locally, etc.) and separates the community from the mine.	Osisko Development has heard concerns from the community in regards to workers and has made decisions to balance the needs of the company with the input received from the community.  Early on in engagement with the community, concerns were raised over the potential increase in traffic from workers travelling to Wells daily. In addition, due to safety, Osisko Development believes it is in the best interest of our employees that they do not drive a minimum of two hours per day for work in addition to a 12-hour shift. Camp accommodation allows for workers to stay in the community and not have to travel daily. Osisko Development is committed to maintaining the safety of our employees and the community. In the draft District of Wells Official Community Plan, it was determined that community members valued a walkable community. We look forward to encouraging our employees to be able to walk from the camp facility to participate in and around Wells.
21-50	Gap: No consideration for impacts of climate change throughout application  Specific Issues: Malfunctions and accidents analysis does not account for impact of climate change (especially increased flooding/fire risk).  The project is a high elevation, subalpine environment particularly sensitive to climate change, and Osisko will have to deal with its impacts over the life of the project.	A full assessment of the potential impacts of climate change on the Project is addressed in Chapter 10 – Effects of the Environment.
21-51	Basis for deciding on likelihood of risks in malfunctions and accidents analysis unclear.	The criteria for likelihood categories is described in Table 9.2-2 and is based on the assessment methodology provided in Chapter 6, which follows the Application Information Requirements (AIR) provided by the EAO.
21-52	No consideration of impacts to evacuation routes from community in case of disaster (Barkerville highway remains sole evacuation route and is shared by mine traffic and residents). The highway already requires serious repairs due to erosion from swollen creeks.	Repair and maintenance of Highway 26 is the responsibility of the BC Ministry of Transportation and Infrastructure.
21-53	Wildlife assessment does not deal with increasing bear-human interactions. Black and Grizzly bears are common in the project area especially in the berry patches on Cow Mountain and Mosquito Creek.	Bear-human interactions are discussed in Chapter 7.8 of the Application which assesses the effects to wildlife due to direct and in-direct mortality. This can be clarified in the Application.

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	Black bear habitat reduction has changed grazing patterns and increased human-bear interactions in Wells.	A Waste (Refuse and Emissions) Management Plan is in place for current operations and will be updated for the Project. This plan will include best waste management practices for limiting wildlife attractants. A Wildlife Management Plan will be developed for the Project and will provide wildlife awareness training to all employees and contractors working on-site along with measures to reduce wildlife attractants to avoid human-wildlife interactions.
21-54	Like many parts of BC, local creeks have seen decrease in salmon spawning numbers over the last decade. The surveys conducted by Osisko and its contractors do not account for these recent changes.	Baseline fisheries surveys follow approved ministry standards and guidelines and are designed to collect information on current distribution and abundance of fish species present in the watercourses in the study area. Spawning surveys were completed in Williams Creek, Stouts Gulch, Slough Creek, Jack of Clubs Creek, and the Willow River for resident fish species. Salmon are limited in their upstream movements by a natural barrier on the Willow River downstream.  As part of the Stewardship Society with Lhtako Dené Nation, Osisko Development is supporting a salmon recovery plan for the Bowron River watershed.
21-55	Gap: Remediation plans insufficient Specific Issues: Osisko's project is located on a contaminated site known to the province, and it lists remediation as a benefit of the project. However, the remediation plan only encompasses the footprint of the proposed mine, leaving a large portion of the oxidized tailings currently polluting the Jack of Clubs Lake untouched.	The remediation associated with the Cariboo Gold Quartz Mine operation, with respect to tailings and waste rock, is under the jurisdiction of the Provincial Government (Crown Contaminated Sites Program in the Ministry of Forests, Lands, Natural Resource Operations and Rural Development [FLNRORD]). Osisko Development and FLNRORD have ongoing discussions regarding remediation activities for areas outside of the planned Project footprint.
21-56	Benefits to the Province and Wells will be extremely limited, given the limited extent of remediation.	Osisko Development is committed to remediating the brownfield site where the Project is located, which was the site of the historic Cariboo Gold Quartz Mine, and of which no on-site remediation has occurred. The remediation of this site will be a benefit to the local community and the Province as it will address long-standing concerns regarding the site.
21-57	No specific measures for long term follow up for water quality in the Jack of Clubs Lake.	Monitoring will be undertaken in Jack of Clubs Lake during active effluent discharge, which would start during Construction and continue through to cessation of discharge in the Post-closure phase to verify water quality predictions, assess the potential for effects to aquatic resources and uses, and to obtain information to support adaptive management decisions and implementation of contingency measures. The monitoring program will be developed in discussion with regulatory agencies (e.g.,

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		<p>Ministry of Environment and Climate Change Strategy, Environment and Climate Change Canada) as well as Indigenous groups, and is expected to include analytical chemistry and biological community (e.g., benthic invertebrates) monitoring components.</p>
21-58	<p>Given what Osisko will leave on the land in terms of waste and equipment, it is unclear if there will be any net environmental gain during or after the project.</p>	<p>The site will be reclaimed as outlined in Appendix 1.0-13 Reclamation and Closure Plan Summary.</p> <p>Under the <i>Mines Act</i> and the Health, Safety and Reclamation Code, the primary end land use (ELU) goal is to return the disturbed area available for reclamation to pre-mining land use. Part 10.7.5 of the HSRC states “excluding lands that are not to be reclaimed, the average land capability to be achieved on the remaining lands shall not be less than the average that existed prior to mining, unless the land capability is not consistent with the approved end land use.” Reclamation and closure planning is directed towards achieving target ELUs and mitigating long-term risks to the environment, social values, and Indigenous nations and local resident’s use of the land after mining.</p> <p>The primary target ELUs for the Project’s reclaimable land are forest ecosystems, representative of pre-mining ecosystems, that support wildlife including Woodland Caribou (<i>Rangifer tarandus caribou</i>). This target is also supported by ODV’s Caribou Mitigation and Management Plan, Wildlife Management Plan, Aquatic Ecosystem Management Plan, and Invasive Plant Management Plan. Secondary target ELUs, where appropriate, include Indigenous nations current and traditional use, hunting, trapping, commercial forestry, outdoor recreation, and future industrial activity, particularly mining.</p>
21-59	<p>There is low confidence in Osisko to remediate the land according to its plans given the company’s poor environmental record.</p>	<p>Osisko Development has addressed or is addressing all non-compliances. See response to 21-19.</p> <p>As part of the Mines Act Permit, Osisko Development will be required to provide a reclamation bond to the Province. The bond amount and timing of payment(s) is set by the Ministry of Energy, Mines and Low Carbon Innovation as a condition of the permit. The reclamation bond is a mechanism by which the province manages mine site closure costs and liability risk.</p>

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21-60	Gap: No acknowledgment or plans for alleviating historic trauma Specific Issues: Residents of Wells and local First Nations have lived with contamination their whole lives. The impacts of that contamination on community health and wellbeing are currently unknown (Ex. Swimming or eating fish out of the contaminated Jack of Clubs Lake). There are no plans to better understand these impacts.	Osisko Development would like to discuss this further with the community to better understand the impacts from the perspective of the community, and to summarize the results of the Human Health and Environmental Risk Assessment (See Section 7.13 of the Application).
21-61	The community has a long history of trauma and poor trust in the safety of the environment because of historic mining (ie. Not knowing whether berries or fish harvested on the land are safe to eat). There is little understanding of the trauma experienced by the community demonstrated in the project description and no concrete plans that address or even acknowledge it.	Osisko Development would like to further discuss this with the community to better understand the comment and concerns regarding historic mining so these concerns can be reflected in the revised Application..
21-62	No plans for helping locals to adapt to environmental change, including safety of locally harvested food and water.	Osisko Development would like to discuss this further with the community and provide the results of the Human Health and Environmental Risk Assessment (See Section 7.13 of the Application) which addresses human consumption, exposure, and provides mitigation measures for reducing human and ecological health risk. It should also be noted that that country foods are a component of the Human Health and Ecological Risk Assessment.
21-63	No compensation for extra vigilance required by local community to monitor and police Osisko's work, particularly given Osisko's poor record of abiding by environmental regulations.	See response to 21-27.
21-64	Disproportionate distribution of risks and benefits: Osisko's board and shareholders hold little risk to their health and livelihood, while benefiting financially from the project. Little financial or quality of life benefits for locals, except through (possible) jobs and limited one-time contributions to local organizations.	Osisko Development is currently in the process of developing a Memorandum of Understanding with the District of Wells which addresses sewer, water and infrastructure upgrades as well as the school. Contributions from Osisko Development to the company have historically been on an annual basis and not one time only unless that was specifically requested.  Osisko Development will develop and implement a local hire policy and work with local service providers to provide training opportunities for local residents. Osisko Development has contributed to and will continue to contribute to community initiatives that benefit the community of Wells.
21-65	No specific analysis of the gender aspects of the Cariboo Gold Project. For example, impacts of a predominantly male workforce on	Chapter 7.10 – Employment and Economy provides information pertaining to gender demographics for the Local Assessment Area and

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	<p>community, specific measures for empowering and supporting female employees, unequal impacts of environmental change and environmental contamination on women. Preventing harassment is not adequate.</p>	<p>Regional Assessment Area. Osisko Development is also preparing a technical memo on GBA+ that will be provided to the EAO, the contents of which will be incorporated into the revised Application.</p> <p>It is a Company Policy to provide equal opportunity to all existing employees and applicants for employment. Osisko Development Corporation is governed by laws where the Company operates projects following Federal and Provincial Labor Laws and Human Rights Laws, which protect employees from discrimination and harassment. When considering applicants for positions within our Company, only job-related criteria such as ability, merit and responsibility are used to evaluate applicants and employees. Osisko Development Corporation embodies the principle that all persons should be assessed on individual merit and not on criteria unrelated to job performance.</p> <p>The Company values differences and is working to mitigate pay disparities. The Company is committed to encouraging the respect of individuals, their integrity and their dignity by ensuring that the working environment and relations between employees shall be free of discrimination or harassment.</p> <p>The Company is currently developing a process for hiring under-represented groups, with the support and advice of qualified professionals, and where applicable, members of the under-represented groups. This is set to be in place in time for the Project hiring process.</p> <p>Osisko Development Corporation will work with gender-based analysis plus (GBA+) groups and segments of society currently underrepresented to understand how they can be more involved in the Project.</p>
21-66	<p>While benefits of clean up are mentioned, detrimental impacts of opening a 15-20 year mine in an area with a history of human and environmental trauma from gold mining is not.</p>	<p>The purpose of the environmental assessment is to identify the effects (both positive and negative) from the Project. A summary of positive project effects is provided in Section 1.5.2 of the Application Summary. A summary of Negative Residual Effects is provided in Section 1.5.3 of the Application Summary and is the primary focus of Chapter 7 of the Application.</p>



## 2.22 #22 – Anonymous

### 2.22.1 Comment

I hate the increase in traffic past my house and all over town, including near the school. I used to walk up Hardscrabble all the time with my dog and now you can't even walk 1/2 a km without a couple of trucks going by. I don't support this project and I don't like what it's doing to the community.

### 2.22.2 Response

Mine-related traffic will turn into the Mine Site at the bypass, which is located before the community of Wells. Mine traffic between the Mine Site Complex and Bonanza Ledge will be on the Mine Access Roads as shown on Figure 1.1-3 in Chapter 1 – Project Overview of the Application.

Osisko Development will continue to engage with the community to understand concerns regarding the Project.

## 2.23 #23 – Anonymous

### 2.23.1 Comment

The mine would be a very positive contribution to Quesnel and area economy. Truly hope it all is approved, the sooner the better.

### 2.23.2 Response

Thank you for your comments and ongoing support of the Project.

Osisko Development, through its Community Relations Policy is committed to:

- Establishing ongoing dialogue and respectful relationships with host communities through sharing of information and recording, understanding and working collaboratively on responding to concerns.
- Evaluating each of our activities in terms of the potential negative impacts and risks for the natural, human and social environments, with the goal of adopting mitigation measures aimed at prevention and protection.
- Ensuring that stakeholders potentially affected by the impacts of its activities are identified at an early stage and consulted.
- Contributing to the socio-economic development of host communities through investments in community-based sustainable development projects.
- Contributing to the economic development of host communities by creating employment opportunities and promoting local purchasing

Osisko Development, through its Responsible Procurement Policy is committed to:

- Strictly complying with its code of conduct and ethics, governance guidelines, and other relevant policies, procedures and signed agreements in host communities
- Contribute to the economic development of the host communities by promoting local purchasing and minimizing barriers that inhibit participation of local suppliers of goods and services to supply chain opportunities arising from ODV's activities.

To fulfill those commitments, Osisko Development will communicate clearly and in a timely manner, the project's needs, opportunities, requirements and standards with host communities and adapt procurement approaches and strategies to meet the uniqueness of each site. Osisko Development will encourage the development of viable local businesses that meet its needs, requirements and standards, particularly businesses owned by Aboriginal people, women or other diverse groups.

## 2.24 #24 – Anonymous

### 2.24.1 Comment

I am appalled to think that the mine would change so drastically the look and feel of our wonderful little town. I moved from a large city to get away from things like tall buildings and heavy traffic noise and now you want to make it all happen here? The large building should be built in an area that would not be seen by local residents or by tourists coming into the town, such as a location on the back side of the mountain rather than right off the highway. Power lines and roads could also be directed to the other side so as to not interfere with the daily life in our small community. It is very unfair for a company such as yours to come in and take over a lively, active community, changing it from what it is to something you desire. Life is not all about money. It is about peace and quiet and neighbours helping one another. If you want to be a neighbour in this community, you need to think hard about what you are trying to do to change it to just another spot on the map. You have already changed it drastically for tourists by purchasing most of the accommodations that they used when visiting. You have added a huge camp right in the town boundaries. Please don't add a huge building and heavy power lines with roads everywhere.

### 2.24.2 Response

The location of the former Cariboo Gold Quartz Mine was selected as the location of the Mine Site based on numerous criteria. The site was selected based on a number of technical, environmental, social and economic considerations which includes but is not limited to the following:

- Proximity to the ore zones and surface topography. The Mine Site Services Building is located directly above the Valley Zone and is central, relative to the Mosquito, Shaft, and Cow zones.
- Reducing the need for further underground development, which would result in more waste rock needing to be stored on surface.
- Development of as much of the Project on existing brownfield sites as possible. As part of the Project, reclamation activities will be undertaken during the operation, decommissioning and closure phases.
- Minimizing greenfield site surface disturbance, in the form of a longer transmission line and additional road building.
- Minimizing the volume of water that needs to be managed, resulting in less disruption to natural hydrologic processes, which was one of the resource protection objectives used to guide the design of water management approaches.

An alternative analysis for the Project was completed and is provided in Chapter 1 – Project Overview, Section 1.7. A further description of the selection process in relation to the Services Building location is provided as a response to Comment #14.

Osisko Development has been working with the community to address concerns regarding the location of the Mine Site and Services Building. The Services Building was redesigned to reduce the overall height and landscaping design concepts have been developed to further reduce the visual impact. Osisko Development is continuing to refine the building appearance to be more aesthetically pleasing. Osisko Development welcomes community ideas on the building aesthetics to maintain community character and be attractive to tourism.

Osisko Development purchased the Hubs Motel in August 2019 after the property had been for sale for two years. Prior to COVID, Osisko Development made rooms available to interested parties, upon request, with the proceeds from those stays donated to the Wells Community Foundation. Due to COVID, this practice was suspended, but it is our intention to continue this once restrictions are lifted.

Accommodation planning for the Cariboo Gold Project does not rely on the continued use of the Hubs Motel, and Osisko Development is open to selling the accommodation at a future date to a new owner who would operate the motel in order to meet and enhance the community goals regarding tourism.

## **2.25 #25 – Anonymous**

### **2.25.1 Comment**

As a resident of the community, I have been engaged in a variety of community consultation processes for the Cariboo Gold Project since early 2019. These processes leave me with an

overall lack of confidence in both the company's desire and ability to mitigate the negative impacts of its operations on the local community. Many promises were made in early community engagement stages that have since been abandoned in the formal submission process. Understanding the difference between what Osisko might do and what they are required to do has been confusing. The time required for residents to engage fully in the process has been overwhelming - practically a part-time job, only we are not being compensated for our time. I live at the front lines of Osisko's currently exploratory operations and the eventual site construction of their proposed operations. My own personal experiences in dealing with the company have been polite but completely ineffectual. The noise and disruption to my enjoyment of my own residence by Osisko's operations has been escalating each year in their exploratory efforts, and when I contact the community relations department directly with my concerns, my comments are being politely dismissed, disputed, or just all together ignored. In some cases, incidents of major disruption by Osisko to the community have occurred, and they were mitigated when community members complained. Osisko prides itself on the response to these concerns as a demonstration of responsiveness to the community, but I only see the lack of proactive planning for community health, safety, and enjoyment as the reason why those incidents happen in the first place. The lack of proactive planning for community health and enjoyment is also present in Osisko's application for its permitted operations. This project is an important economic opportunity, but the opportunity must not come at the expense of all other opportunities, including the ability of the long-standing heritage, arts, and wilderness tourism sectors to thrive, and the ability of residents to enjoy peace and safety in the community. Far more time, research, and dollars should have been invested in demonstrating how Osisko will mitigate the impacts of its operations on the sound, light, traffic, dust, and visual environment of the community, as well as its impact on housing, land use, health and police services, and other economic sectors in the community. I specifically object to the proposed location of the concentrator, the use of local municipal roads for industrial hauling and access, the buy-up of local resident properties for commercial use by the operation, and the operation of industrial activities outside the normal working hours of 8 am to 8 pm within the District of Wells.

### 2.25.2 Response

As part of the Socio-Economic Monitoring Plan there will be a focus on community feedback mechanisms and monitoring social and economic outcomes as a measure of mitigation and management effectiveness.

Osisko Development will continue to operate the Community Relations Office and hold community meetings and workshops to obtain feedback regarding on-going activities. Senior leadership will continue to be present within the community to listen to feedback and address concerns.

Community Health is a Valued Component and is discussed in Section 7.14 Community Health. Effects on Community Health and mitigation measures are identified. Enhancement measures include:

- General:
  - Continue to engage the community to define and refine mitigation measures
  - Work with GBA+ groups and segments of society to understand how they can be more involved in the Project
- Health Infrastructure and Services:
  - Provide training opportunities to local residents thereby increasing the skills of the local and regional workforce and enabling ODV to maximize hiring from the local and regional area
  - Coordinate with BC Wildfire so that equipment and staff can support wildfire response as required
  - Encourage workers to volunteer with the WVFB or undertaken other volunteer opportunities in the community
  - Develop a mutual aid agreement with the WVFB
  - Fund a social work position for the LAA for a period of four years
- Population Health:
  - Provide training opportunities to local residents thereby increasing the skills of the local and regional workforce and enabling ODV to maximize hiring from the local and regional area
  - Fund a social work position for the LAA for a period of four years

Acoustics, light, traffic, air quality, visual quality, housing, land use, health and emergency services and economy are either valued components or sub-components discussed in the Application. Data gathering and analysis on these valued components have been underway since 2016. The Application follows the requirements of the Application Information Requirements, providing an assessment of the effects and identifying mitigation measures for these valued components or sub-components. A summary of effects and mitigation measures is provided in the Application Summary, along with the Noise Management Plan and Air Quality Monitoring Plan.

The location of the former Cariboo Gold Quartz Mine was selected as the location of the Mine Site based on numerous criteria. The site was selected based on a number of technical, environmental, social and economic considerations which includes but is not limited to the following:

- Proximity to the ore zones and surface topography. The Mine Site Services Building is located directly above the Valley Zone and is central, relative to the Mosquito, Shaft, and Cow zones.
- Reducing the need for further underground development, which would result in more waste rock needing to be stored on surface.
- Development of as much of the Project on existing brownfield sites as possible. As part of the Project, reclamation activities will be undertaken during the operation, decommissioning and closure phases.
- Minimizing greenfield site surface disturbance, in the form of a longer transmission line and additional road building.
- Minimizing the volume of water that needs to be managed, resulting in less disruption to natural hydrologic processes, which was one of the resource protection objectives used to guide the design of water management approaches.

An alternative analysis for the Project was completed and is provided in Chapter 1 – Project Overview, Section 1.7. A further description of the selection process in relation to the Services Building location is provided as a response to Comment #14.

Mine Site traffic will turn off of Highway 26 before entering the community of Wells. Industrial traffic for the Mine Site will not access the site on local or municipal roads. Mine traffic between the Mine Site Complex and Bonanza Ledge will be on the Mine Access Roads as shown on Figure 1.1-3 in Chapter 1 – Project Overview of the Application.

There are no plans to purchase residential properties for commercial use. The Mine Site will be located within either a mineral lease or a mining permit area over mineral claims covering the Cariboo Gold Project footprint (as shown in Chapter 1 Project Overview, Figure 1.4-2). A significant portion of the Cariboo Gold Project including the planned location of the Services Building is located within property owned by Barkerville Gold Mines, a subsidiary of Osisko Development Corp.

The Mine Site will operate 24-hours a day, however, activity will be mostly underground.

## **2.26 #26 – Anonymous**

### **2.26.1 Comment**

I pleased to hear about the progress in this project and as a merchant of the Quesnel Downtown Association, this is an exciting future for us all. It will only be beneficial to our future.

### **2.26.2 Response**

Thank you for your comments and ongoing support of the Project.

## 2.27 #27 – Anonymous

### 2.27.1 Comment

The Cariboo Gold Project will be a welcome addition to the region. I appreciate Osisko's response to community members questions and their commitment to developing a responsible mining program that addresses remediation of historical contamination in the area. Over the years we have seen improvements to the local area including new and updated housing, financial contributions to local organizations and an increase in employment for local residents who otherwise would not have had the opportunity for year-round work without having to leave town. I would like to see the District of Wells Mayor and Council do more to support the proposal and acknowledge the benefits being offered to them in the way of infrastructure upgrades, this town will not survive successfully without the mine. The application addresses the potential benefits to the community as well as the potential negatives to the community if the mine is approved. That being said, (the following request is not for Osisko) it may be of use to community members to have the District of Wells acknowledge what the negatives are to the town if the mine doesn't go through.

### 2.27.2 Response

Thank you for your comments and ongoing support of the Project.

Osisko Development will provide your comment regarding the Project to the District of Wells for consideration.

## 2.28 #28 – Anonymous

### 2.28.1 Comment

As a part-time resident in the area I have had concerns about the mine and its operation for the past few years, and am concerned that the issues raised by residents are not often addressed directly. The concentrator area, including ventilator shafts, propane and fuel storage, high voltage electrical power, sub-station, water treatment tower, camp facility, new industrial bridge on one side of town, new industrial road on mountainside above town, and secondary adit on opposite side of highway will create a permanent industrial scar on a community that is reknown for its wilderness residential quality, and which acts as a gateway to touristic activities which depend on wilderness as their signature aspect, including Bowron Lake Provincial Park, Cariboo Mountains Park, and Barkerville Historic Park, near which I live. The visual impacts of creating an industrial complex in a residential community are not the most significant impact however. Osisko appears to make no attempt in its submission to describe the ongoing daily activity that the project will generate. It's this motion, including engine noise, mechanical device noise (already 24 hours a day!), exhaust, back-up alarms and increased general activity that are not addressed in the submission. There are noise bylaws in Wells which are being, in my opinion, ignored. Osisko does not address, anywhere in the description, how it plans to operate in the

winter, or what the impact on the community will be in that season, let alone the community impact on a typical windy summer day. Overall, I have had concerns about the recent detailed submission showing an industrial complex being built on the perimeter of a tourist and residential area, and feel that it is unacceptable. Were the mine expected to produce a product that is of commercial and industrial value (iron, minerals for rechargeable batteries, aluminum, barium etc) I would be more sympathetic to this project. While gold has some limited industrial value, I feel that the prime purpose of a gold mine is to make money for the investors. Mining will always have its controversies, but with the world already dealing with serious climate issues, a gold mine, in my opinion, is an unnecessary frill.

### 2.28.2 Response

The Mine Site will be landscaped to minimize visual impacts and to look more like a natural site. Visual renderings of the landscaped area are shown in Chapter 1 – Project Overview, Figure 1.4-4, Figure 1.5-5, and Figure 1.5-6. Osisko Development has redesigned the Services Building to reduce the overall height and is continuing to refine the building appearance to be more aesthetically pleasing. Osisko Development welcomes community ideas on the building aesthetics to maintain community character and be attractive to tourism.

During construction, the Mine Site will be active with heavy equipment and personnel completing activities such as vegetation removal, site preparation and grading, and building construction. The community can expect noise and activity levels similar to those of an active construction site. During construction, both the Island Mountain Portal and Valley Portal will undergo active development, with waste rock trucks crossing Highway 26 to move material from the Island Mountain Portal to the Bulk Fill Area. Once the underground drift connecting the two portals is complete, activities will shift primarily to underground construction.

During operations, mining activities will be underground or within the Services Building. Most exploration activities will also be underground at this time. Aboveground activities will consist mostly of trucks moving concentrate to QR Mill from the Services Building, and the transport of waste rock (via electric haul trucks) to Bonanza Ledge along the B-Road. Trucks transporting goods to the Mine Site will also be present, along with workers staying at the camp accommodation.

Activities in the summer and winter will be similar, with machinery completing snow removal during the winter months. Osisko Development has an experienced team of mining operators that have worked at several mines within Canada.

Osisko Development will comply with all regulatory requirements for the construction, operation and decommissioning of the Project.

The Project has been designed to limit effects on the environment, including contributing to climate change. The Project will not rely on diesel generators for power during operations, and will use electric vehicles both underground and to haul waste rock to Bonanza Ledge. Osisko



Development is also exploring the option of using electric vehicles to haul concentrate from the Mine Site to the QR Mill.

## 2.29 #29 – Anonymous

### 2.29.1 Comment

The community already has been profoundly impacted by Osisko through the development and exploration phases. The key elements of the proposal are this: The concentrator area, including ventilator shafts, propane and fuel storage, high voltage electrical power, sub-station, water treatment tower, camp facility, new industrial bridge on one side of town, new industrial road on mountainside above town, and secondary adit on opposite side of highway will create a permanent industrial scar on a community that is reknown for its wilderness residential quality, and which acts as a gateway to touristic activities which depend on wilderness as their signature aspect, including Bowron Lake Provincial Park, Cariboo Mountains Park, and Barkerville Historic Park. The visual impacts of creating an industrial complex in a residential community are not the most significant impact however. Osisko makes no attempt in its submission to describe the ongoing daily activity that the project will generate. It's this motion, including engine noise, mechanical device noise, exhaust, back-up alarms and increased general activity that are not addressed in the submission. A 'typical day' scenario would help Osisko and the community to understand the visual, auditory, and environmental impact of the activity that is required to accomplish the goals of industrial mining at this scale. Such a scenario needs to include the impact of existing exploratory work, development of additional mining infrastructure, support activities for the various camps that it is operating in the region, and consider weather events, and seasonal changes. Osisko also does not address, anywhere in the description, how it plans to operate in the winter, or what the impact on the community will be in that season, let alone the community impact on a typical windy summer day. Overall, I have had concerns about this project and the recent detailed submission showing an industrial complex being built on the perimeter of a tourist and residential area is unacceptable.

### 2.29.2 Response

Osisko Development has committed to the development of management and monitoring plans as described in Appendix 20.1. These include a Noise Management and Monitoring Plan and a Waste (Refuse and Emissions) Management Plan, which includes a Fugitive Dust Control Plan and Air Quality Monitoring Plan. Mitigation measures for the Project are summarized in Appendix 20.1. These include mitigation for project effects related to noise, air quality and visual quality.

During construction, the Mine Site will be active with heavy equipment and personnel completing activities such as vegetation removal, site preparation and grading, and building construction. The community can expect noise and activity levels similar to those of an active construction site. During construction, both the Island Mountain Portal and Valley Portal will

undergo active development, with waste rock trucks crossing Highway 26 to move material from the Island Mountain Portal to the Bulk Fill Area. Once the underground drift connecting the two portals is complete, activities will shift primarily to underground construction.

Osisko Development has put significant effort in to the design of the Project and Mine Site to reduce and eliminate a majority of impacts from a typical mining operation. All activities will be contained inside the Services Building and the underground infrastructure. The location, orientation and specific attenuation design and material have been included for the Services Building to capture noise and lighting annoyance. We also truly believe we are correcting an important long lasting environmental problem by reclaiming a waste dump and other infrastructure left from the past mining operations which is contaminating the soil and Jack of Clubs Lake. We are still working on improving the visual impact and will continue engaging with the community of Wells towards an attractive town entrance.

During operations, mining activities will be underground or within the Services Building. Most exploration activities will also be underground at this time. Aboveground activities will consist mostly of trucks moving concentrate to QR Mill from the Services Building, and the transport of waste rock (via electric haul trucks) to Bonanza Ledge along the B-Road. Trucks transporting goods to the Mine Site will also be present, along with workers staying at the camp accommodation.

Activities in the summer and winter will be similar, with machinery completing snow removal during the winter months. Osisko Development has an experienced team of mining operators that have worked at several mines within Canada.

Osisko Development would welcome the opportunity to host a community meeting that describes a “typical day” scenario for the Project, including the implications of mitigations for noise, visual and air emissions.

## **2.30 #30 – Anonymous**

### **2.30.1 Comment**

Hi, I guide in the wells area and I've resided in the barkerville area all of my life. The people I bring into the area are here for the natural beauty, not to witness large scale mining operations. If this mine goes through, you will be severely damaging some of the most pristine wilderness in all of the cariboo. Cow mountain was taken off the list of mountains we could skidoo, in the 2000's and it consistently blows my mind that as long as it's for industry and profit, it doesn't matter what species or territory we put at risk. Tseko has consistently downplayed their footprint on the area, they continue to lie in their proposals to the community and this will be no different, than what we've been dealt in the past. I live near their camp and the noise from that and the mine is EASILY heard from what used to be my peaceful wilderness retreat. I've had clients tell me how unhappy they are with the changes to the area, and I've encouraged them to voice their concerns here as well. We need to stand up for wells and for one of the last untouched areas

we have for non-motorized recreation. In a time when heat waves and global warming are our future, we need to do our part to lower our impact. Allowing even more large scale mining in the area will not be the answer to promoting tourism and better environmental practises in the area. The other thing I've been incredibly concerned about with the concentrator's placement, is the fact that the willow river is a tributary of the Fraser river. It runs past and feeds lots of marsh land and highly sensitive areas. What would ever happen to these delegate regions, should they have a spill? How would they mitigate the clean up, and how would they stop all that toxic waste from draining straight into the Fraser river? It would damage important spawning areas and vegetation along the way. Please, please consider declining their proposal. Please consider not only our future, but the future of our children and our planet. This mine is not the way. Let's stop putting profit over the planet, and over the entire future of our species. Thank you so much for your time. Warm regards.

### 2.30.2 Response

The Project footprint has been designed to maximize use of brownfield and previously disturbed sites so to not impact greenfield areas. The Mine Site will use existing roads and will not require new roads.

Osisko Development installed noise monitoring equipment in Wells in August 2021. The results from these monitors will be shared with the community to increase transparency and accountability.

A Noise Management and Monitoring Plan will be developed for the Project. The Noise Management and Monitoring Plan details mitigation, management, and monitoring measures for noise-related adverse effects from mining activities. It defines mitigation measures to control noise effects from the Project and identifies current noise criteria that would trigger further potential contingency and adaptive measures if exceeded. A change in the noise environment has the potential to adversely affect people and wildlife in the local area. It sets forth the industry BMPs to control the noise sources and reduce the overall noise from the Project.

The plan includes the following key objectives:

- Legislation, guidelines, and/or industry standards relevant to Project noise;
- Mitigation measures planned to reasonably minimize effects from Project noise; and
- Outline of monitoring and reporting planned throughout the Project life.

The plan applies to the Project activities that produce noise and are applicable to the Construction and Operations Phases. Mitigation measures for reducing noise effects are provided in Section 7.3 Acoustic and Osisko Development will be required to implement them should an EA Certificate be issued.

Osisko Development will implement a Fuel Management and Spill Contingency Plan, including procedures that equip vehicles and buildings with spill response equipment and supplies (e.g.,

spill clean-up kits, booms, etc.) and facilitate immediate response to clean-up spills to land or water, and implementation of remediation measures as soon as practicable.

## 2.31 #31 – Anonymous

### 2.31.1 Comment

Type what you like or copy any of this: The community already has been profoundly impacted by Osisko through the development and exploration phases. The key elements of the proposal are this: The concentrator area, including ventilator shafts, propane and fuel storage, high voltage electrical power, sub-station, water treatment tower, camp facility, new industrial bridge on one side of town, new industrial road on mountainside above town, and secondary adit on opposite side of highway will create a permanent industrial scar on a community that is renowned for its wilderness residential quality, and which acts as a gateway to touristic activities which depend on wilderness as their signature aspect, including Bowron Lake Provincial Park, Cariboo Mountains Park, and Barkerville Historic Park. The visual impacts of creating an industrial complex in a residential community are not the most significant impact however. Osisko makes no attempt in its submission to describe the ongoing daily activity that the project will generate. It's this motion, including engine noise, mechanical device noise, exhaust, back-up alarms and increased general activity that are not addressed in the submission. A 'typical day' scenario would help Osisko and the community to understand the visual, auditory, and environmental impact of the activity that is required to accomplish the goals of industrial mining at this scale. Such a scenario needs to include the impact of existing exploratory work, development of additional mining infrastructure, support activities for the various camps that it is operating in the region, and consider weather events, and seasonal changes. Osisko also does not address, anywhere in the description, how it plans to operate in the winter, or what the impact on the community will be in that season, let alone the community impact on a typical windy summer day. Overall, I have had concerns about this project and the recent detailed submission showing an industrial complex being built on the perimeter of a tourist and residential area is unacceptable.

### 2.31.2 Response

Osisko Development has committed to the development of management and monitoring plans as described in Appendix 20.1. These include a Noise Management and Monitoring Plan and a Waste (Refuse and Emissions) Management Plan, which includes a Fugitive Dust Control **Plan** and Air Quality Monitoring **Plan**. Mitigation measures for the Project are summarized in Appendix 20.1. These include mitigation for project effects related to noise, air quality and visual quality.

During construction, the Mine Site will be active with heavy equipment and personnel completing activities such as vegetation removal, site preparation and grading, and building construction. The community can expect noise and activity levels similar to those of an active

construction site. During construction, both the Island Mountain Portal and Valley Portal will undergo active development, with waste rock trucks crossing Highway 26 to move material from the Island Mountain Portal to the Bulk Fill Area. Once the underground drift connecting the two portals is complete, activities will shift primarily to underground construction.

Osisko Development has put significant effort in to the design of the Project and Mine Site to reduce and eliminate a majority of impacts from a typical mining operation. All activities will be contained inside the Services Building and the underground infrastructure. The location, orientation and specific attenuation design and material have been included for the Services Building to capture noise and lighting annoyance. We also truly believe we are correcting an important long lasting environmental problem by reclaiming a waste dump and other infrastructure left from the past mining operations which is contaminating the soil and Jack of Clubs Lake. We are still working on improving the visual impact and will continue engaging with the community of Wells towards an attractive town entrance.

During operations, mining activities will be underground or within the Services Building. Most exploration activities will also be underground at this time. Aboveground activities will consist mostly of trucks moving concentrate to QR Mill from the Services Building, and the transport of waste rock (via electric haul trucks) to Bonanza Ledge along the B-Road. Trucks transporting goods to the Mine Site will also be present, along with workers staying at the camp accommodation.

Activities in the summer and winter will be similar, with machinery completing snow removal during the winter months. Osisko Development has an experienced team of mining operators that have worked at several mines within Canada.

Osisko Development would welcome the opportunity to host a community meeting that describes a “typical day” scenario for the Project, including the implications of mitigations for noise, visual and air emissions.

## 2.32 #32 – Anonymous

### 2.32.1 Comment

The community already has been profoundly impacted by Osisko through the development and exploration phases. The key elements of the proposal are this: The concentrator area, including ventilator shafts, propane and fuel storage, high voltage electrical power, sub-station, water treatment tower, camp facility, new industrial bridge on one side of town, new industrial road on mountainside above town, and secondary adit on opposite side of highway will create a permanent industrial scar on a community that is reknown for its wilderness residential quality, and which acts as a gateway to touristic activities which depend on wilderness as their signature aspect, including Bowron Lake Provincial Park, Cariboo Mountains Park, and Barkerville Historic Park. The visual impacts of creating an industrial complex in a residential community are not the most significant impact however. Osisko makes no attempt in its submission to

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### 2.32.2 Response

Osisko Development has committed to the development of management and monitoring plans as described in Appendix 20.1. These include a Noise Management and Monitoring Plan and a Waste (Refuse and Emissions) Management Plan, which includes a Fugitive Dust Control Plan and Air Quality Monitoring Plan. Mitigation measures for the Project are summarized in Appendix 20.1. These include mitigation for project effects related to noise, air quality and visual quality.

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waste rock (via electric haul trucks) to Bonanza Ledge along the B-Road. Trucks transporting goods to the Mine Site will also be present, along with workers staying at the camp accommodation.

Activities in the summer and winter will be similar, with machinery completing snow removal during the winter months. Osisko Development has an experienced team of mining operators that have worked at several mines within Canada.

Osisko Development would welcome the opportunity to host a community meeting that describes a “typical day” scenario for the Project, including the implications of mitigations for noise, visual and air emissions.

## **2.33 #33 – Justin Fedirko, Barkerville BC**

### **2.33.1 Comment**

As an employee at a copper mine, I have always admired my place of works’ remote location and minimal impact on surrounding communities, while simultaneously remaining prosperous for themselves and for the surrounding communities. The proposed location of the new concentrator and haul truck load out is a minimal effort on the part of Osisko Gold, providing them with convenient access to water for their milling process, and their load out conveniently close to the main highway, not taking into account the eyesore created by a building of that magnitude and the noise pollution of a load out that close to the community. Pumping, Pipelines, and access roads are all viable options to move infrastructure and load out off the highway and away from the community of Wells and should be considered as an alternative to effectively destroying the backdrop that makes Wells and area a desirable tourist destination. It is the responsibility of Osisko Gold to explore all viable options and to put the well-being of the community at the forefront of their proposal. I feel that the current proposal benefits the company solely in terms of cost and convenience while neglecting the needs of the community. A second proposal needs to be put forth to move infrastructure out of the community and away from the highway. The technology for this is readily available and should be considered before this project moves forward. Thank you for your time.

### **2.33.2 Response**

The location of the former Cariboo Gold Quartz Mine was selected as the location of the Mine Site based on numerous criteria. The site was selected based on a number of technical, environmental, social and economic considerations which includes but is not limited to the following:

- Proximity to the ore zones and surface topography. The Mine Site Services Building is located directly above the Valley Zone and is central, relative to the Mosquito, Shaft, and Cow zones.

- Reducing the need for further underground development, which would result in more waste rock needing to be stored on surface.
- Development of as much of the Project on existing brownfield sites as possible. As part of the Project, reclamation activities will be undertaken during the operation, decommissioning and closure phases.
- Minimizing greenfield site surface disturbance, in the form of a longer transmission line and additional road building.
- Minimizing the volume of water that needs to be managed, resulting in less disruption to natural hydrologic processes, which was one of the resource protection objectives used to guide the design of water management approaches.

An alternative analysis for the Project was completed and is provided in Chapter 1 – Project Overview, Section 1.7. A further description of the selection process in relation to the Services Building location is provided as a response to Comment #14.

Osisko Development has been working with the community to address concerns regarding the location of the Mine Site and Services Building. The Services Building was redesigned to reduce the overall height and landscaping design concepts have been developed to further reduce the visual impact. Osisko Development is continuing to refine the building appearance to be more aesthetically pleasing. Osisko Development welcomes community ideas on the building aesthetics to maintain community character and be attractive to tourism.

## **2.34 #34 – Laurie Rice, Quesnel, BC**

### **2.34.1 Comment**

Environmental Stewardship is important to me and I have confidence that this project will have broad positive economic and community impacts on the entire region. It is important to see this project move forward for the benefit of our region.

### **2.34.2 Response**

Thank you for your comments and ongoing support of the Project. Osisko Development is supporting both a Caribou Stewardship Initiative and a Salmon Restoration Initiative with Indigenous nations.

## **2.35 #35 – Bruce Self, Quesnel and Antler creek**

### **2.35.1 Comment**

I do not agree with Osisko's plan as it stands. There are many other options available to them that will minimize the impacts on the environment, wildlife and the citizens and town of Wells. The mine owners may not agree with the other options (such as those identified by Dave Jorgenson), but these options are perfectly reasonable and will still allow the mine to be extremely profitable. I think it is essential to remember that this resource BELONGS to the



province of BC and the PUBLIC and Osisko has permits to access it but does not own it. No one is suggesting that it should not be mined but we are suggesting that it be mined in a way that reduces impacts on other stakeholders. .

### 2.35.2 Response

The location of the former Cariboo Gold Quartz Mine was selected as the location of the Mine Site based on numerous criteria. The site was selected based on a number of technical, environmental, social and economic considerations which includes but is not limited to the following:

- Proximity to the ore zones and surface topography. The Mine Site Services Building is located directly above the Valley Zone and is central, relative to the Mosquito, Shaft, and Cow zones.
- Reducing the need for further underground development, which would result in more waste rock needing to be stored on surface.
- Development of as much of the Project on existing brownfield sites as possible. As part of the Project, reclamation activities will be undertaken during the operation, decommissioning and closure phases.
- Minimizing greenfield site surface disturbance, in the form of a longer transmission line and additional road building.
- Minimizing the volume of water that needs to be managed, resulting in less disruption to natural hydrologic processes, which was one of the resource protection objectives used to guide the design of water management approaches.

An alternative analysis for the Project was completed and is provided in Chapter 1 – Project Overview, Section 1.7. A further description of the selection process in relation to the Services Building location is provided as a response to Comment #14.

Osisko Development has been working with the community to address concerns regarding the location of the Mine Site and Services Building. The Services Building was redesigned to reduce the overall height and landscaping design concepts have been developed to further reduce the visual impact. Osisko Development is continuing to refine the building appearance to be more aesthetically pleasing. Osisko Development welcomes community ideas on the building aesthetics to maintain community character and be attractive to tourism.

Osisko Development legally owns the mineral rights to the Project area, and has the right to develop the resource. The Cariboo Gold Mine has been designed based on the intent and commitment to develop the Project in a sustainable manner that respects environmental, social, heritage, and health values while providing economic benefits for the region. All of which must be balanced and assessed according to regulatory frameworks such as the Environmental Assessment process.

## 2.36 #36 – Anonymous

### 2.36.1 Comment

Osisko has shown that they care about the community and the environment of both Wells and Quesnel. And I think they will continue to set the bar higher and reach those goals by continuing to be a positive contributor to those communities and the workers who come from afar.

### 2.36.2 Response

Thank you for your comments and ongoing support of the Project. Osisko Development employees are active participants in the community by taking in, and participating in, local events such as theatre shows, sports leagues, and school activities.

## 2.37 #37 – Anonymous

### 2.37.1 Comment

This project is a great asset to the region. With the forestry industry struggling it would be nice to see a large project like a gold mine come in to fill this large void the forestry left. The spin off would be excellent for Quesnel as well (Hotels, restaurants and shopping) Barkerville Gold mines have always support local company's and they will continue to do so. This is a great project and I hope that it moves forward!

### 2.37.2 Response

Thank you for your comments and ongoing support of the Project. Osisko Development is supporting the regions economic growth and will contribute to new opportunities by hiring 75% or more of the workforce and source a proportion of its goods and services from businesses in the region. Osisko Development also has the Sustainable Workforce Initiative which aims to train displaced forestry workers as well and unemployed and under-employed residents of the Cariboo Region.

## 2.38 #38 – Anonymous

### 2.38.1 Comment

'Have a read the next steps in contributing to the successful development of the Cariboo Gold Project?! One of the many flaws of the Environmental Assessment process is that, if Osisko doesn't mention something...it doesn't exist in the eyes of the assessors. As a result, if the "Technical Advisory Committee" are not cognizant of the local landscape, familiar with alternative 69 kV routing options, aware of Osisko's current land ownership structure, knowledgeable about Osisko's plans to start an Aggregate Mine on the Pinkerton FSR, aware of the geography of the municipal area of Wells, considering the cumulative impact of adding mining to the ongoing exploration chaos, then they won't have a grasp of the impact of Osisko's

proposal, or the environmental, social and economic simplicity of the solution. Couple that with Osisko's truncated presentation of data that is clearly slanted to project the best face on the proposal on behalf of their stockholders, and you get a pretty skewed process.' Those Deep pockets should not be making decision's about anything concerning a town/area that isnt theirs. Wells ceased to be a mining town decades ago, it is now a tourist destination, not an industrial destination, so there is no need of anymore expansion in this industry, it will not benefit the residents but only serve to remove quality of life, permanently damage the tourist industry, permanently damage the environment, kill endless amounts of wildlife, and destroy wildlife corridors that are already on the brink of extinction from man. If the animals could talk they would oppose it! This company will only tear this land apart until it finds and takes what it wants, leaving destruction and death in its wake, not unlike one who eats a fast food meal then throws their garbage out the window without a care never looking back. These resources belong to everyone, not just them, so what gives them the right ..these strangers to this land, to do what they want and override the rights and voices of the true people of this land? !!! ONLY the long term residents/families of Wells should make the decision !!!

### 2.38.2 Response

The Application provides the required information for the Project as per the Application Information Requirements (EAO 2021). Information on the Project components is provided in Chapter 1 – Project Overview. Information on the Project setting is described in Section 7.1, and further described in the Existing Conditions section of the Valued Components Effects Assessment (See Chapter 7). The purpose of this information is to inform technical reviewers about the project activities and components and the environmental setting. The Technical Advisory Committee includes various members who are familiar with the local landscape and land ownership structure, including representatives from the District of Wells, various local and regional ministries and representatives of the participating Indigenous nations. Osisko Development has also offered to provide tours of the Project area to members of the Technical Advisory Committee, however, the ongoing situation with COVID has limited the opportunities.

Land ownership is provided in Section 7.11 Land and Resource Use, Figure 7.11-6 and Figure 7.11-7. Alternatives for the Transmission Line were described in Chapter 1 – Project Overview, Section 1.7.

Osisko Development has identified mitigation measures to minimize or reduce effects to the biophysical and socio-economic environments. These measures are based on standard industry and best management practices. Project effects and mitigation measures are described in the Application Summary, Section 1.5.1.

Osisko Development owns the mineral rights to the Project area, and has the right to develop the resource. Osisko Development is working closely with our Indigenous partners and local communities to develop the Project. The Cariboo Gold Mine is designed to have high

environmental standards which translate into low impact to natural surroundings while creating development opportunities for our Indigenous partners and local stakeholders.

### **2.39 #39 – Graeme Armstrong, 5th Generation Quesnel Resident, Quesnel BC**

#### **2.39.1 Comment**

I fully support this project. It is great to see it moving forward. Quesnel and the surrounding area has always relied on primary resource jobs that support the region. This project will provide long term jobs to many families. I am confident that the company can continue to mitigate any environmental concerns and operate in a safe and responsible manner.

#### **2.39.2 Response**

Thank you for your comments and ongoing support of the Project. ODV is excited to be a part of the regions economic growth and contribute to new opportunities by hiring 75% or more of the workforce and source a proportion of its goods and services from local businesses. New opportunities will draw workers and their families to the region.

### **2.40 #40 – Anonymous**

#### **2.40.1 Comment**

As an expat of Wells, I was and remain appreciative of the environment that surrounds it. Wells is a mining town, and the proposed 'mine' etc will be a boon to the local economy. However, the proposed location of the new concentrator and haul truck load out provides Osisko Gold, with convenient access to water for their milling process, and their load out conveniently close to the main highway, but does not take into account the eyesore created by a building of that magnitude and the noise pollution of a load out that close to the community. Pumping, Pipelines, and access roads are all viable options to move infrastructure and load out off the highway and away from the community of Wells and should be considered as an alternative to the proposed plan that effectively destroys the backdrop which makes Wells and area a desirable tourist destination. It is the responsibility of Osisko Gold to explore all viable options and to put the well-being of the community at the forefront of their proposal. I feel that the current proposal benefits the company solely in terms of cost and convenience while neglecting the needs of the community. A second proposal needs to be put forth to move infrastructure out of the community and away from the highway. The technology for this is readily available and should be considered before this project moves forward. Thank you for your time.

#### **2.40.2 Response**

The location of the former Cariboo Gold Quartz Mine was selected as the location of the Mine Site based on numerous criteria. The site was selected based on a number of technical,

environmental, social and economic considerations which includes but is not limited to the following:

- Proximity to the ore zones and surface topography. The Mine Site Services Building is located directly above the Valley Zone and is central, relative to the Mosquito, Shaft, and Cow zones.
- Reducing the need for further underground development, which would result in more waste rock needing to be stored on surface.
- Development of as much of the Project on existing brownfield sites as possible. As part of the Project, reclamation activities will be undertaken during the operation, decommissioning and closure phases.
- Minimizing greenfield site surface disturbance, in the form of a longer transmission line and additional road building.
- Minimizing the volume of water that needs to be managed, resulting in less disruption to natural hydrologic processes, which was one of the resource protection objectives used to guide the design of water management approaches.

An alternative analysis for the Project was completed and is provided in Chapter 1 – Project Overview, Section 1.7. A further description of the selection process in relation to the Services Building location is provided as a response to Comment #14.

Osisko Development has been working with the community to address concerns regarding the location of the Mine Site and Services Building. The Services Building was redesigned to reduce the overall height and landscaping design concepts have been developed to further reduce the visual impact. Osisko Development is continuing to refine the building appearance to be more aesthetically pleasing. Osisko Development welcomes community ideas on the building aesthetics to maintain community character and be attractive to tourism.

## 2.41 #41 – Alison Galbraith, Wells, BC

### 2.41.1 Comment

As a resident of Wells, I am strongly opposed to the proposed Northern Transmission Line route that has been identified as Osisko's 'preferred alternative' for power supply when the alternative to run a parallel transmission line along hwy 26 would minimize environmental impacts and meet our communities future energy needs. In order to gain project certification through the Environmental Assessment process, Osisko needs to show that they've done their due diligence in looking at alternative transmission line options and making a case for their option of choice. Osisko's preferred option is to run a power line north of Highway 26, through critical Caribou habitat, building new roads through forested ecosystems rather than paralleling the existing transmission line on Highway 26. The Northern Transmission line will also run through an undisturbed forest landscape on Island Mountain as it enters Wells, having adverse impacts on

the visual quality for residents. An even more egregious outcome of the Northern Transmission line option for Wells residents is that the line will not provide long-term sustainable power for Wells and the communities along Highway 26. In public meetings, the Wells community was told that the line would not be built to BC Hydro standards and would be decommissioned. The attached document identifies my concerns regarding the lack of methodological rigour in the 'Power Supply Alternatives Assessment Analysis' (Appendix 1.0-16) which is the process for which the Northern Route was identified as the preferred alternative.

### 2.41.2 Response

Thank you for your comments. The following was provided as a response to the Technical Advisory Committee regarding the Transmission Line.

Constructing a new 69 kV transmission line along the existing highway-adjacent right-of-way (ROW) associated with Highway 26 (Alternatives A and B) would introduce development delays that are incompatible with the construction and development timeline of the Cariboo Gold Project (the Project). The primary cause of this schedule incompatibility is BC Hydro's unavailability to direct resources toward the construction of this transmission line within the timelines planned for the Project. In discussions between ODV and BC Hydro, it was communicated that, although BC Hydro would not necessarily be opposed to upgrading electrical transmission infrastructure between the Barlow substation and the Town of Wells if such a request was received, BC Hydro is currently pursuing higher-priority infrastructure upgrades elsewhere in the province that take precedence over this Highway 26 project.

ODV raised the prospect of privately financing and constructing the transmission line along the existing Highway 26-adjacent ROW; however, this ROW belongs to the Ministry of Transportation and Infrastructure (MOTI). MOTI protocols dictate that the permits required to build and operate a power line along a highway-adjacent ROW cannot be awarded to a private entity, in this case, ODV. As such, only BC Hydro would be authorized to construct a powerline along this route; this again ties to BC Hydro's current prioritization of this infrastructure upgrade relative to other projects it is undertaking.

Regarding the District of Wells' use of the power supplied by the planned transmission line, there are several complicating factors associated with this power supply access. Government regulations restrict a private entity (i.e., ODV) from directly selling power to a consumer (i.e., the Town of Wells and its present and future residents). As such, ODV is not authorized to provide power conveyed via its privately-operated transmission line directly to the District of Wells.

In order to supply power from ODV's Transmission Line to the District of Wells, an intermediary entity would need to be established in accordance with the relevant regulatory processes required to operate as a utility company/distributor. This intermediary entity would need to be created and operated separately from ODV; however, ODV would be open to and supportive of such an arrangement that would facilitate the supply of power from ODV's Transmission Line to the District of Wells.

The current EAC Application assumes that the Transmission Line will be decommissioned and reclaimed following closure of the Project; this inclusion ensures that the closure activities and costs associated with the entire Project are appropriately considered. It is possible that an agreement could be reached in the future, pending negotiations with BC Hydro and other relevant regulatory bodies, in which BC Hydro would assume ownership and operation of the Project's Transmission Line. In this case, BC Hydro would be able to supply power to the District of Wells via the transmission line that was constructed and previously owned/operated by ODV. The proposed transmission line is being designed in accordance with BC Hydro standards and requirements to the greatest extent possible to make it technically feasible for this ownership/operation transfer to occur at some point in the future, should an agreement be reached between BC Hydro, ODV, and other relevant regulatory bodies.

Regarding the provision of three-phase power to the District of Wells, ODV has been informed by BC Hydro that there have been no formal requests for three-phase power supply to the District of Wells. ODV notes that three-phase power is not used to power residential or light-utility commercial operations, but rather to power large, high-voltage heavy industrial equipment. Currently, most such loads, if not all, are associated with the current (non-CGP) ODV operations and supplied by the existing onsite generator supplied power; such loads would subsequently be supplied by the Project's Transmission Line once available. Should three-phase power become available, it is acknowledged that ODV subcontractors may want to establish a local presence in the Town of Wells to support mining activity associated with the Project, and other residents of the District of Wells may want to establish industrial operations. If an intermediary entity was established that allowed for a supply of power from the ODV-operated transmission line to the District of Wells and that was compliant with all relevant regulations governing such a power supply arrangement, it would be possible to supply three-phase power to industrial entities outside of the Project.

#### 2.41.3 Attachment – Power Supply Alternatives Assessment analysis (Appendix 1.0-16) (1)

Comments and responses from the attachment are provided in Table 2.41-1.

Table 2.41-1 Comment #41 Attachment – Responses

Number	Comment	Response
41-1	<p>Review of Power Supply Alternatives Assessment analysis (Appendix 1.0-16)</p> <p>Concern: The alternative means assessment for Power Supply lacks methodological rigour. Rigour in this context, referring to the legitimacy, integrity and soundness of the process.</p>	<p>The assessment was conducted by a third party consultant and based on industry standard and approved methodological rigor All accounts, sub-accounts and indicators were identified and analyzed by experienced environmental specialists, with input from experienced engineering personnel. All these steps are clearly described in the assessment report, along with all weightings, ascribed values and calculated scores.</p>
41-2	<p>Comments:</p> <p>The Socio-economic account scores much higher for the Northern Route due to the particular value choices represented in the sub-account. There are two sub-accounts in the Socio-economic account, Land Use and General aesthetics, amenities, and continued community use. The indicators used to determine the best option to meet this socio-economic measure are: the amount of Power and Traffic Disruption and Aesthetics. Why isn't sustainable power for the community listed as a sub-account?</p> <p>Especially given that Community Infrastructure and Services are identified by Osisko as a Valued Component in the Project, with the rationale that, "the quality and availability of services and infrastructure in a community or region contribute to residents' overall quality of life." What about consideration of Traditional Land Use Value, or Perception?</p> <p>By leaving out key long-term value components and putting undue weight on lesser values (power and traffic disruption during the one year construction phase), the analysis erodes public confidence and trust in a process that we expect to be fair and objective.</p>	<p>As noted in Section 3 of the Alternatives assessment report, the alternative analyses were completed in order to identify a routing for the mine's power supply which met certain conditions. The provision of power to the community is not one of the stated objectives for installing the line and does not present itself as data to discriminate different routing options. As this is outside the scope of the analysis, it was not considered.</p> <p>The option analysis focuses on characteristics that differ across options. Traditional land use by Indigenous nations was considered, as were archaeological and sacred sites during the characterization phase (section 5 of the report). There were no identified impacts to traditional use among the options. This was affirmed through meetings with the participating Indigenous nations. As there were no differences in traditional use, this characteristic was not considered further. As stated in the analysis report, the assessment is based on characteristics where differences exist to enable discriminating between route options.</p>
41-3	<p>Within the Environment account, The Northern Transmission Line cuts through a permanent Old Growth Management Area (OGMA) which will have a much greater disturbance impact (having inherently higher attribute values) than the previously disturbed OGMA's along highway 26. This is not reflected in the Power Supply Alternatives Assessment analysis (Appendix 1.0-16), with the Northern Route (Alt C) scoring a value of 6 and Highway 26 (Alt B) scoring 3. I would like to request a more comprehensive valuation of the OGMA sub-account,</p>	<p>OGMA locations were based on mapping files obtained from the ministry database. The OGMA close to the Northern route consists of a number of discrete stands. Based on the mapping provided by the Ministry and the commitment from the developer, the routing of the Northern Route has been adjusted to avoid these patches of old growth areas by changing direction including using existing logging roads that run between those patches. For the routing along Highway 26, the right-of-way cannot be shifted to avoid old growth patches as it parallels the road. The</p>



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	assigning higher value to old growth stand attributes, particularly with regard to Caribou habitat.	Northern route has the flexibility in routing to largely avoid OGMA's, while the Highway 26 options inevitably run through a larger portion of OGMA's.
41-4	More clarification is required as to why the Highway 26 route is more technically complex. For the Northern Route, 'a total of 39 km of access road will be required. 22.7 km will be forest roads that require some clearing and upgrades.' That leaves 16.3 km of new access road construction, not to mention the crossing of numerous water bodies and fish-bearing streams along the route. To characterize the technical challenges of constructability with Terrain-related complexity and Proximity to existing utility infrastructure is a grossly simplified and narrow characterization. Presumably, cutting a new linear feature and roads into an area without road access (Northern Route) is more technically complex than widening a right-of-way adjacent to a highway?	The existing utility infrastructure presents problems/constraints associated with placement/power management/ safety during installation. There are strict BC Hydro and MOTI requirements regarding the construction of a T-Line along Highway 26 that also impact the technical aspects of those options. In addition, as stated in the assessment report, the topography alongside Highway 26 also presents issues where in some sections, the only suitable areas for pole placement are currently occupied by the existing line and telecommunication cables. The northern route though longer than the Highway 26 route, does not include any areas that present significant technical obstacles. The spanning of waterways/ waterbodies by lines and upgrades to existing access roads in these areas would be routine construction activities. It should be noted that no new access roads (other than those within the Transmission Line right-of-way) will be required for construction or maintenance of the transmission line. All access roads will be either existing, or upgrades.
41-4	The weightings for indicators and sub-accounts were assigned based on multi-disciplinary discussions on relative importance of components. Who was part of the multi-disciplinary discussions and who decided on the relative importance of components?	Qualified Environmental Professionals as well as Professional Engineers with approved transmission line experience, as per the BC Professional Governance Act were part of the analysis and discussions. Final weightings of components were decided upon two rounds of review with Osisko Development's environmental consultants in charge of the Environmental assessment of the project.
41-5	Why isn't sustainable power for the community listed as a sub-account?	As noted in Section 3 of the Alternatives assessment report, the alternative analyses were completed in order to identify a routing which met certain conditions as listed. The provision of power to the community is not one of the stated objectives for installing the line and does not present itself as data to discriminate different routing options. As this is outside the scope of the analysis, it was not considered.
41-6	The Environment and Climate Change Canada guidelines list Traditional Land Use Value to characterize socio-economic impacts? Why was this sub-account not considered?	Traditional land use was considered, as were archaeological and sacred sites during the characterization phase (section 5 of the report). The participating Indigenous nations were consulted and provincial databases were reviewed to determine impacts to traditional land use. There were no identified impacts to traditional use among the options. This was

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		affirmed through meetings with the indigenous communities concerned. As there were no differences in traditional use, this characteristic was not considered further. As stated in the analysis report, the assessment is based on characteristics where differences exist to enable discriminating between route options.
41-7	Has a soil sensitivity analysis been conducted along the proposed Northern Transmission Line Route?	Soils are addressed in Section 7.6 Soils.
41-8	A qualitative measure is used to determine the alternative means rating for aesthetics. Who determines which option rates higher aesthetically? Aesthetically, the Northern Transmission line would be given a much lower score if a Visual Impact Assessment was conducted from the Wells viewscape.	. While there will be some impact to aesthetics if the Northern route was viewed solely from Wells viewscape, this specific angle of view would have a lower impact than that which would arise from aesthetic effects from the highway. A new 36 m ROW would need to be cleared along Highway 26 and all trees within it would need to be cut to BC Hydro's standards. So, in this regard, a new ROW would need to encroach on a supplemental 52 private land parcels, where in many cases, houses are built close to the road. This would mean, for many residents, that trees on their land (and some in their front yards) will need to be cut down for the 36 m wide new ROW and setting up the transmission line close to their home. In terms of aesthetic and visual impact, this route would create a greater and direct aesthetic impact to a number of resident than a line built in a forested area. The aesthetic impact would also be higher for all travelers along Hwy 26.
41-9	Why have Visual Quality Objectives not been factored into the alternative means assessment with regards to running the Northern Route transmission line within a highly visible stretch of timbered hillside along Island Mountain on the Wells end of the proposed line?	While the application of VQO is a useful tool, using the VQO would not provide any new information that would improve the ability to compare aesthetic impacts in this case. The VQO is normally used for forestry purposes to evaluate cut blocks but rarely linear transmission lines.
41-10	Why is the additional new 4-km access road in mountainous terrain near Wells to extend the Hwy 26 transmission line required when the Hwy 26 line runs to the same junction in which the Northern Transmission line is proposed to cross the highway (by the ball diamond)?	In order to build along Highway 26, the transmission line along the 4 km that parallels Jack of Clubs Lake would have to be built up-slope of the current transmission line. Two transmission lines cannot be placed next to each other on a steep slope. A new access road would be required to facilitate this construction.
41-11	Another question I had where the Highway 26 option scored poorly was	This is a technical issue. The existing utility infrastructure presents problems/constraints associated with placement/power management/

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	<p>regarding the "Potential impact of existing utility infrastructure" category on page 27. It reads as follows: 'Proximity to existing utility lines and infrastructure will require adequate clearance and conformity with technical standards and regulations. Turning off power on existing lines may be required to allow some construction activities. Crossing of other aerial lines or excavation close to buried infrastructure requires additional design, approvals, and execution inputs.</p> <p>Options that avoid any conflicts with existing utility infrastructure are preferred.'</p> <p>As permitting and power disruptions are already covered in other categories I wondered whether proximity to existing utility lines and infrastructure is a legitimate constraint to the Highway 26 option? Additional supporting information is required for validation and transparency.</p>	<p>safety during installation. There are strict BC Hydro and MOTI requirements regarding the construction of a T-Line along Highway 26 that also impact the technical aspects of those options. This is distinct from permitting (a schedule and cost constraint) and from power disruptions (impacts to the community and customers).</p>
41-12	<p>The Estimated operational costs for the Northern Route are \$120,000 per year. What type of maintenance (disturbance) will be required along the route? Will there be any work done in winter?</p>	<p>Operational costs are associated mainly with ongoing maintenance of the Transmission Line access roads. Maintenance activities for the Transmission Line right-of-way include vegetation maintenance. This is typically done approximately every 7 years and is dependent on vegetation species in the right-of-way and growth rates.</p>
41-13	<p>Given that the Northern Transmission line costs ten times more annually than the Highway 26 option, has the difference of \$2.16 million been accounted for in the Economic Account of this analysis?</p>	<p>Both capital and operational costs were considered.</p>
41-14	<p>In Appendix 1.0-16 it states that "The lines would be expected to eventually be passed over to BC Hydro, so decommissioning is not anticipated and not considered for the assessment." What arrangements have been made with BC Hydro regarding the proposed Northern Transmission line route. In public meetings, the community was told that the line would not be built to BC Hydro standards and would be decommissioned. The assumption was made that Osisko would be responsible for the cost of removal and remediation. Is this not the case?</p>	<p>The current EAC Application assumes that the Transmission Line will be decommissioned and reclaimed following closure of the Project; this inclusion ensures that the closure activities and costs associated with the entire Project are appropriately considered. It is possible that an agreement could be reached in the future, pending negotiations with BC Hydro and other relevant regulatory bodies, in which BC Hydro would assume ownership and operation of the Project's Transmission Line. In this case, BC Hydro would be able to supply power to the District of Wells via the transmission line that was constructed and previously owned/operated by ODV. The proposed transmission line is being designed in accordance with BC Hydro standards and requirements to the greatest extent possible to make it technically feasible for this</p>

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		ownership/operation transfer to occur at some point in the future, should an agreement be reached between BC Hydro, ODV, and other relevant regulatory bodies.
41-15	Request: I would request that the proponent re-evaluate the 'preferred alternative', the Northern Transmission Line Route, with consideration to the methodology in choosing, valuating, and measuring the sub-accounts. Consideration should be given to Sustainable long-term Community Power Supply and Traditional Land Use within the Socio-Economic account. Additional supporting information for assigned indicator values and specific criteria for why the particular sub-accounts were chosen is required to ensure the integrity and transparency of the alternative means analysis.	Sustainable long-term Community Supply is not a differentiator for a routing assessment because whichever option is chosen, the final outcome related to the pass over of the line to BC Hydro remains the same.  Traditional Indigenous Land Use was included in the assessment. Results from discussions with Indigenous local communities and Osisko have been incorporated into the analysis. Traditional land use by indigenous communities and Nations was considered, as were archaeological and sacred sites during the characterization phase (section 5 of the report). There were no identified impacts to traditional use among the options. This was affirmed through meetings with the participating Indigenous communities.

## 2.42 #42 – Anonymous

### 2.42.1 Comment

The community already has been profoundly impacted by Osisko through the development and exploration phases. The key elements of the proposal are this: The concentrator area, including ventilator shafts, propane and fuel storage, high voltage electrical power, sub-station, water treatment tower, camp facility, new industrial bridge on one side of town, new industrial road on mountainside above town, and secondary adit on opposite side of highway will create a permanent industrial scar on a community that is reknown for its wilderness residential quality, and which acts as a gateway to touristic activities which depend on wilderness as their signature aspect, including Bowron Lake Provincial Park, Cariboo Mountains Park, and Barkerville Historic Park. The visual impacts of creating an industrial complex in a residential community are not the most significant impact however. Osisko makes no attempt in its submission to describe the ongoing daily activity that the project will generate. It's this motion, including engine noise, mechanical device noise, exhaust, back-up alarms and increased general activity that are not addressed in the submission. A 'typical day' scenario would help Osisko and the community to understand the visual, auditory, and environmental impact of the activity that is required to accomplish the goals of industrial mining at this scale. Such a scenario needs to include the impact of existing exploratory work, development of additional mining infrastructure, support activities for the various camps that it is operating in the region, and consider weather events, and seasonal changes. Osisko also does not address, anywhere in the description, how it plans to operate in the winter, or what the impact on the community will be in that season, let alone the community impact on a typical windy summer day. Overall, I have had concerns about this project and the recent detailed submission showing an industrial complex being built on the perimeter of a tourist and residential area is unacceptable.

### 2.42.2 Response

Osisko Development has committed to the development of management and monitoring plans as described in Appendix 20.1. These include a Noise Management and Monitoring Plan and a Waste (Refuse and Emissions) Management Plan, which includes a Fugitive Dust Control Plan and Air Quality Monitoring Plan. Mitigation measures for the Project are summarized in Appendix 20.1. These include mitigation for project effects related to noise, air quality and visual quality.

During construction, the Mine Site will be active with heavy equipment and personnel completing activities such as vegetation removal, site preparation and grading, and building construction. The community can expect noise and activity levels similar to those of an active construction site. During construction, both the Island Mountain Portal and Valley Portal will undergo active development, with waste rock trucks crossing Highway 26 to move material from the Island Mountain Portal to the Bulk Fill Area. Once the underground drift connecting the two portals is complete, activities will shift primarily to underground construction.

Osisko Development has put significant effort in to the design of the Project and Mine Site to reduce and eliminate a majority of impacts from a typical mining operation. All activities will be contained inside the Services Building and the underground infrastructure. The location, orientation and specific attenuation design and material have been included for the Services Building to capture noise and lighting annoyance. We also truly believe we are correcting an important long lasting environmental problem by reclaiming a waste dump and other infrastructure left from the past mining operations which is contaminating the soil and Jack of Clubs Lake. We are still working on improving the visual impact and will continue engaging with the community of Wells towards an attractive town entrance.

During operations, mining activities will be underground or within the Services Building. Most exploration activities will also be underground at this time. Aboveground activities will consist mostly of trucks moving concentrate to QR Mill from the Services Building, and the transport of waste rock (via electric haul trucks) to Bonanza Ledge along the B-Road. Trucks transporting goods to the Mine Site will also be present, along with workers staying at the camp accommodation.

Activities in the summer and winter will be similar, with machinery completing snow removal during the winter months. Osisko Development has an experienced team of mining operators that have worked at several mines within Canada.

Osisko Development would welcome the opportunity to host a community meeting that describes a “typical day” scenario for the Project, including the implications of mitigations for noise, visual and air emissions.

## **2.43 #43 – Anonymous**

### **2.43.1 Comment**

Attached are my comments on Section 7.10 Employment and Economy.

### **2.43.2 Response**

Thank you for your comments. Responses are provided in the section below.

### **2.43.3 Attachment – Comments on Employment and Economy Section 7.10**

Comments and responses from the attachment are provided in Table 2.43-1.

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**Table 2.43-1 Comment #43 Attachment - Responses**

Number	Comment	Response
43-1	<p>Comments on Section 7.10 Employment and Economy Section I am commenting as a member of the Community Advisory Committee, and as a long-time resident of Wells, a homeowner and landlord.</p> <p>This section, while placing a heavy emphasis on job creation and employment, glosses over other aspects that one would expect to see in this chapter. It also does not present a full analysis of the topics it discusses.</p>	<p>Section 7.10 Employment and Economy will be updated to provide more information specific to Wells.</p>
43-2	<p>Direct Employment This section stresses job creation within the community and touts a 'local first' hiring policy. This claim looks good on paper, and I am sure those from outside the community reviewing the project would think of this as a positive. However, at this point in time, almost everyone who wishes to work for ODV is already working there. So, it appears that most of the future job creation will be outside Wells, and this should be stated as such in the proposal.</p>	<p>Project's workforce requirements, and assumptions about how the requirements may be met were discussed in Chapter 7.10. Key assumptions were that 75% of required workers would be hired from the Cariboo Region and that those working for Osisko Development would transition from their current responsibilities to the Project. Those workers transitioning from another Osisko Development operations will benefit from jobs at the Project since their existing jobs would come to an end and, without the new proposed Project, they would be unemployed. The Project will extend local benefits over the construction and operations periods. Further, Osisko Development wishes to maximize local and regional hiring from identified Diverse Groups. A discussion will be included in the upcoming GBA+ study in January 2022 with information incorporated into the revised Application.</p> <p>Appendix 1.0-14 CGP Workforce Policies and Programs: includes Osisko Development's workforce policies and commitments to hiring local and Indigenous people and to provide equal, diverse, and inclusive employment opportunities based on qualifications.</p>
43-3	<p>Negative Impacts on Tourism There is insufficient analysis of the interaction of the proposed project with the existing and potential tourism industry. The negative impacts of the project are glossed over.</p>	<p>A Tourism study for the Project is being prepared and will be provided to the EAO.</p>
43-4	<p>BGM has already employed a number of Wells residents. This of course is a positive benefit for the individual, especially those who have been able to maintain summer employment at Barkerville and winter employment at BGM. However, in most cases it has moved tourism workers to jobs in mining. This problem is exasperated by the lack of</p>	<p>Section 1.6.3 Workforce Sourcing, Accommodation, and Wellbeing of Chapter 1.0: Project Overview includes a full description of Project's workforce sourcing and accommodation plan.</p> <p>According to Section 1.6.3:</p>

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	<p>housing in the community. With vacancy rates at zero and a high unfulfilled demand, this means that not only is there a loss of tourism workers, but there is also a loss of housing for tourism workers. It means there can not be an influx of new workers into the community to meet the employment demands of tourism, because there is no housing for them.</p>	<ul style="list-style-type: none"> <li>• Employees who are not local to the area (for example, Wells or Quesnel) or employee working on a 14 days on/14 days off the roster will be provided with accommodation in the new Worker Accommodations at the Mine Site Complex and at the QR Mill.</li> <li>• The existing accommodation and the various accommodations that Osisko Development currently owns in the District of Wells are sufficient to meet the Project's labour requirements during the Construction Phase.</li> <li>• Current Camp A and Camp B will be used while the site earthworks, water management structures, and the new accommodation are being constructed.</li> <li>• Once the new Worker Accommodation is complete and operational, and along with Camp A and Camp B, there will be sufficient capacity to accommodate the peak on-site workforce during the Construction Phase of approximately 273 workers.</li> <li>• Workers will be able to leave the accommodation when off-shift and continue to commit to the Osisko Development's Code of Conduct and Ethics.</li> <li>• The capacity and condition of the existing QR Mill accommodation are adequate for construction personnel during the pre-production period, at which time the QR Mill operations personnel will transfer to the new accommodation.</li> <li>• During short periods of increased construction activity, minor shortfalls in accommodation are planned to be addressed through accommodation available in Wells and Quesnel.</li> <li>• A detailed logistics plan will be developed to maintain adequate accommodations during the QR Mill upgrade work for the Project.</li> <li>• The new Worker Accommodation at the Mine Site Complex and new Worker Accommodation at the QR Mill will be adequate to accommodate Osisko Development workers during the Operations Phase and most of the Closure Phase.</li> <li>• Once the accommodation buildings are ready for decommissioning during the Closure Phase, workers will stay at available local accommodation (in Wells or Quesnel).</li> </ul>



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		<ul style="list-style-type: none"> <li>• During the Post-Closure Phase, workers will stay at available local accommodation (in Wells or Quesnel) if and as needed.</li> <li>• Transportation Plan: Workers will transport to and from each site (Mine Site and QR Mill) through a combination of shuttle service from Quesnel, personal vehicles (for contractors), and company vehicles for transport from Wells and Quesnel until the Worker Accommodations is built to capacity. Once the Worker Accommodations are built, the shuttling will occur according to the shifts and company vehicles, or personal vehicle (for contractors) will be used on and between sites as needed.</li> </ul> <p>The above described Workforce Sourcing and Accommodation Plan will lift pressure from the housing market that the Project may create. In addition, Osisko Development wishes to invest in community development initiatives. Current discussions to identify priorities are underway. The GBA+ Study will include a chapter that discusses community development initiatives, up to date, and the results of collaborations. Community development initiatives will be discussed in the GBA+ Study since they show indirect benefits for Diverse Groups in the Local Assessment Area as well as the sustainable benefits the Cariboo Gold Project will bring to the Local Assessment Area.</p> <p>Osisko Development, through its Community Relations Policy is committed to:</p> <ul style="list-style-type: none"> <li>• Establishing ongoing dialogue and respectful relationships with host communities through sharing of information and recording, understanding, and working collaboratively on responding to concerns.</li> <li>• Evaluating each of our activities in terms of the potential negative impacts and risks for the natural, human, and social environments, with the goal of adopting mitigation measures aimed at prevention and protection.</li> <li>• Ensuring that stakeholders potentially affected by the impacts of its activities are identified at an early stage and consulted.</li> </ul>

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Number	Comment	Response
		<ul style="list-style-type: none"> <li>Contributing to the socio-economic development of host communities through investments in community-based sustainable development projects.</li> <li>Contributing to the economic development of host communities by creating employment opportunities and promoting local purchasing.</li> </ul>
43-5	<p>In addition, ODV (or its associates) has purchased the two major motels, and recently purchased an additional RV park taking over 80% of the overnight tourism accommodation out of circulation. Elsewhere, (in the subsection on Wells in the Summary) it is stated in several places that Wells aspires to become an overnight stop for people visiting Wells and Bowron. These comments are grossly inaccurate. In the 1970's that was the aspiration. By the 1990s Wells had achieved that goal, and in fact, had become a destination in its own right. People came stayed overnight and longer to pursue a variety of activities in Wells and area, that included culture, history, and outdoor recreation. It is only in the last 5 years, with the removal of accommodation that the situation has changed. These actions by BGM/ODV have already had significant negative impacts on tourism. This situation needs to be more accurately stated in the document.</p>	<p>Noted. A review of Project's effects on tourism will be included in the revised Application in January 2022. Section 1.6.3 Workforce Sourcing, Accommodation, will be updated with additional information that describe the camps, their amenities and capacity and whether they will accommodate Project's workforce only or other users such as tourists. The estimates of construction and operations workers will be compared to camp capacities to identify whether there will be room to accommodate other users. Depending on the results of the analysis, further mitigation may be identified.</p> <p>Prior to COVID, Osisko Development made rooms available to interested parties, upon request, with the proceeds from those stays donated to the Wells Community Foundation. Over a 8 month period, only 12 room nights were rented out in total to the public.</p> <p>The Whitecaps was purchased by a contractor, who is no longer a contractor on our site and hasn't been since 2015. Osisko Development has reached out to the owner of the Whitecaps to release rooms to the public and they declined. Osisko Development is not responsible for their business practices. The RV park that was purchased has not been operational for two years.</p>
43-6	<p>Community Liveability, Arts and Culture as an Economic Driver This section lacks detail on the contribution of these factors on economic health and stability. In 1970 Wells was a community that</p>	<p>The Community Involvement Plan outlines the process ODV will follow to meet its commitments to community members, stakeholders, and the public during all phases of the Project.</p>

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Number	Comment	Response
	<p>mining had abandoned. An influx of young people with creative ideas transformed the community from a ghost town to a vibrant community. They revived the fire department, restored the Community Hall, restored the Hill Meat Market for an art Gallery, restored the Sunset Theatre, and breathed new life into the Museum. The formation of Island Mountain Arts in 1977 attracted not only students and instructors and established cultural tourism as a valued industry in Wells, but also ultimately attracted full-time residents. Artists moved to Wells and opened studios and galleries. Up until recently, Culture and Tourism were the major employment sectors. Some of the attributes that people have listed that they value about Wells, and that make Wells a desirable community, include:</p> <ul style="list-style-type: none"> <li>• Low traffic, pedestrian friendly community</li> <li>• Friendly close-knit community</li> <li>• Air quality</li> <li>• Affordable housing</li> <li>• Cultural activities and events</li> <li>• Natural beauty</li> <li>• Closeness to nature,</li> <li>• Abundant wildlife</li> </ul> <p>Almost all these attributes are threatened by the current proposal. For example, ODV/BGM has purchased one apartment block and several private residences. Most recent purchases have been well above market value, driving up real estate prices. This in turn will drive up taxes and Wells may become unaffordable for seniors and those on lower or fixed incomes.</p>	<p>Osisko Development Corp. will proactively engage with the communities involved with the Project. This engagement will be made to build and maintain constructive relationships and of maximizing local benefits.</p> <p>Osisko Development Corp. will work with local community members, stakeholders, and the public to maximize the positive economic benefits of the Project that will flow into their communities. Osisko Development Corp. is committed to establishing collaborative dialogue with local community members, stakeholders, and the public to better understand community priorities and integrate feedback and concerns into all levels of Project planning, decision-making, and implementation.</p> <p>This document will also provide a community and stakeholder concerns and issues monitoring plan.</p> <p>ODV, through its Community Relations Policy is committed to:</p> <ul style="list-style-type: none"> <li>• Establishing ongoing dialogue and respectful relationships with host communities through sharing of information and recording, understanding, and working collaboratively on responding to concerns.</li> <li>• Evaluating each of our activities in terms of the potential negative impacts and risks for the natural, human, and social environments, with the goal of adopting mitigation measures aimed at prevention and protection.</li> <li>• Ensuring that stakeholders potentially affected by the impacts of its activities are identified at an early stage and consulted.</li> <li>• Contributing to the socio-economic development of host communities through investments in community-based sustainable development projects.</li> <li>• Contributing to the economic development of host communities by creating employment opportunities and promoting local.</li> </ul>
43-7	<p>While ODV might argue that the loss of this liveability will be compensated by the economic value this project will give to the Province, local residents who have worked hard to preserve the community do not necessarily agree. The graveness of the upheaval that will be caused to the existing way of life is greatly underplayed in the application.</p>	<p>Osisko Development has provided support to District of Wells initiatives for community planning and infrastructure upgrades. Osisko Development is currently in the process of developing a Memorandum of Understanding with the District of Wells which addresses sewer, water and infrastructure upgrades as well as the school.</p>

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Number	Comment	Response
43-8	In a previous comment period I had asked for the following questions to be answered. For the most part they were not, so I repeat them here. To date the information provided either does not apply to the situation in Wells, or is too general and vague to be useful.	Question answers are provided below.
43-9	What are the jobs to be created and who is going to fill them? Do these people currently live in Wells and if not, where will they live during their employment (camp, commute, etc.)	<p>Section 1.6.3 Workforce Sourcing, Accommodation, and Wellbeing of Chapter 1.0: Project Overview includes full description of Project's workforce sourcing and accommodation plan. Appendix 1.0-14: includes a full list of workforce policies and programs.</p> <p>Table 1.6-1 Project Summary of the Construction Phase Workforce includes a list of construction jobs by facility area, Category, Numbers and Role/ Skill Requirements.</p> <p>Table 1.6-2 Project Summary of the Operations Phase Workforce includes a list of operations jobs by facility area, Category, Numbers and Role/ Skill Requirements.</p> <p>Osisko Development Corp. workforce policies and programs are provided in Appendix 1.0-14.</p> <p>ODV will hire a variety of contractors for construction. Contractors generally have a core group of workers (e.g., trades people, labourers, operators) and hire locally as required to support their existing workforce. For sourcing, key assumptions were that 75% of required workers would be hired from the Cariboo Region and that those working for ODV would transition from their current responsibilities to the Project.</p> <p>CGP Hiring Program is currently being developed and will be incorporating recommendations and mitigative measures outlined in the CDP Application where appropriate. This includes, but is not limited to, the following:</p> <ul style="list-style-type: none"> <li>• Providing training opportunities to residents, as appropriate, to increase the skills of the local and regional workforce to enable ODV to maximize hiring from the local and regional area. This will also help expand the pool of potential employees and will help facilitate hiring of individuals from segments of society generally not well represented in mining projects.</li> </ul>

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Number	Comment	Response
		<ul style="list-style-type: none"> <li>• Holding a community open house to inform people about the types of opportunities, requirements, and training available.</li> <li>• Encouraging contractor companies to hire local or regional residents; and</li> <li>• Updating and further developing proactive employment policies and programs.</li> <li>• ODV will work to communicate employment opportunities through a variety of communication means, which may include:               <ul style="list-style-type: none"> <li>• Project website.</li> <li>• Project newsletter.</li> <li>• Social media.</li> <li>• Email list serve.</li> <li>• Recruitment events.</li> <li>• Newspapers (local and regional).</li> <li>• Open houses and workshops; and</li> <li>• Local and regional employment centers.</li> </ul> </li> </ul>
43-10	<p>Given the information gathered above, what benefits/disbenefits from this employment will accrue to Wells as opposed to the region.</p>	<p>Wells is part of the Local Assessment Area. The discussion in the Revised Application will continue to include Wells in the LAA unless if disproportionately affected. Expected benefits are:</p> <ul style="list-style-type: none"> <li>• Access to direct employment in the CGP</li> <li>• Increase in labor income for those employed by ODV</li> <li>• Increase in contribution of municipal taxes</li> <li>• Growth opportunities for local businesses through procurement</li> <li>• Access to training</li> <li>• Contribution to socio-economic development</li> </ul> <p>Potential negative effects were identified and discussed in the Application for the LAA. Mitigation measures were included and will be updated with relevant references to ODV's commitments as described in the corporate policies.</p>

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Number	Comment	Response
43-11	What will be the impact of the proposed camp on Wells? Will it be a wet camp or a dry camp? Will its residents be allowed to fraternize businesses in Wells? What will be the anticipated level of spending?	<p>The revised Application will include full description of the camps: their capacity, amenities, and camp policies.</p> <p>Workplace Policies and Programs were included in Appendix 1.0-14 CGP workforce policies and programs. ODV has a drug and alcohol policy that includes zero tolerance. All staff must read and sign off on the policy. Every employee and contractor on site have a duty to attend work “fit for duty.” A positive and respectful camp environment will be created through a “ One Team, One Company, One Family” approach.</p> <p>ODV has an anti-bullying and harassment policy in place, and staff must also sign and comply with this policy, which outlines that the Company has zero-tolerance for:</p> <ul style="list-style-type: none"> <li>• Sexual harassment.</li> <li>• Racial or national origin harassment.</li> <li>• Harassment based on gender, race, color, religion, age, national origin, disability or sexual orientation; or</li> <li>• Retaliation against anyone for making a good-faith complaint of such harassment or for cooperating in the Company investigations of such complaints.</li> </ul> <p>ODV’s employees and contractors must always sign the corporate Code of Conduct and Ethics and agree to respect its terms and its intent while on and off shift at the workplace or in the community.</p>
43-12	What is an accurate estimate of families that might move to Wells for the duration of this project? On what is that estimate based? What jobs would they be filling? What incentive would they have to move to Wells as opposed to living elsewhere? How will they be housed?	<p>Potential changes in population due to the Project were based on the Project’s workforce requirements, and assumptions about how the requirements may be met. Key assumptions were that 75% of required workers would be hired from the Cariboo Region and that those working for Osisko Development would transition from their current responsibilities to the Project. The revised Application will include edits to assumptions and a conservative estimate of families who may choose to move to Wells based on BC mining industry’s experience.</p>
43-13	Will BGM build additional family-friendly housing (instead of draining existing stock) and if so, how much, and where (given the geo-technical challenges of the area)?	<p>Community development initiatives will be identified in collaboration with the local municipalities based on community’s priorities. Approximately 7 to 10 homes are planned to be built in Wells on currently empty lots.</p>

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Number	Comment	Response
43-14	Of the overall economic benefits derived from the project what type and proportion will fall to the Province (or provincially as a whole), to the region, and to the community of Wells?	Section 7.10 Employment and Economy Table 7.10-41 Total Economic Impact of the Cariboo Gold Project (Direct, Indirect, and Induced) summarizes regional and provincial overall economic benefits from the Project.
43-15	Of the overall negative economic impacts of the project what type and proportion will fall on Wells as compared to the region and the province.	No negative economic effects were identified.
43-16	The specific section on Wells should have included these detailed answers.	Impacts on Wells are discussed under the Local Assessment Area. The revised Application will include additional details if Wells is disproportionately affected.

## 2.44 #44 – Anonymous

### 2.44.1 Comment

Osisko Development as good track record for developing mining projects with respect to local communities and environment. Also, they support many local organizations and at time will finance new infrastructures for the communities where they are located which will be a good thing for the Wells/Quesnel area.

### 2.44.2 Response

Osisko Development has been proud to support local organizations including Island Mountain Arts, the Sunset Theatre, Newman and Wright, and Barkerville Historic Town and Park. Osisko Development is currently in the process of developing a Memorandum of Understanding with the District of Wells which addresses sewer, water and infrastructure upgrades as well as the school.

## 2.45 #45 – Kayly Phipps, Prince George, BC

### 2.45.1 Comment

Five years ago, I moved to Wells for a position at BGM and I have never looked back. I love living and working in this region and I tell everyone I know that they need to come see it for themselves. Increasing the job and housing market in this region will be great for the community and give the region even more exposure. There are a shocking number of people in BC who have no idea Wells – Barkerville - Bowron Lakes exists and that's a crime. The only "scar" I see on this landscape is the tailings beach that you stare at as you drive into Wells. Most people have no idea what they're looking at. By taking ownership of that area, BGM/Osisko also takes on the reclamation and remediation of the tailings area and I'm excited to see what they do to make it an actual tourist destination. I respect the concern for air and noise pollution that the concentrator building may cause. I would expect BGM/Osisko to work with the town and listen to these concerns. There are so many modern technologies and options for the company to make this an easier transition for everyone. Set-up low lighting conditions for the evening so that the community isn't staring into a beacon all night long. I agree that no one wants to stare at a big ugly building. This has been an artist's community for the last few decades – I believe that we can work together to make the building something everyone can be proud of.

### 2.45.2 Response

Thank you for your comments and ongoing support of the Project.

The remediation associated with the Cariboo Gold Quartz Mine operation (i.e., the area referred to in the reviewer's comment), with respect to tailings and waste rock, is under the jurisdiction of the Provincial Government (Crown Contaminated Sites Program in the Ministry of Forests, Lands, Natural Resource Operations and Rural Development [FLNRORD]). Osisko



Development and FLNRORD have ongoing discussions regarding remediation activities for areas outside of the planned Project footprint.

Osisko Development is continuing to refine the building appearance to be more aesthetically pleasing. Osisko Development welcomes community ideas on the building aesthetics to maintain community character and be attractive to tourism.

## **2.46 #46 – Jason Mueller, Quesnel, BC**

### **2.46.1 Comment**

I am a current employee of Osisko Dev. I look forward to this project going forward and the opportunities it provides for the local communities and area. I am glad Osisko is committed to responsible mining and the environment.

### **2.46.2 Response**

Thank you for your comments and ongoing support of the Project.

## **2.47 #47 – Marcel Guiguet, Wells, BC**

### **2.47.1 Comment**

I am a wells resident, I was born in a mining town and I will retire in a mining town. I feel as Osisko follows environmental policies that exceed government parameters.

### **2.47.2 Response**

Thank you for your comments and ongoing support of the Project.

## **2.48 #48 – Anonymous**

### **2.48.1 Comment**

Barkerville Gold Mines plays a crucial role in the development of the Wells Community. The organization provides jobs, infrastructure and pumps money into the local economy. The extraction of gold also contributes to economic growth at a federal and global scale; this is important. However, I think the company is missing the mark on considering some local voices. The company needs to stop taking up available real estate in the town. Or, give it back to the community through affordable housing.

### **2.48.2 Response**

Of the 18 residential properties that were sold in the last year, three were purchased by Osisko Development. Osisko Development appreciates the community and has listened to all voices in the community. A summary of community engagement activities to date is provided in Chapter 3 Public Engagement. Table 3.4-1 provides a summary of key issues and responses.

## **2.49 #49 – Anonymous**

### 2.49.1 Comment

I have recently become an employee with Osisko. I have quickly discovered that the efforts and support this project will and already have provided the wells community and surrounding areas will have a positive impact. This project will give me the opportunity to expand my experience and knowledge. I agree with this project moving forward!

### 2.49.2 Response

Thank you for your comments and ongoing support of the Project. Osisko Development will continue to support the growth and development of our employees with new opportunities.

## 2.50 #50 – Anonymous

### 2.50.1 Comment

I just wanted to start by saying I think the new phase of mining will bring lasting economic benefits to the town of Wells through employment opportunities directly at the mine and through growing local business opportunities. As an employee of BGM I feel it is a privilege to live and work in the beautiful town of Wells. The pristine beauty of the Cariboo Mountains combines with the thriving arts, and growing food industry make it an ideal place to live and work. I would like to see BGM and Osisko Development continue to work and grow with the town of Wells in a respectful manner by taking in the locals perspectives. Some suggestions that I have would be to incorporate tourism and the arts directly into the new development. If the concentrator is to go into its current proposed location, I believe it should be painted with a large mural detailing the history of the land and the culture of Wells, Barkerville and the surrounding area. The building is going to stand out so we might as well make it into a beautiful public art piece and not an eye sore. I also think having an interpretive boardwalk through the valley zone to show the history of mining, historic tailings, and how mining techniques and practices have changed over the years. I believe the impact of such a board walk could have many impacts on community relations. A board walk increases public knowledge of the current project and increases knowledge of the natural resource industry. A boardwalk has a tourist draw for a short and accessible walkway from town. If planned properly a boardwalk could allow access to the public trails on Cow Mountain that are currently cut off by active work areas. Overall I think this project will continue to have a net positive impact on Wells as long as development is being done with a community focus for long term success in Wells and the surrounding areas.

### 2.50.2 Response

Thank you for the comments and ongoing support of the Project. The new camp accommodation has been designed with modern facilities for employees, including a fitness centre and theatre. Osisko Development is supporting the Cariboo Gold Quartz Headframe Project which will see the headframe moved to Lot B and become the base for an interpretive centre to showcase mining today as well as mining in the Wells area.

## 2.51 #51 – Donna Williams, Wells, BC

### 2.51.1 Comment

As a new permanent resident and homeowner of Wells, (as of this past July), I am not as “in the know” as many of the longer term residents as to the reasons behind the many decisions made concerning the placement of the concentrator, water treatment tower, etc. That said, I can’t help but feel that placing these structures, that stand in stark contrast to the natural beauty of this area, and can only negatively impact what is most valued here, (its natural peaceful ambiance), is short-sighted on your part. The alternate location behind Cow Mtn. where it will be out of sight to townspeople and tourists, would be much less obtrusive. If this mine wants to live harmoniously in this community, the fewer industrial blemishes on the landscape will go a long way in achieving this outcome. Please consider.

### 2.51.2 Response

The location of the former Cariboo Gold Quartz Mine was selected as the location of the Mine Site based on numerous criteria. The site was selected based on a number of technical, environmental, social and economic considerations which includes but is not limited to the following:

- Proximity to the ore zones and surface topography. The Mine Site Services Building is located directly above the Valley Zone and is central, relative to the Mosquito, Shaft, and Cow zones.
- Reducing the need for further underground development, which would result in more waste rock needing to be stored on surface.
- Development of as much of the Project on existing brownfield sites as possible. As part of the Project, reclamation activities will be undertaken during the operation, decommissioning and closure phases.
- Minimizing greenfield site surface disturbance, in the form of a longer transmission line and additional road building.
- Minimizing the volume of water that needs to be managed, resulting in less disruption to natural hydrologic processes, which was one of the resource protection objectives used to guide the design of water management approaches.

An alternative analysis for the Project was completed and is provided in Chapter 1 – Project Overview, Section 1.7. A further description of the selection process in relation to the Services Building location is provided as a response to Comment #14.

Osisko Development has been working with the community to address concerns regarding the location of the Mine Site and Services Building. The Services Building was redesigned to reduce the overall height and landscaping design concepts have been developed to further reduce the visual impact. Osisko Development is continuing to refine the building appearance to be more

aesthetically pleasing. Osisko Development welcomes community ideas on the building aesthetics to maintain community character and be attractive to tourism.

## **2.52 #52 – Anonymous**

### **2.52.1 Comment**

The Cariboo Gold Project will likely not be able to proceed due to their lack of support to re open the Quesnel Hydraulic Road which is included in their transportation plan.

### **2.52.2 Response**

Maintenance and repair of the Quesnel Hydraulic Road is the responsibility of the BC Ministry of Transportation and Infrastructure. The Quesnel Hydraulic Road is included in the Transportation Route as it is a potential route workers could use to access the QR Mill. If this road is not accessible, then all workers will travel from Quesnel to the QR Mill via Highway 26 and the 500 Nyland Lake Road.

## **2.53 #53 – Anonymous**

### **2.53.1 Comment**

As a business owner in Quesnel, I look forward to the continuation of this project. I feel it provides a good balance of responsible development that will benefit the region as a whole. BGM has proven itself as a good corporate citizen in the past years it has been operating. As the economy in the Cariboo is in a state of transition due to repeated crisis in the forest industry (Mountain Pine Beetle, Forest Fires), this project will provide much needed long term jobs and stability.

### **2.53.2 Response**

ODV is excited to be a part of the regions economic growth and future by developing new opportunities that include hiring 75% or more of the workforce from the region and sourcing a proportion of its goods and services from local businesses. New opportunities will draw workers and their families to the region, creating more opportunity through spin-off economic activity. Thank you for your comments and ongoing support of the Project.

## **2.54 #54 – John Aitken , Wells, BC**

### **2.54.1 Comment**

In these times of uncertainty to have a company come in and invest so much time and money into the wells district in the form of the Cariboo Project is a blessing for all of us. Not only Wells but Quesnel as well will benefit from this for many years to come. Osisko has shown themselves to be environmentally responsible and a team player with the communities around them.

### 2.54.2 Response

ODV is excited to be a part of the regions economic growth and future by developing new opportunities that include hiring 75% or more of the workforce from the region and sourcing a proportion of its goods and services from local businesses. New opportunities will draw workers and their families to the region, creating more opportunity through spin-off economic activity. Thank you for your comments and ongoing support of the Project.

## 2.55 #55 – Anonymous

### 2.55.1 Comment

I find it hard to accept plans that locate the mine so close to the town of Wells. How are the cultural attributes of the place protected and respected? Wells is also a tourist town and arts destination, hardly a location for industry weather it's a pulp mill or a mine. The footprint of the mine, essentially co-located with but dwarfing this historic community is unacceptable in my opinion.

### 2.55.2 Response

Osisko Development recognizes the importance of art to the community and has committed to the following to continue to support the arts community in Wells:

- ODV to host community events to promote and encourage Arts and Culture within the District of Wells.
- ODV will support the arts in the District of Wells by continuing to work closely with Wells' arts-related stakeholders and organizations to discuss benefits that can be provided by ODV to support the arts sector and arts infrastructure.
- Contact key leaders of the arts sector at least semi-annually to better understand the impacts on the sector, if any, caused by ODV.
- ODV will promote the arts sector to all workers .
- ODV will support to Island Mountain Arts to enhance youth programs and encourage participation.

## 2.56 #56 – Anonymous

### 2.56.1 Comment

This project would be a tremendous asset to our region! What a great way to promote economic growth in Quesnel, Wells, Barkerville, and the surrounding area. Being a local business owner, I am very excited for what this means with respect to promoting job creation and growing our local economy.

### 2.56.2 Response

ODV is excited to be a part of the regions economic growth and future by developing new opportunities that include hiring 75% or more of the workforce from the region and sourcing a proportion of its goods and services from local businesses. New opportunities will draw workers and their families to the region creating more opportunity through spin-off economic activity. To further the economic opportunities for the region, Osisko Development commits to identifying barriers and facilitating employment and training opportunities. Thank you for your comments and ongoing support of the Project.

## 2.57 #57 – Anonymous

### 2.57.1 Comment

Attached are my comments on the Wells Sub-section to 1.0 Project Summary

### 2.57.2 Response

Thank you for comments. Responses are provided in the section below.

### 2.57.3 Attachment – Comments on Wells Section

Comments and responses from the attachment are provided in Table 2.57-1.

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**Table 2.57-1 Comment #57 Attachment – Responses**

Number	Comment	Response
57-1	<p>Comments on the Wells Section – 1.0 Project Summary pages 72-84 I am submitting these comments as a member of the Community Advisory Committee and a long-time resident of Wells.</p> <p>Overall, this section is disappointing in that it did not answer the questions posed in the last round of comments by myself and other residents of Wells. The data supplies is not quantified and unsubstantiated.</p> <p>It is also unfortunate that this section is buried in the Project Summary instead of receiving its own Chapter.</p>	<p>The Application Summary is intended to give a broad understanding of the information provided in the EA Application and follow the instruction of the Application Information Requirements (EAO 2021), which include:</p> <ul style="list-style-type: none"> <li>• A summary description of the project;</li> <li>• A summary description of the assessment scope;</li> <li>• A brief overview of engagement activities with Indigenous nations, the public, local governments , provincial and federal government agencies and stakeholders;</li> <li>• A summary of the key issues raised by Indigenous nations, the public, local governments, provincial and federal government agencies and stakeholders;</li> <li>• A summary of key effects, proposed mitigation measures, and predicted residual and cumulative effects; and</li> <li>• A summary of key effects on Indigenous nations and their rights, and proposed mitigation measures.</li> </ul> <p>The Application must include a plain-language summary of the impacts and benefits to the District of Wells.</p> <p>The Wells section in the Application Summary was added based on public comments on the Application Information Requirements. The intent of this section was to provide a plain-language summary accessible to all readers, and to direct those that wish for quantifiable and substantiated data to the relevant VC Chapters and appropriate Appendices.</p>
57-2	<p>The section repeats much of the information provided at various open houses sponsored by ODV/BGM and does not seem to include new analysis. Phrases such as “where possible”, “to the extent feasible” and “where practical” weaken the believability of the statements and promises, especially given the track record of ODV/BGM with provincial and federal environmental infractions, and their very poor track record in dealing with current complaints during the exploration stage. The information provided is not detailed enough to provide Wells residents with a clear idea of what their community will be like if the project goes</p>	<p>The Project Summary was informed by the contents of the Application. Presentations and open houses are also presenting information that was developed to support the Application.</p> <p>As requested by the EAO, the mitigation measures will be revised to be measurable and specific. This will be provided in the Revised Application.</p> <p>Osisko Development would like to host a community meeting that describes a “typical day” scenario for the Project, including the implications of mitigations for noise, visual and air emissions.</p>

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Number	Comment	Response
	<p>ahead as proposed. A clear and detailed description of a 'typical' day would be helpful, as well as good visual simulations. (The visual simulations provided to date have been inadequate and misleading, using very wide-angle lenses which minimize the visual impact of the proposed buildings and in no way represent what the eye would actually see.)</p>	
57-3	<p>The language in this section reflects an attitude that the company is willing to do small things that are easily accomplished but is much less willing to make significant changes to the project that would put the community's values first.</p>	<p>Osisko Development has made significant changes to the Project based on community engagement. These include:</p> <ul style="list-style-type: none"> <li>• Underground mining and not open pit</li> <li>• Tailings stored at the QR Mill and not in the vicinity of Wells</li> <li>• Reduction in the height of the Services Building</li> <li>• Camp layout with a Sprung Structure instead of trailers</li> <li>• Placement of mining infrastructure underground such as the crusher, which is typically aboveground</li> </ul>
57-4	<p>Location of Above Ground Infrastructure This section should address, but does not, the largest issue with the proposed Cariboo Gold Project in relation to the community of Wells – the location of the above ground infrastructure. It is frustrating to the local community that a project that could realize all of the projected positive benefits of employment and economic development should also have such devastating negative impacts – especially when viable alternatives exist. We could 'have our cake and eat it too' if the project design was different. However, ODV/BGM has refused to consider any alternative designs and continues to put company profit ahead of community well-being.</p>	<p>An alternative analysis for the Project was completed and is provided in Chapter 1 – Project Overview, Section 1.7. A further description of the selection process in relation to the Services Building location is provided as a response to Comment #14.</p>
57-5	<p>Table 9: Summary of Potential Impacts and Mitigation Air Quality What are the ppm of particulates that are predicted for various areas in Wells at various stages of the project?</p>	<p>Contour maps showing the spatial distribution of predicted CAC concentrations and particle deposition from the Project in the Mine Site are provided in Appendix 7.2-1 Air Quality Effects Assessment.</p>



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Number	Comment	Response
57-6	The comments about two portals is misleading – while it will decrease the time for portal development it will increase the level of disturbance. Why is the alternative to omit the Island Mountain portal and do the complete development underground not discussed? (while this option is more expensive for the company it eliminates much surface disturbance.)	The use of two portals allows the Project to develop the underground at a faster rate. Once the underground ramp between the two portals is completed most construction activity will move underground, thus minimizing surface activities, and limiting the community disturbance that has been identified as a primary concern for many residents. This is an example of mitigation by design that Osisko Development has implemented as a result of community feedback.
57-7	Acoustic Statements such as “Activities for minimizing noise disturbance to Community of Wells residents will be employed where possible, particularly activities at the Mine Site Complex” give no sense of security to residents, especially given ODV/BGM inability or unwillingness to mitigate excessive noise during the exploration phase.	Osisko Development has committed to the development of a Noise Management and Monitoring Plan for the Project. The Noise Management and Monitoring Plan details mitigation, management, and monitoring measures for noise-related adverse effects from mining activities. It defines mitigation measures to control noise effects from the Project and identifies current noise criteria that would trigger further potential contingency and adaptive measures if exceeded.
	What will be the exact decibel readings in key residential areas and near the school and various time during the project?	A contour map showing sound level contours for the Mine Site during Operations is provided in Section 7.3 Acoustic Figure 7.3-5.
57-8	As has been noted several times at open houses and CAC meetings and during the initial comment period, the acoustic baseline data was collected at inappropriate locations and at times when industrial noise had greatly increased over historic levels.	It was determined that based on sound recordings taken during the noise measurements that drilling operations did not have a perceptible impact on overall noise levels at the measurement locations. The baseline measurements are representative of pre-exploration drilling noise levels.
57-9	Employment and Economy The proposed initiative to develop additional tourism products such as mine tours will not offset the negative impacts to the existing tourism industry in Wells. Industrial tourism is a very small subset and not a big seller in today’s market. The existing market is looking for peace and quiet, a sense of place, easy access to outdoor recreation and cultural activities. All of these things will be negatively impacted by the current proposal – particularly the proposed location of the Service Building and the proposed Island Mountain Portal.	A Tourism Study is being prepared and will be provided to the EAO. Osisko Development recognizes the importance of tourism to the District of Wells, and believes that mining and tourism can co-exist. Osisko Development has made the following commitments regarding tourism: <ul style="list-style-type: none"> <li>• Work with the District of Wells and local residents to identify ways in which the mine can help promote tourism in the area (e.g., moving the headframe to the community).</li> <li>• Work to develop a tourism component that is complimentary to the mine (e.g., visitors center, mine tours, etc.) that may attract people to the area or encourage them to stop while passing through Wells.</li> </ul>

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		<ul style="list-style-type: none"> <li>• Develop a strategy to mitigate pressures on recreation and tourism in the Project area due to increased population and visitors.</li> <li>• Contact industry leaders in the tourism industry at least semi-annually to better understand the impacts on the sector, if any, caused by ODV.</li> <li>• Place signage on recreational trails and public roads if there is the potential for conflicts with Project activities.</li> </ul>
57-10	This section does not adequately describe the negative impacts of the project on the tourism industry (nor does Section 7.10).	A Tourism Study is being completed and will be provided to the EAO.
57-11	Land and Resources • I am wondering of what possible use is “advance notice” of a negative impact. It does not change or mitigate the negative impact.	This is a standard mitigation measure to notify recreational users of activity that might affect their use.
57-12	Signage does not compensate for the loss of recreational opportunities	This is a standard mitigation measure to notify recreational users of activity that might affect their use.
57-13	The proposed mitigation strategies for light, noise and visual quality give no indication of what will actually been seen and heard, which of course the information we are seeking here.	Osisko Development would like to host a community meeting that describes a “typical day” scenario for the Project, including the implications of mitigations for noise, visual and air emissions.
57-14	Human and Ecological Health This section is insufficient. Human Health factors that need to be accounted for are: o deleterious affects of noise and light pollution o poor air quality, o Higher risk of communicable diseases due to influx of transient workers (as has already been demonstrated with COVID 19) o Higher stress levels due to increased traffic, higher cost of living	Human Health and Ecological Risk Assessments (HHERA)s are rigorously controlled by standards guidelines and best management practices to meet the requirements of the local, regional and provincial health authorities. The assessment of human and ecological health for this Application was completed by Qualified Environmental Professionals (QEP)s working under the BC Professional Governance Act, to ensure that all potential effects are sufficiently assessed and proper mitigation measures have been identified. The QEPs are continuing to work with the appropriate members of the Technical Advisory Committee (TAC)

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		<p>appointed by the EAO to ensure that all aspects of the HHERA assessment are clear and meet the requirements of the Application Information Requirements.</p> <p>It is noted that Air Quality is assessed in Section 7.2 Air Quality. The results of the Air Quality effects assessment is an input to the Human Health and Ecological Risk Assessment (HHERA) (See Section 7.13 Human and Ecological Health)</p> <p>Light is assessed in Section 7.11 Land and Resource Use.</p> <p>Other aspects of Health are addressed in Section 7.14 Community Health. This includes population health and health-related infrastructures.</p>
57-15	<p>Community Health</p> <p>Much of this section seems to be aimed at the mine workforce not the community</p>	<p>Mitigation measures are provided to limit Project effects. Osisko Development has proposed measures that can be applied to the workforce and implemented through management plans and company policy. Through these plans and policy, they are designed to limit effects to the community.</p>
57-16	<p>Are the proposed health services for the employees or for the community in general? How will these be delivered? Is this going to be a private health clinic? More information is needed.</p>	<p>Mitigation measures are provided to limit Project effects. Osisko Development has proposed measures that can be applied to the workforce and implemented through management plans and company policy. Through these plans and policy, they are designed to limit effects to the community.</p>
	<p>Table 10: Positive Benefits to the District of Wells</p> <p>The projected benefits included in this table are not specific, not quantifiable, and not supported by any evidence.</p>	<p>Short and long term benefits from the Project for the region are described in the response to Comment #10. The benefits provided in Table 10 are specific to the District of Wells and are summarized from the Valued Components effects assessment.</p>
57-17	<p>Air Quality, Surface Water, Soil, Vegetation and Wildlife</p> <p>The only benefit listed here is the clean up of the mine site, including historic tailings at the conclusion of the project. This can hardly be listed as a benefit of the project, because as current owners of these properties they are legally required to do this regardless of whether or not the project goes forward.</p>	<p>Historical tailings and waste rock generated from the former Cariboo Gold Quartz Mine (operated from 1930 to 1970 by others) are located in the proposed Project Footprint. No remediation or reclamation was completed following the operation of the Cariboo Gold Quartz Mine. Most mine infrastructure for the Project will be located on top of these historical mine wastes. Osisko Development is engaging in ongoing discussions with the Ministry of Forests, Lands, Natural Resources Operations and Rural Development (FLNRORD) regarding historical disturbances outside the Project Footprint. The remediation associated with the Cariboo Gold</p>

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		Quartz Mine operation, with respect to tailings and waste rock outside of the Project footprint, is under the jurisdiction of FLNRORD.
57-18	Subsequent Sections Projected benefits are not quantified nor supported by evidence	Short and long term benefits from the Project for the region are described in the response to Comment #10. These benefits were identified as outcomes of the effects assessment.

## 2.58 #58 – Anonymous

### 2.58.1 Comment

I have been working with Barkerville gold for 4 years now as a supplier great company to work with I have also been on a tour of the mine and processing plant they where all very clean and safe to have the expansion go through I believe it would be a great project to help the area and town move forward .

### 2.58.2 Response

ODV is excited to be a part of the regions economic growth by sourcing a proportion of its goods and services from local businesses, creating more opportunity through spin-off economic activity. Thank you for your comments and ongoing support of the Project.

## 2.59 #59 – Paula Curtis, Wells, BC

### 2.59.1 Comment

I have lived on the Barkerville Highway just west of Wells for 12 years. In the past couple of years the speeding traffic on the highway his gotten ridiculous. This past spring and in 2020 there was a much larger number of moose, bear, deer, porcupine, and other critters killed by traffic then we have ever seen before! The little trucks go way too fast and are impatient and pass in dangerous places. The huge trucks carrying massive equipment and don't (probably can't) even slow down or try to miss the wildlife. I worry about our caribou. I also work in Wells in the summer, in the tourism industry. The dynamics of the town has really changed. Both motels and one campground are gone to the mine. On summer nights the streets would be filled with tourists strolling around, shopping, going for dinner and checking out the beauty of Wells. This rarely happens anymore. I am worried that the mine will keep chipping away at every bit of tourism the area has until it's totally gone. I might add that casually strolling around that area of town has gotten so dusty from the added truck traffic it is uncomfortable and probably not good for your health. Everything is caked in dust these days like it was all dirt roads. I am devastated thinking that a huge concentrator building on the mountain will be what greets the world in the future. And I can't imagine the noise that will come from it! I have already noticed an increase in noise in general. It isn't the peaceful community it was. I don't have time or the attention span to read the document that was provided by Osisko but it sounds to me there could be some compromises made to keep the integrity of the community. The mine isn't going to volunteer to make these changes, this is we're I am counting on the government to protect the community.

### 2.59.2 Response

Osisko Development has committed to the following mitigation regarding traffic and wildlife:

- Utilize wildlife signage (reduce speeds and notice of potential movement area) to minimize the potential of wildlife collisions

- Maximum allowable speed limits as outlined in the ODV Road Use Policy will be followed at all times to suppress dust and minimize the potential for collisions with wildlife.
- Implementation of and strict adherence to speed limits.

Osisko Development has also made the following commitments regarding tourism:

- Work with the District of Wells and local residents to identify ways in which the mine can help promote tourism in the area (e.g., moving the headframe to the community).
- Work to develop a tourism component that is complimentary to the mine (e.g., visitors center, mine tours, etc.) that may attract people to the area or encourage them to stop while passing through Wells.

Osisko Development has installed noise monitoring equipment at four locations within Wells and is installing air quality monitoring equipment in Fall 2021. The results of these monitoring programs will be shared with the community.

**Response below provided by the EAO:**

The BC EAO, through the Application Development & Review phase as well as the Effects Assessment phase of the EA, is working to ensure that Osisko Development incorporates the concerns and comments of the community and provides mitigation strategies in their final application. These strategies will need to adequately satisfy the EAO that the effects of the Project are understood, are addressed by mitigation measures, and will be incorporated, as needed, into a draft EAC for the Project.

## **2.60 #60 – Allen Crowe, Prince George**

### **2.60.1 Comment**

See attached

### **2.60.2 Response**

Thank you for your comment. The response is provided in the Table below.

### **2.60.3 Attachment – Letter Caribou Gold Project**

Comments and responses from the attachment are provided in Table 2.60-1.

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**Table 2.60-1 Comment # Attachment - Responses**

Number	Comment	Response
60-1	<p>I am reaching out on behalf of Lakewood Electric with regard to the Cariboo Gold Project located near Wells BC.</p> <p>Lakewood Electric started working at the QR mill and Bonanza ledge for Barkerville Gold Mine several years ago. Lakewood has managed to employ electricians from Quesnel, Williams Lake and the Prince George area on these projects.</p> <p>BC and the rest of the country are in a downturn due to COVID. The overall state of the deficit in BC and Canada has continued to climb. There are a limited number of opportunities within BC and Canada that have the ability to help grow our economy, create jobs and help to rectify our deficits. I feel that it is of the utmost importance that projects like the Proposed Cariboo Gold Project move forward.</p> <p>The economical and financial opportunities that projects like the Cariboo Gold Project present for the local citizens, first nations, contractors and our country as a whole cannot go unrecognized.</p> <p>With the standards put in place by our government to protect our lands, water and air people should feel at ease knowing that these projects are governed and policed for the overall long term protection of the environment for generations to come.</p> <p>In summary I am excited to see the project move forward. It has been a positive experience watching the project evolve from a small operation to what could become a large successful undertaking for the local communities, first nations and us as Canadians.</p>	<p>Thank you for your comments and ongoing support of the Project. Osisko Development will continue creating economic potential in the region, adding employment opportunities by partnering with local businesses to purchase a proportion of its goods and services during construction, operations, and closure. Osisko Development has committed to developing a local procurement policy for the Project. Osisko Development will develop and implement a local hire policy and work with local service providers to provide training opportunities for local residents.</p>

## 2.61 #61 – Anonymous

### 2.61.1 Comment

Dear evaluation committee, I would like to draw your attention to the Cariboo Gold Project's decision to use battery-electric mining equipment and further expand on the impact this decision can have. Battery-electric mining equipment is a relatively new technology for the industry but is proving to be reliable and safe. For mine employees battery-electric equipment means significantly improved air quality thanks to zero emissions of exhaust gases and diesel particulate matter. It also means reduced heat underground due to batteries operating at drastically lower temperatures than diesel engines, reduced dust in the air because there is no exhaust pipe stirring up the ground, and improved ergonomics - less vibration and noise compared to a diesel engine. One of the first mines to explore BEV equipment was Newmont's Borden Lake mine. By eliminating diesel underground the mine expected a 70 percent reduction in greenhouse gases, 2 million litres reduction of diesel fuel, and 1 million litres reduction in propane. They also expected a reduction in electricity consumption of 35,000 megawatt hours annually, due in large part to drastically reduced ventilation needs. (source: <https://solidground.sandvik/a-quest-to-coexist/>) When surveyed, about 90% of Borden Lake employees said they would not want to go back to working with diesel equipment if given the choice, speaking to the great impact this decision can have on the health of a mine's people. (source: [https://assets.ey.com/content/dam/ey-sites/ey-com/en\\_gl/topics/mining-metals/mining-metals-pdfs/ey-electrification-in-mining-survey.pdf](https://assets.ey.com/content/dam/ey-sites/ey-com/en_gl/topics/mining-metals/mining-metals-pdfs/ey-electrification-in-mining-survey.pdf)) This decision is incredibly proactive, will lead to a healthier workforce, environment, and community, and should not be overlooked.

### 2.61.2 Response

Thank you for your comment and support for the Project. Early on in Project development, the use of electrical equipment and less reliance on diesel was identified as a key measure that could be used to reduce emissions. The Project will use the following electric equipment:

- A Rail-Veyor® system (electrical automated train) to transfer material from Shaft Zone and the Valley Zone crushing station, which is designed to convey 3,000 tpd of ore over 800 m, including grizzly and rockbreaker
- Underground haul truck (the Artisan/Sandvick Z50 battery electric haul truck [Artisan Vehicle Systems Inc., 2021; Figure 1.4-9]), used as mitigation for Project emissions
- Electric MT720 Sandvik Roadheader

Osisko Development has also committed to the use of electric equipment for the hauling waste rock from the Mine Site Complex to the Waste Rock Storage Facility at Bonanza Ledge. Osisko Development is also exploring the use of electric vehicles to haul concentrate from the Mine Site to the QR Mill.



### 2.61.3 Attachment – ey-electrication-in-mining-survey

The document *Electrication in mining survey* (EY, 2019) is provided in Appendix A.

## 2.62 #62 – Lindsay Kay, Wells, BC

### 2.62.1 Comment

The most glaring issue I have is with the plan to put a gigantic, monolithic concentrator at the entrance to our lovely town, literally right behind the visitor information centre. There are so many ways that this project will negatively affect the tourism and arts industry that this community relies on, this is just the most obvious. I am in support of what Dave Jorgenson and others have recommended regarding finding an alternative location for the concentrator and I am really disappointed that Osisko/BGM does not seem to be taking this concern seriously. It would appear that they are just not willing to find an alternative location because it would be more costly. I have concerns for yet-unseen environmental impacts that this project will have on the community and surrounding area. I have concerns for the health and safety of the community. It is a well known fact that industrial worker camps lead to increases in crime, drug use, domestic violence etc etc. Those of us that have been here for a long time have already seen and felt the change in atmosphere that has occurred as a result of the increase in mine activity and the presence of transitory workers. I have concerns for the safety of our roads and especially the Barkerville Hwy. There is now so much industrial traffic on what can already be a pretty spooky Hwy. It doesn't feel safe. I have concerns for the light, dust and sound pollution that is not just a threat for the future, but that is already happening. I have already encountered many frustrating scenarios as a result of this project. The fact that it is only in the exploration phase makes me really worried about what to expect for the future. I am fortunate in that I haven't personally experienced the light pollution, but I know that lots of other have, especially anyone living close to the mine office/camp/parking lot. The dust this spring was the worst I've ever seen in my 15 years of living here, everything I owned that was outside was covered in a thick layer of it. The noise is atrocious. Not only from the traffic (especially the quads) but from the drills on the mountain. It seems to have subsided for now but for about a month (until recently) there was a constant, very loud, drone coming from Island Mountain. Unfortunately it wasn't constant enough to be the kind of white noise that you don't really notice. It would change every now and then and wake me up in the night. All of this even though there are noise bylaws which Osisko/BGM is clearly breaking and the District of Wells doesn't seem to be enforcing. Sometimes it honestly sounded like a helicopter was coming over the hill, but I would continue listening and, no, it was just a ridiculously loud drill that went into overdrive. My house is located in what used to be the best little private, quiet corner of town which has now become a noisy, busy intersection of mine trucks, fuel tankers, tracked vehicles, low bed tractor-trailers and quads. This spring was brutal. Osisko/BGM decided to just plow on through spring break up and consequently destroyed the road that they usually use to get to Island Mountain. This resulted in them using an adjacent road and destroying the section of road in front of my house.

So not only did I have the aforementioned various vehicles driving past my house every 3-10 minutes, 24 hours a day, but the road was a disaster and a safety hazard, especially for emergency vehicles, should they have needed to use it. The road is back to normal now, and I am glad that they have gone back to using the road they normally use. The traffic has decreased (I assume due to the new road they put in near lot B) and I am glad that when I write to the mine office to complain when trucks continue to use the wrong road, they usually stop. However, the huge tankers and low beds are unable to use the regular road and so there is still regularly huge trucks full of fuel and god knows what going past my house (and the school and the daycare) on the daily. Nothing about that feels safe to me. In the time it took me to write this letter, another fuel truck drove past my house. I had a particular incident in June that was really scary and highlighted my feelings of not being safe. I was outside stacking firewood when all the power lines above my head and the pole across the street started shaking like crazy and I thought the lines were going to come down on me. I ran into the house until it stopped and then I walked up the road to find an excavator that had come down the road with it's boom arm up too high which had taken out the bottom line. (The line was not totally severed but hanging low.) My nerves were already frayed from having huge dump trucks driving back and forth in front of my house all day dumping rocks onto the road and I completely lost my temper. I realize this all happened because they were fixing the road, but they were fixing the road because Osisko/BGM decided to continue using the roads even though they were destroying them. Those roads never should have needed fixing in the first place. I found it really disturbing that when I wrote to BGM about what happened there was no apology and their response was totally lame. I wrote to the Wells Council as well and only one Council member even acknowledged receipt of my email. Incidentally, the previous day that same excavator was parked on the lot just up the road from my house (next to my neighbours lot) and was running all day. ALL DAY! My neighbour talked to the operator who apologized and had some mechanical reason for it to be running all day but it's still totally unacceptable for so many reasons. Obviously I don't support this project. That said, it's really hard because I have friends and neighbours with good jobs and opportunities as a direct result of the mine being here. I deeply care for these people and I know they care for the community and I don't want to alienate myself from them or vice versa. At the same time, using future local employment as a potential benefit to the community is not accurate as I'm pretty sure that almost everyone that lives in Wells and would be interested in working for the mine already does so. And I'm sure that everyone who ever lived here can attest to the fact that Quesnel is not local, so that doesn't count. Finally, I have to say that I am so disillusioned with this whole Environmental Assessment process. It feels like a bunch bureaucratic hoops to jump through for people that are already tired and depressed. This process seems to be majorly weighed in favour of the mine and I actually feel like I just wasted an hour of my life complaining about this when in the end, it's going to happen regardless. But I might as well participate since doing nothing would feel even worse.

### 2.62.2 Response

The location of the former Cariboo Gold Quartz Mine was selected as the location of the Mine Site based on numerous criteria. The site was selected based on a number of technical, environmental, social and economic considerations which includes but is not limited to the following:

- Proximity to the ore zones and surface topography. The Mine Site Services Building is located directly above the Valley Zone and is central, relative to the Mosquito, Shaft, and Cow zones.
- Reducing the need for further underground development, which would result in more waste rock needing to be stored on surface.
- Development of as much of the Project on existing brownfield sites as possible. As part of the Project, reclamation activities will be undertaken during the operation, decommissioning and closure phases.
- Minimizing greenfield site surface disturbance, in the form of a longer transmission line and additional road building.
- Minimizing the volume of water that needs to be managed, resulting in less disruption to natural hydrologic processes, which was one of the resource protection objectives used to guide the design of water management approaches.

An alternative analysis for the Project was completed and is provided in Chapter 1 – Project Overview, Section 1.7. A further description of the selection process in relation to the Services Building location is provided as a response to Comment #14.

Osisko Development has been working with the community to address concerns regarding the location of the Mine Site and Services Building. The Services Building was redesigned to reduce the overall height and landscaping design concepts have been developed to further reduce the visual impact. Osisko Development is continuing to refine the building appearance to be more aesthetically pleasing. Osisko Development welcomes community ideas on the building aesthetics to maintain community character and be attractive to tourism.

Mine Site traffic will turn off of Highway 26 before entering the community of Wells. Industrial traffic for the Mine Site will not access the site on local or municipal roads. Mine traffic between the Mine Site Complex and Bonanza Ledge will be on the Mine Access Roads as shown on Figure 1.1-3 in Chapter 1 – Project Overview of the Application.

The purpose of the environmental assessment is to identify the effects (both positive and negative) from the Project on environmental and socio-economic valued components. A summary of positive project effects is provided in Section 1.5.2 of the Application Summary. A summary of Negative Residual Effects is provided in Section 1.5.3 of the Application Summary.

Protecting employees and all other persons from undue risks to their health and safety (H&S) arising out of, or relating to, activities at ODV project sites is a fundamental task of the company. Osisko Development Corp. is also devoted to safeguarding the public and local, nearby communities from risks arising out of, or regarding, activities at mining and/or exploration sites, including the protection and the reclamation of the land and watercourses affected by mining activities.

The Occupational Health and Safety Management Plan (OHSMP) applies to all ODV, contractor and subcontractor construction activities with H&S risks throughout ODV operations in BC.

The purpose of the OHSMP is to:

- Define responsibilities, processes, and procedures for achieving ODV policy commitments and the ODV H&S objectives, including regulatory compliance;
- Define and document the risk-based approach to H&S planning, assurance and control of the ODV H&S risks and opportunities;
- Document project-level H&S program elements required under the Code, ODV's OHSMP, and WorkSafeBC; and
- Provide guidance to the Project participants about best H&S practices where no explicit regulatory requirements exist.

In addition, Osisko Development will also be developing a Socio-Economic Monitoring Plan. This plan will be a high-level strategic plan that describes an approach to monitoring and managing the potential social and economic effects of the Project, with a specific focus on:

- Community health and well-being
- Community safety
- Community development and housing
- Economic diversification
- Community feedback mechanisms; and
- Monitoring of social and economic outcomes as a measure of mitigation and management effectiveness

### **Response below is provided by the EAO**

The EA process intends to ensure that the concerns of the community and its health, the environment, and Indigenous nations are fully heard and incorporated into the draft EAC that will manage and mitigate the effects of the project. The issuance of an EAC to Cariboo gold is dependent on these issues being adequately addressed. It is a large, and very involved, process that the EAO understands can feel daunting to participate in. The EAO greatly appreciates all efforts members of the public make to participate.

## **2.63 #63 – D.L. Funk - Community Advisory Committee member, Wells, BC**

### **2.63.1 Comment**

The Cariboo Gold Project falls within District of Wells boundaries, which means Wells is the community most heavily affected by the proposed mine. The July 2021 Project Application from Osisko falls well short of identifying and addressing the impact on those who live in Wells in a format that is comprehensible and digestible. More information is attached.

### **2.63.2 Response**

Thank you for your comments. The District of Wells was included as a separate Local Assessment Area for socio-economic valued components to identify effects that would specifically apply to the community.

### **2.63.3 Attachment – Wells-impact\_EAO-CGP\_Public-Comments\_06Oct2021**

Comments and responses from the attachment are provided in Table 2.63-1.

Table 2.63-1 Comment #63 Attachment - Responses

Number	Comment	Response
63-1	Wells is the town most affected by the proposed mine. During the Public Comment Period last winter (Process Planning Phase), a stand-alone chapter about the mine's impact on Wells was requested. Instead, the July 2021 Application contains only a scant and superficial few pages buried in Chapter 1 – Application Summary (Section 1.7, pp. 72-82).	As per the Application Information Requirements, the Application must include a plain-language summary of the impacts and benefits to the District of Wells. This is included in the Application Summary. Discussion in the Application Summary pertaining to the District of Wells will be expanded upon in the revised Application. Detailed discussion on the potential effects to Wells and proposed mitigation are provided in Chapter 7.10 Employment and Economy, Chapter 7.12 Infrastructure and Services, Chapter 7.17 Community Health and Chapter 7.16 Culture. Additional information pertaining specifically to the District of Wells will be incorporated into each Chapter.
63-2	I will again request a stand-alone and much more comprehensive chapter on Wells. Please include information embedded in other chapters, such as Wells history, governance, demographics, education, employment and labour market, housing, current health services, local infrastructure, and baseline studies (such as they exist) for noise, light and other valued components. At present, a reader has to poke through thousands of pages to figure out if reference to a Local Assessment Area is Wells or not, and what the relevance could be for those who live here, the most directly-affected community.	In preparation of the Application, Osisko Development is required to follow the Application Information Requirements (AIR), provided by the EAO. Inclusion of a plain-language summary, specific to the District of Wells, in the Application Summary was a direct result of public feedback to the AIR. Additional information will be incorporated into the Application Summary to support further discussion about the District of Wells.
63-3	Please include measurable impacts of activities and proposed mitigation actions. Also, how will accountability be achieved? Using phrases such as 'where practicable' and 'where possible' aren't specific enough.	As requested by the EAO, the mitigation measures will be revised to be measurable and specific. This will be provided in the Revised Application. See response to Comment #9.
63-4	The Cumulative Effects for Noise (Acoustics) need to be identified. Why are these not in the application?	An interaction does not exist between the residual effect of the Project and the other past, current, or future project/activities. The project residual effects are not expected beyond the local assessment area and the activities listed above are well away from Regional Assessment Area apart from transportation. The transportation was part of baseline measurements.
63-5	If 2020 census figures are available, please use those.	Census information collected in 2021 will be released in 2022. It will be included as made available.

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Number	Comment	Response
63-6	<p>Several other Public Comments address the concerns and gaps in information specifically related to Wells, which I support and also seek answers for:</p> <ul style="list-style-type: none"> <li>• Judy Campbell, CAC Member – Economic Impact Assessment / KPMG (Appendix 07.10) – Oct 4, 2021</li> <li>• Dave Jorgenson, CAC Member – Visual Quality Effects Assessment ( Appendix 7.11-4) – Sept. 22, 2021</li> <li>– Traffic Impact Assessment (Appendix 01.0.09) – Sept. 24, 2021</li> <li>– Services Building Site Selection – Alternative Means (Chapter 01.7) – Oct. 4, 2021</li> </ul> <p>The location of the gigantic Services Building at the entrance to Wells, within sight and sound of homes and businesses, is the biggest issue many of us have with the Cariboo Gold Project Application. Osisko's insistence of this location is both disappointing and frustrating. Its rationale and defence is weak, often misleading, and unconvincing. A new alternative site analysis is required.</p> <ul style="list-style-type: none"> <li>• Anonymous – Comments on Employment and Employment (Chapter 07, Section 07.10) – Oct. 6, 2021</li> <li>• Anonymous – Comments on the Wells Sub-section to 1.0 Project Summary – Oct. 6, 2021</li> </ul>	<p>Answers for these public comments have been provided in this document.</p>

## 2.64 #64 – Mike and Linda Sarabyn, Quesnel

### 2.64.1 Comment

My wife and I are in support of these types of projects. We believe that resource extraction is and will remain an important element in the economy of the central interior as well as the province of BC. We expect that all environmental safeguards are in place and adhered to. Large, well organized mining operations offer the best potential to safeguard these values. The investment in the communities that are associated with these facilities is extremely important for our area. The communities need successful business and ventures to allow investment in facilities related to health, recreation, sports and availability of products. These then, in turn, attract more investment and people that are drawn to vibrant communities. We hope that the committee looks upon this project favorably and allows it to proceed within the rules and regulations regarding this industry.

### 2.64.2 Response

ODV is excited to be a part of the regions economic growth and future by developing new opportunities that include hiring 75% or more of the workforce from the region and sourcing a proportion of its goods and services from local businesses. New opportunities will draw workers and their families to the region, creating even more opportunity through spin-off economic activity. Thank you for your comments and ongoing support of the Project.

## 2.65 #65 – Anonymous

### 2.65.1 Comment

The successful initiation of the Cariboo Gold underground mine will provide significant local and provincial employment opportunities, bring economic growth and improved infrastructure to the town of Wells, and provide economic benefit to the province of British Columbia. Barkerville Gold Mines Ltd is committed to mining in a sustainable, environmentally and socially-acceptable manner and has a good working relationship and respect for it's local stakeholders.

### 2.65.2 Response

ODV is excited to be a part of the regions economic growth and contribute to new opportunities by hiring 75% or more of the workforce and source a proportion of its goods and services from local businesses. New opportunities will draw workers and their families to the region, creating more opportunity through spin-off economic activity. ODV's commitment to upgrade infrastructure including potable water treatment and distribution, wastewater collection and treatment systems, and local facilities will have lasting community benefits and provide lasting economic opportunities to residents. Thank you for your comments and ongoing support of the Project.



## 2.66 #66 – Anonymous

### 2.66.1 Comment

As an outside observer, I am intrigued by certain comments made by Wells residents and concerned stakeholders: 1- Several comments are made on the impact the mine will have on the environment and the wildlife. From searching on Google, I found several references that show the site of the future Cariboo Gold Project is located on the site on an historical mine that used to deposit tailings in the Jack of Clubs Lake which caused contamination of the lake with arsenic and mercury. I would think that locating the mine at this location would avoid causing further impact to the environment. Is this site restored and is now the lake safe of contaminants? 2- When I look at the entrance of the town of Wells, I see the natural beauty in the background with the lake in the forefront and the mountain in the far. I also see the rock dump and the old reddish tails. If the mine is relocated, I assume that BGM/Osisko will still be obligated to restore the site? 3- The last comment is a trivial question. Residents of Wells are concerned with the traffic generated by the concentrate trucks (and noise generated with the trucks). My understanding from the presentation I've attended and knowledge of the mining industry, the transport of concentrate is the compromise to eliminate having a Tailings Management Facility in the vicinity of Wells? Is this a correct assumption?

### 2.66.2 Response

The Project is located on the site of the historic Cariboo Gold Quartz Mine, which operated from the 1930s to the 1960s. Since the mine closed in 1967, no reclamation or restoration activities have occurred at the site. There are advisories in place for Jack of Clubs lake to limit activities due to contamination from previous mining activities.

As part of the Cariboo Gold Project, the Project footprint will be reclaimed to meet the following end land use goals:

- Provide safe access for wildlife and people
- Provide physically and geochemically stable landforms
- Protect valued ecosystem components
- Prevent or minimize environmental impacts (e.g., metal leaching/acid rock drainage [ML/ARD]) from mine wastes
- Reclaim the Project to the targeted end land use
- Develop reclamation and closure activities with Indigenous partners

Further information on reclamation can be found in Appendix 1.0-13 Reclamation and Closure Plan Summary.

Concentrate will be transported to Osisko Development's existing QR Mill facility which is located along the 500 Nyland Lake Road. Early in engagement activities, the community did not want tailings present near Wells. The decision was made to haul concentrate to the QR Mill for processing and the storage of tailings material in a filtered stack tailings storage facility. This decision limited the size of the Project footprint near Wells, and also utilized an existing brownfield site, reducing the amount of disturbance required.

## 2.67 #67 – Anonymous

### 2.67.1 Comment

This project will be a great contribution to the local economy, bringing good jobs and opportunity to the community.

### 2.67.2 Response

ODV is excited to be a part of the regions economic growth and contribute to new opportunities by hiring 75% or more of the workforce and source a proportion of its goods and services from local businesses. New opportunities will draw workers and their families to the region, creating more opportunity through spin-off economic activity. Thank you for your comments and ongoing support of the Project.

## 2.68 #68 – Anonymous

### 2.68.1 Comment

I support Osisko's development proposal for the Cariboo Gold Project. Economic development is vital to providing employment, taxes and services for all. This is a modern proposal, and will restore areas degraded and contaminated by historic mining processes. It will also assist Wells in basic services such as a more secure power supply, water and sewer services. It will supplement the existing income from tourism, logging and local arts. The taxes paid by both Osisko, contractors and employees working support services for all of BC including include education, health and housing. Osisko is a major employer in Wells and enabled one of my family members to return from overseas and work in province with Osisko. Mine workers are actively engaged in the community, and ski, hike, canoe while staying in town and working for Osisko. Many of Osikos staff make there home in Wells, some in Quesnel and others are on a travel in/out basis.

### 2.68.2 Response

ODV is excited to be a part of the regions economic growth and contribute to new opportunities by hiring 75% or more of the workforce and source a proportion of its goods and services from local businesses. New opportunities will draw workers and their families to the region, creating more opportunity through spin-off economic activity. Environmental quality in the region will be enhanced as the Cariboo Gold Project will be developed mainly within the historical Cariboo Gold Quartz Mine site. In areas of overlap with the Project's surface footprint, historical

contamination will be reclaimed when the Cariboo Gold Project is reclaimed, removing legacy environmental issues.

Thank you for your comments and ongoing support of the Project.

## 2.69 #69 – Anonymous

### 2.69.1 Comment

I support Osisko's proposed mine development plan as it balances community concerns and support the feasible extraction of gold while upholding the highest standards of environmental, safety and social engagement. The Barkerville-Wells region has hosted some of the most significant historic gold mining in Canada. To this day, gold continues to be alluvially mined at a medium to large scale in and around Wells. While the forests surrounding Wells have re-grown in the decades since the now-historic Cow and Mosquito mines closed in the 70/80s, the Wells area is not a pristine, untouched environment. Osiskos' proposal to continue this mining tradition while also remediating historic waste is an ideal continuation of formal mining for the town of Wells. Mining is part of Wells past, present and future. Mining is part of Wells identity. Tourism goes hand in hand with that identity. Many tourists travel through Wells to access the Bowron Lake chain and local hiking and skiing trails, but many also visit to learn about the development of mining and the immigrant mining community who made Barkerville and Wells home. Over the past year, reduced tourism traffic has seen many businesses in Wells rely upon Osisko workers support in order to stay open. The proposed mine will increase the year-round population of Wells, providing infrastructure and customers for these current and other future businesses. Mine employees have lots to contribute to the community of Wells – not just in terms of income, but also a diversity of community related interests including support of the arts and outdoor recreation. The proposed location of the concentrator, discussed in many of the comments, will be visible for people travelling into Wells. This can either be a necessary eyesore (engineering, mining, ground condition concerns appear to be the main drivers of the proposed location), or an opportunity for the town of Wells to showcase local art. Painting or decorating the concentrators could make them a tourist attraction and an impressive first welcome to the town. Based on the proposed plan, I think the mine will bring significant benefit and opportunity to the town and surrounding region. I support its development.

### 2.69.2 Response

Osisko Development looks forward to the opportunity to meet with and receive input from local organizations in regards to the region's economic growth and continued support of local businesses. New opportunities will draw workers and their families to the region, creating more opportunity through spin-off economic activity such as an increased customer base for arts and cultural activities and products. Thank you for your comments and ongoing support of the Project.

## 2.70 #70 – Matthew Maglio, Quesnel, BC

### 2.70.1 Comment

I am very excited for this project. It would bring new families to our communities and strengthen our small town economy's allowing them to provide more for our families.

### 2.70.2 Response

ODV is excited to be a part of the regions economic growth and contribute to new opportunities and support local businesses. New opportunities will draw workers and their families to the region, creating more opportunity through spin-off economic activity. Thank you for your comments and ongoing support of the Project.

## 2.71 #71 – Anonymous

### 2.71.1 Comment

The town of Wells will benefit from the Cariboo Gold Project. We are extremely fortunate to have the investment of a large industry within our municipality. With extremely deferred maintenance on our municipal buildings, aging infrastructure and housing shortages, the expansion of the mine will literally save our town. Barkerville Gold Mines is Community minded and has always stepped up to help or support through the many crisis. Continuous monetary and in-kind contributions. It is good to see housing development take place in our community, it is a sign of growth and hopefully will bring further investment, I hope that Osisko will continue to build houses and encourage employees to live in the community, support population growth and enrollment numbers for the school. I would like to see an alternative location for the concentrator plant, however if that option is not feasible I would like to see effort made to make the building aesthetically pleasing, and blend into the community. I am happy to hear that there mandate is to support the local labour market by hiring within the local CRD region. I would encourage them to do the same for contractors and suppliers, quality relationships, loyalty will go a long way Living in the community you hear and see a lot of the work place climate and culture. I think that the organizations has a lot of work to do to improve that and create and environment that people want to work for. An inclusive and supportive work place culture that is community minded, culturally competent and safe Overall I support this project and the positive impacts on our community and the region

### 2.71.2 Response

ODV is excited to be a part of the regions economic growth and future by developing new opportunities that include hiring 75% or more of the workforce from the region and sourcing a proportion of its goods and services from local businesses. New opportunities will draw workers and their families to the region creating more opportunity through spin-off economic activity. ODV is building a worker camp to house workers to lessen the demand for housing especially in Wells. Thank you for your comments and ongoing support of the Project.

The location of the former Cariboo Gold Quartz Mine was selected as the location of the Mine Site based on numerous criteria. The site was selected based on a number of technical, environmental, social and economic considerations which includes but is not limited to the following:

- Proximity to the ore zones and surface topography. The Mine Site Services Building is located directly above the Valley Zone and is central, relative to the Mosquito, Shaft, and Cow zones.
- Reducing the need for further underground development, which would result in more waste rock needing to be stored on surface.
- Development of as much of the Project on existing brownfield sites as possible. As part of the Project, reclamation activities will be undertaken during the operation, decommissioning and closure phases.
- Minimizing greenfield site surface disturbance, in the form of a longer transmission line and additional road building.
- Minimizing the volume of water that needs to be managed, resulting in less disruption to natural hydrologic processes, which was one of the resource protection objectives used to guide the design of water management approaches.

An alternative analysis for the Project was completed and is provided in Chapter 1 – Project Overview, Section 1.7. A further description of the selection process in relation to the Services Building location is provided as a response to Comment #14.

Osisko Development has been working with the community to address concerns regarding the location of the Mine Site and Services Building. The Services Building was redesigned to reduce the overall height and landscaping design concepts have been developed to further reduce the visual impact. Osisko Development is continuing to refine the building appearance to be more aesthetically pleasing. Osisko Development welcomes community ideas on the building aesthetics to maintain community character and be attractive to tourism.

## 2.72 #72 – Anonymous

### 2.72.1 Comment

The successful initiation of the Cariboo Gold underground mine will provide significant local and provincial employment opportunities, bring economic growth and improved infrastructure to the town of Wells, and provide economic benefit to the province of British Columbia. Barkerville Gold Mines Ltd is committed to mining in a sustainable, environmentally and socially-acceptable manner and has a good working relationship and respect for it's local stakeholders. I have worked in and lived in small towns with mining and logging, when the mining and logging dry up and close down these small towns turn into ghost towns. Everyone complains of speeding traffic from BGM, i infact have followed these ore trucks and company trucks, and to date they don't

speed. Now logging trucks and forestry trucks is a different story. Don't forget yes BGM uses this road but so does logging, other mining companies, other road building and construction companies not working for BGM use this road. NO BGM means no jobs, no infrastructure, no taxes, no business revenue, no new families, no jobs mean people will move away. Look at McKenzie

### 2.72.2 Response

ODV is excited to be a part of the regions economic growth and future by developing new opportunities for the regional workforce and local businesses. Thank you for your comments and ongoing support of the Project.

## 2.73 #73 – Anonymous

### 2.73.1 Comment

On Community Health: A recurring point in many of these documents is that much of the infrastructure in Wells was developed to support mining. Ultimately, the work that we do should always be going back to the people it is for. We build homes, community halls, hospitals and more to support human beings - not the profession they work in. In adverse health effects, ODV absolves itself of responsibility for workers and Wells residents by saying that choosing shift work which may lead to burnout, perception of negative effects on quality of life or hardships at home it is individual choice and life decision that the project can't influence or change. In reality, a lot of people who have dedicated themselves to settling their lives in Wells can't just pick up and find somewhere that will be better for their mental health - that is a huge privilege. ODV, ultimately, holds all the power to change all of this through direct policy action. What if workers only had to work 9-5? What if drilling didn't occur 24 hours a day? What if the industry set a standard that encouraged healthy work-life balances over work hard, play hard? What if workers were able to express concern about the way things were getting done without fear of breaching totalitarian NDA's? If the operations aren't viable while respecting workers' humanity, then should they really be viable at all?

### 2.73.2 Response

Osisko Development has developed corporate policies to address the concerns expressed, and welcomes feedback to continuously improve employee experience. These policies are included in Appendix 1.0-14: Workforce Policies And Programs . Relevant information from these policies will be expanded upon in the revised Application and incorporated into the discussion of mitigation measures pertaining to Community Health. . Below is a summary of relevant commitment made under each policy:

Osisko Development, through its *Responsible Procurement Policy* is committed to is committed to:

- Strictly complying with our code of conduct and ethics, governance guidelines, and other relevant policies, procedures and signed agreements with our host communities.
- Contributing to the economic development of our host communities by promoting local purchasing.
- Enabling access and minimizing barriers that inhibit participation of local suppliers of goods and services to supply chain opportunities arising from our activities.
- Communicating clearly and in a timely manner, our needs, opportunities, requirements and standards.
- Adapting procurement approaches and strategies to meet the uniqueness of each site.
- Encouraging the development of viable local businesses that meet our needs, requirements and standards, particularly businesses owned by Aboriginal people, women or underrepresented groups or promoting these groups.

Osisko Development, through its *Community Relations Policy* is committed to:

- Establishing ongoing dialogue and respectful relationships with host communities through sharing of information and recording, understanding and working collaboratively on responding to concerns.
- Strictly complying with laws and regulations in the jurisdictions in which we operate.
- Evaluating each of our activities in terms of the potential negative impacts and risks for the natural, human and social environments, with the goal of adopting mitigation measures aimed at prevention and protection.
- Contributing to the socio-economic development of host communities through investments in community-based sustainable development projects.
- Aiming for continuous improvement by implementing community relationship management programs, annually reviewing our commitments and objectives, recording concerns and responses, and developing plans and targets to improve performance.

Osisko Development, through its *Environmental Policy*, is committed to:

- Protecting the environment.
- Strictly complying with laws and regulations in the jurisdictions in which we operate.
- Evaluating each of our activities in terms of the potential impacts and risks for the natural, human and social environments, with the goal of prevention and protection.
- Developing emergency action plans to mitigate the negative effects of unplanned events.
- Designing and using our facilities with approved technologies and the most efficient techniques to minimize the risk to the environment, and to the health and safety of people, while keeping in mind the concerns of the host communities.

- Raising environmental awareness by providing employees with the appropriate training and tools to prevent risks and respond effectively to any incidents.
- Ensuring efficient use of natural resources and consumer goods such as water and energy.
- Minimizing the footprint of our activities and reducing emissions in air, water and soil, including the generation of waste and the production of greenhouse gases.
- Restoring the sites to ensure physical and chemical stability through progressive rehabilitation measures and regularly updating closure and rehabilitation plans and ensuring that associated financial assurances are adequate.

Osisko Development through the *Code of Business Conduct & Ethics* requires all directors, officers, employees, contractors, and consultants to, always, comply and act in accordance with the principles stated in the Code. Violations of this Code by any director, officer, employee, contractor or consultant are grounds for disciplinary action, which may include immediate termination of employment, provision of services, position as an officer of the Corporation, or, in the case of a director, a request for the director's resignation. For the workplace, the Code requires:

#### *Substance Abuse*

The Corporation is committed to maintaining a safe and healthy work environment free of substance abuse. Employees, officers and directors of the Corporation are expected to perform their responsibilities in a professional manner and, to the degree that job performance or judgment may be hindered, be free from the effects of drugs and/or alcohol.

#### *Workplace Violence*

The workplace must be free from violent behavior. Threatening, intimidating or aggressive behavior, as well as bullying, subjecting to ridicule or other similar behavior toward fellow employees or others in the workplace will not be tolerated.

Osisko Development, through its Health and Safety Policy is committed to:

- Strictly complying with the laws and regulations in the jurisdictions in which we operate.
- Implementing our Occupational Health and Safety Management System (OHSMS).
- Evaluating each of our activities in terms of the potential impacts and risks for the natural, human and social environments, with the goal of prevention and protection.
- Developing emergency action plans to mitigate the negative effects of unplanned events.
- Designing and using our facilities with approved technologies and the most efficient techniques to minimize the risk to the environment, and to the health and safety of people, while keeping in mind the concerns of the host communities.

#### *Workplace Safety Programs*



All employees will be required to complete mandatory training including, but not limited to:

- Health and Safety Orientation and Training, including:
  - Occupational health and safety, including safe work practices,
  - Health and wellness,
- Site-specific Orientation.
- Code of Conduct Training.
- Training on the anti-bullying and harassment policy

*Cultural Training and Awareness:*

This training will be completed at the beginning of employment and designed to meet occupational health and safety requirements. As well, training will be completed as conditions require (e.g., renewal of safe work practices training, refreshing the training materials, or new positions that require new safety training).

In addition to required training, Osisko Development strives to invest in the professional development of its employees and will work closely with direct hires and contracting agencies to support skills development. An employee performance review will be conducted annually for each employee to set goals for professional development with a manager or senior staff. Professional development and training will be available as appropriate, and on-site and off-site courses will be potential training opportunities for employees. As well, first aid training opportunities will be provided to employees to fulfill the Project's on-site first aid safety needs.

## **2.74 #74 – Anonymous**

### **2.74.1 Comment**

I support the Cariboo Gold Project with one caveat. Location. Osisko identified two site location options that met their criteria for: technical suitability; environmental considerations; socio-economic considerations; and economic feasibility. Osisko wrote a report on how both options were feasible. By Osisko's own deductions, the Mine Site (behind visitor info. with portal in residential area) and Cow site (1.5 km's further from Wells) are both viable options. So why not be a good neighbour. Rather than running your industrial operations in the backyard, just go with your second favourite option, a couple of feasible kilometers away, so that we can live side by side without acrimony.

### **2.74.2 Response**

The location of the former Cariboo Gold Quartz Mine was selected as the location of the Mine Site based on numerous criteria. The site was selected based on a number of technical, environmental, social and economic considerations which includes but is not limited to the following:

- Proximity to the ore zones and surface topography. The Mine Site Services Building is located directly above the Valley Zone and is central, relative to the Mosquito, Shaft, and Cow zones.
- Reducing the need for further underground development, which would result in more waste rock needing to be stored on surface.
- Development of as much of the Project on existing brownfield sites as possible. As part of the Project, reclamation activities will be undertaken during the operation, decommissioning and closure phases.
- Minimizing greenfield site surface disturbance, in the form of a longer transmission line and additional road building.
- Minimizing the volume of water that needs to be managed, resulting in less disruption to natural hydrologic processes, which was one of the resource protection objectives used to guide the design of water management approaches.

An alternative analysis for the Project was completed and is provided in Chapter 1 – Project Overview, Section 1.7. A further description of the selection process in relation to the Services Building location is provided as a response to Comment #14.

Osisko Development has been working with the community to address concerns regarding the location of the Mine Site and Services Building. The Services Building was redesigned to reduce the overall height and landscaping design concepts have been developed to further reduce the visual impact. Osisko Development is continuing to refine the building appearance to be more aesthetically pleasing. Osisko Development welcomes community ideas on the building aesthetics to maintain community character and be attractive to tourism.

## 2.75 #75 – Anonymous

### 2.75.1 Comment

I've been coming to this community regularly since 2004, and have been a permanent resident since 2012. I love this place, and have promoted it across the country as a livable locale, where the loudest sound is birds, and you can also choose one of 250 scotches at the local pub as a tippie before bed. Recently, Facebook has come under fire for, as a recent whistle blower Frances Haugen says, "Consistently putting profit before people." We already know that Osisko is legally bound to its stakeholders to maximize profit under corporate law. As a result, If I happened to think that the existing tourism oriented-industries could possibly interfere with mine development, the first thing I would do to – in order to knee-cap that tiny industry – would be to buy up most of the accommodations that allow that industry to thrive. Whether by malfeasance or necessity, this has already happened. One of the Best Possible Ways to offset this is to move operations out of sight, onto already denuded land just the other side of Cow Mountain. It sounds like a simple (Albeit More Expensive) win-win for the town, and for the mine. Is there a reasonable explanation for not doing so, other than the bottom line? And, if it's really all about

cost, is that added cost really all that significant in the face of an operation expected to extract 6 to 9 billion dollars worth of gold? Seems like a relatively tiny trade-off, if only to preserve the comparatively small and delicate – but sustainable – economy that has sprung up in mining's absence, and, perhaps, when active mining is absent again – in a projected 15 years. There's a win-win solution here, I know it.

### 2.75.2 Response

The location of the former Cariboo Gold Quartz Mine was selected as the location of the Mine Site based on numerous criteria. The site was selected based on a number of technical, environmental, social and economic considerations which includes but is not limited to the following:

- Proximity to the ore zones and surface topography. The Mine Site Services Building is located directly above the Valley Zone and is central, relative to the Mosquito, Shaft, and Cow zones.
- Reducing the need for further underground development, which would result in more waste rock needing to be stored on surface.
- Development of as much of the Project on existing brownfield sites as possible. As part of the Project, reclamation activities will be undertaken during the operation, decommissioning and closure phases.
- Minimizing greenfield site surface disturbance, in the form of a longer transmission line and additional road building.
- Minimizing the volume of water that needs to be managed, resulting in less disruption to natural hydrologic processes, which was one of the resource protection objectives used to guide the design of water management approaches.

An alternative analysis for the Project was completed and is provided in Chapter 1 – Project Overview, Section 1.7. A further description of the selection process in relation to the Services Building location is provided as a response to Comment #14.

Osisko Development recognizes the importance of tourism to the District of Wells, and believes that mining and tourism can co-exist. Osisko Development has made the following commitments regarding tourism:

- Work with the District of Wells and local residents to identify ways in which the mine can help promote tourism in the area (e.g., moving the headframe to the community).
- Work to develop a tourism component that is complimentary to the mine (e.g., visitors center, mine tours, etc.) that may attract people to the area or encourage them to stop while passing through Wells.
- Develop a strategy to mitigate pressures on recreation and tourism in the Project area due to increased population and visitors.

- Contact industry leaders in the tourism industry at least semi-annually to better understand the impacts on the sector, if any, caused by ODV.
- Place signage on recreational trails and public roads if there is the potential for conflicts with Project activities.

## **2.76 #76 – Cam Beck, Wells, BC**

### **2.76.1 Comment**

See attached.

### **2.76.2 Response**

Thank you for your comments. Responses are provided in the section below.

### **2.76.3 Attachment – C Beck Oct 2021 re Cariboo Gold EAC.pdf**

Comments and responses from the attachment are provided in Table 2.76-1.

Table 2.76-1 Comment #76 Attachment - Responses

Number	Comment	Response
76-1	<p>As a person looking forward to the benefits, both to the community of Wells and to all of British Columbia, of Osisko Development’s Cariboo Gold Project, I am seriously disappointed by the company’s Environmental Assessment Certificate application. Sadly, the project will likely be delayed until the company can make an adequate application. I hope the following suggestions will help speed up the development and approval of that application.</p>	<p>Comments on the Application have been received from the Technical Advisory Committee and the public. These comments will be reflected in the revised Application which will be submitted to the EAO in early 2022.</p>
76-2	<p>Be specific. The application should avoid vague, meaningless suggestions for mitigating or offsetting negative impacts of the project. Suggestions that plans “will be developed” and that the proponent “will work with” other parties may be well intentioned but are quite nebulous. The application should avoid suggestions the proponent will do something vague in the undefined future. Instead the application should provide commitments for mitigation and impact offsets that are measurable and enforceable.</p> <p>This was the directive provided by BC Auditor General Carol Bellringer in her May 2015 Follow-Up Report: Environmental Assessment Office when she stated the Environmental Assessment Office must “ensure commitments are clearly written in a measurable and enforceable manner” (emphasis added). This means, quite simply, that an application should</p> <ul style="list-style-type: none"> <li>• identify measurable maximum impacts, not only on the natural environment but on the socioeconomic environment as well</li> <li>• identify specific, measurable initiatives the proponent will undertake to mitigate or offset negative impacts</li> </ul> <p>This also means an application should explain how these measures will be enforceable, with the impacts and the mitigating or offsetting measures monitored by an independent agency, and how the proponent will respond to any failure to meet its commitments.</p>	<p>The development of certain management and monitoring plans are outside of the scope of this Environmental Assessment, and are instead components of the Project permitting process. Where relevant to effects assessment, details of these plans have been incorporated into the Application to demonstrate how effects will be managed. A summary of mitigation, including Management and Monitoring Plans is provided in Appendix 20.1 of the Application. Osisko Development has committed to providing additional details of the management and monitoring plans in the revised Application. As requested by the EAO, mitigation measures will be revised to be measurable and specific. This will be provided in the Revised Application.</p> <p>See Response to Comment #9.</p>
76-3	<p>Minimize the footprint and negative impacts (1) The application identifies the environmental impact of a project with an</p>	<p>The Project Footprint has been reduced through ongoing design changes, such as moving surface infrastructure underground, backfilling waste rock underground and consolidating surface infrastructure within the Services</p>

# CARIBOO GOLD PROJECT

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Number	Comment	Response
	<p>unnecessarily large footprint and, consequently, environmental and visual impacts that are far more extensive than they need to be.</p> <p>These impacts substantially increase the likelihood the application will be rejected by the Environmental Assessment Office.</p> <p>As others have shown, a new application could propose a considerably reduced footprint, and fewer negative impacts, by constructing the proposed service building at the “Cow Site”, 500 m south of the currently proposed location at the “Mine Site”.</p> <p>Access to and from the service building would then be along the Pinkerton Forest Road. Trucks hauling ore from the service building to the QR mill and trucks hauling aggregate from the Tucker Lake aggregate mine to the project would not have to travel along Highway 26 on the north shore of Jack of Clubs Lake, nor cross the proposed bridge over the Willow River on the west side of the community.</p> <p>Moreover, there would no longer be a need for a new road on Barkerville Mountain for trucks hauling waste rock from the service building to the waste rock storage facility.</p>	<p>Building. The Project footprint presented in the Application is buffered by 50 m to provide a maximum area where the Project will be located. This is typical of environmental assessments and the actual Project footprint will be smaller than what is shown as detailed design is completed.</p> <p>An alternative analysis for the Project was completed and is provided in Chapter 1 – Project Overview, Section 1.7. A further description of the selection process in relation to the Services Building location is provided as a response to Comment #14. The Tucker Lake aggregate mine is not part of the Cariboo Gold Project.</p> <p>The Project is using existing access roads to haul waste rock from the Services Building to the Waste Rock Storage Area at Bonanza Ledge. The access roads are shown in Chapter 1 – Project Overview, Figure 1.1-3.</p>
76-4	<p>Additionally, the 69 kV transmission line could be routed along the Pinkerton rather than along a proposed swath to be cut through a forested Old Growth Management Area and across the east slope of Island Mountain immediately above, and in plain sight of, the community.</p>	<p>OG See response to Comment #14 .</p>
76-5	<p>In summary:</p> <ul style="list-style-type: none"> <li>• the impact of ore trucks traveling across a bridge on the west side of the community and along the shore of Jack of Clubs Lake would be eliminated</li> <li>• the impact of aggregate trucks traveling that same route would be eliminated</li> <li>• the impact of a new road on an unstable slope up Barkerville Mountain would be eliminated</li> <li>• the 69 kV's impact on an Old Growth Management Area and on the scenic forest above the community would be eliminated.</li> </ul>	<p>An alternative analysis for the Project was completed and is provided in Chapter 1 – Project Overview, Section 1.7. A further description of the selection process in relation to the Services Building location is provided as a response to Comment #14.</p>

# CARIBOO GOLD PROJECT

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Number	Comment	Response
	<p>Instead, all this truck traffic and the transmission line would be routed along a single pre-existing industrial corridor, the Pinkerton Forest Road.</p>	
76-6	<p>This also eliminates another significant, negative socio-environmental impact. The proposed service building would not loom over the community as it would if built at the “Mine Site” but instead would be out of the community’s sight. The proponent would no longer need to pretend the hulking 12 story high building won’t have a huge negative impact on the visual quality of the community if built at the “Mine Site”.</p> <p>“In response to the feedback received during the Early Engagement Phase, ODV reduced the height of the Services Building to improve the visual aspects. . . . the highest part of the building has been reduced in height by approximately 20 m, resulting in a new maximum height of approximately 37 m” the current application states (p 1-114).</p> <p>Improved visual aspects? Really? The application merely replaces an 800 pound pig with a 700 pound pig, and the façade treatments and landscaping suggested elsewhere in the application is just (you knew this was coming) lipstick on the pig.</p>	<p>Osisko Development has been working with the community to address concerns regarding the location of the Mine Site and Services Building. The Services Building was redesigned to reduce the overall height and landscaping design concepts have been developed to further reduce the visual impact. Osisko Development is continuing to refine the building appearance to be more aesthetically pleasing. Osisko Development welcomes community ideas on the building aesthetics to maintain community character and be attractive to tourism.</p>
76-7	<p>Minimize the footprint and negative impacts (2)</p> <p>The project footprint and negative environmental impacts are unnecessarily large for another reason: the proposed Island Mountain portal.</p> <p>This portal should be omitted from a new Environmental Assessment Certificate application. This portal was not part of the proponent’s Preliminary Economic Assessment (August 2019). Figure 16.4 (p 197) and figure 16.8 (p 206) in that document illustrate carefully designed mine access and underground development with just one mine access portal. Figures 16.4 and 16.8 show that portal on Cow Mountain and, from there, underground access to both Cow Mountain and Island Mountain. No Island Mountain portal is identified, and no Island Mountain portal is required.</p>	<p>The Island Mountain Portal was a design addition and is described in the Detailed Project Description and Application. The development of the Island Mountain Portal will allow the Project to move to underground construction activities quicker, and reducing the surface activities and effects associated with those activities.</p>

Number	Comment	Response
	<p>The Island Mountain portal was also not part of the proponent’s Initial Project Description (October 2019). That document identified just one portal “with the entrance near the historic Cariboo Gold Quartz 1500 portal on Cow Mountain, near the northeast end of Jack of Clubs Lake” (p 33).</p> <p>Excluding the portal from the Project is obviously a technical and economically viable alternative!</p> <p>The Island Mountain portal is clearly an afterthought. It was added to the proponent’s Detailed Project Description (October 2020) “to accelerate the development of the underground infrastructures. This will reduce the surface construction period and enable underground connection between the mine extraction zones of Shaft, Valley and Cow” (p 77).</p> <p>But: as was clear in the Preliminary Economic Assessment and Initial Project Description, an Island Mountain portal is not required to “enable” the underground connection!</p> <p>And: though the application suggests the Island Mountain portal will reduce the dust and noise caused by construction from two years to one year, it fails to acknowledge the dust and noise created during the projected one year construction period will be much closer to homes in the community.</p>	
76-8	<p>Minimize the footprint and negative impacts (3)</p> <p>The project footprint identified in the application, and the resulting negative environmental impacts, are also unnecessarily large because it includes a 69kV transmission line that follows a corridor north of Highway 26</p> <p>As already noted, the line would have a significant impact on the view from the community of Wells: the proposed corridor crosses the lower eastern slope of Island Mountain directly above the community.</p> <p>But: the negative impact on the habitat of the endangered Southern Mountain Caribou, is the biggest reason to propose a new route in a new Environmental Assessment Certificate application. This was made evident in a submission by Jake Bradshaw, a UNBC caribou researcher and PhD candidate, during the Project’s early engagement period in</p>	<p>Effects to southern mountain caribou are described in Section 7.8 Wildlife. Osisko Development has routed the Transmission Line through disturbed areas and has proposed a number of mitigation measures to address effects to Caribou. Osisko Development has discussed with FLNRORD the Transmission Line route and discussions are ongoing. A Caribou Mitigation and Management Plan for the Project will be developed.</p>



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Number	Comment	Response
	<p>July 2019. Mr Bradshaw noted the proponent stated, in a public engagement session on July 13, that the northern corridor avoids critical caribou habitat.</p> <p>That statement was incorrect, said Mr Bradshaw, who went on to state the northern corridor would intrude on and eliminate critical habitat (emphasis added). It would also add, he said, another “linear feature”, that is, another wide, continuous and cleared right-of-way, to the landscape between Quesnel and Wells, and explained such linear features “are known to increase the efficiency and speed that predators travel”. By predators he was referring, of course, to bears and wolves that kill caribou.</p> <p>Mr Bradshaw also described the constraints imposed on mine infrastructure development by a December 9 2009 provincial government order protecting caribou habitat in this area, constraints that could make it difficult if not impossible to construct a transmission line along the northern corridor.</p> <p>Further constraints are a distinct possibility. In 2018 the Government of Canada suggested a possible federal government Critical Habitat Protection Order as provided for by Section 63 of the Species At Risk Act (SARA). This prompted the provincial government to begin developing caribou herd plans. In the Peace River region this led to significantly increased constraints on industrial development in caribou habitat. A herd plan for the Barkerville Caribou herd is now being developed.</p> <p>Clearly, the proposed northern corridor’s impact on critical caribou habitat makes a reconsideration of alternative corridors highly desirable. Existing and potential additional regulatory constraints on development in this critical habitat make the reconsideration a virtual necessity.</p>	
76-9	<p>Mitigate and offset negative impacts on the socio-economic environment</p> <p>An applicant should provide specific, measurable objectives for initiatives to mitigate and offset negative impacts on human and community wellbeing.</p>	<p>As requested by the EAO, the mitigation measures will be revised to be measurable and specific. This will be provided in the Revised Application. Management and monitoring plans will be developed during the permitting phase and provided to regulators as part of the permitting process. As part of the EA Certificate, Osisko Development expects that there will be conditions related to the development, review and approval</p>

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Number	Comment	Response
	<p>Instead, as with other vague ideas in this Environmental Assessment Certificate application, there is absolutely no commitment except such vague notions as: “develop a socio-economic monitoring plan”; “work with”; “engage with”; “provide ongoing communication”.</p> <p>A new application should include initiatives, with measurable objectives, to address those in the community of Wells who will not be able to directly benefit from employment and business opportunities provided by the mine. This includes, obviously, retirees and the disabled.</p>	<p>of management plans. Relevant plans will be provided to the District of Wells for comment.</p>
76-10	<p>It also includes many people who have invested heavily in acquiring skills and developing markets for their services and products, particularly people engaged in the arts and tourism. The unprecedented demand for housing generated by the project will significantly increase land values.</p> <p>Unless mitigating measures are employed, the increased property values will make rents or taxes unaffordable to many of these long-time community residents.</p> <p>Increased property values will also increase the property taxes for existing businesses in the arts and tourism sectors. The continued existence of these businesses, negatively impacted as they already were by the current pandemic, would be severely jeopardized.</p> <p>If the community loses most, if not all, of these residents and businesses the project will not diversify the community’s economy. Instead it will have the opposite effect: it will stifle arts and tourism enterprise, and curtail economic diversity. It will make Wells a one-industry town subject to the whims of international gold prices and of distant investors with no interest in the community.</p>	<p>Osisko Development will also be developing a Socio-Economic Monitoring Plan. This plan will be a high-level strategic plan that describes an approach to monitoring and managing the potential social and economic effects of the Project, with a specific focus on:</p> <ul style="list-style-type: none"> <li>• Community health and well-being</li> <li>• Community safety</li> <li>• Community development and housing</li> <li>• Economic diversification</li> <li>• Community feedback mechanisms; and</li> <li>• Monitoring of social and economic outcomes as a measure of mitigation and management effectiveness</li> </ul>
76-11	<p>The application should also include initiatives to address the project’s elimination, already, of all motel accommodation in the community (one motel was taken over by the proponent and the other was acquired by a third party to serve the proponent’s contractors). Significantly reduced visitor accommodation in the community has reduced the number of people patronizing local restaurants, gift shops and art galleries: the</p>	<p>Accommodation planning for the Cariboo Gold Project does not rely on the continued use of the Hubs Motel, and Osisko Development is open to selling the accommodation at a future date to a new owner who would operate the motel in order to meet and enhance the community goals regarding tourism.</p>

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Number	Comment	Response
	<p>application should address this impact and provide measurable objectives for initiatives to mitigate and offset these impacts.</p>	
76-12	<p>Be “sustainable”, or not</p> <p>Don’t claim the mine is “sustainable”: how better to lose credibility than to claim a mine with a projected life of 16 years is “sustainable”? Only, of course, by claiming the ore body is “sustainable”: but when it’s gone, it’s gone!</p> <p>The project could be sustainable if the application includes a concrete plan for preserving and enhancing a sustainable community during and after the closure of the mine, and a concrete plan for sustaining caribou during the life of the mine.</p> <p>But: if the mine or project isn’t going to be sustainable, then don’t engage in the farce of claiming it is!</p>	<p>ODV aims to create sustainable benefits in the community upon mine closure through the following:</p> <ul style="list-style-type: none"> <li>• Education and training, provided by the Project along with the new skills that workers will learn while on the job, provide sustainable economic benefits that can be used upon mine closure to get jobs elsewhere and sustain livelihoods.</li> <li>• The Project’s commitment to cover the demands for goods and services from within the Local Assessment Area and the Regional Assessment Area will expand the capacity of local and regional business and give them a sustainable economic benefit to participate in other similar opportunities upon mine closure.</li> <li>• Construction and operations workforce will gain transferable skills that they can employ, elsewhere, upon mine closure.</li> </ul> <p>Project’s activities will result in new and improved infrastructure in the Local Assessment Area and the Regional Assessment Area. Infrastructure expansion/improvements have sustainable benefits to the communities in the LAA and the RAA.</p>
76-13	<p>Conclusion</p> <p>Development of the Cariboo Gold Project has already provided both Wells and the region with significant benefits. These benefits will be eclipsed by the benefits arising from the eventual approval of the project. A revised Environmental Assessment Certificate application that will yield the same results but with a reduced footprint and with reduced negative impacts should be developed without delay.</p>	<p>A revised Application that reflects comments received from the Technical Advisory Committee and the public will be provided by Osisko Development to the EAO.</p>

## 2.77 #77 – Anonymous

### 2.77.1 Comment

It seems that there has been a significant amount of environmental assessment done in this scenario with attempts to limit impacts on the communities it affects. There will always be those opposed to developing industry however if the industry is respecting the environment in its practices it will benefit all involved.

### 2.77.2 Response

Thank you for your comments and ongoing support of the Project.

## 2.78 #78 – Anonymous

### 2.78.1 Comment

The team at Osisko Development has experience building and operating a mine in close proximity to a community. The Malartic operation in the province of Quebec has been a success whereby Osisko was respectful of the community members and made significant investments in the town such as building a new school. The town of Wells, as does Malartic, has a rich mining history which contributes to the local tourism in the area (Barkerville). Osisko is dedicated to operating in a safe and sustainable way and to preserve the local attractions that make Wells such a unique place to be. The Cariboo project will be another great example of how multiple industries can thrive in harmony (arts, history, outdoor sports, mining etc.).

### 2.78.2 Response

Osisko Development is excited to be a part of the region's economic growth and contribute to new opportunities and support local businesses. New opportunities will draw workers and their families to the region, creating more opportunity through spin-off economic activity such as an increased customer base for arts and cultural activities and products. New investments will renew community infrastructure and recreational facilities. Thank you for your comments and ongoing support of the Project.

## **2.79 #79 – Ed Coleman, Retire CEO of Barkerville Historic Town & Park and Cottonwood House Historic Site, Quesnel, BC**

### **2.79.1 Comment**

Since 2015, I have witnessed the depth of commitment that the Osisko, Osisko Developments, and Barkerville Gold Mines Teams have put into the Cariboo Gold Fields Project. Their Community Investments in Wells, their investment in Barkerville Historic Town & Park and Cottonwood House Historic Site, specifically: an 1800s Tunnel Rehabilitation Project, Indigenous Research and Programming for both Sites, support for the Year-round diversification including the Tube Run, cooperative environmental testing in the Park Boundaries (454ha), input into the Barkerville eventual Indigenous Cultural Centre, and more. I learned quickly that the senior decision makers are a grass roots, highly experience and education, community minded, and a professional Team. The Environmental Certificate Process is intensive and I appreciate all the voices in the process.

### **2.79.2 Response**

Osisko Development is excited to be a part of the region's economic growth. New opportunities for local businesses, arts and culture activities and products will draw workers and their families to the region, creating more opportunity. New investments will renew community infrastructure and recreational facilities. Thank you for your comments and ongoing support of the Project.

## **2.80 #80 – Robin Tremblay, Malartic**

### **2.80.1 Comment**

Malartic, October 6, 2021 Hi, My name is Robin Tremblay. I have been a resident of the town of Malartic for 45 years. I have been working for the Osisko mine for 12 years now, which is now the Canadian Malartic mine. I am a representative of health and safety for workers. The priority of Osisko and the Canadian Malartic Mine is the health and safety of all workers and citizens of the town of Malartic. I took part to all the construction of the Osisko mine and the Bape meetings and the majority of the citizens of Malartic were in favor of the project because they saw all the benefits that the mine could provide. The citizens were happy because they had priority hiring for the mine as well as all the local companies in the city. Thanks to Osisko, Malartic is on the map now. - Robin Tremblay

### **2.80.2 Response**

Thank you for your comments and support.

## 2.81 #81 – Anonymous

### 2.81.1 Comment

I think that everyone understands the economic benefits this project can bring to the town of Wells and the Cariboo region. I also think residents of Wells are underestimating the probability of losing this industrial project. For sure, the mine location will cause visual impact, noise and traffic. It is impossible to have an industrial project that has no impact. I think everyone is also assuming correctly that BGM/Osisko is locating its Mine at the entrance of the town to gain some economical advantages (road access, facility to services, etc). While some residents of Wells are assuming that relocating the Mine would only have a little impact economically on the project. I doubt this because BGM/Osisko has always been opposed to this option and if it would be a small economical impact, I think they would have relocated the mine much sooner to avoid opposition. My questions I would like to ask Osisko is: Would the Cariboo Gold Project be viable economically from your corporation's standards if relocated?. The infrastructure in Wells are in great need of upgrade and repairs: - As everyone is aware, the town sewage system is in non-compliance and urgent need of important corrective measures. - We had a lead problem this summer in the potable water distribution and we have doubts about the town water quality. - The school is in desperate need of renovation and we don't know where the kids will go to school this winter. I see many comments on concerns with tourism being affected by the Cariboo project. I am more concerned about the immediate well being of the residents and how the town will and can address those repairs to the infrastructure. I would favour dialogue and compromise at this stage of the project, instead of jeopardizing losing this project. A project of over 400 Million dollars for a town of 200 is rare and incredibly valuable for the sustaining the existence of Wells.

### 2.81.2 Response

See Response to Comment #14. Attachment A of the Technical Memo includes environmental, social, technical and economic criteria that compares the two alternatives.

Osisko Development is currently in the process of developing a Memorandum of Understanding with the District of Wells which addresses sewer, water and infrastructure upgrades as well as the school.

## 2.82 #82 – Dave Plant, Quesnel BC

### 2.82.1 Comment

The Cariboo Gold Project is a great opportunity for the Cariboo region, not only Wells and Barkerville, but also Quesnel. The regional economy would benefit from such a project, their plan is to rebuild the Cariboo and provide much needed employment. I believe that if they are open and transparent with their operations this could potentially benefit all British Columbians.

### 2.82.2 Response

Osisko Development is excited to be a part of the regions economic growth and contribute to new opportunities by hiring 75% or more of the workforce and source a proportion of its goods and services from local businesses. New opportunities will draw workers and their families to the region, creating more opportunity through spin-off economic activity. Thank you for your comments and ongoing support of the Project.

## 2.83 #83 – Shar Berg, Quesnel, BC

### 2.83.1 Comment

The Caribou Gold Project would not only directly benefit Wells and Barkerville but Quesnel too. The projected growth in economy and employment out weight the risk. I believe if Osisko, Barkerville Gold Mines is open and transparent with their operations this 20-year project could be good for all of BC.

### 2.83.2 Response

Thank you for your comments and ongoing support of the Project.

## 2.84 #84 – Anonymous

### 2.84.1 Comment

I have personally invested in the community of Wells for many years. During this time, I have seen Wells boom and die. In the past when Island Mountain Mine was booming, there was a thriving town. People had money and community spirit. The Curling rink would have bonspiels that lasted days. Major holidays were marked with dances. The local restaurants would be open all year round. When the mine closed money stopped flowing and Wells started to deteriorate. The town does not have the financial capability to maintain the amazing infrastructure given to us during the peak of mining in the past. I do not want to see us loose what we have, I want to see us grow and thrive. I would love for people to have jobs, private businesses to grow and our kids to have a healthy life. I have seen the town benefit from mining in the past, why can we not do it again? I believe the Cariboo Gold Project can help contribute to the survival of our community.

### 2.84.2 Response

ODV is excited to be a part of the region's economic growth and contribute to new opportunities and support local businesses. New opportunities will draw workers and their families to the region, creating more opportunity through spin-off economic activity such as an increased customer base for arts and culture activities and products. New investments will renew community infrastructure and recreational facilities. Thank you for your comments and ongoing support of the Project.

## 2.85 #85 – Anonymous

### 2.85.1 Comment

1. When I hear community members talk about new road access up Barkerville Mountain, can Osisko please explain where this because when I read the information I understand it to mean existing roads will be used like the A Road and the B Road. 2. Do the traffic and noise assessments account for the logging trucks that go through town at all hours of the day and night? Why are there complaints about 18 trucks a day from Osisko's project when logging trucks are upwards of 150-200 trucks per day? 3. Can Osisko provide a realistic view of what the transmission line route looks like because community members are saying the Northern Route is undisturbed but that's not what the Osisko assessment is. 4. Can Osisko have an engineer explain why the Stouts Gulch route for the transmission line isn't feasible? 5. Can Osisko tell us how they plan to use the Island Mountain Portal at the end of construction? I've heard this mentioned before but can this really become a tourist attraction? 6. There is a lot of talk about the exploration noise that's happening, can Osisko explain what will happen with Exploration if the project goes through? Will it still be on surface and in the boundaries of town?

### 2.85.2 Response

Mine traffic between the Mine Site Complex and Bonanza Ledge will be on the Mine Access Roads as shown on Figure 1.1-3 in Chapter 1 – Project Overview of the Application. These are currently known in the community as the B-Road and A-Road.

The traffic assessment used Ministry of Transportation and Infrastructure data for the analysis. This would include any logging truck traffic during the data collection period.

The baseline noise assessments would include any large truck traffic that passed by the noise monitors on the monitoring days.

A detailed view of the Transmission Line Route is available in Appendix 7.9-3, Figure 3-1 to 3-5. The photo imagery shows areas of disturbance. Osisko Development conducted a site tour with FLNRORD in summer 2021 and additional forestry-cleared areas along the Transmission Line route on Island Mountain were observed.

A transmission line route along Stouts Gulch was not evaluated.

Island Mountain Portal will be used for emergency egress only for Year 3 to Year 16. Osisko Development is open to discussing use for the Island Mountain Portal after construction including turning it into a tourism point of interest. Osisko Development would be interested in developing a tourism attraction similar to those of the Britannia Mine Museum or Kimberly Mine Museum.

If the Project proceeds and underground development is initiated, the exploration program will move underground. Surface drilling in relation to the Project mining zones (Mosquito, Shaft, Valley, Cow) will not be required in Operations.



## 2.86 #86 – Anonymous

### 2.86.1 Comment

I first came to Wells in the fall of 1968 and immediately fell in love with this quiet clean air and the charm of this beautiful little town of Wells. Many of the other residents value those qualities and so have the tourist who've visited throughout the decades, often coming back year after year, supporting a local tourism economy. It would be ashame to lose those qualities to a massive industrial development within the boundaries of this beautiful little town. I don't believe the Cariboo Gold Project, as proposed, has addressed my concerns about: 1) Noise. 2) Air Quality ( Vehicle dust and emissions ). 3) Traffic. 4) Water. 5) Wildlife. 6) Losing the appeal of this quaint little town that has drawn both tourists and artists through the decades. How will Osisko address these concerns in a way that we can hold them to their commitments?

Anonymous

### 2.86.2 Response

The Project will be required to follow the conditions in the EA Certificate, if issued, as well as the requirements of any regulatory permits and approvals issued to construct and operate the mine. See also the response to Comment #9.

## 2.87 #87 – Anonymous

### 2.87.1 Comment

I believe the Cariboo Gold Project is a much needed opportunity for positive economic development in the Cariboo region. The high paying jobs, taxes and economic stimulus a project like this has on a region is meaningful. Osisko is a knowledgeable, highly credible mining group with a depth of experience on how to develop sustainable mineral projects. I and my family are supportive of this project.

### 2.87.2 Response

ODV is excited to be a part of the regions economic growth and contribute to new opportunities by hiring 75% or more of the workforce and source a proportion of its goods and services from local businesses. New opportunities will draw workers and their families to the region, creating more opportunity through spin-off economic activity. Thank you for your comments and ongoing support of the Project.

## 2.88 #88 – Anonymous

### 2.88.1 Comment

Please find attached.

### 2.88.2 Response

Thank you for your comments. Responses are provided in the section below.

2.88.3 Attachment – Socio-Economic Health State (1).pdf

Comments and responses from the attachment are provided in Table 2.88-1.

Table 2.88-1 Comment #88 Attachment - Responses

Number	Comment	Response
88-1	<p>State of Socio-Economic Health 7.1-1</p> <p>Factors that affect health are identified in this document as income, education, employment, physical environment and deprivation. I have done my best to highlight deprivation under each of the subheadings.</p>	<p>The valued components (VC)s identified and assessed in the Application pertaining to social, economic and health factors are separated as follows:</p> <ul style="list-style-type: none"> <li>• Chapter 7.10 Employment and Economy</li> <li>• Chapter 7.12 Infrastructure and Services</li> <li>• Chapter 7.13 Human and Ecological Health</li> <li>• Chapter 7.14 Community Health</li> </ul>
88-2	<p>INCOME: Throughout this document, reference is made to imply that folks living in Wells are anticipated to supply services to the mine. Similar to mountain towns overrun by silicon valley VC's, the mine and folks working directly for the mine set up the region for gross wages disparity. As per the EAO open house in September 2021, wages for workers sit around 70,000 per annum - this is almost DOUBLE the current living wage in this area. While no one is disparaging the mine for paying employees adequately, this influx of cash disproportionately affects local housing markets, preventing investment from groups that see themselves in this region beyond the lifetime of the mine. From here, you get property monopolies, the rich get richer, the poor stay poor. This adversely affects the very factions of worker that the District of Wells should be looking to attract. As the population of public sector workers age, new teachers or childcare workers for the school cannot make the choice to move here because it is impossible to have their public sector salaries, and face the reality of paying off grotesque student loans in an environment when houses are overvalued, and quality of life is reduced to 24 hours of drilling and transport.</p>	<p>Osisko Development will develop a Socio-Economic Monitoring Plan. This plan will be a high-level strategic plan that describes an approach to monitoring and managing the potential social and economic effects of the Project, with a specific focus on:</p> <ul style="list-style-type: none"> <li>• Community health and well-being</li> <li>• Community safety</li> <li>• Community development and housing</li> <li>• Economic diversification</li> <li>• Community feedback mechanisms; and</li> <li>• Monitoring of social and economic outcomes as a measure of mitigation and management effectiveness</li> </ul>
88-3	<p>EDUCATION: Everywhere the mine is investing money seems to be with the intention of putting post secondary efforts towards trades programs to help support people who can work at an arm's length of the mine. If population is to adjust sustainably, supports need to be put in place to also encourage the education of other factions of the public sector that provide indispensable services. Better investments into</p>	<p>Osisko Development is committed to providing training opportunities to residents, as appropriate, to increase the skills of the local and regional workforce to enable Osisko Development to maximize hiring from the local and regional area. This will also help expand the pool of potential</p>

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Number	Comment	Response
	<p>emergency services for the region, specifically fire and EMS, are going to be crucial in our changing climate as well.</p>	<p>employees and will help facilitate hiring of individuals from segments of society generally not well represented in mining projects.</p> <p>Education and training, provided by the Project along with the new skills that workers will learn while on the job, provide sustainable economic benefits that can be used upon mine closure to get jobs elsewhere and sustain livelihoods.</p>
88-4	<p>EMPLOYMENT: Though a large fraction of jobs will be available, the time period is incredibly finite. In the worker policies section, the company states that they encourage promotion from within and expanded job experience through lateral job moves.</p> <p>When employees are promoted from within, what does their contract renegotiation look like? Are they being adequately compensated as they absorb tasks?</p> <p>What work does Osisko do to ensure these lateral moves are not taking advantage of their workers (setting tasks outside of expertise to save time and/or money)</p> <p>What is the level of supervision that supervisors with proper training are able to give to folks being asked to do a certain job for the first time?</p> <p>How is this activity continuously monitored?</p> <p>How does Osisko prevent communication breakdown for specified job tasks?</p> <p>How are these tasks monitored ongoing to make sure they have not eroded from best practices?</p> <p>These are key and crucial processes. You are working in a town with a singular water source. One miscommunication will drastically affect the livability of this area, and if we are working to make this a viable livable township beyond the life mine, there is much work to be done beyond tourism and industry to ensure that we have regional food security and climate change mitigations like firesmart initiatives in place.</p>	<p>Osisko Development Corporation is committed to maximizing employment opportunities for local residents over the long-term. While the life of mine of the proposed Cariboo Gold Project is 16 years, Osisko will continue to conduct exploration activities and studies to investigate future opportunities for expansion or extending the duration of mining activities in the area.</p> <p>The Project will include a robust environmental management system that includes a number of environmental management plans and monitoring programs. These plans and programs will identify not only mitigation and monitoring measures to be employed for minimizing adverse effects to environmental and social valued components, but also the roles and responsibilities of key employees and supervisors, as well as mechanisms for communicating their responsibilities related to protection of these environmental and social values.</p>
88-5	<p>PHYSICAL ENVIRONMENT: There are a multitude of comments in this period that point out the robust effects that the exploration period has had on the quality of life for residents in Wells. It is important to acknowledge that one of the main reasons for moving to rural locations is for the quality of life found in a rural space's proximity to nature. It is</p>	<p>There is the potential for positive effects on Land and Resource Use arising from the Project. Osisko Development Corp. will collaborate with the community of Wells to investigate opportunities to enhance local tourism initiatives that take advantage of the mining history in the area. The public land and resource valued subcomponent, primarily the</p>

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Number	Comment	Response
	<p>frustrating to see in the community recreation section ( 11) that people, instead of retaining the outdoor activity in the area, should just go elsewhere in the CRD. This is an unfair economic assumption of people living here. Not everyone can afford to travel in the way this document seems to suggest.</p>	<p>recreation and tourism experience, may be improved in the community of Wells by implementing the following activities:</p> <ul style="list-style-type: none"> <li>• Provide residents and tourists information about the Project by placing interpretive signage at specific viewing areas around the community.</li> <li>• Investigate community and stakeholder interest in developing a mine tour program that can be advertised at the Tourist Information Center and in other businesses in Wells and Quesnel.</li> <li>• Explore opportunities, with the various user groups, to enhance or add to the extensive trail system located proximate to the Mine Site.</li> </ul> <p>There is the potential for positive effects on recreation associated with the construction and operations of the Transmission Line ROW. The ROW will provide improved access to areas that may attract a variety of recreational activities such as hiking, cross country skiing and snowmobiling.</p> <p>The characterization of potential positive effects will be evaluated as enhancement plans are developed in discussion with the District of Wells, Indigenous nations, business owners, recreation and tourism representatives and the Barkerville Historic Town and Park. Following implementation of enhancement measures, the success will be monitored and adapted as required during on-going engagement with stakeholders.</p>
88-6	<p>In summary, this report highlights the development of the Cariboo Gold project as a diversification from the forestry industry. This is not diversification - it is a regime shift from one extractive industry to another, one where the economic value is dictated by the price at which gold fetches at a market level.</p>	<p>Noted</p>
88-7	<p>In general, Much of the language choice in this document is already pushing the reader to see only the alternatives as opposed to what is lost through direct impact. This is readable in viewing the loss of Wells recreation space as inconsequential because there's lots of other places to go in the CRD, and saying that it wouldn't be so hard to move the elementary population in Wells to Barlow Creek.</p>	<p>In-migration of workers can created increased demand for community recreation facilities and use areas. To mitigate this Osisko has proposed the following mitigation measures:</p> <ul style="list-style-type: none"> <li>• Provide fitness facilities at the worker camps</li> <li>• Include information regarding recreation opportunities in the area, uses and activities that can be undertaken and any Indigenous-specific concerns regarding use in the area as part of on-boarding</li> </ul>

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Number	Comment	Response
		<ul style="list-style-type: none"><li>• Inform Quesnel, Wells, CRD, and Indigenous nations regarding anticipated timing of construction, number of workers, and duration of construction so that they can plan and provide input to ODV regarding use in the area</li></ul>

## 2.89 #89 – Anonymous

### 2.89.1 Comment

Our family presently enjoys the natural environment, the peace and quiet of Wells. While there are a very few people who moved here to work in the mine the majority of the townspeople moved here for the rural setting and the great quality of life that Wells has offered. While here we have developed, own and operate a variety of successful tourism-related businesses that have thrived over the past twenty-five years. Wells is the natural gateway to The Bowron Lakes Provincial Park and Canoe Circuit, and Barkerville Historic town and surrounding areas. This symbiotic relationship shared by all three areas has allowed tourism to flourish while protecting the integrity of the community members and surroundings. This sustainable industry has brought many people into Wells to work in the private sector, arts and tourism over the past 50 years, and 80,000-100,000 people visitors come to the area annually. This very gateway, both symbolically and real are now being threatened out of existence by Osisko's proposal to have the Highway or No Way. The concentrator, its industry noise, dust pollution, constant mine and service vehicles and massive unsightliness will negatively impact the qualities we now enjoy and seriously impact our ability to maintain and grow our arts, history and adventure tourism in the area. It is unacceptable for Osisko to hijack the entrance to our town, to build a 12 story high concentrator, 2 football fields in length there, behind the Tourism Visitor Center. It is intolerable for us to have to have service vehicles, back-up alarms, dust, noise pollution that we would have to endure, 7 days a week, 24 hours a day. This is about ensuring us that Osisko comes up with a better location for the concentrator instead of Osisko declaring that this is where the concentrator is going to be. I encourage you to seek expert opinions outside of Osisko for the concentrator location. Osisko has constantly rejected the idea of moving the concentrator away from the town without reasonable substantiations. The project stands to make billions of dollars and can afford to make the decision to back away from the town to another location. This submission is an act of poor faith, with absolutely no consideration to the townspeople of Wells. Infrastructure Decline Tourism has been the economic driver for over 50 years and has enjoyed a symbiotic relationship with several users of the infrastructure that was in place up to 5 years ago, including placer miners, off season workers, hunters and generally anyone else that comes to the area for various reasons. It's important to understand that Tourism and the Arts has been growing for at least 25 years and has only showed setbacks when Osisko( then BGM) started to buy up tourism -related properties in recent years. Although fires and Covid have added other layers of challenge, Osisko's activity has exacerbated these effects, and, more importantly, permanently disabled the tourism economy. Over the past 5-7 years, 2 accommodations: a Motel and Motor Inn, have been bought by the mine or an acting interest for the mine for their sole proprietary use. That equates to 80 rooms nights disappearing. A very popular campground has also just been bought by the mine in the

summer of 2021, further deteriorating availability for a critical mass of people needing accommodation. This is not about whether we have a mine or not. Osisko is continually promoting the richness of the project which has the greatest financial benefit to the proponents. One could come to the conclusion that this is a deliberate campaign to weaken the tourism industry, or simply careless actions and considerations brought on by a company that does not understand how tourism operates, and what infrastructures are required for tourism to continue to grow and thrive. These buying up tourism infrastructure does not recognize or promote diversity, in fact it feels like a takeover. Regardless of the intent, the buying-up actions speaks of a company not having the communities welfare at stake. I absolutely reject the imposition that the project as it is now presented, will have on me, my family's and my neighbours lives. I have no faith in Osisko coexisting with the town unless they are mandated to change the project deliverables. This is about the fundamental rights of a community to enjoy a reasonable quality of life, within the boundaries of the town. It is about diversity. Not about supplanting one industry for another.

### 2.89.2 Response

The location of the former Cariboo Gold Quartz Mine was selected as the location of the Mine Site based on numerous criteria. The site was selected based on a number of technical, environmental, social and economic considerations which includes but is not limited to the following:

- Proximity to the ore zones and surface topography. The Mine Site Services Building is located directly above the Valley Zone and is central, relative to the Mosquito, Shaft, and Cow zones.
- Reducing the need for further underground development, which would result in more waste rock needing to be stored on surface.
- Development of as much of the Project on existing brownfield sites as possible. As part of the Project, reclamation activities will be undertaken during the operation, decommissioning and closure phases.
- Minimizing greenfield site surface disturbance, in the form of a longer transmission line and additional road building.
- Minimizing the volume of water that needs to be managed, resulting in less disruption to natural hydrologic processes, which was one of the resource protection objectives used to guide the design of water management approaches.

An alternative analysis for the Project was completed and is provided in Chapter 1 – Project Overview, Section 1.7. A further description of the selection process in relation to the Services Building location is provided as a response to Comment #14.



Osisko Development has been working with the community to address concerns regarding the location of the Mine Site and Services Building. The Services Building was redesigned to reduce the overall height and landscaping design concepts have been developed to further reduce the visual impact. Osisko Development is continuing to refine the building appearance to be more aesthetically pleasing. Osisko Development welcomes community ideas on the building aesthetics to maintain community character and be attractive to tourism.

Osisko Development recognizes the importance of tourism to the District of Wells, and believes that mining and tourism can co-exist. Osisko Development has made the following commitments regarding tourism:

- Work with the District of Wells and local residents to identify ways in which the mine can help promote tourism in the area (e.g., moving the headframe to the community).
- Work to develop a tourism component that is complimentary to the mine (e.g., visitors center, mine tours, etc.) that may attract people to the area or encourage them to stop while passing through Wells.
- Develop a strategy to mitigate pressures on recreation and tourism in the Project area due to increased population and visitors.
- Contact industry leaders in the tourism industry at least semi-annually to better understand the impacts on the sector, if any, caused by ODV.
- Place signage on recreational trails and public roads if there is the potential for conflicts with Project activities.

Osisko Development purchased the Hubs Motel in August 2019 after the property had been for sale for two years. Prior to COVID, Osisko Development made rooms available to interested parties, upon request, with the proceeds from those stays donated to the Wells Community Foundation. Due to COVID, this practice was suspended, but it is our intention to continue this once restrictions are lifted.

Accommodation planning for the Cariboo Gold Project does not rely on the continued use of the Hubs Motel, and Osisko Development is open to selling the accommodation at a future date to a new owner who would operate the motel in order to meet and enhance the community goals regarding tourism.

Osisko Development will also be developing a Socio-Economic Monitoring Plan. This plan will be a high-level strategic plan that describes an approach to monitoring and managing the potential social and economic effects of the Project, with a specific focus on:

- Community health and well-being
- Community safety
- Community development and housing
- Economic diversification
- Community feedback mechanisms; and
- Monitoring of social and economic outcomes as a measure of mitigation and management effectiveness

Osisko Development will continue to operate the Community Relations Office and hold community meetings and workshops to obtain feedback regarding on-going activities. Senior leadership will continue to be present within in the community to listen to feedback and address concerns.

## **2.90 #90 – Jess Shaw, Wells, BC**

### **2.90.1 Comment**

I have been working as a geologist for BGM since January, 2017. Having spent more than half my time over the past five years living and working in Wells, and I've come to consider it a second a second home. I'm a proud supporter of local business, as well as a patron and now and then participant in the local arts. I've witnessed some positive growth in the community during my time in Wells. I look forward to future growth and the expanded contribution to community improvement that BGM/Osisko can offer with continued company development. I have been working as a geologist for BGM since January, 2017. Having spent more than half my time over the past five years living and working in Wells, I've come to consider it a second home. Wells is truly wonderful! I'm a proud supporter and patron of local business, as well as a supporter of and now and then participant in the local arts. I've witnessed some positive growth in the community during my time in Wells. I look forward to future growth and the expanded contribution to community improvement that BGM/Osisko can offer with continued development.

### **2.90.2 Response**

ODV is excited to be a part of the regions economic growth and contribute to new opportunities by hiring 75% or more of the workforce and source a proportion of its goods and services from local businesses. New opportunities will draw workers and their

families to the region, creating more opportunity through spin-off economic activity. Thank you for your comments and ongoing support of the Project.

## **2.91 #91 – VICTOR HANSEN, Prince George**

### **2.91.1 Comment**

Good day , nothing but great things to say in regards to BVG and Osisko development , they have been great community supporters throughout the years , this year they really came thru with a \$500,000.00 donation to keep the Barkerville Heritage Site up and running for another year as they were not able to secure gov't funding, will be great for the local communities for future employment opportunities and development of the area, the companies have a excellent track record for caring for the environment in their practices, look forward to many years of opportunity in the are, thank you

### **2.91.2 Response**

ODV is excited to be a part of the region's economic growth and contribute to new opportunities and support local businesses. New opportunities will draw workers and their families to the region, creating more opportunity through spin-off economic activity such as an increased customer base for arts and culture activities and products, local restaurants and other businesses. New investments will renew community infrastructure and recreational facilities. Thank you for your comments and ongoing support of the Project.

## **2.92 #92 – Falko Kadenbach, Quesnel**

### **2.92.1 Comment**

BGM's revitalization of the mines in Wells and QR have brought many jobs and economic growth to the region. With proper environmental practices and community engagement, I fully support their efforts to expand their operations.

### **2.92.2 Response**

By committing to hire 75% or more of its workforce from the region and partner with local businesses to supply a proportion of its goods and services, ODV is excited to be creating economic potential in the region during construction, operations, and closure phases. Thank you for your comments and ongoing support of the Project.

## **2.93 #93 – Katie Hayhurst, Bella Coola**

### 2.93.1 Comment

The Wells and Barkerville area is our cherished second home, and primary home of our immediate family and many friends who have dedicated much of their lives to making this the special BC community that it is. Our wish is that the Environmental Assessment Office will do all in your power to ensure the Cariboo Gold Project's mining development is assessed and [potentially] carried out in harmony with - not at the expense of - this precious and unique rural BC community, including the arts and tourism industries they have painstakingly developed over many decades. In addition, our concern is for the cumulative effects this mining project, on top of existing and extensive logging, could have on the community and vulnerable wildlife populations already under stress. As a retired MCIP Registered Community Planner, I am particularly concerned that transportation routing and industrial-scale development be carefully planned to avoid the impacts of extensive noise, light, air, and water pollutants that can significantly affect not only the quality of life but the health and safety of residents, visitors, and surrounding wildlife. Already, early phases of exploration and preliminary development have highlighted the stress it can cause if care is not taken to separate industrial activities outside core residential and tourist areas. I have viewed suggestions by community member, Dave Jorgenson, for relocating industrial transportation routes and building sites designed to help avoid some of the worst impacts. I urge the EAO to give serious consideration to those, and any other similar concerns and suggestions. There may be some environmental and initial expense tradeoffs, but also significant benefits - especially in the long run. The Wells District and Barkerville area is a small, rural, BC community that does not have the capacity to defend itself alone from the scale of industrial development proposed by Osisko for their Cariboo Gold Project. It behooves the Environmental Assessment Office to be especially diligent in their consideration of this project and any conditions they might need to apply, should the project be approved to go ahead. Thank you for this opportunity to respond.

### 2.93.2 Response

ODV, through its Community Relations Policy is committed to:

- Establishing ongoing dialogue and respectful relationships with host communities through sharing of information and recording, understanding and working collaboratively on responding to concerns.
- Strictly complying with laws and regulations in the jurisdictions in which we operate.
- Evaluating each of our activities in terms of the potential negative impacts and risks for the natural, human and social environments, with the goal of adopting mitigation measures aimed at prevention and protection.

- Ensuring that stakeholders potentially affected by the impacts of our activities are identified at an early stage and consulted.
- Adapting the community consultation approach to meet the uniqueness of each site.
- Contributing to the socio-economic development of host communities through investments in community-based sustainable development projects.
- Contributing to the economic development of host communities by creating employment opportunities and promoting local purchasing.
- Ensuring that employees and subcontractors interact with Aboriginal and local communities, organizations, groups and individuals with respect and integrity through raising awareness and acceptance of cultural differences and fostering diversity and inclusion in our workplaces.
- Establishing and maintaining a feedback system and complaint mechanism, conducting appropriate investigations and identifying and completing corrective actions.
- Aiming for continuous improvement by implementing community relationship management programs, annually reviewing our commitments and objectives, recording concerns and responses, and developing plans and targets to improve performance; and
- Ensuring that the necessary resources – human, material and financial – are available to promote, plan and guide this policy.

ODV, through its Environmental Policy, is committed to:

- Protecting the environment.
- Strictly complying with laws and regulations in the jurisdictions in which we operate.
- Evaluating each of our activities in terms of the potential impacts and risks for the natural, human and social environments, with the goal of prevention and protection.
- Developing emergency action plans to mitigate the negative effects of unplanned events.
- Designing and using our facilities with approved technologies and the most efficient techniques to minimize the risk to the environment, and to the health and safety of people, while keeping in mind the concerns of the host communities.

- Raising environmental awareness by providing employees with the appropriate training and tools to prevent risks and respond effectively to any incidents.
- Ensuring efficient use of natural resources and consumer goods such as water and energy.
- Minimizing the footprint of our activities and reducing emissions in air, water and soil, including the generation of waste and the production of greenhouse gases.
- Restoring the sites to ensure physical and chemical stability through progressive rehabilitation measures and regularly updating closure and rehabilitation plans and ensuring that associated financial assurances are adequate.
- Ensuring that stakeholders potentially affected by impacts are consulted and informed of our environmental objectives and performance.
- Aiming for continuous improvement by implementing environmental management programs, annually reviewing our commitments and objectives, collecting and analyzing statistics, conducting audits and developing plans and targets to improve performance; and
- Ensuring that the necessary resources - human, material and financial - are available to promote, plan and implement this policy.

## 2.94 #94 – John Massier, Director Area C, Barkerville Highway

### 2.94.1 Comment

I would like to see BGM and BC Hydro come to an agreement to use the existing hydro right-of-way along Hwy 26 rather than creating an entirely new corridor. If the line was built to BC Hydro standards along the existing corridor it would greatly benefit the entire region by making 3-phase power available to existing and future business along the route and beyond. There is very little likelihood that BC Hydro will take over the parallel line that is proposed now leaving no legacy of 3-phase power after the mine closes. Also the line that is built should have more capacity than what BGM expects to use so for the +/- 20 year expected life span of the mine there would be opportunity for other users to come on stream. This, of course, would require BC Hydro to invest in our region by constructing a sub-station near the terminus of the line that could redirect power elsewhere in the region to other customers.

### 2.94.2 Response

Thank you for your comments. The following was provided as a response the Technical Advisory Committee regarding the Transmission Line.

Constructing a new 69 kV transmission line along the existing highway-adjacent right-of-way (ROW) associated with Highway 26 (Alternatives A and B) would introduce development delays that are incompatible with the construction and development timeline of the Cariboo Gold Project (the Project). The primary cause of this schedule incompatibility is BC Hydro's unavailability to direct resources toward the construction of this transmission line within the timelines planned for the Project. In discussions between ODV and BC Hydro, it was communicated that, although BC Hydro would not necessarily be opposed to upgrading electrical transmission infrastructure between the Barlow substation and the Town of Wells if such a request was received, BC Hydro is currently pursuing higher-priority infrastructure upgrades elsewhere in the province that take precedence over this Highway 26 project.

ODV raised the prospect of privately financing and constructing the transmission line along the existing Highway 26-adjacent ROW; however, this ROW belongs to the Ministry of Transportation and Infrastructure (MOTI). MOTI protocols dictate that the permits required to build and operate a power line along a highway-adjacent ROW cannot be awarded to a private entity, in this case, ODV. As such, only BC Hydro would be authorized to construct a powerline along this route; this again ties to BC Hydro's current prioritization of this infrastructure upgrade relative to other projects it is undertaking.

Regarding the difference in development requirements between utilizing an existing ROW versus a new one, ODV notes that a significant amount of study work and development of appropriate management plans will be necessary regardless of transmission line route selection. With respect to specific studies and management plans noted in the comment, all of them would be required for all three potential transmission line route options; the one noted exception is the Whitebark Pine study, which would not be required for the Highway 26 route.

Regarding the District of Wells' use of the power supplied by the planned transmission line, there are several complicating factors associated with this power supply access. Government regulations restrict a private entity (i.e., ODV) from directly selling power to a consumer (i.e., the Town of Wells and its present and future residents). As such, ODV is not authorized to provide power conveyed via its privately-operated transmission line directly to the District of Wells.

In order to supply power from ODV's Transmission Line to the District of Wells, an intermediary entity would need to be established in accordance with the relevant regulatory processes required to operate as a utility company/distributor. This intermediary entity

would need to be created and operated separately from ODV; however, ODV would be open to and supportive of such an arrangement that would facilitate the supply of power from ODV's Transmission Line to the District of Wells.

The current EAC Application assumes that the Transmission Line will be decommissioned and reclaimed following closure of the Project; this inclusion ensures that the closure activities and costs associated with the entire Project are appropriately considered. It is possible that an agreement could be reached in the future, pending negotiations with BC Hydro and other relevant regulatory bodies, in which BC Hydro would assume ownership and operation of the Project's Transmission Line. In this case, BC Hydro would be able to supply power to the District of Wells via the transmission line that was constructed and previously owned/operated by ODV. The proposed transmission line is being designed in accordance with BC Hydro standards and requirements to the greatest extent possible to make it technically feasible for this ownership/operation transfer to occur at some point in the future, should an agreement be reached between BC Hydro, ODV, and other relevant regulatory bodies.

Regarding the provision of three-phase power to the District of Wells, ODV has been informed by BC Hydro that there have been no formal requests for three-phase power supply to the District of Wells. ODV notes that three-phase power is not used to power residential or light-utility commercial operations, but rather to power large, high-voltage heavy industrial equipment. Currently, most such loads, if not all, are associated with the current (non-CGP) ODV operations and supplied by the existing onsite generator supplied power; such loads would subsequently be supplied by the Project's Transmission Line once available. Should three-phase power become available, it is acknowledged that ODV subcontractors may want to establish a local presence in the Town of Wells to support mining activity associated with the Project, and other residents of the District of Wells may want to establish industrial operations. If an intermediary entity was established that allowed for a supply of power from the ODV-operated transmission line to the District of Wells and that was compliant with all relevant regulations governing such a power supply arrangement, it would be possible to supply three-phase power to industrial entities outside of the Project.

## 2.95 #95 – Anonymous

### 2.95.1 Comment

A strong economy based in mining development is a necessity in areas like Wells. What a great opportunity to ensure the areas rich mining history continues! I fully support this project moving ahead and believe that the impacts can and will be mitigated to an acceptable level.



### 2.95.2 Response

ODV is excited to be a part of the regions economic growth and contribute to new opportunities by hiring 75% or more of the workforce and source a proportion of its goods and services from local businesses. New opportunities will draw workers and their families to the region, creating more opportunity through spin-off economic activity. Thank you for your comments and ongoing support of the Project.

## 2.96 #96 – Anonymous - CAC Member, Wells, BC

### 2.96.1 Comment

A couple of Comments (October 7, 2021) have lauded Osisko's open pit gold mine at Marlartic, Quebec (now Canadian Malartic) as a successful example of a large mine operating close to a town, respecting its citizens. Note that some residents of Malartic filed a class action lawsuit a few years ago because of noise, dust and blasting. There were numerous infractions of environmental laws and regulations. The case was settled out of court and compensation provided. It is incorrect to leave the impression that everything was/is a happy experience at Malartic for its residents. <https://www.theglobeandmail.com/report-on-business/industry-news/energy-and-resources/quebec-residents-threaten-lawsuit-over-canadian-malartic-gold-mine/article28766468/>  
<https://www.mining.com/malartic-gold-mine-class-action-lawsuit-trial-begins/> <https://tjl.quebec/en/class-actions/nuisances-in-malartic/>

### 2.96.2 Response

The Canadian Malartic Mine Project is outside the scope of this environmental assessment.

In 2014, the Canadian Malartic Mine Project was purchased from Osisko Mining Corporation by Agnico Eagle Mines Limited and Yamana Gold Inc. The lawsuit against the Canadian Malartic Mine was file in 2016 by a small group of Malarctic residents, two years after the mine was sold the current owner. Osisko Development has no involvement in Agnico Eagle Mines Limited or Yamana Gold Inc. or the current operations of the Canadian Malarctic Mine Project.

The project was welcomed and supported by the vast majority of the population of Malartic, as it brought back much needed economic support and development for the town . The population had concerns and conditions to be met related to noise, dust and vibration from blasting operation. With discussion and exchanges, the Canadian Malartic Mine launched several research and innovation programs to improve their performance related to noise, dust and vibration. The programs started in the early days of the

operation were successful and the Canadian Malartic Mine is renowned worldwide for its innovative best practices in the industry and Osisko to be the visionary of behind this success.

## **2.97 #97 – Anonymous**

### **2.97.1 Comment**

I am very much in favor of the Cariboo Gold Project. I believe this project checks all the boxes regarding; economic development, high paying jobs, environmentally sound, strong community support, and long term commitment.

### **2.97.2 Response**

ODV is excited to be a part of the regions economic growth and contribute to new opportunities and support local businesses. New opportunities will draw workers and their families to the region, creating more opportunity through spin-off economic activity. Thank you for your comments and ongoing support of the Project.

## **2.98 #98 – Walt Cobb, Williams Lake B.C.**

### **2.98.1 Comment**

This project is critical not only for the survival of communities like Wells and Barkerville but for the recovery of the region

### **2.98.2 Response**

Thank you for your comments and ongoing support of the Project. By committing to hire 75% or more of its workforce from the region and partner with local businesses to supply a proportion of its goods and services, ODV is excited to be creating economic potential in the region during construction, operations, and closure phases.

## **2.99 #99 – Anonymous**

### **2.99.1 Comment**

See attached Comments

2.99.2 Response

Thank you for your comments. Responses are provided in the section below.

2.99.3 Attachment – General Comments .pdf

Comments and responses from the attachment are provided in Table 2.99-1.

Table 2.99-1 Comment #99 Attachment - Responses

Number	Comment	Response
99-1	<p>I am commenting as a member of the Community Advisory Committee and a long-time resident of Wells. Although I have not been able to read this application in its entirety, I have reviewed large sections of it, including several Appendices, and I have submitted comments relevant to certain sections. However, recently I stepped back and started to think about this situation as a whole.</p>	<p>Thank you for your comments.</p>
99-2	<p>That we are having to consider an application for an industrial project of this size and scope which is to occur literally on top of and inside of a tourism destination is astounding. I really have no idea why a company would think that it is “ok” to place this type of development within yards of residential areas. I think we can safely say that very few of ODVs Montreal staff or their Board of Directors would want this type of development close to their neighbourhood, where they were raising their families. In fact, a local representative of the company told several CAC members in a private meeting that ‘if he lived here, he would move’. So why is it ok for ODV to propose that we be subjected to this development?</p> <p>Why did they not begin planning this project with the basic premise “we need to locate this development away from the community” and work up their logistics around that? More expensive initially, yes, but they would have had much more community support. And local residents are aware (as laid out in many of the comments received) that it would have</p>	<p>Osisko Development recognizes the importance of tourism to the District of Wells, and believes that mining and tourism can co-exist. Osisko Development has made the following commitments regarding tourism:</p> <ul style="list-style-type: none"> <li>• Work with the District of Wells and local residents to identify ways in which the mine can help promote tourism in the area (e.g., moving the headframe to the community).</li> <li>• Work to develop a tourism component that is complimentary to the mine (e.g., visitors center, mine tours, etc.) that may attract people to the area or encourage them to stop while passing through Wells.</li> <li>• Develop a strategy to mitigate pressures on recreation and tourism in the Project area due to increased population and visitors.</li> <li>• Contact industry leaders in the tourism industry at least semi-annually to better understand the impacts on the sector, if any, caused by ODV.</li> <li>• Place signage on recreational trails and public roads if there is the potential for conflicts with Project activities.</li> </ul>

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Number	Comment	Response
	<p>been feasible, regardless of ODVs claims – it just would have been more expensive.</p>	<p>In addition, Osisko Development is open to discussing use for the Island Mountain Portal after construction including turning it into a tourism point of interest. Osisko Development would be interested in developing a tourism attraction similar to those of the Britannia Mine Museum or Kimberly Mine Museum.</p>
99-3	<p>It is interesting to note that ODV has convinced a resident of Malartic to comment. Comparing Wells to Malartic is definitely apples to oranges. While they might appear similar on the surface (they both have had gold mines) on closer examination they have little in common. The mines in the Malartic area operated well into the 1980s with a resurgence in the early 2000s, and unlike Wells, Marlartic did not realign its community vision and goals to pursue a future based on outdoor adventure, culture and the arts.</p>	<p>The Malarctic Project is outside of the scope of this environmental assessment.</p>
99-4	<p>Wells was abandoned by major mining interests in 1967 and aside from sporadic small projects, hard rock mining has played a minor role in economic development. An examination of archival records for every community visioning exercise that has been conducted since the 1970s (and there have been quite a few) will reveal tourism development, particularly that based on outdoor recreation, cultural and heritage tourism and Wells' unique sense of place, have been the lead objectives. The continuance of mining (particularly placer mining) has continued to place a minor role. By what right is a private forprofit interest allowed to completely ignore community aspirations and destroy community achievements that have been hard won over that last 50 years? Wells was a mining town from 1933 to 1967 – 34 years. It has been a tourism destination since 1958 (the official opening of Barkerville) a total of 63 years.</p>	<p>See response to 99-2.</p>
99-5	<p>This project, as currently proposed, with the major infrastructure and camp located so close to tourism assets and residential areas, will destroy the character of the community, one of the main things that attracts visitors and residents alike. It will drive up the cost of living so that many existing residents will be displaced. The quality of life for those remaining will diminish. The current population will be replaced by workers who only intend to stay a few years and are not invested in the community. And when the mine's life is over, what will be left. How will</p>	<p>Osisko Development will develop a Socio-Economic Monitoring Plan. This plan will be a high-level strategic plan that describes an approach to monitoring and managing the potential social and economic effects of the Project, with a specific focus on:</p> <ul style="list-style-type: none"> <li>• Community health and well-being</li> <li>• Community safety</li> <li>• Community development and housing</li> </ul>

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Number	Comment	Response
	the collapse of a viable and sustainable community in Wells affect the Province's investments in Barkerville?	<ul style="list-style-type: none"> <li>• Economic diversification</li> <li>• Community feedback mechanisms; and</li> </ul> Monitoring of social and economic outcomes as a measure of mitigation and management effectiveness
99-6	And of course, this could all be avoided. The project, with a different proposal, could be truly synergistic with Wells. With major infrastructure located out of view, with different traffic routes, with more attention to the visual integrity of the viewscape of Wells, the benefits of the project could be enjoyed without the destruction of the livelihoods of others	An alternative analysis for the Project was completed and is provided in Chapter 1 – Project Overview, Section 1.7. A further description of the selection process in relation to the Services Building location is provided as a response to Comment #14.
99-7	Unfortunately, this current proposal before the EAO does not offer these alternatives. Further it is lacking in detail and the impacts are not quantified. The reader is left with the choice – do I trust that they will do what they say and that their proposed mitigations (mainly unspecified) will work? Or do I not?	The Project will be required to follow the conditions in the EA Certificate, if issued, as well as the requirements of any regulatory permits and approvals issued to construct and operate the mine. See response to Comment #9.
99-8	Based on what I have read, and the information I have been provided with, I do not trust that this proposal will be successful in achieving the mitigations they propose, nor do I trust that ODV will even implement all the mitigations they are promising.	See response to Comment 21-27.

## **2.100 #100 – Anonymous**

### **2.100.1 Comment**

Please see attached PDF document with my comments, and JPEG of map to accompany.  
Thank you.

### **2.100.2 Response**

Thanks you for comments. Responses are provided in the section below.

### **2.100.3 Attachments – (1) EAO Public Comment Oct 5, 2021 .pdf and (2) corridor plan options CGP.jpg**

Comments and responses from the attachments are provided in Table 2.100-1.

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**Table 2.100-1 Comment #100 Attachment - Responses**

Number	Comment	Response
100-1	<p>Cariboo Gold Project Public Comment Period • September 7 to October 7, 2021</p> <p>I am a member of the Community Advisory Committee, and a full time resident and home owner in Wells. I want to thank the EAO for the opportunity to submit public comments on ODV's application in this current phase of the Cariboo Gold Project.</p>	Noted.
100-2	<p>I found it impossible in the time allowed to cover the entire application. In future public comment periods, I would suggest that more than 30 days be allotted to review and comment on the material provided. I feel the size of the application deters some people from taking the time to review and give important feedback because the amount of information is so overwhelming.</p> <p>Here are some points I'd like to comment on.</p>	<p><b>Response provided from the EAO:</b></p> <p>The size of the Application can make it difficult to digest, particularly for members of the public who are reviewing in their spare time. This is why the EAO began the public comment period on the Application over 30 days after receipt (and posting) of the Application to allow additional time for review before the 30-day public comment period began, based on a request from members of the Community Advisory Committee. The summary of the impact to Wells and the application summary were intended to provide shorter versions of the Application that were hopefully more digestible. The EAO appreciates your efforts to review and participate in this EA.</p>
100-3	<p>It is evident from Chapter 7 and parts of Chapter 17 of the application that ODV discovered through community outreach that the sustainable success of the Tourism/ Arts &amp; Culture sector in the community of Wells are of the utmost importance for the livelihood of many people who live in Wells.</p> <p>It may interest the EAO and ODV to know that a recent survey completed by Urban Systems and Dynamic Community Planning - in prep for updating the District of Wells Official Community Plan - revealed that 30% of the population of Wells is reliant on Tourism/Arts &amp; Culture for their livelihood. Comparatively, only 1% of the BC population can say the same. That speaks to how much a thriving Tourism/Arts &amp; Culture sector is paramount to the economic success of the community of Wells.</p>	<p>A Tourism study for the Project is being prepared and will be provided to the EAO.</p> <p>Osisko Development recognizes the importance of tourism to the community. Osisko Development has also made the following commitments regarding tourism:</p> <ul style="list-style-type: none"> <li>• Work with the District of Wells and local residents to identify ways in which the mine can help promote tourism in the area (e.g., moving the headframe to the community).</li> <li>• Work to develop a tourism component that is complimentary to the mine (e.g., visitors center, mine tours, etc.) that may attract people to the area or encourage them to stop while passing through Wells.</li> </ul>

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		<ul style="list-style-type: none"> <li>• Develop a strategy to mitigate pressures on recreation and tourism in the Project area due to increased population and visitors.</li> <li>• Contact industry leaders in the tourism industry at least semi-annually to better understand the impacts on the sector, if any, caused by ODV.</li> <li>• Place signage on recreational trails and public roads if there is the potential for conflicts with Project activities.</li> </ul>
100-4	<p>In Chapter 17.2.1 Environment &amp; Economy the proponent outlines that: “Local concerns were raised about ensuring the various sectors that support the Wells economy can co-exist. These concerns focused on the need to balance the tourism, outdoor recreation, mining, and arts and culture sectors in Wells and prevent the mining industry from negatively impacting the others. Comments were raised about finding potential collaborative or cooperative opportunities between various sectors of the community with this Project that could be mutually beneficial. Comments discussed the need to ensure lasting benefits to the community through legacy investments into infrastructure or programs. ODV is working with the community to balance mining and other economic activities in Wells.”</p> <p>While ODV has generously contributed financially to a number of projects in the works in Wells, I don’t agree that they are working with the community to “balance mining and other economic activities in Wells.” If they feel they are working towards that balance, what are they doing specifically? I would suggest that the EAO ask ODV to expand on the details of this claim in point 17.2.1.</p>	<p>Osisko Development, through its Community Relations Policy is committed to:</p> <ul style="list-style-type: none"> <li>• Establishing ongoing dialogue and respectful relationships with host communities through sharing of information and recording, understanding and working collaboratively on responding to concerns.</li> <li>• Strictly complying with laws and regulations in the jurisdictions in which we operate.</li> <li>• Evaluating each of our activities in terms of the potential negative impacts and risks for the natural, human and social environments, with the goal of adopting mitigation measures aimed at prevention and protection.</li> <li>• Ensuring that stakeholders potentially affected by the impacts of our activities are identified at an early stage and consulted.</li> <li>• Adapting the community consultation approach to meet the uniqueness of each site.</li> <li>• Contributing to the socio-economic development of host communities through investments in community-based sustainable development projects.</li> <li>• Contributing to the economic development of host communities by creating employment opportunities and promoting local purchasing.</li> <li>• Ensuring that employees and subcontractors interact with Aboriginal and local communities, organizations, groups and</li> </ul>



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		<p>individuals with respect and integrity through raising awareness and acceptance of cultural differences and fostering diversity and inclusion in our workplaces.</p> <ul style="list-style-type: none"> <li>• Establishing and maintaining a feedback system and complaint mechanism, conducting appropriate investigations and identifying and completing corrective actions.</li> <li>• Aiming for continuous improvement by implementing community relationship management programs, annually reviewing our commitments and objectives, recording concerns and responses, and developing plans and targets to improve performance; and</li> <li>• Ensuring that the necessary resources – human, material and financial – are available to promote, plan and guide this policy.</li> </ul> <p>An up to date information regarding ongoing discussion with the local governments about community deployment initiatives and identification of priorities will be included in a specific chapter in the upcoming GBA+ Study in January 2022.</p>
100-5	<p>ODV are aware how important it is for locals that Tourism/Arts &amp; Culture are sustainable, and yet the action of buying up, or renting, precious tourism accommodation in Wells shows a complete disregard for the Tourism sector. These actions do not reflect those of a company that professes to want to find a balance between economic sectors even though their report acknowledges that there’s already a concern that the mining industry will negatively impact the other economic activities in the community of Wells.</p> <p>At the last ODV open house on September 22 &amp; 23, 2021, François Vézina said, “Those properties have been on the market for a few years.” That is not a valid point. Those properties - even though they may have been for sale for a while - were still being run as tourist accommodations up until the ODV purchase of them. That action took those accommodations off the market and drastically reduced the available accommodation for tourists visiting the area. Island Mountain Arts, the Sunset Theatre Society and other Non Profit groups that organize events have attested to cancellations to a number of activities due to a lack of accommodation for tourists, and this issue has already</p>	<p>Section 1.6.3 Workforce Sourcing, Accommodation, and Wellbeing of Chapter 1.0: Project Overview includes full description of Project’s workforce sourcing and accommodation plan.</p> <p>The revised Application will include additional details on the camps. The revised Application will include sufficient information about the Project camps, their design capacity, amenities, camp policies and whether they will be open to other users such as tourists.</p> <p>Accommodation planning for the Cariboo Gold Project does not rely on the continued use of the Hubs Motel, and Osisko Development is open to selling the accommodation at a future date to a new owner who would operate the motel in order to meet and enhance the community goals regarding tourism.</p>

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	<p>arisen despite the Cariboo Gold Project only being in the exploration phase. I'd like to request that in advance of the CGP moving forward, that the EAO and the Ministries of Mining and Environment require ODV to address the housing problem they have added to by purchasing local tourist accommodations, which is negatively affecting the Tourism sector in the community of Wells.</p>	
100-6	<p>Location of the Service Building</p> <p>The Tourism based economy in Wells is in jeopardy if the community becomes a visibly active mining town. I am not against the mine, but I am 100% against the service building, the concentrator and the hotel like accommodation existing at the gateway to our community as outlined in the Project Overview in Chapter 1 of the application.</p> <p>The Wells area is frequented by tourists because of the natural beauty, the trails, the star filled night sky and the quaintness of the town. This has been true for decades.</p> <p>If ODV builds the service building and other proposed infrastructure at the gateway to the community, the Tourism industry and the quaintness that Wells is known for will be lost, especially if ODV cannot mitigate the anticipated light and noise pollution.</p> <p>If ODV really wants to find a balance between economic sectors they will seriously consider building the service building/concentrator and camp behind Cow Mountain as other people have suggested in this public comment feedback, or in another location. That suggestion has been repeatedly brought up at ODV open houses over the past year, and there has never been a sufficient answer as to why this option will not be seriously considered by ODV. I would ask the EAO to require the proponent to consider the serious impact this project will have on Tourism to the Wells/Barkerville/Bowron Lake area if an alternate location is not seriously considered.</p> <p>The attached "support a responsible mine plan" <b>[corridor plan options CGP.JPG]</b> shows a much greener and balanced footprint for the service building and for traffic corridor plans. This alternate location may go a long way to reducing dust, noise and light pollution to the community of Wells. It may be more expensive for Osisko to complete, but it will vastly improve the chances of Tourism still thriving in this</p>	<p>A Tourism study for the Project is being prepared and will be provided to the EAO.</p> <p>Osisko Development recognizes the importance of tourism to the community. Osisko Development has also made the following commitments regarding tourism:</p> <ul style="list-style-type: none"> <li>• Work with the District of Wells and local residents to identify ways in which the mine can help promote tourism in the area (e.g., moving the headframe to the community).</li> <li>• Work to develop a tourism component that is complimentary to the mine (e.g., visitors center, mine tours, etc.) that may attract people to the area or encourage them to stop while passing through Wells.</li> <li>• Develop a strategy to mitigate pressures on recreation and tourism in the Project area due to increased population and visitors.</li> <li>• Contact industry leaders in the tourism industry at least semi-annually to better understand the impacts on the sector, if any, caused by ODV.</li> <li>• Place signage on recreational trails and public roads if there is the potential for conflicts with Project activities.</li> </ul> <p>An alternative analysis for the Project was completed and is provided in Chapter 1 – Project Overview, Section 1.7. A further description of the selection process in relation to the Services Building location is provided as a response to Comment #14.</p>

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	community, and for a real balance between mining and Tourism/Arts & Culture to exist in harmony.	
100-7	<p>Lighting</p> <p>Since public consultation started on this project, the proponent has known that lighting and noise have been major concerns brought up by local Wells citizens on numerous occasions. There has never been an adequate reply to what the lighting and noise mitigation will be other than to say both will have mitigation measures implemented. Where are the details? Where are the visuals showing us what the project will look like at night in the proposed location in Wells? The 3D visuals supplied to date do not give the community of Wells and visiting tourists a real sense of what this project is really going to look like as they drive into Wells. More transparency is needed on the visuals.</p> <p>The application states that the lighting that locals have complained about to date is being dealt with, but as of Oct 7, 2021, the lighting that is being used in the exploration phase of the CGP is not directional lighting nor is it being dealt with.</p> <p>When you currently enter Wells as soon as you pass the Jack of Clubs Lake there are no less than 3 areas of exploration that are completely over lit. If the concentrator and camp are built at the JOC Lake the light pollution that will emanate may completely wipe out the night sky that is currently enjoyed by the locals and the tourists who come here from all across BC, Canada and around the world to enjoy its natural beauty, and the peace and quiet of the area.</p> <p>The proponent does state in the application that the lighting for this project will be “directional lighting”. If this is true, that is a positive note, and shows that they are willing to address industrial lighting concerns in the community, but the 3D visuals provided do not give a true picture of what the project will look like at night with the full lighting details pictured. With lighting being such a concern, perhaps the EAO could insist that the Visual Quality Effects Assessment include nighttime views of the service building with 100% of the proposed lighting.</p>	<p>All mitigation measures proposed for the Project are summarized in Appendix 20.1.</p> <p>Exploration activities are outside of the scope of the environmental assessment.</p>
100-8	3D Imaging	A complete Visual Assessment Report will be included in the revised Application which includes analysis of seasonal effects.

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	<p>Appendix 7.11-04 Visual Quality Effects Assessment was presented at the ODV/EAO open house on September 22 &amp; 23. This is the first time any 3D visuals have been presented in this whole process, aside from one 3D image supplied in July 2020 of a draft rendering of what the service building could look like at the gateway to Wells at Jack of Clubs Lake.</p> <p>Since Wells experiences winter for 6 to 7 months of the year, it would be helpful for future 3D renderings to also have a perspective of what the proposed service building location will look like in the winter. The current visuals only shows the view with summer vegetation.</p> <p>That 3D visual back at the July 2020 open house was the image that actually got a lot of locals more actively engaged in this process because it gave them a glimpse into what this project - just hundreds of metres away from residential areas - could actually look like. The image presented - albeit it a draft sample - was an eye sore to many, and people were quite vocal and concerned about how this project will look in its currently proposed location and how it will ultimately affect the Tourism sector of this area and the every day lives of the local residents of Wells.</p> <p>I would request that when the EAO asks the proponent to go back and update its current application so that the 3D imaging for each aspect of the project should reflect visuals in winter and summer and daytime and nighttime views. Many of the images in the visual quality appendix were also perspectives from very far away.</p>	
100-9	<p>I encourage the EAO to ask that the proponent create an application that can truly balance Mining and Outdoor Recreation and Tourism/Arts &amp; Culture. My personal opinion is that in order for that to happen, the major construction components of this project in Wells - specifically the service building/concentrator/camp and traffic routes - need to be Out of Sight, Out of Mine - a mantra that would actually enable an authentic and viable balance between industry and the Tourism/Arts&amp; Culture sectors.</p>	<p>An alternative analysis for the Project was completed and is provided in Chapter 1 – Project Overview, Section 1.7. A further description of the selection process in relation to the Services Building location is provided as a response to Comment #14.</p>
100-10	<p>In closing, I want to say that this has been and continues to be an exhausting process both emotionally and mentally. The lack of ability to meet face to face for this entire EA process - and for the ODV Open</p>	<p>Osisko Development will initiate in-person meetings again with the Community once COVID restrictions allow gatherings.</p>

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	<p>Houses - because of the Covid19 pandemic has been incredibly discouraging. I believe the lack of in person meetings has really taken away the community's ability to fully engage, ask questions and receive adequate answers in what is a life altering project, and one that could become a negatively life altering project for many people in Wells who do not work in the mining industry, and who continue to want the quiet and peaceful community of Wells to be their forever home.</p>	

## 2.101 #101 – Wells homeowner - CAC member, Wells, BC

### 2.101.1 Comment

Osisko's Cariboo Gold Project is an opportunity to provide immense benefits to Wells, Quesnel, the Cariboo Regional District and the province. However, the picture becomes less rosy when one considers some key aspects that remain highly problematic and unresolved, especially for those living in Wells, the most directly-affected community.

### 2.101.2 Response

The Project will contribute to the region's economic growth support local businesses. New opportunities will draw workers and their families to the region, creating more opportunity through spin-off economic activity. New investments will renew community infrastructure and recreational facilities.

The District of Wells was included as a separate Local Assessment Area for socio-economic valued components to identify effects that would specifically apply to the community.

### 2.101.3 Attachment – EAO-Comment\_CGP-Application\_Wells-homeowner.CAC-member\_07Oct2021.pdf

Comments and responses from the attachment are provided in Table 2.101-1.

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**Table 2.101-1 Comment #101 Attachment – Responses**

Number	Comment	Response
101-1	<p>The Environmental Assessment Office has already heard, and continues to hear, a number of concerns about the Cariboo Gold Project from those who live within the District of Wells, where the mine will be located. The July 2021 Application has not satisfactorily addressed these issues.</p>	<p>Osisko Development has been engaging with the community to inform the effects assessment. The information contained in the Application reflects the community feedback to submission date.</p>
101-2	<p>Services Building</p> <ul style="list-style-type: none"> <li>The massive concentrator [Services Building], as proposed, will dominate the southern skyline of Wells and create an unacceptable visual environmental impact. To say nothing of noise, dust, traffic (especially during construction) and other possible impacts. The solution is to move the Services Building to an alternate location on the other side of Cow Mountain, not visible to the town. At the same time, access roads would be moved away from the scenic entrance to Wells (one corridor).</li> </ul>	<p>Osisko Development has been working with the community to address concerns regarding the location of the Mine Site and Services Building. An alternative analysis for the Project was completed and is provided in Chapter 1 – Project Overview, Section 1.7. A further description of the selection process in relation to the Services Building location is provided as a response to Comment #14.. The Services Building was redesigned to reduce the overall height and landscaping design concepts have been developed to further reduce the visual impact.</p> <p>Osisko Development welcomes community ideas on the building aesthetics to maintain community character and be attractive to tourism.</p>
101-3	<ul style="list-style-type: none"> <li>Osisko was asked to provide an alternate site analysis for the Services Building. Their rationale (Chapter 01.7) is weak and superficial. The deficiencies are pointed out in CAC Member Dave Jorgenson’s Site Selection Analysis<sup>1</sup> and need to be addressed. As do the deficiencies he pointed out in his response to ODV’s Visual Quality Effects Assessment<sup>2</sup></li> </ul>	<p>An alternative analysis for the Project was completed and is provided in Chapter 1 – Project Overview, Section 1.7. A further description of the selection process in relation to the Services Building location is provided as a response to Comment #14. A response to the Visual Quality effects assessment is provided as a response to Comment #1.</p>
101-4	<ul style="list-style-type: none"> <li>The proposed Services Building location, close to existing homes and businesses, will make Wells look and feel like an industrial camp. (We’re already experiencing that effect during the current and mostly unregulated Exploration phase, which, incidentally, was not subject to an Environmental Review). Osisko’s refusal to seriously consider a different location is extremely disappointing, worrying and frustrating. ODV says it can mitigate the impact. So far, it has not shown it can. I don’t think it’s possible, either, given the proximity to Wells. In fact, as one senior Osisko official has said to some of us, ‘if I were you, I’d probably want to move, too.</li> </ul>	<p>Osisko Development has developed landscape concepts for the revegetation of the Project footprint and to lessen the visual effects of the Services Building. The landscaping concept is shown in Chapter 1, Figure 1.4-4. The majority of the currently bare landscape will be revegetated.</p> <p>Osisko Development is also developing design concepts on the look of the Services Building and welcomes community ideas on the building aesthetics to maintain community character and be attractive to tourism.</p>

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101-5	<ul style="list-style-type: none"> <li>It's often said that Wells is a mining town, suggesting that 'anything goes' with the Osisko's proposal. It should be pointed out that industrial mining stopped in 1967 when Cariboo Gold Quartz ceased operations, leaving a shell of a town. Some placer mining has continued, balanced by artists and others who moved here, had faith in Wells' future and created a tourism economy based on a vision of recreation, culture and history. Yes, the tourism economy has been fragile and could use a boost from a mining project. But the aim should be diversification, not a takeover by a mining giant, which is the danger now</li> </ul>	<p>Osisko Development recognizes the importance of tourism to the community. Osisko Development has also made the following commitments regarding tourism:</p> <p>Work with the District of Wells and local residents to identify ways in which the mine can help promote tourism in the area (e.g., moving the headframe to the community).</p> <p>Work to develop a tourism component that is complimentary to the mine (e.g., visitors center, mine tours, etc.) that may attract people to the area or encourage them to stop while passing through Wells.</p> <p>Develop a strategy to mitigate pressures on recreation and tourism in the Project area due to increased population and visitors.</p> <p>Contact industry leaders in the tourism industry at least semi-annually to better understand the impacts on the sector, if any, caused by ODV.</p> <p>Place signage on recreational trails and public roads if there is the potential for conflicts with Project activities.</p> <p>Osisko Development is developing a Tourism Study for the Project which will be provided.</p>
101-6	<ul style="list-style-type: none"> <li>I'm surprised existing environmental regulations even allow locating such massive infrastructure so close to a small community. Maps such as Fig. 2 in 01 Application Summary show a Mine Site that totally dominates the small town of Wells. This footprint needs to be, and can be, reduced.</li> </ul>	<p>Osisko Development has worked to reduce the Footprint and localize buildings into one location. The crusher is located underground. Surface infrastructure including the Services Building, camp accommodation and substation are located in close proximity to each other. The redesigned camp accommodation is less space than a typical trailer-style camp.</p>
101-7	<ul style="list-style-type: none"> <li>Osisko talks about being a good neighbour and part of the Wells community. A balanced and community-centric approach would be to move the concentrator out of sight of Wells. It's a viable option and I suspect a lot of opposition to the Application as it now stands would drop if Osisko did this.</li> </ul>	<p>Osisko Development has been working with the community to address concerns regarding the location of the Mine Site and Services Building. An alternative analysis for the Project was completed and is provided in Chapter 1 – Project Overview, Section 1.7. A further description of the selection process in relation to the Services Building location is provided as a response to Comment #14.</p>
101-8	<ul style="list-style-type: none"> <li>I request Osisko be required to submit a more thorough, good faith and serious alternative site analysis for the Services Building. This issue remains unresolved and if the Services Building location remains unchanged, the Cariboo Gold Project as proposed is unacceptable.</li> </ul>	<p>Osisko Development has been working with the community to address concerns regarding the location of the Mine Site and Services Building. An alternative analysis for the Project was completed and is provided in Chapter 1 – Project Overview, Section 1.7. A further description of the</p>



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Number	Comment	Response
		selection process in relation to the Services Building location is provided as a response to Comment #14.
101-9	<p>Island Mountain Portal</p> <ul style="list-style-type: none"> <li>• Another outstanding concern is the proposed portal on Island Mountain to haul ore to the concentrator across the highway at the entrance to Wells . This means noise, dust and safety issues from trucks regularly crossing the road where tourists and locals enter Wells. This, after initially telling us the ore would be transported underground, with no indication trucks would be hauling above-ground for a couple of years first.</li> <li>• The impact of Island Mountain Portal traffic has not been adequately addressed.</li> </ul>	Osisko Development acknowledges that trucks will need to transport construction fill material from the Island Mountain Portal location across Highway 26 to the Mine Site Complex. However, truck traffic from the Island Mountain Portal to the Bulk Fill Area would only be required for the first year of construction. Once the underground ramp connecting the Island Mountain Portal and Valley Portal is complete, waste rock would be moved underground. The Island Mountain Portal would then be used for safety egress only.
101-10	<p>Acoustic / Noise</p> <ul style="list-style-type: none"> <li>• A quiet town is highly valued by Wells residents. During a survey earlier this year by a consultant working with the District of Wells on a new Official Community Plan, residents used the word 'quiet' most frequently to describe an ideal version of our town. Yet, the Valued Component Acoustic (Noise) has continuously been given short-shrift by Osisko.</li> </ul>	Noise was considered as a sub-component under the Acoustic Valued Component. See Section 7.3 of the Application.
101-11	I have said before, and will repeat, that noise data collection is inadequate with only three noise monitoring locations in Wells. Sound can vary throughout the town and more locations are needed to adequately measure future impacts.	<p>Noise monitoring equipment has been installed in Wells at the following locations:</p> <ul style="list-style-type: none"> <li>• 4275 Blair Ave</li> <li>• 2314 Bowman Crescent</li> <li>• 388 Solibakke Drive</li> <li>• Weather Station on the ODV camp by the main office</li> </ul>
101-12	<ul style="list-style-type: none"> <li>• I'm also concerned that excessive drilling noise during the Exploration phase will result in flawed data, if those measurements are used as the baseline.</li> </ul>	It was determined that based on sound recordings taken during the noise measurements that drilling operations did not have a perceptible impact on overall noise levels at the measurement locations. The baseline measurements are representative of pre-exploration drilling noise levels.

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101-13	<ul style="list-style-type: none"> <li>Osisko has not provided information about Cumulative Effects related to Noise.</li> </ul>	<p>An interaction does not exist between the residual effect of the Project and the other past, current, or future project/activities.</p> <p>The project residual effects are not expected beyond the local assessment area and the activities listed above are well away from Regional Assessment Area apart from transportation. The transportation was part of baseline measurements.</p>
101-14	<ul style="list-style-type: none"> <li>At this stage, any Acoustic data submitted by Osisko are unreliable and unless its monitoring improves, will continue to be unreliable. An effort should be made to collect and provide baseline data when drills are not operating.</li> </ul>	<p>It was determined that based on sound recordings taken during the noise measurements that drilling operations did not have a perceptible impact on overall noise levels at the measurement locations. The baseline measurements are representative of pre-exploration drilling noise levels.</p>
101-15	<ul style="list-style-type: none"> <li>Question: Why does Osisko continue with such poor noise monitoring and data collection?</li> </ul>	<p>Noise monitoring and data collection followed the methodology outlined in Appendix 7.3-1. Section 3.3. Methodology was developed from standard guidance material for noise assessments.</p>
101-16	<ul style="list-style-type: none"> <li>Question: Will Osisko commit to doing noise monitoring at additional locations? I recommend the Wells-Barkerville School, Pooley Street, the Wells Meadow Trail, the new Cornish Mountain boardwalk trail, Wells Visitor Centre, and Highway 26 business district. There may be others.</li> </ul>	<p>Noise monitoring equipment has been installed in Wells at the following locations:</p> <ul style="list-style-type: none"> <li>4275 Blair Ave</li> <li>2314 Bowman Crescent</li> <li>388 Solibakke Drive</li> <li>Weather Station on the ODV camp by the main office</li> </ul>
101-17	<ul style="list-style-type: none"> <li>Question: Why is there no projection of, and mitigation for, Cumulative Acoustic Effects in Wells? I request that the Environmental Assessment Office make this a requirement for a Revised Application.</li> </ul>	<p>An interaction does not exist between the residual effect of the Project and the other past, current, or future project/activities.</p> <p>The project residual effects are not expected beyond the local assessment area and the activities listed above are well away from Regional Assessment Area apart from transportation. The transportation was part of baseline measurements.</p>
	<p>Light</p> <ul style="list-style-type: none"> <li>Wells is a town where you can see the stars at night. This is highly valued by residents, who are therefore sensitive to excessive light emissions.</li> <li>Wells residents have already experienced instances of unwelcome excessive light emissions during the Exploration stage, and are</li> </ul>	<p>Updates to the Light Effects Assessment report will be provided in a Technical Memo to the EAO.</p>

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	<p>understandably concerned about similar or worse impacts during construction and operation of the proposed mine.</p> <ul style="list-style-type: none"> <li>The Application has inadequate data regarding the impacts of light emissions and mitigation which needs to be rectified in an amended Application.</li> </ul>	
101-18	<p>Impact on Tourism</p> <ul style="list-style-type: none"> <li>Much of Wells' tourism infrastructure has been lost already and those impacts noted in other Public Comments.</li> <li>Question: What will Osisko do to compensate for or replace the tourism infrastructure?</li> </ul>	<p>Osisko Development recognizes the importance of tourism to the community. Osisko Development has also made the following commitments regarding tourism:</p> <ul style="list-style-type: none"> <li>Work with the District of Wells and local residents to identify ways in which the mine can help promote tourism in the area (e.g., moving the headframe to the community).</li> <li>Work to develop a tourism component that is complimentary to the mine (e.g., visitors center, mine tours, etc.) that may attract people to the area or encourage them to stop while passing through Wells.</li> <li>Develop a strategy to mitigate pressures on recreation and tourism in the Project area due to increased population and visitors.</li> <li>Contact industry leaders in the tourism industry at least semi-annually to better understand the impacts on the sector, if any, caused by ODV.</li> <li>Place signage on recreational trails and public roads if there is the potential for conflicts with Project activities.</li> </ul> <p>Osisko Development is developing a Tourism Study for the Project which will be provided to the EAO as a Technical Memo. This memo will be available for download on the EAO EPIC website.</p>
101-19	<p>Cumulative Effects</p> <ul style="list-style-type: none"> <li>In general, not enough consideration has been given to the cumulative effects of noise, light, visual disturbances, traffic and other impacts on community health. It is hard to grasp what it will be like to live in Wells during mine construction and operations. Please provide this information in a manner that is understandable and easy to grasp.</li> </ul>	<p>Cumulative effects are identified in each Section for each Valued Component. Cumulative effects are changes to the environment, economic, social, cultural, and health values caused by the combined effects of past, present, and potential future human activities. The Cumulative Effects Assessment will consider changes caused by the Project in combination with the effects from past, present, and reasonably foreseeable future projects and activities. The CEA builds off the Valued Component assessment, which</p>

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Number	Comment	Response
	<ul style="list-style-type: none"> <li>We've had a taste of the cumulative impacts (noise, dust, etc.) during the Exploration stage which have been troublesome at times (and are described in other Comments).</li> </ul>	<p>considered past and present cumulative effects in characterizing potential residual effects.</p> <p>All potential adverse residual effects identified for VCs are carried forward to the CEA. Projects or activities that may affect the VC are identified and included in the CEA, including other reviewable projects and non-reviewable activities such as forestry, agriculture, recreational use, and other activities.</p>
101-20	<ul style="list-style-type: none"> <li>It should be noted that the town of Malartic, Quebec has experience with an Osisko gold mine at its doorstep (now Canadian Malartic). As noted elsewhere, residents initially welcomed the Comments to EAO / Application Phase Cariboo Gold – Wells homeowner &amp; CAC member 07 October 2021 Page 3 / 4 massive open pit development. However, environmental regulations were violated and after a few years, residents launched a multi-million dollar class action suit for damages related to noise, dust and explosions. While the Cariboo Gold Project would be underground, there are 202ubstantial above-ground structures and activities. And once built or underway, there's no going back. It's preferable if cumulative impacts are properly identified and mitigation measures in place earlier, rather than Wells residents contending with a lawsuit or settlement compensation later.</li> <li>Question: I ask the Environmental Assessment Office consider the Malartic mine development and residents' experience there as a cautionary tale for the Cariboo Gold Project and apply lessons learned about cumulative effects to this proposed mine.</li> </ul>	<p>Cumulative effects have been considered as part of the effects assessment. The methodology follows the guidance documents provided by the EAO and details on the methodology can be found in Chapter 6.</p> <p>The Malartic Project is outside of the scope of the environmental assessment.</p>
101-21	<p>Transmission Line</p> <ul style="list-style-type: none"> <li>Osisko is proposing a Northern Transmission Line north of Highway 26 to bring three-phase power to its mine, rather than a line, meeting the standards of BC Hydro, along the existing Highway 26 route.</li> </ul>	<p>See response to Comment #41.</p>
101-22	<ul style="list-style-type: none"> <li>The proposed route, north of Hwy 26, could affect caribou habitat.</li> </ul>	<p>Caribou habitat along the transmission line route has been considered in Chapter 7.8 Wildlife.</p>
101-23	<ul style="list-style-type: none"> <li>The proposed line would eventually be abandoned when the mine closes, which is wasteful.</li> </ul>	<p>See response to Comment #41.</p>

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Number	Comment	Response
	<ul style="list-style-type: none"> <li>• The Northern Transmission Line would not benefit the municipality of Wells, whereas a line developed with BC Hydro could potentially leave a legacy of three-phase power for Wells.</li> <li>• I ask that BC Hydro make an investment, and also come to an agreement with Osisko, to use the existing Highway 26 corridor for three-phase power, benefitting not just the mine and Wells, but Barkerville and other businesses along the way.</li> </ul>	
101-24	<p>Summary</p> <p>The Cariboo Gold Project has a lot to offer in terms of jobs and other economic benefits. Community contributions so far to Wells and Barkerville have been welcome, and a Community Benefits Agreement with the District of Wells could result in badly-needed improvements to local infrastructure and other amenities.</p> <p>At the same time, what we cherish about Wells (the many Valued Components) are in danger of being lost if concerns outlined above are not addressed. Moving the Services Building out of sight of Wells would go a long way to minimizing these concerns.</p>	<p>Osisko Development is currently in the process of developing a Memorandum of Understanding with the District of Wells which addresses sewer, water and infrastructure upgrades as well as the school.</p>

## 2.102 #102 – Anonymous

### 2.102.1 Comment

I am a resident of Malartic and a proud employee of the now Canadian Malartic Mine. I was hired as an operator in the early stage of the construction. Osisko as given me a chance to have training and a good job in my hometown after several years of working away from my family in remotes site. I will always be grateful to Osisko and it's management team for their professionalism and openness in addressing concerns with noise and impacts from the mine. The have develop new standards in the mining industry and have succeeded in adressing the challenge of operating a huge open pit mine inside a city (with the dust, noise and vibration generated by a fleet of 400t trucks...). I see that the residence of Wells are concerns and I do understand your concerns. We had the same concerns in Malartic with the construction of the mine. You cannot have a better team of management than Osisko to address your concerns and respect their commitments. To answer the comment posted earlier, the large majority of residence of Malartic where supportive of Osisko and the mining project. Only a small minority was against it. <https://www.globenewswire.com/en/news-release/2011/11/08/1456337/0/fr/Sondage-CROP-en-Abitibi-T%C3%A9miscamingue-87-des-Malarticois-favorables-%C3%A0-la-mini%C3%A8re-Osisko.html>.

### 2.102.2 Response

Thank-you for providing your comments.

## 2.103 #103 – Anonymous

### 2.103.1 Comment

The Cariboo Gold Project has the potential to be the most positive economic business activity we have seen in this region in 100 years. The jobs, the ripple effect, the long term stability, I can only rejoice for what this impact can mean for Wells and Barkerville. However, there are a handful of naysayers who will do anything within their power to show up and disrupt discussions about this project moving forward. I hope the Wells Mayor and Council have the determination to do what is in the short and long term best interests of their community.

### 2.103.2 Response

ODV is excited to be a part of the regions economic growth and contribute to new opportunities by hiring 75% or more of the workforce and source a proportion of its goods and services from local businesses. New opportunities will draw workers and their families to the region, creating more opportunity through spin-off economic activity. Thank you for your comments and ongoing support of the Project.

## 2.104 #104 – Cj Johnston, Wells

### 2.104.1 Comment

Of course, there are many rules and regulations which need followed, I am a simple community member, so I'll leave that to the experts, here is what I think at this point of having been here for 37 years and what are my concerns going forward with this project. Full disclosure - I started out placer mining, and I still am, plus a few years of Tourism and Economic Development thrown in there, gold has been at the very the source of all of my income and reason for being here. I want to see what Osisko is doing for emergency care services such as ambulance being staffed 24/7 365 days of the year, including some kind of medical clinic, even part time, so that folks don't need to go to town for just everything. Support for the Volunteer Fire Brigade - so many things with the increase in population. Wells runs on volunteers, there isn't much time for connecting to the multitude of things that need done, just to keep organizations functioning, we need support here too, possibly paid positions to offset the lack of people time needed but not available due to the long shift work. I was very disappointed that my suggestions for placement of sound monitors didn't see any action. Of course, it is going to be louder, but we need realistic monitoring and then mitigation for reduction of sound infringement. I want to see signs on the HWY 26 for the Caribou, and policies in place for drivers to be warned and cautious when the herd has been seen. Supplemental Recreation is very much needed - a swimming pool and outdoor gym, hiking and snowmobile trails, all to help with integration of employees and Community members, which also will be a lasting legacy. The Social aspects of living here, need attention. A connection between the staff accommodations "entertainment space" would be a good start connecting with the local Sunset Theatre. I'd like to see a tourism tour connection which are much needed, so many want to see a "real" mine - of any kind, education about the gold and the building of this province. An indigenous Cultural Centre with introductions to this unceded it is all located on. Training center for mine work, so many ideas to integrate. There needs to be a hostel or overnight accommodation of some sort developed in the community. Of course, the company is not in the accommodation business, however, it needs to be addressed, and entrepreneurs are not going to invest with only a 16-year window, and at the rates pre covid of 31% occupancy. Certainly, a solution can be forthcoming. For the matter of long-term housing, again something needs to be planned with the District of Wells and Barkerville Heritage Trust. The District of Wells desperately needs upgrades to the water and sewer systems to withstand the increase in population, with the responses needed for emergency services such as firefighting. I like seeing the new addition of a second potable water source which is great. I am not in any support of anything being built near, over, above our current water source of Lowhee Creek, years ago there was talk of that, and it was abundantly clear that there could never be a threat to that. Osisko needs to do a better of job of really understanding that they are already part of the community, sometimes it is very awesome - then we see lights in a parking lot blaring away until someone complains loudly enough, or drillers without mufflers at all hours, exploration or not, part of the project or not - when we see

and hear what is happening already we are not convinced of things we need assurances on. I live and work on the unceded traditional territories of Lhtako Dene and Xat'sūll and Simpcw Secwepemc te Qelmucw [suh-wep-muh] Nations

### 2.104.2 Response

Osisko Development has committed to the following as related to health infrastructure and services:

- Provide training opportunities to local residents thereby increasing the skills of the local and regional workforce and enabling ODV to maximize hiring from the local and regional area
- Coordinate with BC Wildfire so that equipment and staff can support wildfire response as required
- Encourage workers to volunteer with the WVFB or undertaken other volunteer opportunities in the community
- Develop a mutual aid agreement with the WVFB
- Fund a social work position for the LAA for a period of four years

Osisko Development has installed three sound monitors around Wells. The results of these monitors will be provided to the community.

Osisko Development has committed to the following mitigation regarding traffic and wildlife:

- Utilize wildlife signage (reduce speeds and notice of potential movement area) to minimize the potential of wildlife collisions
- Maximum allowable speed limits as outlined in the ODV Road Use Policy will be followed at all times to suppress dust and minimize the potential for collisions with wildlife.
- Implementation of and strict adherence to speed limits.

Osisko Development has also made the following commitments regarding tourism:

- Work with the District of Wells and local residents to identify ways in which the mine can help promote tourism in the area (e.g., moving the headframe to the community).
- Work to develop a tourism component that is complimentary to the mine (e.g., visitors center, mine tours, etc.) that may attract people to the area or encourage them to stop while passing through Wells.
- Develop a strategy to mitigate pressures on recreation and tourism in the Project area due to increased population and visitors.
- Contact industry leaders in the tourism industry at least semi-annually to better understand the impacts on the sector, if any, caused by ODV.



- Place signage on recreational trails and public roads if there is the potential for conflicts with Project activities.

## 2.105 #105 – Anonymous

### 2.105.1 Comment

I can't support an industrial development of this size so close to a small and charming community. Moving the operation to an area that would avoid noise and light pollution in Wells should be a minimum requirement of the mining company.

### 2.105.2 Response

The location of the former Cariboo Gold Quartz Mine was selected as the location of the Mine Site based on numerous criteria. The site was selected based on a number of technical, environmental, social and economic considerations which includes but is not limited to the following:

- Proximity to the ore zones and surface topography. The Mine Site Services Building is located directly above the Valley Zone and is central, relative to the Mosquito, Shaft, and Cow zones.
- Reducing the need for further underground development, which would result in more waste rock needing to be stored on surface.
- Development of as much of the Project on existing brownfield sites as possible. As part of the Project, reclamation activities will be undertaken during the operation, decommissioning and closure phases.
- Minimizing greenfield site surface disturbance, in the form of a longer transmission line and additional road building.
- Minimizing the volume of water that needs to be managed, resulting in less disruption to natural hydrologic processes, which was one of the resource protection objectives used to guide the design of water management approaches.

An alternative analysis for the Project was completed and is provided in Chapter 1 – Project Overview, Section 1.7. A further description of the selection process in relation to the Services Building location is provided as a response to Comment #14.

Osisko Development has been working with the community to address concerns regarding the location of the Mine Site and Services Building. The Services Building was redesigned to reduce the overall height and landscaping design concepts have been developed to further reduce the visual impact. Osisko Development is continuing to refine the building appearance to be more aesthetically pleasing. Osisko Development welcomes community ideas on the building aesthetics to maintain community character and be attractive to tourism.

Osisko Development has proposed mitigation to address effects from noise and light. These mitigation measures are described in the Application Summary.

## **2.106 #106 – Anonymous**

### **2.106.1 Comment**

I agree with the common theme that the concentrator and other massively landscape altering architecture should be placed in areas that do not egregiously change the appearance of our home.

### **2.106.2 Response**

The location of the former Cariboo Gold Quartz Mine was selected as the location of the Mine Site based on numerous criteria. The site was selected based on a number of technical, environmental, social and economic considerations which includes but is not limited to the following:

- Proximity to the ore zones and surface topography. The Mine Site Services Building is located directly above the Valley Zone and is central, relative to the Mosquito, Shaft, and Cow zones.
- Reducing the need for further underground development, which would result in more waste rock needing to be stored on surface.
- Development of as much of the Project on existing brownfield sites as possible. As part of the Project, reclamation activities will be undertaken during the operation, decommissioning and closure phases.
- Minimizing greenfield site surface disturbance, in the form of a longer transmission line and additional road building.
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## 2.107 #107 – The Bedard Family/Evolution Camp Services, Wells, BC

### 2.107.1 Comment

I am a long term resident (40+ years) and homeowner in the Wells/Barkerville region, as well as the owner of 5 local businesses in the area, one of which is a camp service company and several which rely strictly on tourism to survive. I would like to highlight some major benefits that I have not seen mentioned that the mining industry and namely, BGM/Osisiko has contributed to the area. They sometimes quickly get lost in the challenges a growing town has to endeavour to push through when a transition or growth occurs. Our main company, Evolution Camp Services, is the largest employer in the area, after BGM/OsisikoDev, providing active employment to 60+ employees. Evolution employs numerous locals and offers skilled trades positions, for which we provide apprenticeship and training to locals and entry level employees. NONE of this would be possible without having built and grown our company through employment from BGM/Osisiko. We have witnessed first hand, how the community has grown and evolved, and with that comes change which is not always welcome but sometimes necessary. Given that many of our businesses are tourism dependant, we are aware of the tourism attendance to the Wells/Barkerville/Bowron area and monitor the demographic that visits on an annual basis. This tourism has been affected by wildfire seasons, pandemic and drastic weather changes on a regular basis for the past three years so to say the community or tourism attendance has been devastated due to the active mining in the area would be inaccurate. Without our company having consistent employment through the local mine, our businesses would not have survived any one of these challenges. The tourism alone, would not have paid the bills. A common complaint regarding the noise levels in the Wells area have not resonated with me. We own a home, on a ridge, facing cow mountain where the mining takes place and in between the underground mine portal and the drilling site. The noise level has been minimal from my experience and the most we have experienced is a low buzzing noise. We have found that any complaints regarding light, and noise pollution have been well received and rectified, within reason, very quickly. If anything, the logging trucks that begin around 4:30am, are louder than the mine traffic and activity, and also some can drive dangerously fast. I travel back and forth to Quesnel regularly, sometimes on a daily basis and find that the logging trucks frequent the highways far more than the mine haul trucks travelling to the QR Mill. I also find the haul trucks travel together in a pack so that you are able to anticipate several once you see the first one which is helpful when passing on the windy highway. The main reason that my family and I travel back and forth to Quesnel so frequently, is due to the fact that the local school only goes to elementary level. I have three children that attend French Immersion and high school and were required to take the 1.5 hour trip to Quesnel, each way. There is currently no option to attend high school in the Wells area. I would also like to highlight that the local school building, which is privately owned by the District of Wells, was subject to closure due to infrastructure improvements that the DOW was unable to fund. This has been committed to restoration by

BGM/Osisko. My children suffered many challenges relating to mental health, travelling to school for several years on the bus, before we had to make a difficult decision to rent a second home in Quesnel to accommodate the schooling, which is only financially possible due to our consistent employment from the mine. Communities die without schools, many working families will not reside in areas where the only option is to bus their children for long periods of time, or homeschool. This is a great service to the community that I do not see happening otherwise, without the boost to the local economy from the mine and the commitment to restoration of the hub of the community. Throughout the pandemic, many families and communities have suffered great financial devastation and through collaborative efforts and generosity from BGM/Osisko, we were able to donate food, cleaning supplies and Christmas gifts to local first nations, our own community members, homeless, transitional and women shelters in Quesnel, Williams Lake, Soda Creek and Wells/Barkerville/Bowron area which has resounding ripples throughout the Cariboo region. BGM/Osisko has been very generous during these uncertain and challenging times and shows a solid commitment to building community and responding to the immediate needs during difficult times. They have also committed resources, and funds to the wildfire threats in the area during peak season, to ensure our community and the local heritage site, Barkerville Historic Town and Park is preserved and protected. They have offered rapid testing during high stress times of Covid outbreaks when our local health authority could not accommodate. I personally appreciate these efforts and it makes my family and community safer. The safety protocols in place, which my company adheres to, and manages on a daily basis are more stringent and thorough than the provincial health regulations. There are risks in bringing in more people to the community for work but these risks are mitigated with exceptional and deliberate care, and the most current protocols plus additional efforts. The economic benefits the mine has afforded the local population and the opportunities to fill niche businesses, local supply chain, employment and training such as first aid and trades apprenticeship programs, and the opportunities continue. We have been able to build a successful company in our own local area that supports our population with employment, and also contributes back into the economy and surrounding communities of the Cariboo in the form of vehicle purchases, groceries, radios, hardware purchases, kitchen equipment, uniform branding, linens, among many others. The mine has increased property value, and is adding much needed housing that could accommodate new families coming in or allow existing families to upgrade local housing options through earned income from stable job opportunities. Change can be difficult, and some sacrifices have to be made, but my family, and my company, are looking to the future and are confident that BGM/Osisko will respect the core values of our community.

### 2.107.2 Response

Thank you for your comments and ongoing support of the Project. Osisko Development is proud of the work we do with Evolution Camp Catering to ensure that the communities in which we live and work are taken care of during times of need. We appreciate our collaborative partnership with Evolution and look forward to planning future events that give back to the community.

Osisko Development is currently in the process of developing a Memorandum of Understanding with the District of Wells which addresses sewer, water and infrastructure upgrades as well as the school. We recognize that a school is a key component of the community and in 2020, Osisko Development donated \$500,000 to the District of Wells to support the planned renovations at the school.

## **2.108 #108 – Kirk Gable, Prince George, BC**

### **2.108.1 Comment**

After watching this area struggle economically since the closure of the mines in Wells in the late 1960's this project is a welcome and appropriate investment. I am impressed with the respectful and supportive way that BGM has engaged with the communities of Wells and Barkerville. BGM has had and continues to have a positive impact on the local and regional economy and I welcome their future investment and participation in the area. I trust that the provincial environmental regulations are adequate to produce a successful outcome for this project.

### **2.108.2 Response**

ODV is excited to be a part of the region's economic growth and contribute to new opportunities by hiring 75% or more of the workforce and source a proportion of its goods and services from local businesses. New opportunities will draw workers and their families to the region and new revenue will allow improved infrastructure for the District of Wells. Thank you for your comments and ongoing support of the Project.

## **2.109 #109 – Anonymous**

### **2.109.1 Comment**

I am in very much favour of the project

### **2.109.2 Response**

Thank you for your comments and ongoing support of the Project. ODV is excited to be creating economic potential in the region during construction, operations, and closure phases.

## **2.110 #110 – Scott Nelson , Williamslake**

### **2.110.1 Comment**

Fantastic project for the community and a suouer job creation opportunity fir the region as a whole Certainly help diversification for the region Very supportive of the project Scott Nelson

### **2.110.2 Response**

Thank you for your comments and ongoing support of the Project. By committing to hire 75% or more of its workforce from the region and partner with local businesses to supply a proportion of

its goods and services, ODV is excited to be creating economic potential in the region during construction, operations, and closure phases.

## **2.111 #111 – Alison Galbraith, Wells Resident and Community Advisory Committee member, Wells, BC**

### 2.111.1 Comment

See attached document - Comments on Cariboo Gold Project EAC Application

### 2.111.2 Response

Thank you for your comments. Responses are provided in the following section.

### 2.111.3 Attachment – Comments on Cariboo Gold Project EAC Application (1).pdf

Comments and responses from the attachment are provided in Table 2.111-1.

Table 2.111-1 Comment #111 Attachment – Responses

Number	Comment	Response
111-1	<p>Alternative Means for Ore Management (mine site location) – Project Overview 1.7.3.4</p> <p>Concern: The alternative means assessment of the locations for the Mine Site Services Building and the Cow Site Services Building lacks methodological rigour. Rigour in this context, referring to the legitimacy, integrity and soundness of the process.</p> <p>Comments: The preferred location of the Project’s massive industrial complex at the entrance to Wells, and the Island Mountain portal within 250 metres of residences and across from the community ball diamond is extremely concerning and would have significant impacts on community and human wellbeing which is not captured in the socio-economic section of the alternative means analysis.</p> <p>A thorough and comprehensive review of the alternative means for the Services Building site selection has been submitted by a Community Advisory Committee member1 . The submission of the CAC member provides relevant and accurate information that is missing from the proponent’s site selection analysis. I support the comments and clarifications outlined in the document below (see link1 ) and ask that the proponent not dismiss or devalue this information. Local knowledge is invaluable.</p> <p>1. <a href="https://projects.eao.gov.bc.ca/api/public/document/615b55a35c6d1f0022c44abe/download/Alternative%20Site">https://projects.eao.gov.bc.ca/api/public/document/615b55a35c6d1f0022c44abe/ download/Alternative%20Site</a></p>	<p>A response to this document is provided in Comment #14.</p>
111-2	<p>Questions: 1. The proponent states that the Mine Site Services Building location would reduce dust and noise during construction and operations. Given that the Cow Site is over a kilometre further from the residential areas in Wells and eliminates the Island Mountain portal, what is this statement in relation to, and how was it measured? Could the proponent provide a detailed description of the methods and criteria used to compare and</p>	<p>The Alternative Assessment Methodology is described in Chapter , Section 1.7.2. The alternatives assessment followed a multiple accounts analysis.</p> <p>The alternatives are evaluated for technical suitability and economic feasibility. Once technical and economically feasible alternative means are identified they are evaluated on:</p> <ul style="list-style-type: none"> <li>• Cost Implication</li> <li>• Potential residual effects on the environment</li> </ul>

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Number	Comment	Response
	<p>evaluate the potential effects on community and human wellbeing (particularly noise, dust and light) between the two sites?</p>	<ul style="list-style-type: none"> <li>• Amenability to reclamation</li> <li>• Community acceptability</li> <li>• Indigenous and Stakeholder consultation</li> <li>• Other Socio-economic considerations</li> </ul>
111-3	<p>2. Another comment in favour of the Mine Site location is that the site 'would reduce the duration of the Construction Phase'. As the difference in duration is a mere 6 months, and the life of the mine is projected at approximately 20 years, the socio-economic impacts of the construction phase duration are negligible. Has a community impact assessment around site location been considered to capture authentic and relevant socio-economic impacts?</p>	<p>The alternatives assessment considers:</p> <ul style="list-style-type: none"> <li>• Cost Implication</li> <li>• Potential residual effects on the environment</li> <li>• Amenability to reclamation</li> <li>• Community acceptability</li> <li>• Indigenous and Stakeholder consultation</li> <li>• Other Socio-economic considerations</li> </ul> <p>Over the course of ODV's consultation efforts, communities have expressed the need for the Project to be developed in a manner that is safe for both people and the environment. Concern has been expressed about potential long-term effects on human health (e.g., noise, dust, light), the environment (e.g., caribou, water quality), visual aesthetics and traffic near Wells, as well as effects on local tourism. As such, Osisko Development has gone through extensive efforts to select alternatives that minimize potential negative socio-economic and environmental effects in these topic areas. Management and monitoring plans have been developed that address key areas of concern for local communities identified during consultation.</p>
111-4	<p>3. The project overview (1-30) states that, "the associated infrastructure at each portal during this period will include a generator, sound barrier, ventilation fans and heater, water management infrastructure, and sound-proofed fans employed during the decline development stage." What is the projected noise level with the associated portal infrastructure (quantitatively). How will you meet the noise bylaw requirements for residences within a few 100 metres of the proposed Island Mountain Portal?</p>	<p>Section 7.3, Figure 7.3-5 shows the Sound Level Contours for the Mine Site Operation.</p> <p>Osisko Development will comply with all regulatory requirements for the construction, operation and decommissioning of the Project.</p>



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Number	Comment	Response
111-5	<p>4. "At closure, under the Reclamation and Closure Plan, underground mine openings, including portals and ventilation raises, will be sealed with engineer designed plugs preventing ingress by people and animals and permitting the underground workings to be flooded to minimize further Metal Leaching (ML)/ARD." 'To minimize further Metal Leaching' implies leaching during operation. What type and quantity of metal leaching is projected?</p>	<p>This was not the implication of the statement. Wording will be corrected in the Revised Application.</p>
	<p>5. Figure 1.5-6 provides a view of the portal showing the proposed landscape concept during the Closure Phase. This proposed landscape concept for the Island Mountain Portal was designed in order to address concerns raised in public comments on the Project. Correction: The majority of concerns raised in public comments were not around the landscape concepts at portal closure but rather the proposed location. Landscape design projections do not address the actual concerns raised regarding noise, light, dust, emissions that are created alongside a portal proposed in a residential neighbourhood. Does Osisko have the capability to meet any residential bylaws within a 0-1km radius of the proposed Island Mountain portal location?</p>	<p>The Island Mountain Portal will be used during construction and then will be used for emergency egress only in operations. Osisko Development will comply with all regulatory requirements for the construction, operation and decommissioning of the Project.</p>
111-6	<p>Request: I would request that the proponent re-evaluate the 'preferred alternative', the Mine Site Services building, with the inclusion of the Technical Advisory and Community Advisory comments, and with consideration to the methodology and rigour of the alternatives analysis to meet the standards of an independent third party review.</p>	<p>An alternative analysis for the Project was completed and is provided in Chapter 1 – Project Overview, Section 1.7. A further description of the selection process in relation to the Services Building location is provided as a response to Comment #14. The Application is currently under review by the Technical Advisory Committee as per the EA process. Comments raised by the Technical Advisory Committee have been responded to by Osisko Development and revisions will be provided in the Revised Application.</p>
111-7	<p>Land-Use Plans Concern: The proponent has not 'considered consistency' with the CCLUP and other landscape level government plans</p> <p>Comments: The EAO User Guide also stipulates that the Project proposal must consider consistency with any government land-use plan. The Cariboo Chilcotin Land Use Plan (CCLUP) establishes the long-term balance of environment and economy in the Cariboo-Chilcoltin region. The</p>	<p>The CCLUP has been considered and is addressed in Section 7.11 Land and Resource Use.</p>

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Number	Comment	Response
	<p>Cariboo Gold Project is not consistent in meeting the CCLUP's objectives and strategies for the management of natural resources and the maintenance of environmental values, specifically concerning Caribou Management (with regards to the Northern Transmission Line) and Visual Quality Objectives.</p> <p>Request: The proponent aligns the Project with the CCLUP's objectives and strategies for the management of natural resources and the maintenance of environmental values.</p>	
111-8	<p>Visual Quality Objectives</p> <p>Concern: With regards to Visual Resources as a Valued Component, the Project Plan does not include VIA's or provide mitigation measures beyond very superficial 'landscaping features.'</p>	A complete Visual Assessment Report will be included in the revised Application.
111-9	<p>Comment: The EAO recommends engaging with Forests, Lands, and Natural Resource Operations (FLNRO) in the development of a Visual Impact Assessment (VIA). Visually sensitive areas are: 1. Areas visible from communities, public use areas, or travel corridors; 2. Areas seen by a large number of viewers; 3. Areas where public expectation for scenic quality is well above average</p> <p>Request: That a VIA is developed for the current Mine Site location, Island Mountain Portal and Transmission line considering FLNRO's criteria for visually sensitive areas. If a VIA was included in the alternate means analysis for location, the proponent could ensure the scenic quality expectations of the public and the tourism industry are met.</p>	A complete Visual Assessment Report will be included in the revised Application.
111-10	<p>Additional Transmission Line Questions</p> <p>1. Have Cariboo Region government biologists been contacted regarding new linework identifying critical habitat that is more extensive along the Northern Transmission line route?</p>	Osisko Development has contacted FLNRORD regarding revised caribou habitat critical habitat areas. The data is currently not publicly available.
111-11	<p>2. Has Osisko contacted government biologists to get more recent (2021) Caribou population data?</p>	Osisko Development has contacted FLNRORD regarding recent Caribou population data. The data is currently not publicly available.

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Number	Comment	Response
111-12	3. Telemetry data for the Barkerville mountain caribou subpopulation is available and should be included as an overlay for the proposed transmission line route? Why is this relevant information not included in the report?	Osisko Development has contacted FLNRORD regarding recent Caribou telemetry data. The data is currently not publicly available. If it is made available,

## 2.112 #112 – E.G., Barkerville, BC

### 2.112.1 Comment

In general the Cariboo Gold project appears to be a worthwhile proposition. An economic boost to the community but along with obviously substantial environmental impact as well. However, the benefits to both local economies and development of infrastructure while moving ahead with careful consideration to both environments and residents, BGM has long demonstrated a will to support business and individuals and cooperate with the community. With regards to the new hydro line, I regret to find that this will only benefit the mine, as operations along the way will not be able to take advantage of this well needed service. Other mines and Troll Ski Resort for example, as well as power dependent industries that could have a base in the area if there was sufficient power supply. As I understand, due to the nature of the contracts and licensing outside of BC Hydro, this line will be exclusively for BGM. Considering the impact of this line along the route, it is very unfortunate that not even the town site of Barkerville will be able to hook into this line. Especially since the prospects of BC Hydro ever expanding to 3-phase power to this area are slim to none. I am aware that a lot of effort has been spent on this part of the project alone, and that this part is essential to the entire operation, and if the final solution is what has been proposed, I have complete confidence that BGM has looked at every option before making the final decision. I am looking forward to keep following the development of this project, a promising future for the community, and a continuation of the historic legacy of the Cariboo Gold fields.

### 2.112.2 Response

Thank you for your comments and ongoing support of the Project. The following was provided as a response the Technical Advisory Committee regarding the Transmission Line.

Constructing a new 69 kV transmission line along the existing highway-adjacent right-of-way (ROW) associated with Highway 26 (Alternatives A and B) would introduce development delays that are incompatible with the construction and development timeline of the Cariboo Gold Project (the Project). The primary cause of this schedule incompatibility is BC Hydro's unavailability to direct resources toward the construction of this transmission line within the timelines planned for the Project. In discussions between ODV and BC Hydro, it was communicated that, although BC Hydro would not necessarily be opposed to upgrading electrical transmission infrastructure between the Barlow substation and the Town of Wells if such a request was received, BC Hydro is currently pursuing higher-priority infrastructure upgrades elsewhere in the province that take precedence over this Highway 26 project.

ODV raised the prospect of privately financing and constructing the transmission line along the existing Highway 26-adjacent ROW; however, this ROW belongs to the Ministry of Transportation and Infrastructure (MOTI). MOTI protocols dictate that the permits required to build and operate a power line along a highway-adjacent ROW cannot be awarded to a private

entity, in this case, ODV. As such, only BC Hydro would be authorized to construct a powerline along this route; this again ties to BC Hydro's current prioritization of this infrastructure upgrade relative to other projects it is undertaking.

Regarding the difference in development requirements between utilizing an existing ROW versus a new one, ODV notes that a significant amount of study work and development of appropriate management plans will be necessary regardless of transmission line route selection. With respect to specific studies and management plans noted in the comment, all of them would be required for all three potential transmission line route options; the one noted exception is the Whitebark Pine study, which would not be required for the Highway 26 route.

Regarding the District of Wells' use of the power supplied by the planned transmission line, there are several complicating factors associated with this power supply access. Government regulations restrict a private entity (i.e., ODV) from directly selling power to a consumer (i.e., the Town of Wells and its present and future residents). As such, ODV is not authorized to provide power conveyed via its privately-operated transmission line directly to the District of Wells.

In order to supply power from ODV's Transmission Line to the District of Wells, an intermediary entity would need to be established in accordance with the relevant regulatory processes required to operate as a utility company/distributor. This intermediary entity would need to be created and operated separately from ODV; however, ODV would be open to and supportive of such an arrangement that would facilitate the supply of power from ODV's Transmission Line to the District of Wells.

The current EAC Application assumes that the Transmission Line will be decommissioned and reclaimed following closure of the Project; this inclusion ensures that the closure activities and costs associated with the entire Project are appropriately considered. It is possible that an agreement could be reached in the future, pending negotiations with BC Hydro and other relevant regulatory bodies, in which BC Hydro would assume ownership and operation of the Project's Transmission Line. In this case, BC Hydro would be able to supply power to the District of Wells via the transmission line that was constructed and previously owned/operated by ODV. The proposed transmission line is being designed in accordance with BC Hydro standards and requirements to the greatest extent possible to make it technically feasible for this ownership/operation transfer to occur at some point in the future, should an agreement be reached between BC Hydro, ODV, and other relevant regulatory bodies.

Regarding the provision of three-phase power to the District of Wells, ODV has been informed by BC Hydro that there have been no formal requests for three-phase power supply to the District of Wells. ODV notes that three-phase power is not used to power residential or light-utility commercial operations, but rather to power large, high-voltage heavy industrial equipment. Currently, most such loads, if not all, are associated with the current (non-CGP) ODV operations and supplied by the existing onsite generator

supplied power; such loads would subsequently be supplied by the Project's Transmission Line once available. Should three-phase power become available, it is acknowledged that ODV subcontractors may want to establish a local presence in the Town of Wells to support mining activity associated with the Project, and other residents of the District of Wells may want to establish industrial operations. If an intermediary entity was established that allowed for a supply of power from the ODV-operated transmission line to the District of Wells and that was compliant with all relevant regulations governing such a power supply arrangement, it would be possible to supply three-phase power to industrial entities outside of the Project.

### **2.113 #113 – Anonymous**

#### **2.113.1 Comment**

Barkerville Gold Mine brings economic growth to the region with a respectful, inclusive and culturally sensitive approach.

#### **2.113.2 Response**

Thank you for your comments and ongoing support of the Project. By committing to hire 75% or more of its workforce from the region and partner with local businesses to supply a proportion of its goods and services, ODV is excited to be creating economic potential in the region during construction, operations, and closure phases.

### **2.114 #114 – Anonymous**

#### **2.114.1 Comment**

BGM's Cariboo Gold Project will provide employment opportunities with living wages to people of the region as well as economic growth.

#### **2.114.2 Response**

ODV is excited to be a part of the regions economic growth and contribute to new opportunities by hiring 75% or more of the workforce and source a proportion of its goods and services from local businesses. New opportunities will draw workers and their families to the region and new revenue will allow improved infrastructure for the District of Wells. Thank you for your comments and ongoing support of the Project.

### **2.115 #115 – Dave Jorgenson CAC member, Wells, BC**

#### **2.115.1 Comment**

I am surprised by the number of local and distant submissions that claim that Osisko is a good corporate citizen with high environmental standards, that the project is 'environmentally sound', and that people have confidence in their ability to "continue to mitigate any environmental

concerns". To those people, to Osisko, and to the Minister of the Environment I would ask how they can explain: At Malartic Mine in Quebec: Osisko's multi-million dollar class action lawsuit in Quebec by the citizens of Malartic, over the broken promises at Malartic Mine and in response to the report of the Quebec Environmental Protection Agency that, " since 2011, the companies operating Malartic have been unable to demonstrate the mine can be run in an urban environment in accordance with the legal requirements imposed on it. In the latest study published in September 2015, the Regional Public Health Authority was concerned about the proportion of people claiming to be 'affected' (A) or 'highly affected' (HA) by various mine disturbances and impacts. More specifically, the study found that: 1. Over a third of respondents in Malartic claim to be A or HA by the mine; 2. The proportion of people A or HA climbs up to 54% for noise, 74% for dust and 78% for ground tremors in neighborhoods closest to the mine (less 0.7km); 3. In neighborhoods furthest from the mine (up to 2.0-2.5km), the proportion of people A or HA is still significant with 15-26% (noise), 17-41% (ground tremors), and 27-48% (dust); 4. Over a third of the population want to move or be relocated due to the mine's impacts (up to a quarter of the population in the neighborhoods furthest from the mine); In the end, the Public Health Authority recommends to both the operator and regulator to find ways to stop those levels of disturbances, or to offer a relocation and compensation package to those affected by the mine. This document is relevant to us for two reasons. Besides the ongoing resistance of Osisko to recognize the impact of its Malartic mine on a community, it clearly illustrated that the mitigation efforts proposed at the initiation of the project, supported by the municipality, reviewed and approved by the appropriate regulating bodies of the Provincial Government fell far short of protecting up to 30% of the community at large when re-assessed just 3 years later. Obviously, it was too late for the community members by then, to solve the problems that were not adequately addressed in the application phase. This is why this project, despite the differences between underground and open-pit mining, but located literally in the residential district of our community cannot proceed as submitted. Besides the cautionary tale of Malartic, we only have to look at the current social and environmental record of Osisko in Wells, to be concerned about the outcomes of the project as proposed. Currently, in Wells, Osisko's environmental and social license has been further compromised by the following: Osisko's 2018 registration in the Federal Environmental Offenders Registry for multiple repetitions of the same reporting, and exceedences for fisheries and environmental offences at Bonanza Ledge in Wells. 16 counts of failure to comply with Effluent Regulations and 5 toxicity failures. Osisko's subsequent received four Provincial Administrative Penalties in 2020, and 2021 for repeated violations of discharge permits and exceedences for cadmium, cobalt, copper, nitrites, sulphates and zinc, failure to submit an ecological risk assessment, failure to submit or implement contingency plans, and other offences against the Environmental Act. The last penalty was as recently as May of 2021, regarding these specific offences at Bonanza Ledge and QR Mine. Osisko's current investigation by the Ministry of Transport and Infrastructure for multiple violations of the Ministry of Transport Commercial Vehicle Act in Wells. Osisko's ongoing 3 year violations of their Wells Municipal Special Use Permit, and previous violation of Provincial Fuel

Storage Regulations in Wells. Osisko's recent municipal fine for their ongoing violations of the Wells noise bylaw. Osisko's September 2021 reprimand from FLNRORD for multi-year illegal use of Crown Land including storage of dangerous goods, parking of fuel equipment, and industrial supplies, building of infrastructure without a permit, and all also within the municipal boundary of Wells. Given the high degree of self-monitoring, and self-reporting tolerated by provincial agencies, Provincial oversight of Osisko often appears to be limited to catching a repeat offender after the offence. How will Osisko's new proposal make these prolific and ongoing violations stop? In opposition to the hopeful and optimistic opinions of some of the submissions to the EAO, these facts are not the marks of a company that puts community and the environment at the top of their operational agenda. These fines and reprimands, almost all of which were preceded by warnings from the managing Federal and Provincial governing bodies, demonstrate a company with a poor corporate ethic and a lack of pro-active policy. It does not bode well for the Cariboo Gold Project, which uses vague and imperfect and misleading statements to gloss over many critical questions about their operation capacity, reclamation plan, and their respect for community and the environment. The economic benefits described by regional businesses in previous submissions, have so-far come at a direct economic and environmental cost from shortcuts and lack of follow-thru demonstrated by these infractions. How can Osisko assure the community, in the face of these offences, that they are looking after our best interests by locating the concentrator and industrial complex along our water system and in a residential area of our community? Re Section 7 Infrastructure and Services. And recent Environmental Assessment Workshops: Osisko, in a variety of locations through its submission in Section 7.12, and in the September 24th Public comment period makes contradictory, vague and unsupported references to their reclamation plan. For instance, Osisko recently announced that the reclamation plan for the camp building was to donate it to the community of Wells. This is neither explained in their submission, nor a good plan. As the population of Wells collapses at the end of project life, it would not be prudent for the community to acquire more assets, especially ones that were 20 years old, in need of refurbishment, and industry specifically designed. Without a written agreement with the community at the front end of the project this is not a reasonable decommission plan. Osisko should come up with a more comprehensive and understandable plan. In another case, Osisko repeatedly references supporting the community in its pursuit of 3 phase power. It also expressed a verbal decommissioning plan for the power line; to transfer the line to BC Hydro. This conflicts with the previously announced plan to remove the line at project end, and plant trees in the corridor "as if it was a clearcut". The plan (to transfer the power line to BC Hydro) also makes little economic sense, and requires further clarification. As noted in Chapter 7.12 Wells already has existing expansion capacity for residential use from Hydro's power that is currently adequate. Osisko also predicts, in this chapter, that it will have little effect on the volume in the housing market in Wells during the life of the project. 3 phase power would be mildly convenient and attractive to the region but only makes economic sense to BC Hydro in terms of delivering it to a large industrial user, in addition to the variety of smaller potential users. Since Osisko refuses to work



with Hydro to become that user, there is no incentive for power to come to the community in the existing conditions during the life of the project, so their promise to ‘work with the community to lobby the province’ is hollow. Once the mine is closed, there will also be a net reduction in population, and a massive decrease in demand for power from the mine itself, so, once again, it makes little economic sense for BC Hydro to acquire, upgrade and maintain a redundant wilderness power line to a community it already supplies with a convenient hwy access. Osisko’s reclamation plan needs more explanation regarding the powerline corridor, and real estate agreements with third parties. On another note: In Section 7.12.3.2 Osisko reports that their infrastructure will be “350 m from the nearest house which is currently unoccupied.” It’s not clear how this data was obtained. A simple review of the site plan shows that at a minimum: 1. The WRSF haul road is 150 m from an operating apartment complex on Hong Street. 2. The 250 worker camp is 200 m from the same complex. 3. The Concentrator building is 250 m from an occupied house on Mooney Lane, and the proposed electrical substation will be even closer. 4. The 69 kV power corridor will be 100 m from the first occupied house on Davies Road, and 250 m from another apartment building on Burnett Ave. Osisko does not adequately demonstrate an understanding of the entire site-plan’s impact on wide variety of locations within the community. The written comments in section 7 mis-characterize the mine as a facility with a single point of contact with the community (and at a vacant house no-less) A fuller analysis of all the working components in operational phase needs to be conducted in order to understand their impact on the value components related to the entire community.

### 2.115.2 Response

A summary of proposed mitigation measures for the Cariboo Gold Project is provided in Appendix 20.1. This includes the management and monitoring plans that will be prepared for the Project, along with a table describing valued component, project effects and proposed mitigation measures.

The Canadian Malartic Mine Project is outside the scope of this environmental assessment.

In 2014, the Canadian Malartic Mine Project was purchased from Osisko Mining Corporation by Agnico Eagle Mines Limited and Yamana Gold Inc. The lawsuit against the Canadian Malartic Mine was filed in 2016 by a small group of Malartic residents, two years after the mine was sold to the current owner. Osisko Development has no involvement in Agnico Eagle Mines Limited, Yamana Gold Inc., nor the current operations of the Canadian Malartic Mine Project.

The EAO has a compliance and enforcement branch which conducts inspections, complaint reviews, investigations and enforcement to support oversight of EA projects. Information on compliance and enforcement of EA projects can be found in the *Compliance and Enforcement Policy and Procedures* (EAO 2020). Additional information on compliance and enforcement can be found on the EAO’s website.

In addition to the EAC, the Project will require approvals from regulatory agencies as outlined in the *Regulatory Coordination Plan for the Cariboo Gold Project* (EAO 2021) and also described

in Chapter 2, Section 2.5 of the Application. The Project will require numerous permits and approvals before construction can start. Regulatory agencies, such as the Ministry of Energy, Mines and Low Carbon Innovation, also conduct regular inspections to ensure that permit holders are meeting the requirements of their approvals.

Osisko Development does not have an EAC yet for the Cariboo Gold Project, and this is an additional level of oversight for this Project in relation to our other operations in the region.

Responses regarding non-compliances are provided in the responses to Comment #21,

The Reclamation and Closure Plan requires that all mine infrastructure be removed and the Project footprint reclaimed to end land use goals. Osisko Development is open to discussing retaining the camp accommodation for the community of Wells, if this is of interest and acceptable to relevant regulatory agencies. The camp could be used for accommodation purposes, which has been indicated as a limiting factor for tourism during community engagement.

During the life of the Project, the camp will undergo maintenance and upgrades as required, and would be suitable for use after the Project closes. The Solace Longhouse is a permanent quality, code-compliant structure (it is not a traditional, modular trailer-style camp). Due to the significant durability of the components, both the exterior shell (a Sprung Structure, tensioned membrane building) and the interiors, designed and fabricated out of Cross-Laminated Timber, these accommodations have a 50+ year lifespan. After 20 years, there will still be in excess of 30 years of life to the building. The quality and durability of the structure allows it to be demobilized, and re-purposed as/if required. The exterior shell can remain in place for a number of different purposes such as a skating rink, gymnasium, or multi-purpose structure. The interiors, if not required for accommodations can be removed and repurposed elsewhere. This facility will have decades of use left after the life-of-mine expires, which represents millions of dollars of value and Osisko Development is eager to share this legacy gift with the community, in a configuration that suits Wells the best, after the Cariboo Gold Project is complete.

Osisko Development has provided support to District of Wells initiatives for community planning and infrastructure upgrades. Osisko Development is currently in the process of developing a Memorandum of Understanding with the District of Wells which addresses sewer, water and infrastructure upgrades as well as the school.

See response to Comment #41.

The distance to the nearest residence was calculated from the Mine Site Footprint to the nearest building. This was identified in the Initial Project Description and will be revised based on current information. This will be reflected in the Revised Application.

## 2.116 #116 – Anonymous

### 2.116.1 Comment

Wells is a beautiful charming little town that serves as the gateway and support community for both Barkerville and the Bowron Lakes. These two world class tourist destinations will suffer greatly with the loss of Wells as it currently exists. Turning Wells into an industrial site would be shameful. It should definitely not happen.

### 2.116.2 Response

Osisko Development recognizes the importance of tourism to the District of Wells, and believes that mining and tourism can co-exist. Osisko Development has made the following commitments regarding tourism:

- Work with the District of Wells and local residents to identify ways in which the mine can help promote tourism in the area (e.g., moving the headframe to the community).
- Work to develop a tourism component that is complimentary to the mine (e.g., visitors center, mine tours, etc.) that may attract people to the area or encourage them to stop while passing through Wells.
- Develop a strategy to mitigate pressures on recreation and tourism in the Project area due to increased population and visitors.
- Contact industry leaders in the tourism industry at least semi-annually to better understand the impacts on the sector, if any, caused by ODV.
- Place signage on recreational trails and public roads if there is the potential for conflicts with Project activities.

## 2.117 #117 – Devon Macdonald, Home (Wells, BC), Where I Attend University (Victoria, BC)

### 2.117.1 Comment

Please read attached for my comments.

### 2.117.2 Response

Thank you for your comments. Responses are provided in the section below.

### 2.117.3 Attachment – Comments for BGM.pdf

Comments and responses from the attachment are provided in Table 2.117-1.

Table 2.117-1 Comment #117 Attachment - Responses

Number	Comment	Response
117-1	<p>Chapter 18 For Clarity Definition of sustainable (Merriam Webster) 1: capable of being sustained 2a: of, relating to, or being a method of harvesting or using a resource so that the resource is not depleted or permanently damaged b: of or relating to a lifestyle involving the use of sustainable methods sustainable society</p> <p>From Chapter 18 “A sustainable community effectively balances economic, social, cultural, and environmental interests to meet the needs of the present generation without compromising the ability of future generations to meet their needs.”</p> <p>Definition of resiliency (Merriam Webster) 1: the ability of something to return to its original size and shape after being compressed or deformed 2: an ability to recover from or adjust easily to adversity or change</p> <p>From Chapter 18 “A resilient community has the capacity to adapt to changes such as shifting demographics and housing affordability, and “bounce back” from events such as economic downturns and the effects of a changing climate”</p> <p>I have spent most of my life in Wells and hold it as a cherished place in my heart for helping me to become the person that I am today. I want the safe, supportive environment that I grew up in for the children in Wells today and into the future. I am very concerned that in Chapter 18 of the Cariboo Gold Mine Project document Osisko/BGM claims that their impacts on current and future generations have been sufficiently mitigated and that if the community experiences any challenges it will be due to external forces. First, this is an unbelievably brief chapter</p>	<p>The purpose of this chapter was to summarize the analysis and conclusions for environmental, economic, social, cultural and health VCs and Indigenous interests that contribute to the Project’s positive or negative effects on current and future generations. This chapter was written as per the Application Information Requirements (EAO, 2021c).</p>

Number	Comment	Response
	<p>(only 3 pages to address this topic) compared to the other documents in this assessment. This in itself is concerning and while one is directed towards other chapters this does not show due consideration for the impacts on current and future generations. Without properly identifying such impacts I question how Osisko/BGM proposes that they are capable of even beginning to mitigate them?</p> <p>Osisko/BGM claims that “it’s conservative to assume that…future generations are likely to experience the positive Project’s effects and their contribution to the overall improvements of socioeconomic settings in the area” (Chapter 18, p.3). They further claim that “negative effects that could be experienced will be driven by external factors…which the Project has no influence” (Chapter 18, p. 3). These claims are justified in four categories with only one of these sections containing two sentences, the rest having only one sentence.</p>	
117-2	<p>In the Economic Opportunities section they propose that they will “sustainably” use finite and nonrenewable resources which have significant environmental and social impacts. How will this be measurably achieved? Perhaps, as another commenter has pointed out, the word “sustainable” cannot be used in such a context. They will also cut down their costs and inefficiencies by using local services (and very few justifications for their lofty claims). Missing entirely from the phenomenally superficial analysis are the impacts on the economic opportunities that have existed in this town long before Osisko/BGM ever showed up. There have been multiple concerns brought forward relating to the detrimental impacts that Osisko/BGM is already having on the community. In buying the Hubs Motel and now the Cariboo Joy Campground they have severely limited accommodations within a community that’s economy relies heavily on tourism to sustain itself. To argue that the increase in jobs for the mine offsets the negative impacts on local businesses is insulting and shows a conscious disregard for the work that people have put into creating Wells as a tourist destination. What is Osisko/BGM doing to ensure that the tourism industry that makes Wells a resilient and sustainable community can continue.</p>	<p>In Chapter 18, Section 18.2, the sustainable practices were informed by Local Government Planning for Sustainability &amp; Resilience (Government of BC, 2021). These sustainable practices were incorporated into the Project. The wording in Section 18.2 was adapted from Local Government Planning for Sustainability &amp; Resilience (Government of BC, 2021) and is a commitment to adhere to these practices.</p>

Number	Comment	Response
	<p>Resilience and sustainability are also brought up in this chapter and yet for both to be present within a community there cannot be a single entity from which a community derives its financial stability from. Resilience comes with redundancy, meaning that while one thing may serve a certain function alone it will always be susceptible to collapse unless there are several different things serving the same function. The suggestion that Osisko/BGM will have no negative impacts on the resiliency of the community of Wells is preposterous seeing as their actions so far seem determined to stunt the local economy. This is seen in their purchase of businesses and property, and by the fact that they propose that the concentrator can only be placed as the first thing one will see when coming into Wells as some examples. Wells has been able to market itself as a historic, natural, and artistic place to explore. Such a concentrator is damaging to this image. Unless Osisko/BGM puts more thought into their true impacts on this community they cannot argue that their presence will do anything to support resiliency. What measurable ways will the proposed project support a resilience community?</p>	
117-3	<p>For the Social and Cultural category Osisko/BGM claims they will “support community safety, health and diversity”. How is this support being achieved? What measures are being taken to mitigate the impacts of a resource extraction camp being built in the community? Has BGM considered the negative impacts such camps and increased traffic has on communities? The freedom that I felt as a child and a teenager growing up in Wells will not be possible with a mining camp in Wells. My parents felt comfortable letting me roam about Wells because there was a sense of community and trust. With many strange people and increased traffic I am concerned that future generations of Wells will not be able to experience this. Where is this impact in this assessment? What is Osisko/BGM doing to ensure that the community of Wells is still a safe, supportive, and healthy environment to raise a family and to live?</p>	<p>Chapter 18, Section 18.2, the sustainable practices were informed by Local Government Planning for Sustainability &amp; Resilience (Government of BC, 2021). These sustainable practices were incorporated into the Project. The wording in Section 18.2 was adapted from Local Government Planning for Sustainability &amp; Resilience (Government of BC, 2021) and is a commitment to adhere to these practices.</p>
117-4	<p>They also claim that they are encouraging “a design that facilitates physical activity, community connection, housing affordability, food</p>	<p>Chapter 18, Section 18.2, the sustainable practices were informed by Local Government Planning for Sustainability &amp; Resilience (Government</p>

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Number	Comment	Response
	<p>security, cultural diversity, and accessibility to services”. There is no evidence of this. What is Osisko/BGM actively doing to facilitate physical activity, community connection, housing affordability, food security, cultural diversity, and accessibility to services? Each one of these aspects deserves their own section and yet they are limited to a single line.</p>	<p>of BC, 2021). These sustainable practices were incorporated into the Project. The wording in Section 18.2 was adapted from Local Government Planning for Sustainability &amp; Resilience (Government of BC, 2021) and is a commitment to adhere to these practices.</p>
117-5	<p>For the Environmental category Osisko/BGM claims that their proposed project “support[s] the natural environment and its ecosystems so they are better able to resist damage and recover quickly”. This is a very large claim (almost suggesting a godlike status) that I would like to see substantiated. The best way to support such “natural environments and ... ecosystems” is to not destroy or harm them. A mine inherently will have negative impacts on the environment and the surrounding ecosystems. I therefore ask how, considering these inevitable negative impacts, Osisko/BGM is improving the environment’s ability to “resist damage and recover quickly”? I also question how they can claim to be mitigating impacts on “wildlife corridors [and] habitats” when their proposed Northern Transmission Line directly and negatively impacts both these aspects.</p>	<p>Chapter 18, Section 18.2, the sustainable practices were informed by Local Government Planning for Sustainability &amp; Resilience (Government of BC, 2021). These sustainable practices were incorporated into the Project. The wording in Section 18.2 was adapted from Local Government Planning for Sustainability &amp; Resilience (Government of BC, 2021) and is a commitment to adhere to these practices.</p>
117-6	<p>The final category of Land use claims that the project “supports existing land uses and ensures the efficient movement of people, goods and services”. I for one have been blocked from accessing some of the hiking trails that I used to enjoy. The reason given for blocking access is because Osisko/BGM is working in the vicinity. I understand that one cannot enter an active worksite but such a worksite need not extend kilometers beyond the actual work being done. This was also experienced by community members trying to access the Old Cariboo Wagon Road which Osisko/BGM blocked with a gate. I contest the claim that existing land use is being supported and would further claim that it is being negatively impacted. How will Osisko/BGM ensure that recreation around the town will be maintained. They are after all claiming to facilitate physical activity for community members. With increased traffic the claim that efficient movement of people is also not properly addressed within this document. What is Osisko/BGM doing to mitigate impacts to infrastructure (roads)?</p>	<p>Chapter 18, Section 18.2, the sustainable practices were informed by Local Government Planning for Sustainability &amp; Resilience (Government of BC, 2021). These sustainable practices were incorporated into the Project. The wording in Section 18.2 was adapted from Local Government Planning for Sustainability &amp; Resilience (Government of BC, 2021) and is a commitment to adhere to these practices.</p>

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Number	Comment	Response
117-8	<p>After reading this chapter I am disconcerted by the future proposed by Osisko/BGM as the missing information says much to future dealings. While I recognize that this chapter is to function as a summary I am astonished that for a project of this size my comment (on this chapter alone) is almost the same length as their entire chapter. The paucity of information and consideration of all impacts is astounding. To even begin to think of titling this chapter "Impacts on Current and Future Generations" Osisko/BGM must provide an authentic analysis, which includes the negative impacts, on the subject. This should also take into consideration the voice of local residents which from what I have read in this document has been blatantly ignored.</p>	<p>The purpose of this chapter was to summarize the analysis and conclusions for environmental, economic, social, cultural and health VCs and Indigenous interests that contribute to the Project's positive or negative effects on current and future generations. This chapter was written as per the Application Information Requirements (EAO, 2021c).</p>
117-9	<p>Further Questions I Would Like Addressed</p> <p>Chapter 8</p> <p>Why is the indirect emissions as a result of the production of all types of fuel used not included (namely that of producing fossil fuels)?</p> <p>What about housing emissions, emissions from construction, and emissions from employee transportation (flights taken by executives)?</p>	<p>The Environmental Assessment for the Cariboo Gold Project is being carried out under the BC Environmental Assessment Act only, and the project is not subject to a federal environmental assessment under the Impact Assessment Act. As such, the scope for the project GHG assessment does not include upstream emissions associated with fossil fuel production and refining.</p> <p>GHG emissions from all camp housing within the project boundaries has been included in the project GHG assessment, as have all GHG emissions associated with construction activities occurring within the project boundaries. GHG emissions occurring outside the project boundaries from sources that are not owned or controlled by Osisko Development Corporation (including offsite housing and employee ground and air transportation) are outside the scope for this assessment, and thus not included.</p>
117-10	<p>Appendix7.2-1_Air Quality Effects Assessment</p> <p>Will there be airborne mercury?</p> <p>How will the tailings be stored?</p> <p>What are the safety measures for the tailings storage?</p> <p>According to the document baseline air quality data has been taken from the Quesnel Secondary school. Has BGM contacted the Ministry of Environment regarding setting up local (Wells) air quality monitoring</p>	<p>Mercury will not be used as an input or intermediate in any of the mining, ore concentration or ore processing operations associated with the project. Mine-site soils, ore, waste rock and unpaved road materials all contain trace amounts of mercury (parts per billion) which may become airborne as dust. The human health risk assessment conducted as part of the Environmental Assessment included mercury, and concluded that airborne mercury did not pose any inhalation health risks.</p>



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Number	Comment	Response
	<p>stations to collect baseline data? Why weren't baseline assessments done in Wells? How were the impacts of the mill and much higher human activity accounted for?</p>	<p>Tailings will be stored in the Filtered Stack Tailings Storage Facility at the QR Mill. Details on this can be found in Chapter 1 – Project Overview. The Filtered Stack Tailings Storage Facility is a “dry-stack” facility, and tailings will not be stored underwater. Safety measures are outlined in Chapter 9 Malfunctions and Accidents.</p> <p>Osisko Development has been in contact with the Ministry of Environment and Climate Change Strategy regarding setting up local air quality monitoring stations to collect air quality data in Wells. It is anticipated that air quality monitoring will commence in 2021.</p> <p>The use of Quesnel ambient air quality data as conservative baseline (higher ambient baseline concentrations) was discussed with ENV and approved in the Dispersion Modelling Plan (Appendix F within Appendix 7.2-1, Air Quality Effects Assessment) prior to commencement of the dispersion modelling assessment.</p> <p>Please see the previous response regarding the status of air quality monitoring in Wells.</p> <p>Air emissions from all Project activities occurring within the project boundaries (including the mill) and along the ore haulage route were estimated and evaluated in the Air Quality Effects Assessment. Increased human activity occurring within the project boundaries, including at the mine and QR Mill camps, were also included in the assessment. The assessment utilized standardized methodologies from bodies such as the US EPA and Environment and Climate Change to calculate emissions from project activities, and followed the BC Ministry of Environment and Climate Change Strategy Air Quality Dispersion Modelling Guideline in assessing the air quality impacts from these emissions. Increased human activity occurring outside the project boundaries was not accounted for in the assessment.</p>

## 2.118 #118 – Anonymous

### 2.118.1 Comment

See attached comments

### 2.118.2 Response

Thank you for your comments. Responses are provided in the section below.

### 2.118.3 Attachments – listed below

Attachments:

1. CGP EAO-Appendix1.0-16\_Power\_Supply\_Alternatives\_Assessment\_jlewis.pdf
2. CGP EAO-Appendix7.2-3\_Noise\_and\_Vibration\_Technical\_Data\_Report\_jlewis.pdf
3. CGP EAO-Appendix7.3-1\_Noise\_Existing\_Conditions\_jlewis.pdf
4. CGP EAO-Application\_Summary\_jlewis.pdf
5. CGP EAO-Chapter7\_Section7.3\_Acoustic\_jlewis.pdf
6. CGP EAO-Chapter9\_Malfunctions\_and\_Accidents<sup>[[[</sup>SEP]<sub>]]]</sub>\_jlewis.pdf
7. CGP EAO-Chapter20\_Appendices \_jlewis.pdf
8. CGP EAO-General Questions\_jlewis.pdf
9. CGP EAO-Project\_Overview\_jlewis.pdf

Comments and responses from the attachments are provided in Tables 2.118-1 to 2.118-9.

Table 2.118-1 Comment #118 Attachment 1 - Responses

Number	Comment	Response
118-1.1	<p>Cariboo_Gold_Appendix1.0-16_Power_Supply_Alternatives_Assessment.pdf PwrAlternativesQuestions_01 According to the analysis in this Assessment, the Hwy 26 option is</p> <ul style="list-style-type: none"> <li>- only 7 million more dollars</li> <li>- less impact on wildlife</li> <li>- less road building required</li> <li>- 10 fold cheaper to maintain/operate I found it particularly interesting that “Case 4” in the “Sensitivity Analyses” (where Economics were excluded) that the Merit Value of each alternative gap, became much closer (Hwy 26=3.4 and North of Hwy 26= 3.9).</li> </ul>	<p>The reason that a sensitivity analyses is completed is to see how merit values may vary with different weightings or valuations given to different components. As in Case 4, the merit values are closer with the sensitivity scenario without economics; however, as noted in the assessment report, this particular scenario (no economics) was deliberately chosen to remove the more developer-centric perspective where cost could be the main driver.</p>
118-1.2	<p>PwrAlternativesQuestions_02 69kV Power line (no documentation provided, relating to the new line’s design specs). We get snow for 7-8 months of the year (which creates an enhanced environment for the creation of the Corona Effect, typically associated with High Voltage Power Lines)</p> <p>What Corona Effect mitigation will be used? Will the new line produce visible Corona Effects? Will the new line produce UV light from the Corona Effects? Will the new line produce audible Corona Effects? Will the new line produce the Ozone and NOx gases typically associated with the Corona Effect? EMI generated by Corona Effect gap discharges extends to frequencies in the GHz range. What extra mitigation will be in place to prevent interference with emergency services and other wireless shrives in town? There is no mention of maintenance procedures for the 69kV line components. Due to temperature and weather extremes, the components of the line may wear faster. Will there be a more rigorous inspection schedule for the line’s components?</p>	<p>The corona effect is determined by several factors, including the voltage of the line, the diameter and type of conductor used, the configuration and the hardware of the line, and the local weather conditions. For a transmission line, the corona effect typically appears at a voltage higher than 220 kV. Therefore, for a 69 kV line, it is anticipated that there will not be a corona effect. Based on the this threshold, and the mitigations provided below, ODV anticipates that the proposed new Transmission Line will not produce:</p> <ul style="list-style-type: none"> <li>• visible corona effects</li> <li>• UV light from corona effects</li> <li>• audible corona effects</li> <li>• the Ozone and NOx gases typically associated with the corona effect</li> </ul> <p>ODV highlights the key design criteria here that mitigate the corona effect for the Project’s proposed Transmission Line:</p> <ul style="list-style-type: none"> <li>• The conductor diameter chosen for the proposed transmission line is 477Multi-Chip Module (MCM), aluminum conductor steel enforced (ACSR), 21.6 millimetre (mm) diameter, which will produce an electric field much lower than the 21 kV/cm necessary for the corona effect to appear on an overhead line.</li> </ul>

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		<ul style="list-style-type: none"> <li>To mitigate the production of corona, ODV has selected glass insulators, rather than porcelain, which will facilitate the detection of broken insulators from the ground and thus avoid the appearance of corona in the coming years.</li> <li>The new line being designed for a maximum voltage of 138 kV (rather than 69 kV) contributes to substantially limiting the possibility of corona appearing on the line.</li> </ul> <p>No additional mitigations are necessary to prevent interference with emergency services and other wireless services in town because with the design mitigations in place, no interference is expected.</p> <p>Regarding the local climatic conditions, the design of the line takes into account the temperature, wind speed, snow, ice thickness specific to the Quesnel and Wells area. The altitude along the route will also be taken into account during the detailed design.</p> <p>A well designed and maintained transmission line does not produce corona effects. ODV confirms that it is committed to respecting the Radio Influence Voltage (RIV) interference limits in full compliance with the applicable standards and Canadian Radio-television and Telecommunications Commission (CRTC) requirements.</p> <p>Although the maintenance program has not yet been developed, as it will be developed through the permitting process, ODV will implement an inspection schedule that is applicable to the temperature and weather extremes. ODV highlights that it plans to use local BC contractors and businesses to maintain this new transmission line.</p>

**Table 2.118-2 Comment #118 Attachment 2 - Responses**

Number	Comment	Response
118-2.1	Cariboo_Gold_Appendix7.2-3_Noise_and_Vibration_Technical_Data_Report.pdf	Consistent with requirements and guidelines discussed within the report, Appendix7.2-3 (Noise and Vibration Technical Data Report), the assessment considered A-weighted overall levels and full octave band sound data from 31.5 Hz band to 8 kHz band. The 31.5 Hz band

Number	Comment	Response
	<p>For those who might be curious, I have been a sound professional for 40 years (sound recording, creation and mixing). I live, work, record and recreate throughout the Wells/Bowron area.</p> <p>Appendix7.3-1_NoiseVibrationTechData_01</p> <p>2.1.1 OPERATION AND CONSTRUCTION - NOISE</p> <p>“Environmental noise relates to the propagation of audible sound (from about 31.5 Hz to 8 kHz)”</p> <p>Humans hear from 20hz to 20kHz. Please explain why sound below 31.5Hz and above 8kHz aren't considered to propagate. This is an odd assertion.</p>	<p>represents sound signal from about 20 Hz to 44 Hz and 8 kHz band represents data from about 5680 Hz to 11,360 Hz. When A-weighting is applied (which represents adjustment of average adult hearing), a weighting of negative 39 dB is applied to 31.5 Hz band and negative 26 dB is applied to 63 band and so on. The A-weighting de-emphasizes low frequency. Therefore, the lower frequencies have less impact on the regulatory criteria. However, they were also considered in the low frequency assessment.</p> <p>ISO-9613 indicates that at frequencies above 8 kHz substantial air absorption. For example, at 10-degree Celsius temperature and 70% humidity, 1000 Hz band has 3.7 dB attenuation per km distance; 2000 Hz band has 9.7 dB attenuation per km distance; 4000 Hz band has 32.8 dB attenuation per km distance; 8000 Hz band has 117 dB attenuation per km distance and so on. Therefore, lower and higher frequency bands has less contribution in overall sound level. Therefore, the lower frequency bands (below 31.5 Hz band) and high frequency bands (above 8 kHz band) are not considered in the guidelines or assessments.</p>
<p>118-2.2</p>	<p>Appendix7.3-1_NoiseVibrationTechData_02</p> <p>2.1.1 OPERATION AND CONSTRUCTION - NOISE</p> <p>This section appears to speak only of attenuation and alteration as it relates to sound propagation. Those are things that occur for sure, but an environment can also reflect and amplify sound propagation. Wells is in a natural amphitheater. Please confirm that reflection and apparent amplification have been taken into account in this modelling.</p>	<p>ODV confirms that reflection and amplification have been taken into account in the modelling. For example, the model considered reflection of sound and the modelling also considered amplification mechanisms such as downwind or temperature inversions.</p>
<p>118-2.3</p>	<p>Appendix7.3-1_NoiseVibrationTechData_03</p> <p>2.2.1.1 SPATIAL BOUNDARIES “3 km from the boundaries of the PDA (i.e., a further 1.5 km beyond the LAA) for Mine Site and QR Mills. At a distance of 3 km from the PDA, the distance attenuation alone is adequate to reduce the sound pressure level and vibration level from a source to be below baseline acoustic conditions and the potential cumulative effects of the Project beyond 3 km is expected to be negligible.” This is flat out incorrect for our area. For example, on prevailing winds, current Osisko drilling can be heard well above the ambient sound from the 1 Mile Bridge, which is only 2.5kms from the</p>	<p>Although as stated in Section 2.2.1.1, a distance of 3 km alone from the PDA will attenuate the noise levels adequately the ambient, as a conservative approach, ODV confirms that the assessment included downwind conditions in the assessment. For the purposes of the assessment, it is assumed in the modelling that prevailing winds will always be from each noise source towards each sensitive receptor within a 3 km distance, even though that scenario is not realistic. Therefore, the 3km RAA is considered sufficient. ODV is unable to comment on the example of the 1 Mile Bridge scenario without additional project-specific details (i.e., construction equipment, topography, etc.).</p>

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	drilling on Island Mountain. Please ask WPS to justify this statement in light of the facts, which plainly differ	
118-2.4	<p>Appendix7.3-1_NoiseVibrationTechData_04</p> <p>2.3 AMBIENT ENVIRONMENT</p> <p>This section has inherent flaws. I refer to my comments on the Cariboo_Gold_Appendix7.3- 1_Noise_Existing_Conditions.pdf</p>	See below in Table 2.118-3 for baseline related comments.
118-2.5	<p>Appendix7.3-1_NoiseVibrationTechData_05</p> <p>2.4 POINTS OF RECEPTION</p> <p>“Since noise and vibration diminish with distance, compliance at receptors within LAA indicates compliance ...”</p> <p>Again, distance does not equal compliance at receptors here in Wells! I repeat my comment above: This is flat out incorrect for our area. For example, on prevailing winds, current ODV drilling can be heard well above the ambient sound from the 1 Mile Bridge, which is only 2.5kms from the drilling on Island Mountain. Please ask WPS to justify this statement in light of the facts, which plainly differ.</p>	Please see the response to comment #118-2.3 above.
118-2.6	<p>Appendix7.3-1_NoiseVibrationTechData_06</p> <p>2.5.4.1 MUNICIPAL BY-LAWS</p> <p>“However, they exempt for facilities with written authorization, or if activities are of industrial nature taking place on property appropriately zoned for the use being conducted that such as use is conducted in a manner and at such times as would be carried out like other business and within generally accepted practices. Therefore, it is assumed that the by-laws generally do not apply to the Cariboo Mine and associated activities as it demonstrates compliance through assessment, it is an industrial facility and conduct operation within generally accepted practices for a mine construction and operation.”</p> <p>This is incorrect and should be struck from the reports. The Noise By-laws for Wells are set out by the District of Wells. In those bylaws, there is no clause that gives exemption for “activities are of industrial nature taking place on property appropriately zoned for the use”. Despite ODV insistence, their current and future activities are NOT occurring on Industrial land. These areas are zoned as “On Space Parkland”. See</p>	It is our understanding that the statements regarding the District of Wells noise by-law as presented in Section 7.3 are accurate. However, we will review this by-law again and make any required adjustments if necessary in the revised Application.

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	“District of Wells Official Community Plan:Schedule B Sept 2001”. I am fascinated to find out why ODV insist otherwise.	
118-2.7	Appendix7.3-1_NoiseVibrationTechData_07 2.6.1 OPERATION SCENARIO -Table 2-3 MISSING from this section is Surface Drills. They aren’t listed at all. Please recalculate the models with the # of surface drills that will be running during the Operation phase.	The assessment includes the predictable worst-case scenarios and to demonstrate compliance. However, there is no planned surface drilling during operations.
118-2.8	Appendix7.3-1_NoiseVibrationTechData_08 2.7.1 OPERATION AND CONSTRUCTION NOISE & LFN “The assessment considered source specific sound data, Project-specific source and receiver location data, and building locations and construction types (e.g., façade construction).” To my understanding, there isn’t a locked down Services Building design. How can they assert that they have an understanding of buildings that aren’t chosen yet? Please show us the information that they have based their Assessments on.	The specifics at this stage of the design is the type of process where the building will be, where the portals are, and what type of equipment will be used for each process. The source data appropriate for equipment (e.g. loaders) were included. Similarly, building size, location, and building material (e.g. metal clad) were also included with the acoustic performance requirements defined. The recommendations from Appendix 7.3-1 Noise Vibration Technical Data Report, such as building façade performance and allowable sound power levels, will be followed during the appropriate stage.
118-2.9	Appendix7.3-1_NoiseVibrationTechData_09 3.1.1 ASSESSMENT USING HC GUIDELINES In this chart, the “TWO (2) RECEPTORS NEAR MINE” are listed as having 56dB of Cumulative Levels - without mitigation. This is impossible. The Valley Portal Exhaust is rated (earlier in this document) as having a volume of 137dB and will be less that 300 meters away from receptor R01-5! This assertion seems absurd. I formally request an explanation of how they have arrived at this conclusion.	The sound power levels shown on Table 2-3 for Valley Portal Exhaust was listed incorrectly as 137 dBA; however, it was correctly identified as 116 dBA in Appendix B. This has been identified in the Technical Advisory Committee review as well. Table 2-3 will be corrected, accordingly. The report included the recommendation for an additional 10-dB of attenuation (Valley Portal Exhaust). The model indicates that the Valley Portal Exhaust will be at least 360 meters from the nearest receptor.
118-2.10	Appendix7.3-1_NoiseVibrationTechData_10 3.1.2 ASSESSMENT USING ECPMM GUIDELINES Again, the assessment of 55/45 dB (day.night) at receptor R01-5 is literally unbelievable. This is the sound level of light rainfall. I formally request an explanation of how they have arrived at this conclusion.	The Technical Data Report assessment methodology provides additional details on the modelling and effects assessment. The sound levels for assessments are based on dBA scale which represents the average human hearing. The linear scale, represents the “flat” response or linear weighting. The regulatory criteria is based on dBA scale (for the most part). For example the Portal Valley Exhaust is 131 dB and 116 dBA, both

Number	Comment	Response
		of these are presented in the report. Assessment is based on 55 dBA and 45 dBA, as required by the regulatory criteria discussed.
118-2.11	<p>Appendix7.3-1_NoiseVibrationTechData_11 Table A-1: Summary of Points of Reception</p> <p>This is bizarre. Is height in this document, relational or is just the height of a visual microphone?</p> <p>*All* receptors are listed as being at the same height, 1.5 metres. If they used this data point for all sound sources and receptors, then any topological modelling is completely unrelated to this project in Wells. Did they account for actual elevation of all sound sources and receptors in their modelling?</p>	<p>As noted in Table A-1, that all heights are relative to grade. A receptor height of 1.5 m is used to represent the height of an average adult. As noted in the report that the model includes topography (i.e. LAA3_02 the ground height is 1220 masl (metres above sea level) and thus the total height of receptor LAA3_02 is 1221.5 masl)</p> <p>Similarly, each receptor height is based on the ground height at each receptor.</p>
118-2.12	<p>Appendix7.3-1_NoiseVibrationTechData_12 4.1 MITIGATION - OPERATION</p> <p>“A barrier on the Island Mountain Portal extending 75 metres on the north side and 60 metres long on the east side at height of 4 metres. It should be constructed of material providing a surface density of 20 kg/m2. The barriers should also be constructed without gaps within or below its extent.”</p> <p>I have commented elsewhere about this, but a barrier of 4m height will not entirely occlude sound for receptors at higher elevations. There are residences 400m away, at some elevation.</p> <p>Additionally, it will do nothing for the reflected sound that is pronounced in that area. People on the Crescent can hear radio chatter from the parking lot and the drill sites on Island Mntn.</p>	<p>It is agreed that a 4 metre high barrier will not entirely exclude sound for a receptor, but it will minimize the sound such that the regulatory limits that were discussed within the report can be met. In addition, the barrier is only one part of the mitigation recommendations, the other recommendations include sound attenuation on the ventilation raise at the portal. Topography was used in the model. With all of these applied, compliance with the regulatory limits was established.</p>
118-2.13	<p>Appendix7.3-1_NoiseVibrationTechData_13 4.3 BLASTING NOISE AND VIBRATION MITIGATION <sup>[[1]]</sup>It is also recommended to conduct vibration monitoring at the same location as noise monitoring during the first few blasts, especially when they occur near the surface area.” Due to the bowl like land features of the mountains around Wells, and the nature of Low Frequencies, I would encourage multiple testing sites. At least: the station proposed “appropriate setback that is representative of</p>	<p>ODV has committed to the development of a Noise Management and Monitoring Plan for the Project. The Noise Management and Monitoring Plan will detail mitigation, management, and monitoring measures for noise-related adverse effects from mining activities. It will define mitigation measures to control noise effects from the Project and identifies current noise criteria that would trigger further potential contingency and adaptive measures if exceeded.</p>



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	<p>receptors” and 1-2x300 to 500m away, to better represent Low Frequency effects. I’m guessing that wildlife on Cornish Mountain will feel those blasts at 500+ metres away.</p>	
<p>118-2.14</p>	<p>Appendix7.3-1_NoiseVibrationTechData_14 Table B-2b: Noise Source Summary - Operation</p> <p>There appears to be a number of noise sources that would contribute to the overall cumulative noise effects, missing from the list (and presumably therefore, from the modelling).</p> <ul style="list-style-type: none"> <li>• Surface drills!</li> <li>• Underground works vibration effects</li> <li>• All other traffic driving on the mine property (Admin, personal and individual work vehicles vehicles. Mass transit vehicles (with air brakes). Snowplows, sanders, first aid vehicles.</li> <li>• Camp building noise</li> <li>• Hand held and truck radios</li> <li>• Gate operations</li> </ul>	<p>The assessment considers a worst-case predictable operation, however in reality not all equipment will be operating at the same time. Since the assessment considers the predicable worst-case, all the scenarios listed in this question are included within the scenarios assessed. Please also see response to Comment #118.2-7 regarding surface drills.</p>
<p>118-2.15</p>	<p>Appendix7.3-1_NoiseVibrationTechData_15 Table C-3(all): Predicted Low Frequency Sound Level at Poitns of Reception - Operation</p> <p>There is a header on these charts called “Is there tonal below 250 Hz”. From top to bottom for all receptors) the answer is “No”. Since the assessment summaries are based on fallible predictive analysis, based on incomplete information (as per WSP’s own statement), how can this data point be 100% known? Yes/No cannot be 100% known.</p> <p>Along with the modelled effects, I would like to know what the policy will be on the volume of worker’s communications on the Mine Site. Loud equipment and safety concerns lead to people to yelling to each other to be heard. This is a highly annoying noise source that travels far and easily, in all seasons, but particularly in winter.</p>	<p>The assessment is based on a two-step process. The first step checks the difference between dBA and dBC noise levels greater than or equal to 20 dB during the day/nighttime. If it is greater than 20 dB, then a second step checks the presence of a distinct tonal component below 250 Hz. The Yes or No represents the potential for low frequency noise. Not representing the known or unknown.</p> <p>As noted previously, the assessment considered the predicted worst-case scenario where most equipment is operating simultaneously, however in reality not all equipment will be operating at the same time. Therefore all other sounds voiced as concern is indirectly accounted by considering most equipment operating simultaneously.</p>
<p>118-2.16</p>	<p>Appendix7.3-1_NoiseVibrationTechData_16 5.0 CONCLUSIONS</p>	<p>Effects assessment are completed using conservative approach in modelling and assumptions. ODV directs the reviewer to Chapter 7,</p>

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Number	Comment	Response
	<p>I am very disappointed to see such a boldly confident assertion from the Consultant, that noise will not be a problem for this project, only because their analysis suggests that the noise won't "bother" government guidelines. How can this be asserted when everything is theoretical?</p> <p>Noise pollution from the Explorations phase (which will continue through the life of the project, is already is a problem for those of us living here. There is a LOT of theoretical practice applied to the assessment and in practicality, it's highly likely that the assessment will not match the actual experience.</p> <p>Based on what is revealed in this document, there appears to be large gaps in information, which miss informs the analysis. To not speak more of potential mitigation AND to say that the project's noise output will be in compliance, is highly suspect. Also, the fact that WSP's asserted project compliance is based on an incorrect reading of the District of Wells' Noise Bylaws, means that the assertion is based on mis-information. Confidence in this report should not inform Osisko's compliance and mitigation expectations.</p>	<p>Section 7.3, and specifically Section 7.3.7.2.2.2 (Uncertainty) that identifies uncertainties associated with the effects assessment.</p> <p>Compliance has many steps, one step is the design, the second step is the conservative assessment based on data, and the third step is based on measurements once the facility becomes operational. ODV confirms that noise and vibration monitoring requirements will be established to verify compliance.</p>
<p>118-2.17</p>	<p>Appendix7.3-1_NoiseVibrationTechData_17 5.1.4 BLASTING VIBRATION</p> <p>I don't know how the Consultant arrived at a 96 metre boundary for Low Frequency effects from blasting, but I would like to know. Low Frequency propagation, whether airborne or vibrational, are HIGHLY unpredictable and more often than not, has unexpected spurious effects. Again, to not be presenting (or expecting) problematic noise pollution strikes me as naive.</p> <p><a href="https://www.sciencedirect.com/topics/engineering/low-frequency-vibration">https://www.sciencedirect.com/topics/engineering/low-frequency-vibration</a> "Whereas air is essentially a uniform medium, the ground can have a layered structure and its properties vary considerably from one site to another and even within a single site. Thus prediction of absolute levels of vibration and ground-borne noise is extremely difficult"</p>	<p>It is agreed that it is difficult to accurately establish vibration levels. Therefore, there are empirical formulas which provide conservative estimates (over predicts).</p> <p>As mentioned in Section 2.7.2 and 2.7.3 of the Technical Data Report, the method presented in the "United States Office of Surface Mining report 8507" (U.S. OSM 1980) was used for assessing noise and vibration from blasting.</p> <p>The US surface mine guideline is used across the industry to predict a conservative estimate.</p>
	<p>Appendix7.3-1_NoiseVibrationTechData_18 5.2 CLOSURE</p>	<p>Compliance has many steps, one step is the design, the second step is the assessment based on data, and the third step is based on</p>

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Number	Comment	Response
	<p>“The acoustic analysis highlighted in this report is based on information obtained from BGM and its design team. The assessment represents the design conditions as provided at the time of the assessment, and the conclusions are the best judgment of the assessor based on current environmental standards. WSP Canada Inc., attests that to the best of our knowledge, the information presented in this report is accurate.”</p> <p>Bravo to WSP for their work and report but as they say, they are only as good as their info. The absence of key information/facts/design plans means that their job is to provide a “best guess”. Their above declaration is exactly why I am not confident in the assessment results.</p>	<p>measurements once the facility becomes operational. Final noise and vibration compliance will be established through measurements. For that, noise and vibration monitoring requirements will be established to demonstrate compliance.</p>

**Table 2.118-3 Comment #118 Attachment 3 - Responses**

Number	Comment	Response
118-3.1	<p>Cariboo_Gold_Appendix7.3-1_Noise_Existing_Conditions.pdf</p> <p>For those who might be curious, I have been a sound professional for 40 years (sound recording, creation and mixing). I live, work, record and recreate throughout the Wells/Bowron area.</p>	<p>Noted.</p>
118-3.2	<p>Appendix7.3-1_NoiseExisting_01</p> <p>This is a very detailed Report, however, there are 2 serious flaws in it, where it pertains to Residential and Recreational locations.</p> <p>It seems unfortunate that there wasn't more consultation of local knowledge, before these tests were performed.</p> <p>The main issues are:</p> <ol style="list-style-type: none"> <li>1. Measurements were done AFTER exploration drilling had begun. This renders a higher baseline than the Community expects to live within.</li> <li>2. The choice of Monitoring sites inadequately represents an accurate sonic picture of both the whole of The District of Wells, including Residential and Recreational users noise experiences.</li> </ol>	<ol style="list-style-type: none"> <li>1. It was determined that based on sound recordings taken during the noise measurements that drilling operations did not have a perceptible impact on noise levels at the measurement locations.</li> <li>2. See response to Comment 118-3.4 below</li> </ol>

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Number	Comment	Response
118-3.4	<p>There were only 3 Monitor Stations placed in the town of Wells, which is inadequate coverage for the areas that people live, play and work.</p> <ol style="list-style-type: none"> <li>1. The first monitor (R01-ODV Wells Camp) looks to be in a decent location to show the noise from the Camp, however it's not a great place for representing a residential experience. Additionally, the monitoring failed around 2pm, missing most of the afternoon. This data set is flawed.</li> <li>2. R02 (District of Wells residence south of Highway 26) This is another interesting choice as it's close to the highway and the much used, Ski Hill Road. The R02 site is primarily a business area and is close to mine accommodation and parking. The majority of Wells Residences are *not* along the highway. So, this data set is biased towards showing a baseline that is much higher than a residential neighbourhood.</li> <li>3. R03 (ODV office on Sanders Avenue) appears to be behind the ODV offices. This location is beneficial in that it's sheltered more from the highway noise, however, there are large buildings which would cast a sound shadow from the Exploration activities. This is perhaps the most "Residential" location in that the drills would not show up as much.</li> </ol>	<p>The OGC Guideline provides ambient sound levels (ASLs) to be considered for rural areas when conducting an assessment in accordance with the OGC Guideline. These are 45 dBA during the daytime period and 35 dBA during the nighttime period. The noise levels measured at R03 (ODV Wells office on Sanders Avenue) were 43 dBA and 36 dBA during the daytime and nighttime periods, respectively, which are very similar to the OGC Guideline's ASLs for a rural area (i.e., the minimum default ASLs considered by the OGC).</p> <ol style="list-style-type: none"> <li>1. The OGC Guideline requires 3 hours of valid data during the daytime and 3 hours of valid data during the nighttime period. These conditions were satisfied by the monitoring data collected at R01. This location was considered to be representative of the Wells Camp as well as residential locations within Wells near the Wells Camp.</li> <li>2. R02 was located at a residence along Highway 26 and was selected to be representative of residential locations in Wells near the highway.</li> <li>3. R03 was selected to be representative of the residential locations within Wells away from the highway. The concern of this comment is unclear, as being shielded from exploration activities would remove the concern that measured noise levels were impacted by drilling noise. As discussed above, measured noise levels here were very similar to those expected by the OGC Guideline for a rural area.</li> </ol>
118-3.5	<p>My first question is then, will ODV re-test for baselines, without active drilling?</p> <p>Next question, will ODV expand the testing areas to include representative locations for Residents and Recreational Users?</p> <p>Suggested locations would be:</p> <ul style="list-style-type: none"> <li>• the school yard</li> <li>• Margaret &amp; Dawson Streets</li> <li>• a residence on the west end of Crescent</li> <li>• a residence on the east end of Crescent</li> <li>• the Lodge on Pooley</li> <li>• at the SW bend of Mooney Ln</li> </ul>	<p>It was determined that based on sound recordings taken during the noise measurements that drilling operations did not have a perceptible impact on overall noise levels at the measurement locations. Therefore, redoing baseline measurements are not considered to be required.</p> <p>Although baseline noise levels were measured at three locations in Wells, additional receptors were assessed in the Noise and Vibration Technical Data Report to support the application, including 21 receptors in Wells. Noise contours were also presented which show the predicted noise levels from the Project throughout all of Wells.</p>

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Number	Comment	Response
	<ul style="list-style-type: none"> <li>• on Lowhee Dr by the abandoned cabin</li> <li>• in the Meadow at the silver bridge</li> <li>• in the Meadow at the foot of Cornish Mntn</li> <li>• at the entrance to the Learning forest.</li> <li>• Stromville</li> <li>• 1 Mile Bridge</li> </ul> <p>To not measure at sites like these, is to ignore the Community &amp; Tourism experiences.</p>	
118-3.6	<p>Appendix7.3-1_NoiseExisting_02</p> <p>7.3.4.1.1 Operation and Construction – Noise (Audible and Low Frequency Noise) “The predictive analyses were performed using the commercially available software package Computer Aided Noise Abatement (CadnaA), which implements the algorithm contained in the ISO 9613”</p> <p>Can we review screen captures or video of a walkthrough of the model as it is in the software?</p>	<p>The acoustic model includes source, receiver and study area information as points, vertical area, or line sources. These are shown in various Figures within the report.</p> <p>The information that one would expect from a screen capture is already included within the report.</p>
118-3.7	<p>Appendix7.3-1_NoiseExisting_03</p> <p>During Construction &amp; Operation:</p> <p>Will there be someone on-site continuously measuring sound at multiple receptors? If not, how often will they be observing the measurements? Where are those receptors?</p>	<p>Construction and Operation noise will be measured at selected representative receptors over a period of at least one week each. The representative receptors are shown within the report. (e.g. Figure 7.3-2)</p> <p>From these representative receptors, measurement points will be selected.</p>

**Table 2.118-4 Comment #118 Attachment 4 - Responses**

Number	Comment	Response
118-4.1	<p>Cariboo_Gold_Application_Summary.pdf</p> <p>AppSummary_01</p> <p>A few years ago, BGM stated a 10-15 year mine life. Now you state: “The mine has an estimated operational mine life of 16 years, with an overall mine life of approximately 25 to 35 years (construction through post-closure).” Elsewhere in your docs you say it’s a 20 year life. Which duration is Osisko is actually applying for? -----</p>	<p>In previous discussion mine life may have been used to include the operational period of the mine.</p> <p>The Project phases are shown in Chapter 1 Project Overview, Section 1.5.1, Table 1.5-1. To confirm, also stated in Chapter 1, Section 1.1.1, “the mine has an estimated operational mine life of 16 years, with an overall mine life of approximately 25 to 35 years (construction through post-closure).”</p>

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Number	Comment	Response
118-4.2	<p>AppSummary_02 Regarding the Septic Field at the camp (above Lowhee Creek), what testing procedure will be implemented for ground water seeping into the Willow or the town's potable water? How frequently will the testing occur? Will Residents be able to review the regular results anytime they need to? If not, does that not seem logical?</p>	<p>Osisko Development has water quality monitoring stations in Jack of Clubs Lake, the Willow River and at two locations on Lowhee Creek (one at the discharge location and another 1.5 km downstream). This information can be found in our quarterly and annual water quality reports.</p> <p>Additional water quality monitoring stations will be established and the monitoring of which will be developed through the permitting phase. This will include monitoring after Project infrastructure is constructed.</p>
118-4.3	<p>AppSummary_03 Same question as above for the Water Treatment plant discharge.</p>	<p>See response to Comment 118-4.2.</p>
118-4.4	<p>AppSummary_04 What sound mitigating measures will be put in place to prevent sound from the camp, bridge overpass and services building? Be specific please, with each mitigation measure and its timeline for implementation.</p>	<p>Mitigation measures for Project effects due to noise are provided in Section 7.3.5 in the Acoustic effects assessment. Implementation will be during construction.</p>
118-4.5	<p>AppSummary_05 What analysis has been done of the surface/slope stability and water movement on the north end of Barkerville Mntn, below the proposed haul road? Is there a study that can be reviewed?</p>	<p>Preliminary design for the access road at the Mine Site has been completed. Further analysis and design will be completed for detailed design as part of the permitting phase should an Environmental Assessment Certificate be issued for the Project.</p>
118-4.6	<p>AppSummary_06 I didn't see any reference to the reclamation the land below the Mine Site settling pond. Aka the Flats at the east end of the Jack. This is something that has been mentioned several times at BGM &amp; Osisko community meetings. Is this something that Osisko intends to follow up on?</p>	<p>The remediation associated with the Cariboo Gold Quartz Mine operation (i.e., the area referred to in the reviewer's comment), with respect to tailings and waste rock, is under the jurisdiction of the Provincial Government (Crown Contaminated Sites Program in the Ministry of Forests, Lands, Natural Resource Operations and Rural Development [FLNRORD]). Osisko Development and FLNRORD have ongoing discussions regarding remediation activities for areas outside of the planned Project footprint.</p>
118-4.7	<p>AppSummary_07 "Osisko Development Corp. (ODV) recognized early in Project planning that the key to a successful engagement program was ensuring that stakeholders were identified and had the opportunity to participate in a manner that was both meaningful and practical for them."</p>	<p>The Services Building location has been part of the Mine Design since early in the planning process. It was shown in Initial Project Description and Detailed Projection Description, which were both provided to Indigenous nations for Review. Public and stakeholders were able to comment on the Initial Project Description during the Public Comment</p>

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	What was the rationale for *not* consulting the Community, Indigenous Peoples and other Stakeholders on the Services Building location, before the EAO Application was submitted? It's truly unfortunate, as there would have significantly less resistance to the project if Osisko had located the Services building on back of Cow Mountain.	Period in the Early Engagement Phase. ODV has held community workshops where the Services Building location was shown, and in addition, community members have discussed the Services Building location in detail with the design team in separate engagement sessions.
118-4.8	AppSummary_08 The bridge that's shown in Figure 3 and mentioned several times in the document, kindly show a rendering of it.	Detailed design is underway and design drawings will be shared when available. The bridge will be a clearspan structure.
118-4.9	AppSummary_09 There seems to be a second crossing of the Willow indicated. For "Transport", in Figure 3. Are you planning for two crossings? The bridge and "transport crossings" are very unclear and could significantly alter the entrance view to town. We need more understanding of this.	There was an error in the figure. This will be corrected in the Revised Application. There is only one crossing of the Willow River, indicated by the Bridge location.
118-4.10	AppSummary_10 Could we please see a 3D render showing the composition of the underground sedimentary layers around the Services building, including the location of the underground workings?	See Chapter 1 Project Overview, Figure 1.4-4, for a rendering of the Mine Site Complex that shows the Services Building. See Appendix 1.0-7 Feasibility Design - Mine Site Bulk Fill Area, Figures 02 to 05 and 07, that shows contouring around the Mine Site Bulk Fill Area, where the Services Building will be located. See Chapter 1 Project Overview, Figure 1.4-7, for the location of the underground workings. No 3D rendering figures with composition of underground sedimentary layers around the Services Building are available.
118-4.11	AppSummary_11 Section 7.2 "Where practicable, select equipment with low emissions and engines that meet latest applicable Canada emissions standards and guidelines." Please define the all the parameters that affect a "Where practicable" decision? Are these decisions reviewed during the life of the project, to include Cumulative Effects? Who decides and monitors the "where practical" line when budget is the main defining factor on using Electric equipment, or not? ODV or an external group?	As requested by the EAO, the mitigation measures will be revised to be measurable and specific. This will be provided in the Revised Application.

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Number	Comment	Response
118-4.12	AppSummary_12 Section 7.2 “Equipment will be turned off when not in use, where practical”. Please define what “where practical” means?	As requested by the EAO, the mitigation measures will be revised to be measurable and specific. This will be provided in the Revised Application.
118-4.13	AppSummary_13 Section 7.3 “Monitor blasting noise and vibration at an appropriate setback that is representative of receptors, or at the closest receptor during the first few blasts, especially when they occur near the surface area.” Kindly define “Appropriate setback”.	An appropriate setback is used when there are no receptors present. For the Project, there are receptors near the Mine Site and the closest one will be monitored.
118-4.14	AppSummary_14 Section 7.8 “A wildlife education program will be developed and provided to employees, contractors, and site visitors.” Who specifically will develop this program? If the intention is to be internally developed, will external specialists be consulted?	The program will developed by Osisko Development with support by the consultant team. The wildlife program will be developed by a Registered Professional Biologist.
118-4.15	AppSummary_15 Section 7.9 “Installation of a clear-span bridge over the Willow River to avoid any instream works and to limit impacts to fish habitat.” Will the clear span be over the entirety of the spring flooding zone, or will footings be used within the flood area?	The bridge will be designed to engineering standards (CHBDC, etc.). In addition, hydrotechnical considerations will be provided to protect the structure from flooding and to mitigate scour and erosion potential.
118-4.16	AppSummary_16 Section 7.11 “Provide advanced notice to stakeholders of Project activities and schedules, including road impacts and peak Project traffic times.” What form will this take, and why are you not doing it already, in the Exploration phase?	The form of this communication can take numerous forms and Osisko Development would like to discuss this with the community on how they would like to be informed on project activities during mine life. Current activities are provided in the Osisko/BGM newsletter which is sent to community mailing list and hard copies are posted at the Wells Post Office. It is also available on our website and a link is posted on Facebook.
118-4.17	AppSummary_17 7.11 “Provide advanced notification to relevant stakeholders of Project schedules prior to commencing activities that may be outside conditions considered normal (i.e. noise, dust, or vibration during blasting).”	Current activities are provided in the Osisko/BGM newsletter which is sent to community mailing list and hard copies are posted at the Wells Post Office. It is also available on our website and a link is posted on Facebook.



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Number	Comment	Response
	Why are you not doing this already? And what/who defines “activities that may be outside conditions considered normal”?	In this context, Osisko Development personnel would identify when activities creating more than the average noise, dust or vibration are anticipated to occur.
118-4.18	<p>AppSummary_18</p> <p>7.11 “Place signage on affected recreational trails if there is the potential for conflicts with Project activities.”</p> <p>Please explain how Exploration and the CGP will be consulting stakeholders on closing of Recreational Access! So far it seems that someone(s) just decides to block access, then does so. Most efforts to regain access to Public Land that have occurred so far are either slowed or blocked. Please explain how ODV can usurp Public Rights.</p>	<p>Access restrictions are placed to prevent public access to active mine sites. This is a requirement from the province to protect public health and safety.</p> <p>Osisko Development will meet with interested parties to discuss potential effects to recreational trails prior to construction start.</p> <p>Under the <i>Mines Act</i>, a “mine” includes “ a place where mechanical disturbance of the ground or any excavation is made to explore for or to produce coal, mineral bearing substances. The Project Footprint would be considered a “mine”.</p> <p>Section 1.3.1 and 1.3.3 of the Code are also relevant: 1.3.1 – Other than an inspector, only persons authorized by the (mine) manager shall enter or be permitted to enter a mine. 1.3.3 – Unless authorized by the manager, no persons shall enter or leave a mine except by a recognized means of entry or exit.</p>
118-4.19	<p>AppSummary_19</p> <p>7.11 “Discuss appropriate mitigation and access requirements with tenure holders.”</p> <p>Please explain why this is not happening already, in the pre-production phase of the project.</p>	Current exploration activities are outside the scope of the environmental assessment.
118-4.20	<p>AppSummary_20</p> <p>7.11 “Develop a strategy to mitigate pressures on recreation and tourism in the Project area due to increased population and visitors.”</p> <p>The same should be said of mitigating pressure of noise and light, on recreation and tourism. Currently, there is significant noise disruption in the meadow, a huge recreational tourist attraction. I haven’t heard anyone discuss that issue, except for locals.</p> <p>What will the effects be on wildlife and humans be, in the meadow and Community Learning Forest? What studies have been performed out there?</p>	The spatial boundaries for each VC are defined in each VC effects assessment section and are shown on Figures. Baseline study areas are shown in the Appendix reports.

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Number	Comment	Response
118-4.21	<p>AppSummary_21</p> <p>7.11 “Minimize the disturbance areas to the extent practicable.” Practical... for whom? Who determines this and how does the public participate in those decisions?</p>	<p>As requested by the EAO, the mitigation measures will be revised to be measurable and specific. This will be provided in the Revised Application. Disturbance areas are typically the Project footprint, otherwise known as the physical limits of the Project. The Project Footprint is shown in Chapter 1 – Project Overview.</p>
118-4.22	<p>AppSummary_22</p> <p>7.11 “The emission of light towards the sky will be limited by using Luminaires that produce a sober and uniform lighting that will meet operational lighting needs. Luminaires will not produce any emissions above 90 degrees.” AND “Use structure surface treatments such as non-reflective surfaces and colours to blend in with the natural surroundings and reduce visibility.”</p> <p>Please explain how reflected light will be stopped, while snow is on the ground?</p>	<p>Proposed mitigation measures for effects related to light are summarized in Appendix 20.1. The effectiveness of mitigation measures will be monitored and revised if required.</p>
118-4.23	<p>AppSummary_23</p> <p>7.14 Community Health. Is this section meant to only reference the community of ODV workers or does this allude to more?</p>	<p>Community Health includes population health and health-related infrastructure.</p>
118-4.24	<p>AppSummary_24</p> <p>7.16 “Develop and implement a Community Involvement Plan.”</p> <p>Please outline the purpose and goals of this Plan.</p>	<p>The Community Involvement Plan outlines the process ODV will follow to meet its commitments to community members, stakeholders, and the public during all phases of the Project.</p> <p>Osisko Development Corp. will proactively engage with the communities involved with the Project. This engagement will be made to build and maintain constructive relationships and of maximizing local benefits.</p> <p>Osisko Development Corp. will work with local community members, stakeholders, and the public to maximize the positive economic benefits of the Project that will flow into their communities. Osisko Development Corp. is committed to establishing collaborative dialogue with local community members, stakeholders, and the public to better understand community priorities and integrate feedback and concerns into all levels of Project planning, decision-making, and implementation.</p> <p>This document will also provide a community and stakeholder concerns and issues monitoring plan.</p>

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Number	Comment	Response
118-4.25	<p>AppSummary_25</p> <p>7.16 “Contact Indigenous elders on at least semi-annually to inquire about their opinions on if the Project has resulted in any changes to Indigenous language and teachings.”</p> <p>This is great. How about doing that for residents of Wells and surrounding area, as well? The project is surely having an impact on the community of Bowron as well.</p>	<p>Community feedback mechanisms will be described in the Socio-Economic Monitoring Plan.</p>
118-4.26	<p>AppSummary_26</p> <p>1.5.2 Summary of Positive Effects- Infrastructure and Services “Improvement to recycling in the Wells area” Please outline what BGM/ODV is imagining, as no such discussions have happened with those that run the recycling depot.</p>	<p>Osisko Development ODV will work with the community and CRD to identify whether there are ways waste management at site can benefit the community and local facilities</p>
118-4.27	<p>AppSummary_27</p> <p>1.5.3 Summary of Negative Residual Effects Effects-Human Health Add “Addition of Noise Pollution” to this section. Not having it in there suggests that Noise Pollution does not have a negative effect on human health. As you know, Noise Pollution is a significant Value Component in Human Health everywhere, as proven by many studies. Even small increases in noise pollution can lead to anxiety, depression, increased medication use and heart disease, in addition to the obvious, hearing loss. We are already experiencing Negative Residual Effect from the Noise being produced by the Exploration Drilling activities.</p>	<p>Section 7.13 Human and Ecological Health assesses the effects from chemicals emitted by the Project. Section 7.3 Acoustic assesses the effects noise.</p>
118-4.28	<p>AppSummary_28</p> <p>1.5.3 Summary of Negative Residual Effects Effects- Culture As the town becomes an Industrial camp and work zone, community members are, and will, continue to leave. This has and will continue to shift the non-mining Culture of the town. The things that have made Wells the unique and peaceful destination that it is, came from the people living here. Events and tone will drop away, leaving a tangible Cultural void.</p>	<p>Osisko Development recognizes that workers who choose to live in Wells will change the demographic composition of the community. However, Osisko Development also recognizes the importance of art to the community and has therefore committed to the following to continue to support the arts and music community in Wells:</p> <ul style="list-style-type: none"> <li>• Host community events to promote and encourage Arts and Culture within the District of Wells.</li> <li>• Support the arts in the District of Wells by continuing to work closely with Wells’ arts-related stakeholders and organizations to discuss benefits that can be provided by Osisko Development to support the arts sector and arts infrastructure.</li> </ul>

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Number	Comment	Response
		<ul style="list-style-type: none"> <li>Meet with contact key leaders of the arts sector at least semi-annually to better understand the impacts on the sector, if any, caused by Osisko Development.</li> <li>Promote the arts sector to all workers .</li> <li>Support to Island Mountain Arts to enhance youth programs and encourage participation.</li> </ul> <p>Osisko Development has many current employees who participate in the arts and have showcased their talents at Cabarets, been patrons of theatre and music shows at the Sunset Theatre and purchased local artwork from Island Mountain Arts' Gallery.</p>
118-4.29	<p>AppSummary_29</p> <p>1.5.4 Table 5 Potential Cumulative Effects– Acoustic “Potential cumulative effects for Acoustics were not identified.”</p> <p>Traffic is a huge factor in the increased noise pollution in Wells. Also, construction of additional housing and businesses, related to the Project’s existence would present Acoustic Cumulative Effects. Please add this or justify why not.</p>	<p>An interaction does not exist between the residual effect of the Project and the other past, current, or future project/activities.</p> <p>The project residual effects are not expected beyond the local assessment area and the activities listed above are well away from Regional Assessment Area apart from transportation. The transportation was part of baseline measurements.</p>
118-4.30	<p>AppSummary_30</p> <p>1.7.2 Predicted Benefits to the District of Wells Historically ODV has suggested “Predicted Benefits” which it has then taken off the table. While all of these ideas are nice, they are nothing but carrots dangling in front of the Application Cart. Until ODV has committed to any Benefits, they present more as sales tactics. Which Benefits has ODV firmly decided to deliver on/made promises to engage with on Project Certification?</p>	<p>Mitigation measures identified in the Application will be included in the conditions of the EA Certificate. This includes enhancement measures. The EA Certificate is a legally binding document.</p>

**Table 2.118-5 Comment #118 Attachment 5 - Responses**

Number	Comment	Response
118-5.1	<p>Cariboo_Gold_Chapter7_Section7.3_Acoustic.pdf</p> <p>Ch7-Section7.3Acoustic_01</p> <p>7.3 Acoustic</p>	<p>In our understanding, the current drilling operation is part of exploration activities and not part of construction or operation activities and therefore were not considered.</p>

Number	Comment	Response
	<p>“Project components considered in the assessment include:</p> <ul style="list-style-type: none"> <li>• Noise and vibration due to construction and closure activities;</li> <li>• Noise and vibration due to operations; and</li> <li>• Noise and vibration due to blasting (construction and operations).” <p>A huge issue that is happening now, even before the project has been certified is drill noise. This should really be a bullet point on the above list.</p> </li></ul>	
118-5.2	<p>Ch7-Section7.3Acoustic_02 7.3.1.1 Health Canada Noise Guideline</p> <p>How do plan to solicit honest feedback from the Community? There are many people in Wells that are currently Highly Annoyed with the drill noise, but they are “afraid” to make a complaint for many different reasons, or they feel it’s futile.</p>	<p>The assessment is based on quantifiable % highly annoyed (%HA) provided by Health Canada and is not based on feedback from the Community.</p>
118-5.3	<p>Ch7-Section7.3Acoustic_03 7.3.1.1.1 Environment Canada’s Environmental Code of Practice for Metal Mines</p> <p>This is all well and good for a larger centre but our noise floor in Wells was WAY below those numbers before ODV set the drills to work. It’s great that ODV is considering HC’s recommendation on Impact and Tonal sounds but the worst aspects of acoustics issues right now is the ambient or continuous droning type sounds that never stop. This relentless noise pollution has an unconscious impact on people’s health and should not be overlooked.</p> <p>“Concussion noise of a maximum of 128 dB.” For your reference, this is the volume of a jet taking off. This will provoke all out panic and anger in the streets if it happens unexpectedly.</p>	<p>It is understood for metal mines are typically in rural or remote areas and it is assumed that Environment Canada’s Code of Practice was developed considering this fact.</p> <p>The 128 dB (not dBA) range is considered as a limit for blasting in many guidelines, including Ontario Ministry of Environments NPC-119. Therefore, this limit is considered relevant.</p>
118-5.4	<p>Ch7-Section7.3Acoustic_04 7.3.1.1.2 BC Oil and Gas Guideline</p> <p>“Presence of a distinct tonal component below 250 Hz.” Is this dBA or dBC weighted, or a composite? Will you be collecting Sound Measurement data broken down into 1/3 octave bands once measuring the actual activities?</p>	<p>The OGC Guideline (BC OGC, 2018) is based on linear sound level for 1/3 octave band and dBA and dBA for overall sound level. Therefore the measurement data will be in 1/3 octave band, dBA, and dBC.</p>

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Number	Comment	Response
118-5.5	<p>Ch7-Section7.3Acoustic_05</p> <p>7.3.1.1.3 Osisko has quoted Noise Bylaws from the CRD as if they apply to Wells, and given this info to their Consultants. This is straight up fraudulent behaviour.</p> <p>The CRD's bylaws are not the District of Wells' bylaws. There is no exemption for "Activities of a commercial or industrial nature taking place on property appropriately zoned for the use being conducted", in the District's bylaws. Also the land that they are applying to use is NOT zoned as Industrial. It is zoned as Parkland. ODV has been in contravention to the District of Wells' Noise bylaws, continuously, for months and is now trying to impose its will on Wells' Bylaws.</p>	<p>Section 7.3 Acoustic discusses both Noise Bylaws and assumes that it is not applicable to an industrial facility based on the wordings of the bylaw (as noted within the Section). Clarification will be provided in the revised Application.</p>
118-5.6	<p>Ch7-Section7.3Acoustic_06</p> <p>7.3.2.2.1 A. Mine Site "1. Portal activities at the Valley Portal located at the east side of the main mine site between Jack of Clubs Lake and the Community of Wells, primarily resulting from ventilation and movement of equipment in and out of the Portal; <sup>(SEP)</sup>We have knowledge of the volume of such activities, from the Bonanza adit. It's LOUD. How on earth do you plan on mitigating that sound when it's up against a mountain that reflects sound into town? Will this activity conform to the District's Noise Bylaws?</p>	<p>Current operations at Bonanza Ledge are not part of the Cariboo Gold Project. This assessment considers source sound levels from planned Project activities and also considers reflection of ground, topography as well as downwind conditions.</p> <p>It is assumed that the bylaw generally does not apply to an industrial facility. Compliance is demonstrated through a noise and vibration assessment.</p>
118-5.7	<p>"4. Building breakout and exhaust emissions from the Services Building, associated with the operation of various equipment inside the building (i.e., conveyors, blowers, hoppers, screens, sorters, crushers, ball and sag mills, dust collection equipment, and building ventilation, etc.); " What will the projected cumulative volume of these activities be inside the building? What will the projected cumulative volume of these activities be outside the building? Will the inside of the building be acoustically treated to reduce reverberation and therefore the overall SPL vibrating the building? What materials will the Services building's walls be constructed from? (Metal is a resonator (and metal walls are more flexible and lower mass than other materials, so will transmit sound more easily.)</p>	<p>The assessment considered and included reverberation inside the building in determining the building envelope acoustic performance requirements.</p> <p>The recommendation was provided for a sandwich panel or material meeting the performance requirements provided in the report.</p>
118-5.8	<p>Same questions as above, for the Water Treatment Plant</p>	<p>See above comment.</p>

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Number	Comment	Response
118-5.9	<p>“6. Building breakout and exhaust emissions from the Services Building, associated with the operation of various equipment inside the building (i.e., conveyors, blowers, hoppers, screens, sorters, crushers, ball and sag mills, dust collection equipment, and building ventilation, etc.);” Can you please outline what will be contained in the Airborne emissions that emirate from within the Services building, Water Treatment Plant, Electrical Substation, Camps, Bulk Fill Area, Sedimentary Pond, as well as from the Ventilation Raises? I read through the Emissions docs but they were not specific about the outputs from the specific locations. Also, please include data regarding any extreme/overload exhaust events that might occur.</p>	<p>Emissions have been estimated for all surface and underground emission sources with the Project Boundaries (Mine Site and Quesnel River Mill), as well as the ore haulage route between the Mine Site and the Quesnel River Mill. Air emission estimated include Criteria Air Contaminants, such as particulate matter and nitrogen dioxide; and other Contaminants of Potential Concern, which include contaminants such as metals and Volatile Organic Compounds. Details regarding air emissions and emission sources are provided in Section 5 (Emissions Inventory Results) of Appendix 7.2-1, Air Quality Effects Assessment.</p> <p>Worst-case emission have been considered in the assessment, which includes events such as underground blasting.</p>
118-5.10	<p>Ch7-Section7.3Acoustic_07 7.3.2.2.4 D. Transmission Line “The operations of the new 69 km transmission line (which encompasses noise emissions associated with its operation). A corona noise effect is audible noise from electrical discharge caused by the ionization of a fluid such as air surrounding a conductor carrying a high voltage. Noise from corona effect was considered in the assessment.” Super! What are those values?</p>	<p>69.2 dBA for every metre of the Transmission Line was used in the assessment for corona effect. The transmission line is approximately 20 metres above ground.</p>
118-5.11	<p>Ch7-Section7.3Acoustic_08 7.3.3.1 Information Sources “Data bases of similar sources as well as site plans;” Could you please outline the “similar sources as well as site plans” used? As far as I can tell, there are no gold mines whose centres of production within 100 metres of Residents on surface, with mining occurring under the town. I am stunned that you think this will be liveable.</p>	<p>Please note this is a database of similar source type (e.g. excavators, loaders, etc.) and not based on similar geographical site.</p>
118-5.12	<p>Ch7-Section7.3Acoustic_09 7.3.3.3 Project-Specific Existing Conditions Studies Taken, in 2018 &amp; 2019 ... AFTER related surface drilling had begun on the edge of town.</p>	<p>It was determined that based on sound recordings taken during the noise measurements that drilling operations did not have a perceptible impact</p>

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	The baseline study is a misrepresentation of what Wells was pre-Exploration drilling.	on overall noise levels at the measurement locations. The baseline measurements are representative of pre-exploration drilling noise levels.
118.5-12	Ch7-Section7.3Acoustic_10 7.3.4.1 Methods “Sensitive receptors within the spatial assessment boundaries were identified (as shown above in Figure 7.3-2 and in the Acoustic Technical Data Report in Appendix 7.3-2);” Again, the receptor locations that were chosen for the measurements, simply do not capture a cogent picture of pre-drilling Residential & Recreational users’ ambient noise levels.	The OGC Guideline provides ambient sound levels (ASLs) to be considered for rural areas when conducting an assessment in accordance with the OGC Guideline. These are 45 dBA during the daytime period and 35 dBA during the nighttime period. The noise levels measured at R03 (ODV Wells office on Sanders Avenue, selected to be representative of residential locations in Wells away from the highway) were 43 dBA and 36 dBA during the daytime and nighttime periods, respectively, which are very similar to the OGC Guideline’s ASLs for a rural area (i.e., the minimum default ASLs considered by the OGC).  Although baseline noise levels were measured at three locations in Wells, additional receptors were assessed in the Noise and Vibration Technical Data Report to support the application, including 21 receptors in Wells. Noise contours were also presented which show the predicted noise levels from the Project throughout all of Wells.
118-5.13	“A predictive computer modeling and analysis were completed to predict sound levels from the Project activities at the receptors; “ While this may be the case, the modelling is based on current plans, as provided by the proponent, which was made up of an incomplete list of activities, mechanicals and final building designs at the Mine Site. Again, statements by the Consultants and Osisko that the Mine Site plans are Compliant with government standards as asserted in the Acoustics reports, have NOT been proven in situ. Claiming that the project will meet those standards in practice, is false.	Compliance has many steps, one step is the design, then the second step is the assessment based on data, the third step is based on measurements once the facility becomes operational. Final noise and vibration compliance will be established through measurements. For that, noise and vibration monitoring requirements will be established to demonstrate compliance.
118-5.14	“Predicted noise levels were compared to applicable limits establish in accordance with regulatory guidelines to assess potential effects; and” AGAIN, there is no exemption for “Activities of a commercial or industrial nature taking place on property appropriately zoned for the use being conducted”, in the District’s bylaws. Also the land that they are applying to use is NOT zoned as Industrial. It is zoned as Parkland.	The end use mine can be treated as industrial activity/facility. It is assumed that the by-law generally does not apply to an industrial facility. Therefore, compliance is demonstrated through a noise and vibration assessment.
118-5.15	“Where required noise control measures were included to demonstrate compliance and such control measures are included as recommendations.” While the mitigation suggestions are a good start,	Please note this is a database of similar source type (e.g. excavators, loaders, etc.) and not based on similar geographical site.



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	however, they are based on “quantified based on modelling and analysis”. Solutions are suggested based on “practicality and experience”, however, that is the ‘practicality and experience’ as used in a different acoustic environment.	Compliance has many steps, one step is the design, then the second step is the assessment based on data, the third step is based on measurements once the facility becomes operational. Final noise and vibration compliance will be established through measurements. For that, noise and vibration monitoring requirements will be established to demonstrate compliance.
118-5.16	It is also very interesting to me that the reports lack screen captures or video tours of the model. I would have liked to analyze the details of the models. Since no final design for the Services building has been provided ... how could the Consultant properly model its sonic contribution to the environment?  I would also be very interested to see what wind modelling they used and how it played into their predictions.	The acoustic model is a 3D representation of the area above ground. It includes topography, site layout, building locations, source locations, etc. The key information is depicted in various Figures included within the report.  A sonic effect occurs when an object travels through air faster than the speed of sound. Such a scenario is not expected within this facility.
118-5.17	Ch7-Section7.3Acoustic_11 7.3.4.4.2 Noise from Blasting (Construction and Operations) “Figure 7.3-6 shows a 250-metre buffer zone from the receptors adjacent to the Mine Site and since blasting is to occur within that buffer zone then there is a potential to exceed the criteria limit and not meet the endpoint.”  What time of day do you intend to do this blasting? Since this activity has the potential to create long term hearing loss, please outline the plan for informing the Community about the blasting. Ahead of time and at the time. of blasting. How many blasts will be required over what period of time (estimated), before the blasting is considered ‘underground’ and ‘contained’.	Blasting is planned for underground activities only and no surface blasting is required. Blasting will be at set times at the end of the work shift only and this will be communicated to the community. Osisko Development is committed to minimizing the impact of blast vibration on the community by adjusting it’s blasting schedule to accommodate the residents of Wells and using blast design parameters that minimize vibration being felt on the surface.
118-5.18	Ch7-Section7.3Acoustic_12 Figure 7.3-6 This image is difficult to understand. Perhaps an image that shows the estimated noise and vibration radius’?	This figure shows if blasting occurs within this buffer area (from house), the noise and vibration measurement will be required.
118-5.19	Ch7-Section7.3Acoustic_13 Table 7.3-13 Proposed Mitigation Measures and Their Effectiveness – Acoustic “Buildings or enclosures that are used to enclose noise processing equipment will include, at a minimum, an enclosure of sandwich sheet metal (about 18 to 20 gauge or better) cladding or an enclosure	Depending on the building and location of activities inside the building the inside sound levels vary from 87 to 105 dBA. Hearing protection may be required inside.

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	providing insertion losses shown below.” This is a great start. What will the noise level be inside the building? 130dB inside -30 to -40 dB from wall structure treatment is still potentially 80dB outside of the build. The volume of a lawnmower.	
118-5.20	“Generators will include Sound Attenuated enclosures with an engine muffler providing a total sound power of no more than 98 dBA.” ... the volume of a snowmobile	Correct the recommended generator noise will be no more than 98 dBA. From the source location to the receiver the distance and other factors will attenuate the remaining noise to meet the regulatory guidelines.
118-5.21	“Substation transformers (32 MVA) were assumed to be no more than 100 dBA of total sound power level and includes a noise barrier on north and east side of the transformer yard. The barrier is of 4.5 metres height and constructed of material providing a surface density of 20 kg/m <sup>2</sup> . The barriers should also be constructed without gaps within or below its extent.” Why only on the north and east sides!? What about users on the Lake. The acoustics of the Lake should be protected as much as possible as well!	The distance to the closet resident is closer than the distance to the closet point of the lake. Therefore a barrier was recommended for the residential side.
118-5.22	“All ventilation openings (including intakes and discharge) were assumed to have an acoustic louvre (6 inches or better). If the total area of ventilation openings exceeds 8% of the total façade area, an acoustical louver a 12-inch acoustic louvre will be required.” Why not use the larger loaves, right off the bat? What happens if plans change... at any point in the project and 8% is exceeded?	Osisko Development will consider this and provide an update in the revised Application.
118-5.23	“Fans at ventilation raises at Shaft Zones are required at least 20 dB sound attenuation and Valley Zones ventilation raises require at least 10 dB sound attenuation.” 20dB off of a 130dB noise source is still 110dB (the volume of a snowblower and above the sound volume that is capable of producing hearing loss, with prolonged exposure). Based on this, I would question if the answer to “Residual Effect” should actually be Yes.	The sound power levels shown on Table 2-3 for Valley Portal Exhaust was listed incorrectly listed as 137 dBA, it was correctly identified in Appendix B as 116 dBA. This has been identified in the peer review as well. Table 2-3 will be updated accordingly. The report included the recommendation for an additional 10-dB of attenuation (Valley Portal Exhaust). The model indicates that the Valley Portal Exhaust will be at least 360 meters from the nearest receptor.
118-5.24	“A barrier on the Island Mountain Portal extending 75 m on the north side and 60 m long on the east side at height of 4 m. It should be constructed of material providing a surface density of 20 kg/m <sup>2</sup> . The barriers should also be constructed without gaps within or below its	Agree a 4 metre high barrier will not entirely exclude sound for a receptor, but it will minimize the sound such that the regulatory limits that were discussed within the report can be met. In addition, the barrier is only one part of the mitigation recommendations, the other recommendations include sound attenuation on the ventilation raise at the portal.

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	<p>extent.” I’ve already covered this elsewhere but this barrier will not prevent reflected sound off of the mountain.</p>	<p>Topography was used in the model. With all of these applied, compliance with the regulatory limits was established.</p> <p>In the model, first order of reflection was used along with downwind and moderate temperature inversion conditions to account for these types of concerns.</p>
<p>118-5.25</p>	<p>Ch7-Section7.3Acoustic_14 Table 7.3-15 Residual Effect Characterization for Construction Noise and Low Frequency Noise “Minimal changes to the baseline conditions and project contribution is below the limits” While I respect and am grateful for legislated limits on sound in populated environments, Wells is no regular acoustic environment. In 2017, I could hear the sound of my blood moving in my body, while outside. Ambient noise has already taken that away. I could hear snow hitting my fleece jacket, an ant crawling on a leaf. All gone sine the Exploration program began. I moved to Wells for these things. Not only for my soul, but for my sound recording profession. Ambient noise coming from the drills, is now an infringement on my lifestyle, profession and peace of mind. Should the standards not be adjusted for the baseline that Wells used to have (before 2018)?</p>	<p>The assessment follows the guidelines as described in Section 7.3 Acoustic.</p>
<p>118-5.26</p>	<p>Ch7-Section7.3Acoustic_15 7.3.9.6 Mitigation Measures “Potential adverse cumulative effects were not identified. Additional mitigation measures are not required.” The Cumulative Effects study appears to have not included Exploration drilling. My understanding is that surface drilling of around the same number of drills as currently in operation, will continue from now until the end of operation. Is there a Cumulative Effects assessment report that includes the surface drilling program?</p>	<p>During operations exploration will be underground. There will be no cumulative effects from the Project and the exploration program.</p>
<p>118-5.27</p>	<p>Ch7-Section7.3Acoustic_16 7.3.10 Follow-up Strategy “Noise and vibration mitigation measures will be implemented as part of the Construction Environmental Management Plan and Explosives Management Plan. These plans will be developed prior to the start of construction. A Noise Monitoring Plan will also be developed to verify that measures are in place to minimize acoustic effects, and to ensure these measures are effective.”</p>	<p>Management and monitoring plans will be developed during the permitting phase and provided to regulators as part of the permitting process. As part of the EA Certificate, Osisko Development expects that there will be conditions related to the development, review and approval of management plans. Relevant plans will be provided to the District of Wells for comment.</p>

Number	Comment	Response
	When will the Noise Monitoring Plan be available to review? It would seem critical component to achieve Certificate approval.	
118-5.28	<p>“As part of ongoing consultation and engagement with interested parties (including community representatives, Indigenous nations, and local government representatives), ODV will confirm interest in receiving regular updates on monitoring results and preferred mechanisms for sharing data and information. These groups will also be engaged on strategies to be employed if predicted effects and mitigation effectiveness are not as expected.”</p> <p>Sounds great. I’m interested.</p>	Comment noted.
118-5.29	<p>Ch7-Section7.3Acoustic-Tables_17</p> <p>7.3-3 “Where possible, implement administrative controls such as plan activities considering timing constraints, or scheduling of specific construction activities to minimize disturbance to receptors (e.g. not concentrate equipment near a receptor).” “Where possible”? And what if you deem it not possible, then what?</p>	As requested by the EAO, the mitigation measures will be revised to be measurable and specific. This will be provided in the Revised Application.
118-5.30	<p>Ch7-Section7.3Acoustic-Tables_18</p> <p>7.3-4<sup>SEP</sup> “Investigate persistent complaints and implement corrective actions.” Does this mean that you will only investigate persistent complaints? Does this mean that if ODV’s activities negatively affects only one individual’s living, that the must write you over and over again, to see effort and change by ODV? How many times does one complain before your define complaints as “persistent”?</p>	Community feedback mechanisms will be described in the Socio-Economic Monitoring Plan.
118-5.31	<p>Ch7-Section7.3Acoustic-Tables_19</p> <p>7.3-9 “Generators will include Sound Attenuated enclosures with an engine muffler providing a total sound power of no more than 98 dBA.” This is helpful, but lacks the specificity of distance. A generator at 98dBA a kilometre away, is VERY different than one half a kilometre away, let alone 200 metres. For example, 98dbA for the generator that you plan to use during Construction at the Island Mountain portal is far too loud for the residences in Upper Wells and will add to the Cumulative Acoustic Effects all across town. This is the equivalent loudness of a helicopter.</p>	The Noise Management and Monitoring Plan details mitigation, management, and monitoring measures for noise-related adverse effects from mining activities. It defines mitigation measures to control noise effects from the Project and identifies current noise criteria that would trigger further potential contingency and adaptive measures if exceeded.
118-5.32	Ch7-Section7.3Acoustic-Tables_20	Comment noted.

Number	Comment	Response
	<p>7.3-12 “All ventilation openings (including intakes and discharge) were assumed to have an acoustic louvre (6 inches or better). If the total area of ventilation openings exceeds 8% of the total façade area, an acoustical louver a 12-inch acoustic louvre will be required.” This is all well and good but if there is 130dB of loudness behind the wall, then these measures are likely to be substantially inadequate.</p>	
<p>118-5.33</p>	<p>Ch7-Section7.3Acoustic-Tables_21</p> <p>7.3-13 “Fans at ventilation raises at Shaft Zones are required at least 20 dB sound attenuation and Valley Zones ventilation raises require at least 10 dB sound attenuation.”</p> <p>*** The Valley Vent Raise Intake is quoted as having a volume of 129!! 10db off of a 130dB noise source is still the volume of a police siren and can result in permanent hearing loss!***</p>	<p>Comment noted.</p>
<p>118-5.34</p>	<p>Ch7-Section7.3Acoustic-Tables_22</p> <p>7.3-13 “A barrier on the Island Mountain Portal extending 75 metres on the north side and 60 metres long on the east side at height of 4 metres. It should be constructed of material providing a surface density of 20 kg/m<sup>2</sup>. The barriers should also be constructed without gaps within or below its extent.”</p> <p>This strikes me as an incomplete solution to the noise at the Island Mntn Portal. 4 meters in height will not stop the sound from projecting at the houses on the Crescent. In fact, with the barrier being so far from the noise source(s), it will do little for anyone except for those walking by at ground level. Mitigating noise from the Portal for residents will be all about measures taken at the noise source.</p>	<p>The Noise Management and Monitoring Plan details mitigation, management, and monitoring measures for noise-related adverse effects from mining activities. It defines mitigation measures to control noise effects from the Project and identifies current noise criteria that would trigger further potential contingency and adaptive measures if exceeded. A change in the noise environment has the potential to adversely affect people and wildlife in the local area. It sets forth the industry BMPs to control the noise sources and reduce the overall noise from the Project.</p> <p>The plan includes the following key objectives:</p> <ul style="list-style-type: none"> <li>• Legislation, guidelines, and/or industry standards relevant to Project noise;</li> <li>• Mitigation measures planned to reasonably minimize effects from Project noise; and</li> <li>• Outline of monitoring and reporting planned throughout the Project life.</li> </ul> <p>The plan applies to the Project activities that produce noise and are applicable to the Construction and Operations Phases.</p>
<p>118.5-35</p>	<p>Ch7-Section7.3Acoustic-Tables_23</p> <p>7.4-40 “Speed limits will be enforced.” How will they be enforced?</p>	<p>A Traffic Control Plan will be developed for the Project. The purpose of the Traffic Control Plan (TCP) is to provide the expectations of all Project</p>

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		related vehicle traffic entering and exiting all ODV project sites and to guide how this traffic will be managed.

**Table 2.118-6 Comment #118 Attachment 6 - Responses**

Number	Comment	Response
118-6.1	<p>AccidentsQuestions_01</p> <p>9.3.1 Potential Malfunctions or Accidents</p> <p>Noise pollution or extreme volume events appear to be missing from table 9.3.1 Explosions and Vehicle incidents, as example. As is the hazard of a 40,000L LP tank rupture. A critical, rare and extreme risk event that could harm people up to 1km away.</p>	<p>ODV thanks the reviewer for their comments and highlights that typically, noise pollution is assessed in an environmental assessment as a pervasive and ongoing event associated with Project activities. As it relates to malfunctions and accidents, there could be singular extreme noise events with some incident types (e.g., explosives accident); however, these events would be singular, instantaneous, and so short term as to be inconsequential in the overall worst-case scenario assessment.</p> <p>Notwithstanding the above, ODV will include acoustic as a potential effect from an explosives accident in Table 9.3-1 of Chapter 9 (Malfunctions and Accidents) in the revised Application; the text in the column Potential Effects of Table 9.3-1 will read “Changes to air quality, acoustic , and effects on human health.” ODV confirms that although this possible effect was not listed in Table 9.3.-1 of Section 9.3.1 (Initial Scoping Assessment), ODV had included the effect in the assessment of carried forward malfunctions and accidents. ODV directs the reader to Table 9.4-2, Table 9.4-4, and Section 9.4.3.3.</p> <p>With respect to vehicles and possible noise pollution, ODV is of the opinion that there would be no acoustic implications for a vehicle incident (Section 9.4.7; Vehicle or Equipment Accidents).</p> <p>If the commentor is referring to extreme spill volume events associated with vehicle or fuel tank rupture, ODV directs the reader to Sections 9.4.6 for the assessment of “Spills - Hazardous Materials Release to Land and/or Water” where ODV believes this worst-case scenario is sufficiently covered.</p> <p>ODV highlights that an updated Chapter 9 (Malfunctions and Accidents) will be provided in the revised Application that will include example</p>

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		incidents (malfunctions and accidents) in Table 9.3-1 that are covered by each malfunction and accident.
118-6.2	<p>AccidentsQuestions_02</p> <p>9.3.2 Differential Effects (Affected Populations)</p> <ul style="list-style-type: none"> <li>• “Any incidents affecting vegetation, surface water, freshwater fish, or wildlife may disproportionately affect sub-populations, particularly Indigenous communities, that rely on their ability to fish, hunt, trap, gather, and harvest in the area. For Indigenous communities, these are captured where interactions between a potential incident and Indigenous interests are identified (in Section 9.4: Moderate Risk Incidents and Section 9.5: Low Risk Incidents).</li> <li>• Any incidents affecting air quality or surface water may disproportionately affect members of the community with pre-existing health conditions.”</li> </ul> <p>While not specifically sited in EAO’s AIR, it seems odd that acoustic effects are not included in either two bullet points in this section. Noise effects animal and human, so fitting to be included.</p>	<p>ODV acknowledges the commentor’s request and acoustic effects will be included into the two quoted bullets of Section 9.3.2 in the revised Application, specifically:</p> <p>“Any incidents affecting vegetation, acoustic, surface water, freshwater fish, or wildlife may disproportionately affect sub-populations, particularly Indigenous communities, that rely on their ability to fish, hunt, trap, gather, and harvest in the area. For Indigenous communities, these are captured where interactions between a potential incident and Indigenous interests are identified (in Section 9.4: Moderate Risk Incidents and Section 9.5: Low Risk Incidents).</p> <p>Any incidents affecting air quality, acoustic, or surface water may disproportionately affect members of the community with pre-existing health conditions.”</p>
118-6.3	<p>AccidentsQuestions_03 Table 9.4-1 Moderate Risk</p> <p>Table 9.4-1 Moderate Risk Malfunctions and Accidents “Notification of appropriate authorities.” If this includes notifying the District (so that the public is notified), please note that the District doesn’t seem to work onsite more than 3 days a week, so notification of the public could be dangerously compromised. Please please please work out a system that supports a 24/7 notification system</p>	<p>The following mitigation will be added to the updated Chapter 9 (Malfunctions and Accidents), in Table 9.4-1 and Table 9.5-1, where the Mine Emergency Response Plan is identified as an applicable management plan for an incident (e.g. fire, explosives): “ODV will work with the District of Wells to update the Mine Emergency Response Plan to ensure appropriate notifications to the public in a timely manner (i.e., that supports a 24/7 notification system).”</p>
118-6.4	<p>AccidentsQuestions_04</p> <p>Table 9.4-1 Fire Description</p> <p>“Regardless, a major fire would likely be contained to the Project site and would have a minor localized effect on the surrounding environment.”</p> <p>What is the plan for a worst case scenario? Say one of the LP tanks explodes during fire season, and lights the side of Island Mountain on fire. What is your plan for that?</p>	<p>ODV acknowledges the comment and confirms that although a potential fire is assessed as potentially extending beyond the Project footprint, a major fire would most likely be contained to the Project site and would have a minor localized effect on the surrounding environment. ODV will update the text in Section 9.4.2.1 of the revised Application to include a cross-reference to Table 9.3-1 where new examples of incident types (including fire) will be provided. ODV also directs the reviewer to Sections 9.4.2.2 to 9.4.2.7 for the assessed extents of a worst-case fire scenario. ODV confirms that the mitigations proposed in Chapter 9 for a worst-case</p>

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		<p>fire scenario are sufficient to address all fire scenarios, including the following mitigations and key response procedures:</p> <p><u>Key Mitigations:</u></p> <ul style="list-style-type: none"> <li>• Muster stations will be identified and communicated to all workers.</li> <li>• The fire alarm system will consist of fire and smoke detectors, manual pull stations in strategically located sites in buildings, and audible and visual notifications.</li> <li>• The fire alarm system will be monitored 24 hours per day.</li> <li>• Buildings, vehicles, and mobile equipment will be equipped with the proper rated fire extinguishers.</li> <li>• Underground mobile equipment will be outfitted with fire suppression systems.</li> <li>• Emergency response to fires will be conducted by the mine rescue team, including personnel trained in firefighting and proper equipment use.</li> <li>• Comprehensive first aid facilities and qualified first aid attendants will be available.</li> <li>• All employees will be trained in the safe response to fires, fire alarms, use of standard fire extinguishers, and evacuation procedures.</li> <li>• Emergency evacuation training will be undertaken once a year for both underground and surface infrastructure.</li> <li>• Chemicals and refuse will be properly stored (e.g., ensure flammable and combustible materials are stored in specified known areas).</li> <li>• Managers will regularly monitor the BC Wildfire rating, weather conditions, and any fires in the Cariboo Regional District (CRD) to assess the risk to personnel, contractors, and equipment of the Project.</li> <li>• Procedures will be implemented to keep travel ways clear, allowing for safe egress to refuge.</li> </ul>



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		<ul style="list-style-type: none"> <li>• NEWLY ADDED MITIGATION: Implementing use of the Emergency WRSF Access Road between the Bonanza Ledge Site and Mine Site Complex, if required.</li> <li>• NEWLY ADDED MITIGATION: An outline of the role of the mine rescue team and required training, including the coordination of response with ODV and municipalities and emergency response departments, will be included in the Mine Emergency Response Plan, with attached applicable mutual agreements.</li> <li>• NEWLY ADDED MITIGATION: ODV will work with the District of Wells to update the Mine Emergency Response Plan (MERP) to ensure appropriate notifications to the public in a timely manner (i.e., that supports a 24/7 notification system).</li> <li>• NEWLY ADDED MITIGATION: If a major incident (malfunction or accident) associated with the Project occurs, the Mine Emergency Response Plan will be implemented, including notification of appropriate authorities and deployment of trained personnel.</li> </ul> <p><u>Key Response Procedures:</u></p> <ul style="list-style-type: none"> <li>• Initiation and implementation of Mine Emergency Response Plan.</li> <li>• Identification and control of risk to human health and safety.</li> <li>• Notification of appropriate authorities.</li> <li>• If safe and appropriate to do so [e.g., no toxic materials or burning leaks involved], use of fire suppression by trained personnel. If not safe or appropriate, evacuation and waiting for firefighters.</li> <li>• Recovery and remediation.</li> <li>• Accident investigation.</li> <li>• Follow-up monitoring, including assessment of incident causes and monitoring of affected VCs.</li> </ul>

Table 2.118-7 Comment #118 Attachment 7 - Responses

Number	Comment	Response
118-7.1	<p>Ch20_AppendixQuestions_01                      20.1 Summary of Mitigation Measures                      “The table also identifies the means through which mitigation will be achieved (Project Design Management / Monitoring Plan, or Permitting).” Thinking Like a Neighbour: An obvious line of mitigation is to not have problems arise in the first place. Starting a new process/activity for the Mine? *Have an ODV role to review the process experience, as if they live next door. Noise, dust, light, vibration, access limits etc. Any effect that might occur</p>	<p>As described in Chapter 6 Assessment Methodologies, Section 6.5.1 Mitigation Measures, the BC Environmental Assessment Act (BCEAA) defines mitigation as actions to offset the potential adverse effects of a project. After identifying potential negative project-related effects, mitigation measures are applied to avoid, minimize, or otherwise reduce, restore, or offset project effects. Enhancement measures can also be applied to further improve direct and indirect positive outcomes of a project to the human and biophysical environment. ODV’s primary goal is to avoid the necessity for mitigation altogether and to eliminate any potential effects that may arise. This is done through revisions to Project Design and Operational decisions in order to “not have problems arise in the first place” as the reviewer mentions.</p> <p>A formal Feedback email address (feedback@osiskodev.com) is provided on ODV’s website as well as a direct line phone number (778-414-8493). All questions, comments, compliments or complaints to these are responded to in a timely manner. ODV’s goal is to respond to emails within 24 hours of receipt. Sometimes these responses are a full answer to questions and other times we let the person know we have reached out to the technical team for more information and respond to them again once we receive it. If need be, meetings are set up to discuss topics further with the complainant to ensure the issue is fully addressed. All correspondence and resolutions are tracked and reviewed at monthly meetings with all departments to discuss and ensure the necessary information is disseminated to staff and employees.</p>
118-7.2	<p>Complaint Resolution                      What is the channel and resolution process for Community Members when life is being disrupted by Mine activities? Does ODV promise to act on Complaints immediately and follow through in a timely fashion, until completely resolved?                      If mitigation efforts fail to provide resolution, what further processes can be taken? What if ODV decides that there is no other mitigation measure available, and the complainant is still suffering from the effects of Mine’s activities? Then what?</p>	<p>A formal Feedback email address (feedback@osiskodev.com) is provided on ODV’s website as well as a direct line phone number (778-414-8493). All questions, comments, compliments or complaints to these are responded to in a timely manner. ODV’s goal is to respond to emails within 24 hours of receipt. Sometimes these responses are a full answer to questions and other times we let the person know we have reached out to the technical team for more information and respond to them again once we receive it. If need be, meetings are set up to discuss topics further with the complainant to ensure the issue is fully addressed. All correspondence and resolutions are tracked and reviewed at monthly</p>

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Number	Comment	Response
		meetings with all departments to discuss and ensure the necessary information is disseminated to staff and employees.
118-7.3	I don't see any of the Plans that are mentioned in 7.10-3 (Community Involvement Plan, SocioEconomic Monitoring Plan) but would like to know more about them and the "Community Monitoring Committee" that you propose.	Management Plans are typically developed during the Project permitting phase, which is separate from the Environmental Assessment process. These will be provided for review at that time. A Community Monitoring Committee has not yet been developed however ODV is still actively consulting with the community and government agencies on how best to implement such a committee.
118-7.4	Ch20_AppendixQuestions_02 20.1.1 Existing ODV Management Plans Mitigation Measure Plans that appear to be missing from the list: Acoustic, Light, Dust.	Acoustic, Light and Dust do not have existing independent Management Plans, but are instead components of the existing management plans identified in Chapter 20.1.1. including the Construction Environmental Management Plan, Occupational Health and Safety Plan and Waste (Refuse and Emissions) Management Plan. A Noise Management and Monitoring Plan will be developed for the Project.
118-7.5	Ch20_AppendixQuestions_03 20.1.3 Project-Specific Monitoring Plans (Noise Management & Monitoring Plan)"The plan includes the following key objectives: • ... • Mitigation measures planned to reasonably minimize effects from Project noise; and • ... Please define "reasonably". How does "reasonably" defend the public from ODV's reimagining of Wells as an Industrial Town. How does it defend the personal peaceful enjoyment of my home, and my professional ability to record wildlife and sound effects in the environment, which has already been compromised enough to stop trying? I moved up here for these things which have been significantly eroded over the last year plus.	The term "reasonably" in this context implies that although available standard and accepted measures will be implemented to minimize noise, it is not possible or practical to eliminate noise altogether. The District of Wells BYLAW NO. 93. enforces the level of noise at which ODV is allowed to operated and ODV will comply. Osisko Development encourages the individual to review the document BYLAW ENFORCEMENT: BEST PRACTICES GUIDE FOR LOCAL GOVERNMENTS (2016), provided by the BC Office of the Ombudsperson. <a href="https://bcombudsperson.ca/assets/media/Special-Report-No-36-Bylaw-Enforcement-Best-Practices-Guide-for-Local-Governments.pdf">https://bcombudsperson.ca/assets/media/Special-Report-No-36-Bylaw-Enforcement-Best-Practices-Guide-for-Local-Governments.pdf</a> . This document provides helpful guidance in understanding bylaw enforcement and the use of reasonable practices.
118-7.6	Ch20_AppendixQuestions_04 2.1.2 Surface Infrastructure Ventilation Raises appear to be missing, along with related machinery and buildings	Noted. This will be added to the revised Application.

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Number	Comment	Response
118-7.7	Ch20_AppendixQuestions_05 2.1.2 Surface Infrastructure “Security fence and access gate” Can this (and all gates) be visually designed to match the quaintness of Wells, verses a typical industrial gulag gate?	Security gates will need to be designed such as to meet industry and regulatory standards for health and safety and as such are limited in design options.
118-7.8	Ch20_AppendixQuestions_06 Cariboo_Gold_Chapter20_PLANS - OVERALL comment Will these Plans be submitted as a part of the Certificate Application? Awarding of a Project Certificate based on a plan for plans, leaves way too much blowing in the wind.	The development of Management Plans often requires input from both the Project permitting process (which is separate from the EA process) and from the Conditions imposed following the conclusion of the EA assessment. The mitigation measures described in the EA are necessary to determine whether an effect can adequately be managed, if implemented. For many potential effects, the implementation of a Management Plan itself, that follows the EA conditions, or conditions of a permit is sufficient to manage that effect.
118-7.9	Ch20_AppendixQuestions_07 Table 20.1-1 Summary of Proposed Mitigation Measures for the Cariboo Gold Project “Where practicable, select equipment with low emissions, such as Tier 4 generators, and engines that meet latest applicable Canada emissions standards and guidelines.” “Where practical” is far from good enough.	Osisko Development is required to ensure that all equipment meets the latest applicable Canada emissions standards and guidelines. Where practicable, ODV will go above and beyond the recommended standards and guidelines to implement the best available equipment, such as Tier 4 generators and also electric (emission free) vehicles. It should be noted that lower tier generators may in fact meet the applicable standards and guidelines, however Osisko Development has opted to purchase Tier 4 generators where possible and available in order to further minimize project emissions.

**Table 2.118-8 Comment #118 Attachment 8 - Responses**

Number	Comment	Response
118-8.1	Cariboo_Gold_General Questions GeneralQuestions_01 Where will the new (Wells) highway bypass be exactly, and what will it look like?	The location of the Wells Bypass is shown in Chapter 1 Figure 1.4-2. It will look like a turning lane.

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Number	Comment	Response
118-8.2	GeneralQuestions_02 There is a significant lack of discussion across the Application, with regard to the effects of winter temps, the icy highway and snow loads and clearing.	Winter conditions have been considered in the planning and design of the Project. It should be noted that most activity will be either underground or within the Services Building.
118-8.3	Example questions: - Will speeds of all vehicles be reduced by any amount, during the winter?	Osisko Development has committed to develop and implement a Traffic Control Plan and provide contractors, sub-contractors, workers, etc. with a copy of the Plan, including key highway and roadway regulations and roadway regulations upon on-boarding. There will be an implementation of and strict adherence to speed limits.
118-8.4	- Sound Propagation increases significantly as temperatures drop. None of the Acoustics related studies have air temperature factored in.	The acoustic study considered temperature, humidity, ground absorption or reflection, downwind conditions (where wind was assumed from every source to every receptor) as well as temperature inversion. Temperature effects were considered as zero and below; 0 to 10; 10 to 20 and 20 and above and the highest impact was presented.
118-8.5	- Where will the Mine Site & Haul roads cleared snow be stored in the winter?	The cleared snow will be stored on the Project footprint.
118-8.6	- Will the stored snow be trucked out in the spring to avoid unexpected flooding down hill	Snow will be stored in the Project Footprint. All contact water include snowmelt will be captured by the water management system.
118-8.7	- Will idling rules be upheld in the winter? Or will rules be put in place that workers set schedules that won't have them sitting waiting in their vehicles for 15 mins in the cold?	Equipment will be turned off when not in use to avoid unnecessary idling of motors
118-8.8	GeneralQuestions_03 When will Osisko be presenting information on Light Effects & Mitigation?	Light effects and mitigation measures are provided in Section 7.11 – Land and Resource Use. Osisko Development can present this information at an upcoming community workshop.
118-8.9	GeneralQuestions_04 Is there a plan for stated system of rules and ramifications for worker behaviors across procedures? Something that will give weight to the importance following the rules.	Workers will be required to follow the Employee Code of Conduct. Failure to comply with the Employee Code of Conduct, will result in action taken against the employee and may result in termination.

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Number	Comment	Response
118-8.10	GeneralQuestions_05 Not a question so much. There is already an unacceptable level of noise from ODV/BGM activities. Please explain how this is acceptable.	Exploration activities are outside of the scope of the environmental assessment. If you have concerns about current noise levels, please provide them to the Community Feedback email or phone line.
118-8.11	GeneralQuestions_06 Completely missing from these docs, is the use of surface drilling throughout the duration of the project. Am I missing something?	There are no surface drilling activities as part of the Cariboo Gold Project. Exploration activities will move underground.
118-8.12	GeneralQuestions_07 Will the interior of the Services building be treated for acoustics?	Yes, modelling underway to determine appropriate insulation
118-8.13	GeneralQuestions_08 There is very little info on the ventilation raises, and these almost require their own section. How will they be constructed? How will the power lines run to the fans? Please provide a visual mock up of any ROW clearing that you are required to do around the ventilation raises and their power lines.	Ventilation raises will be drilled by a raise bore. The fans will be powered by the power system within the underground mine. No powerlines are required on surface.
118-8.14	GeneralQuestions_09 There is a *lot* of vague and interpretable language in all of these documents.	Noted. Clarifications have been requested by the EAO and the document will be revised.
118-8.15	GeneralQuestions_10 There are significant gaps in information based on stated Planned for Plans that aren't in the application. This makes it impossible to assess some of the provided information. References to a yet to be created "Community Involvement Plan" for example. Considering there is no chapter on Community Effects (other than a few pages in the Application Summary), the Community Involvement Plan is a critical missing piece. Until we can read a plan, everything is speculation and hearsay.	High level descriptions of the Management and Monitoring Plans are provided in Appendix 20.1. These plans will be developed and submitted for review with the appropriate regulator during the permitting stage. The Socio-Economic Monitoring Plan will be submitted to the District of Wells for review and comment.
118-8.16	GeneralQuestions_11 There really should be specifics on Environmental Monitoring during Construction and Operation. When is that coming?	The Construction Environmental Management Plan will be developed and provided to regulators for review during the permitting stage.
118-8.17	GeneralQuestions_12 ODV's history is to implement new activities and wait to see what fall out there might be. There is nothing which leads me to believe that	Construction will not begin until all required permits have been obtained from regulators. These permits require detailed assessments, modelling

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Number	Comment	Response
	ODV will stop working from 'figure it out later'. This shoulders the Community with post complaints (which has been nearly every week for a year). This is effectively a form of servitude.	and technical reports, many of which have been underway for several years.

**Table 2.118-9 Comment #118 Attachment 9 - Responses**

Number	Comment	Response
118-9.1	Cariboo_Gold_Project_Overview.pdf ProjectOverview_01 1.4.1.3.1 Ventilation Raises What is the specific location of the Vents? There are only 3 that are marked in diagrams, as far as I can see. There is considerable noise related to such infrastructure. Please outline vent raises on a topographical map. What significant noise mitigation is planned for these vents, especially the ones within town, the meadow and Caribou habitat.	Figure 1.4-1 identified 5 ventilation raises: <ul style="list-style-type: none"> <li>• Mosquito Intake Ventilation Raise</li> <li>• Mosquito Exhaust Ventilation Raise</li> <li>• Shaft Intake Ventilation Raise</li> <li>• Valley Intake Ventilation Raise</li> <li>• Valley Exhaust Ventilation Raise</li> </ul> These ventilation raises are identified by a green triangle as described in the Legend and are labeled in the Figure.  Table 7.3-13 (Pg 7-33) of Chapter 7.3 – Acoustic identifies mitigation pertaining to operational noise, including noise from ventilation raises specifically.
118-9.2	ProjectOverview_02 1.4.1.3.1 Ventilation Raises “During the Project’s development, additional underground ventilation raises may be required, or the currently planned raises may be extended to reach the lower levels of the underground mine zones.” Please outline who would review and approve any additional Vents and if the public would be informed about such plans.	The requirement for additional ventilation raises would be reviewed and approved by the Ministry of Energy, Mines and Low Carbon Innovation (EMLI). The public would be informed of any Project changes.
118-9.3	ProjectOverview_03 1.4.1.3.1 Ventilation Raises “Existing access roads will be used to access the ventilation raises.” Please ensure that the vent infrastructure fencing, does NOT block any access roads or other trails on public land.	Osisko Development does not intend to block any existing publicly available access roads or trails on public land.

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Number	Comment	Response
118-9.4	<p>ProjectOverview_04</p> <p>Figure 1.4-15 Figure 1.4-15 shows non-contact water emptying into the Willow River. Figure 1.4-18 appears to be missing what appears to be the 3 potential inputs to the River as noted in Fig. 1.4-15</p>	<p>Non-contact water is managed to maintain natural flow levels in downstream environments. Figure 1.4-18 is a diagram showing the water management system for contact water.</p>
118-9.5	<p>ProjectOverview_05</p> <p>Figure 1.4-18 What defines an “Emergency” which would require the discharge of untreated water from the Sediment Pond and Inflows, into the Jack of Clubs Lake?</p>	<p>The current water balance model in the Water Management Plan (WMP) does not consider the non-contact diversions that capture natural catchment runoff, only the mine contact areas and resulting contact water that is to be treated. As such, these flows are not in the model diagram.</p>
118-9.6	<p>ProjectOverview_06</p> <p>If “Emergency” included overflow due to seasonal weather/rain, how often do you expect the discharging to occur? Will water testing increase in times that the discharging is happening?</p> <p>Will the Community be notified when discharging is happening? How will the Community be notified? Will there be an audible notification associated with Emergency Water Releases?</p>	<p>The Mine Site’s stormwater management systems will be designed for a 1-200 year stormwater event. Water Quality monitoring stations are currently established near Wells and further stations will be established after construction of Project Infrastructure. During extreme flood events, monitoring equipment could be dislodged and it is typically unsafe for workers to take measurements.</p> <p>Emergency procedures will be established for Project activities.</p>
118-9.7	<p>ProjectOverview_07</p> <p>1.4.1.2 Figure 1.4-2</p> <p>This map shows the Valley Portal as being accessed outside of the Services building. I thought you said access would be from within the Services building. So to be clear, equipment traffic will be transiting the portal on the outside of the Services building?</p>	<p>A full description of the Valley Portal is provided in Chapter 1, Section 1.4.1.3 of the Application. Valley Portal Design Plan and Cross Section Views are presented in Figure 1.4-6. Chapter 1 of the Application is available at on the Cariboo Gold EPIC website. Equipment traffic may transit the Valley portal. It is assumed that the commentor is referring to the statement that no material (ore or waste) will transit from the portal. All ore will be sent with a vertical conveyor directly inside the concentrator (service building). The waste will be return underground by a waste pass (vertical excavation gravity feed) to the underground mine.</p>
118-9.8	<p>ProjectOverview_08</p> <p>1.4.2 Transportation Route</p> <p>“18 to 20 transport truckloads per day (roundtrip; maximum 25 per day)” This is already a lot of heavy traffic using highway 26 and there can be a shortage of passing infrastructure opportunities. It’s easy to get stuck behind a slower moving truck for 15 minutes. You state “Upgrades to the existing Transportation Routes are not required as</p>	<p>A Traffic Impact Assessment was completed, and provided as Appendix 1.0-9. The study identified that a mitigation measure for managing service vehicles would be to schedule supply deliveries outside of commuter peak hours. As well, please refer to Chapter 7.12 for a full assessment of traffic related impacts. The assessment of existing conditions related to Road Transportation begins at Section 7.12.3.5.4.1. Discussion of Project related effects resulting in increased traffic volumes</p>



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Number	Comment	Response
	part of the Project.” This project’s traffic increase represents a significant change to timely and safe use of Highway 26 by all users. Please explain why you do not think additional infrastructure is required, based on your planned and other unexpected/mentioned increased use	is provided in Section 7.12.4.4.2.1. Discussion of management and mitigation is provided in Table 7.12-18. Characterization of Residual effects related to Traffic are provided in Section 7.12.7. The summary of residual effects does not warrant changes to Highway 26 infrastructure.
118-9.9	ProjectOverview_09 1.4.2 Transportation Route “A Project traffic study was completed and is provided in Appendix 1.0-9.” The Appendix is empty?	The Appendix is available at on the Cariboo Gold EPIC website.
118-9.10	ProjectOverview_10 1.4.4 Transmission Line “The Transmission Line would require ROW dimensions of a maximum of 40 m in width” 131 feet of cleared land from Barlow Creek to Wells? Please explain the logic for how the transmission line won’t affect the Caribou’s habitat? Additionally, please show mock ups of how a 131 foot gash (ROW) along Island Mountain as the line enters town, will look from town! Please include the towers in the mock ups. I would suggest showing the ROW mock up from multiple views: Driving west from Barkerville (around Stromville), from the silver bridge in the meadow, from the school field and, on the highway between Pooley & the bridge. Also please create a mock-up of what the lines will look like, crossing the highway at the entrance to Wells.	A full discussion and assessment of Impacts and associated mitigations measures pertaining to Caribou habitat as a result of the Transmission line are provided in Chapter 7.8 – Wildlife. Discussion of habitat alteration and associated mitigation for Caribou begins in Section 7.8.9.3.1.  An assessment of visual impacts from the Project is provided in Chapter 7.11. It is acknowledged that Appendix 7.11-4 – Visual Quality Effects Assessment was erroneously submitted. The document provided was in fact only a subsection to this Appendix. The full Visual Quality Effects Assessment will be submitted to the EAO for review.
118-9.11	ProjectOverview_11 1.4.4 Transmission Line <sup>SEP</sup> “Generators will be installed near the Mine portal areas for use during Mine Site construction and until the Transmission Line is operational.” Please explain how loud these generators will be, when exactly they will be running, and how you plan to mitigate the noise.	Please refer to Chapter 7.3 – Acoustic for a full assessment of effects pertaining to noise, including characterization of residual effects and mitigation for Operations noise and low frequency noise. Specific to generators, as a mitigation measure, all generators will include Sound Attenuated enclosures with an engine muffler providing a total sound power of no more than 98 dBA.
118-9.12	ProjectOverview_12 1.5.1 Project Phases The Project Phases Duration chart seems off in relation to the duration of the EA. The EA process is ~2 years. There appears to be a	Construction of the Project may only occur following receipt of an Environmental Assessment Certificate. Table 1.5-2 indicates Project phases and associated activities from the date of Submission of the Application (Q3 2021). The EA process, however, began well before this date. It is anticipated that if an EAC is issued, the completion date for this

# CARIBOO GOLD PROJECT

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Number	Comment	Response
	<p>Construction Phase starting before the project is Certified. In the Project Overview 1.5.2 Project Schedule there is the statement “Construction start dates are subject to receipt of the EAC and required permits and approvals, and are presented as estimates based on current schedule assumptions.”</p> <p>Please clarify this contradiction. <del>SEPSEP</del> And, if the CGP needs to get ahead of Year 1, by constructing without a project Certificate, wouldn't that be presumptuous and potentially leave Wells in disarray, should the certificate not be approved or a new application be submitted with the Services building somewhere else?</p>	<p>will be approximately Q3 2022, at which point, Construction will commence. Any construction related activities that require additional permits may only commence upon receipt of those permits.</p>
118-9.13	<p>ProjectOverview_13 1.5.1.4.5 Reclamation Strategy</p> <p>Thank you for these images, but it's not sufficient to show such mock ups from one location only. Especially, from a vantage point that minimizes the impact. Please add images from 3-4 additional vantage points, at a further distance away.</p>	<p>Additional information on visual impacts and proposed mitigation is provided in Chapter 7.11 and Appendix 7.11-4.. It is acknowledged that Appendix 7.11-4 – Visual Quality Effects Assessment was erroneously submitted. The document provided was in fact only a subsection to this Appendix. The full Visual Quality Effects Assessment will be submitted to the EAO for review.</p>
118-9.14	<p>ProjectOverview_14 1.5.3 Summary of Changes from Detailed Project Description</p> <p>“The locations for Mine Site effluent discharge have been adjusted. Locations for effluent discharge can be seen on Figure 1.4-17.” In looking at this new location for Effluent Discharge, I'm perplexed as to the justification for the risk of discharging potentially harmful substances directly into a recreational area. People paddle the river and swim less than a kilometre downstream. How can this be justified?</p>	<p>Locations for Mine Site effluent discharge have been determined to minimize the potential effect on the receiving environment. Assessment of existing conditions, potential project related effects and mitigation measures for Human and Ecological health is provided in Chapter 7.13 and associated Appendices. All project related effluent must meet Ministry of Health, and regional Health Authority standards, guidelines and conditions. Chapter 7.13 describes the mitigation measures to ensure these standards and guidelines are met.</p>
118-9.15	<p>ProjectOverview_15 Table 1.5.2 Cariboo Gold Project Milestones</p> <p>Please describe how you plan to mitigate all of the Acoustic and Dust effects that will occur as a result of such a massive amount of sporadic and new upwind (of town) construction activities. Also, it's stated elsewhere in the application, that all Production Equipment will be outfitted with mitigation (Electric, noise based back up alarms, etc). Will this be the case with any Contractor Construction Equipment as well?</p>	<p>Mitigation measures pertaining to Acoustic effects are provided in Chapter 7.3 - Acoustic, Section 7.3.5 – Effects Management.</p>

### 3. REFERENCES

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- Environmental Assessment Office (EAO). 2020. Compliance and Enforcement Policy and Procedures. Available at: [https://www2.gov.bc.ca/assets/gov/environment/natural-resource-stewardship/environmental-assessments/compliance-and-enforcement/eao\\_ce-policy-procedures\\_march2020.pdf](https://www2.gov.bc.ca/assets/gov/environment/natural-resource-stewardship/environmental-assessments/compliance-and-enforcement/eao_ce-policy-procedures_march2020.pdf). Accessed October 2021.
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# APPENDIX A PUBLIC COMMENT ATTACHMENTS

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## A.1 Comment #1

Visual Assessment.

There are a variety of shortcomings of the visual assessment.

Building Colour:

Selected colours make the assumption that the building can be disguised and that it is against a green or dark background. The reality is that this location receives snowfall 6 to 7 months of the year, so building colour would have to account for seasonal variations.

How will Osisko solve the problem of the building being highly visible?

Can you add more VQ analysis of the building in Winter?

Can you add the power line and poles and sub station to the VQ?

Will there be emissions from the building?

Will there be lighting visible to the public?

If there are steam, smoke, or other emissions how will Osisko mitigate the visual effect?

This is an example of a similar sized building in a valley, but with emissions drawing attention to it.



Figure 3.0-3 VPI\_DSP (Sugar Creek Loop Access) - Project - Operations Phase - Year 2



Camo coloured concentrator in red circle



Current 50 mm view from submission w/red circle

Current 50 mm view from 50' east, shows more of concentrator location (in red circle)



Wide angle view Google Street view from same location in May, 2012. Even more visibility without leaf cover w/red circle

Pg 8

fig 3.0-3

Pano taken from curb level.

50' from photographers left, and from the cab height of a pickup, there is a much better picture of the concentrator, with a clear view between the tree.

(See sample photo)

This image and all other VQ assessments took place at maximum foliage cover. Spring and Winter simulations would be useful, since 8 months of the year we do not have this much vegetation screening. (See May Google Earth street view) Also, consideration of building colour should include winter landscape (see photo below in April).

Please redo this simulation in alternate seasons



Page 10  
fig 3.0-6

What construction does this figure show? It looks like a multi-storey building at the Aurum site near the museum.

Page 12  
fig 3.0-9

Where is the building visible in figure 3.0-6?

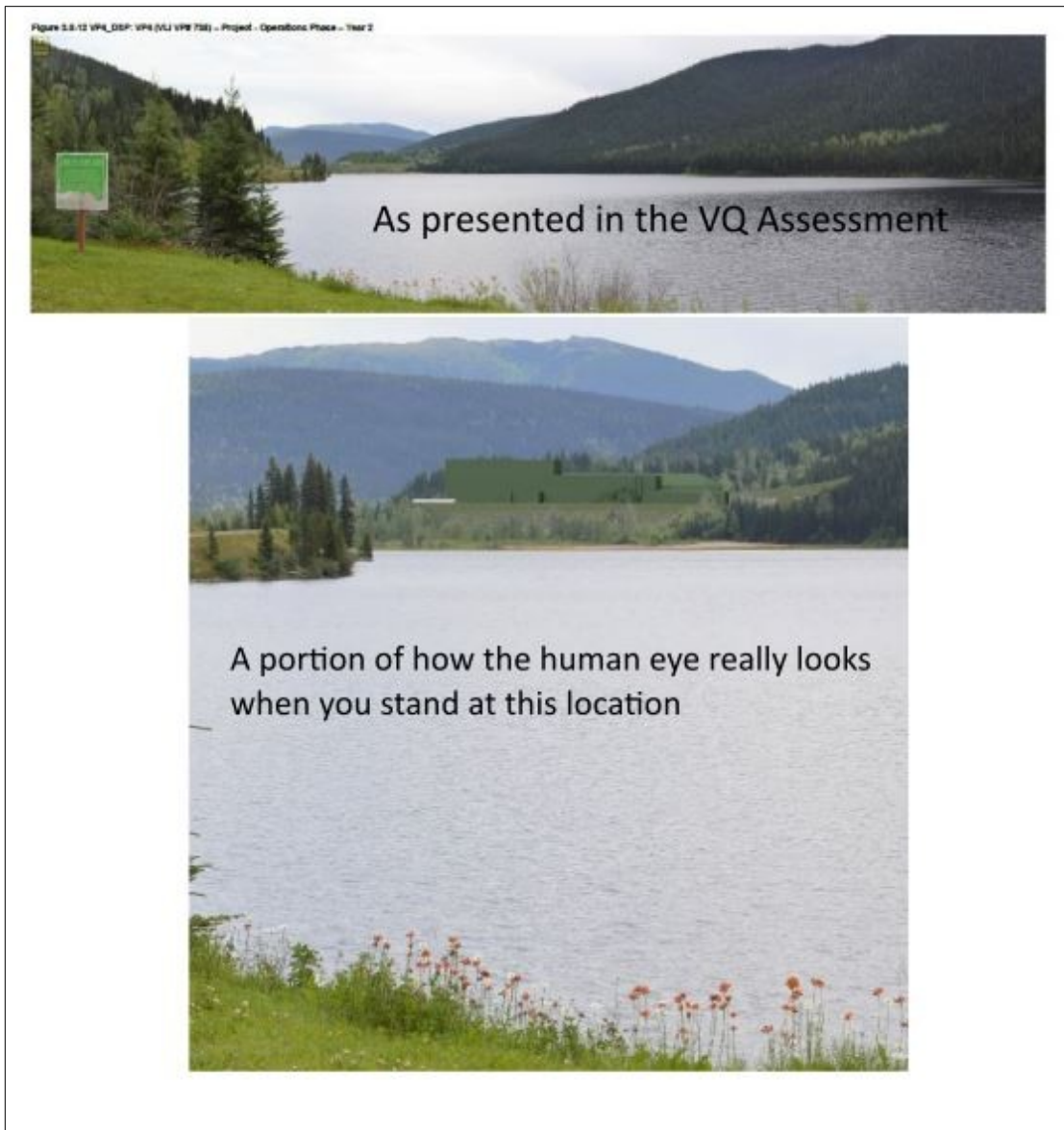
Winter simulations would be useful, since 6 months of the year we do not have this much vegetation screening, and building colour will stand out against white landscape.



Compare fig 3.0-6 with this pano photo from the same location in May. Much more of both the concentrator and the Aurum Adit are visible. Please account for this:

Page 14  
fig 3.0-12

This is a perfect example of the inadequacy of VQ data. Although the wide angle shot accurately depicts the size of the building, the photo doesn't account for the human eyes ability to focus on the anomaly. (Note, for instance, the effect of the sign on the viewer...even in the submission.)



Human Activity, emissions, dust, also not accounted for  
 Winter simulations building colour will stand out against white landscape.  
 Please indicate how you will mitigate these issues.

Pg 16

fig 3.0-16

Should include power line and sub station.

Some of the landscape has been cropped out of this photo for some reason(an entire mountain in the background behind the Taco stand):

This viewpoint also includes the activity at the Aurum. Although it is difficult to include such a wide panorama in the image, the fact remains that viewers in the area of the visitor information center have a panoramic view. In Year 2, a person standing here would also view activities at the Aurum, the intersection and bridge at the hwy, access road activity as well as the water treatment tower, concentrator and ventilator shaft.

Please also include a VQ from this location of the Aurum, Bridge, and power line.

Will there be emissions in the visual field?

This VQ assessment is inadequate, please provide more details

pg 18  
fig 3.0-18

Also fails to include new intersection, power lines ascending the hill.  
The 69 kv line indicated in this photo is a 70' pole structure.  
More of these should be shown in the photo.



#### PHOTO

The lawn-belt ascending the mountain doesn't have a top. I would like to see the rest of this powerline corridor from this location.

In addition, the distortion from the wide angle view of this photo, makes the lawn-belt look under 35 deg, but in fact, this is currently almost a cliff. The distortion shrinks the truck(which in reality is only 150m from the viewer, and falsely moves the adit back from Pooley Street.

Assuming that the adit door is a minimum 10' tall, and that the benches are 20' tall the trees on the landscape are too big for year three.

Below is an example of a nursery grown tree, transplanted as a large tree, and 21 years old. Despite being selected for hardiness by a local Quesnel nursery, and being planted in fertile soil in a protected location, it has only just attained the height of the trees (7 m) in the photograph.

At best, the trees in the VQ example will have been in the ground for 2 years.

Can you confirm that that there are about 500 trees in fig 3.0-18?

Will you be benching each terrace with fertile topsoil?

What is the estimated height and depth of each bench?

What is the approximate slope angle of the power line right of way?

Can you show the right of way where it turns and runs across the mtn?

How do you anticipate achieving these spectacular results with planting as shown in the VQ?



#### GENERALLY SPEAKING:

All overhead figures(such as 3.0-7, 13, 18) should at least show all the items the VA is trying to include. The concentrator is drawn on these aerial maps, and the camp, but not the second, (and third?) large buildings illustrated in fig 3.0-9 and fig 3.0-15, That would be useful to help the viewer orient themselves to the projections. In addition, it would be useful to include the 80,000 white propane tanks and infrastructure at the ventilator, or substation.

#### PLEASE ADD MORE VQ ASSESSMENT STATIONS

##### #1 VQ STATION

For 2 km in length, (the 1 mile bridge to West Pooley street) the entire Island Mountain will be in view to westbound traffic. Can we see a visual mockup take from near the 1 mile bridge that includes all the visual impacts current and proposed, including the 2 power corridors, ventilator shafts, current and future drill pads and roads?



If a particular mine asset is hidden, it would be helpful to have that labelled so that we know it has been included and is screened.



### #2 VQ STATION

For 1 km from the Recycle Depot to the new proposed 4 way, the viewscape includes the entire panorama of disturbed site on the B road, the Concentrator Area, the Aurum Adit and the Power infrastructure.



**Concentrator, Aurum Adit, Two power line corridors,  
Not shown: B road to left of concentrator**

Given that it is impossible to recreate the human experience with a pano this large, I would like to see an aerial shot of these components, and then panos of each of them in succession, so we could imagine the working environment of the mine from the town.

One suggested location would be the high traffic location at the corner of Camel Drive.

### #3 VQ STATION

A third location should be done from East Pooley Street in front of the old Jack O Clubs Hotel

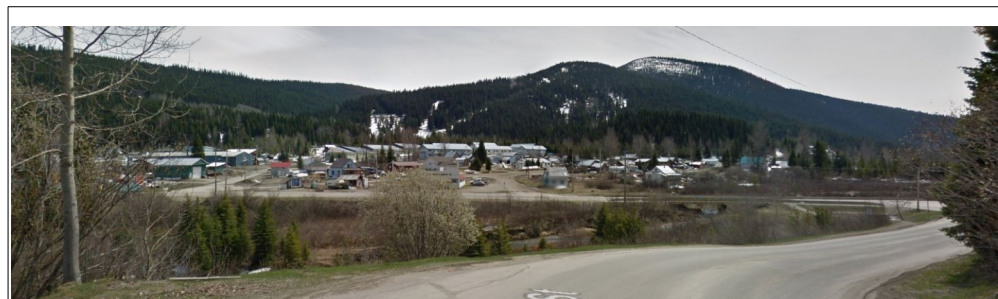


Figure 1: #3 VQ Station. Pooley street from Google earth

## A.2 Comment #5

## 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.

Dave Jorgenson

## A.3 Comment #9

In the past couple of months, Osisko/BGM has received complaints about constant and relentless noise from 24-hour exploration drills on mountains adjacent to Wells, affecting residents' quality of life in a town where quiet is valued. Without redress to date.

Osisko was asked about about drilling noise at the Cariboo Gold Project's EA Virtual Open House on Sept. 23, 2021, during a written q. and a. period:

a) 'ODV/BGM has ca.11 exploration drills around Wells now which means drilling noise 24/7 in Wells. This contravenes the Wells Noise Bylaw which calls for quiet from 10 pm – 7 am. If you're not honouring the Wells Noise Bylaw, how do we have any confidence you'll honour other assurances you're making in your mine application?'

Similarly:

b) 'Can you tell us how we can trust the information that you are telling us today, when your Explorations group is not honouring the rights and following the law, within the District already?'

Osisko's Vice-President of Project Development, Francois Vezina, stated the company was in compliance. At first, he said the company's operations fell under Cariboo Regional District regulations and the continuous drilling noise was a permitted use. When he was corrected -- that this activity is within District of Wells jurisdiction -- he still asserted it was a permitted use, and fell under Exemption 6.g where the Noise Bylaw is not enforced for anyone 'conducting reasonable business and commercial activities.'

In fact, Exemption 6.g of Bylaw 202-2021 does not apply to all night drilling noise by a private company and ODV/BGM has just recently been ticketed by the District of Wells for Noise Bylaw infractions.

The company's actions are extremely concerning. First, they break the District's Noise Bylaw and then claim compliance through a generous and incorrect interpretation what they think is a loophole.

The Cariboo Gold Project has a million moving pieces with numerous potential impacts for residents of Wells. If Osisko's Exploration activities are not honouring the Wells Noise Bylaw, how can we trust any of their claims to mitigate negative impacts of the Project?

Other examples of violations are found here: <https://fredinwells.wordpress.com/2021/07/26/what-is-your-ideal-corporate-guiding-philosophy/>.

It should also be noted that at Osisko's Malartic open pit gold mine in Quebec, residents initially welcomed the development.<sup>1</sup> After a few years, residents launched a multi-million dollar class action suit for damages related to noise, dust and explosions.<sup>2</sup> While the Cariboo Gold Project would be

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1 <https://nationalpost.com/news/the-town-that-will-become-canadas-biggest-gold-mine>

2 <https://truenorthjournal.ca/2017/06/malartic-town-consumed-mining/> and <https://miningwatch.ca/blog/2012/11/2/living-near-mine-can-be-pits>



underground, there are substantial above-ground structures and activities. And once underway or built, there's no going back.

At the Sept. 23 Open House Mr. Vezina also said: 'We are not the bad guys. We are good people. We have good core values. We care about the community.'

I very much want to believe that, since this town needs an economic boost and the diversity a mine could provide. Indeed, Osisko's contributions to some Wells infrastructure projects and to Barkerville's summer season are appreciated. Further needed benefits are expected under a Community Benefit Agreement.

But some of ODV's activities during the Exploration phase, such as unrelenting drilling noise, don't inspire confidence about impact mitigation during the mine's Construction and Operation phases. (And noise impact is not something to be traded away for other community benefits).

It also doesn't inspire confidence when the Minister of Mines reportedly told District of Wells representatives at a recent UBCM Ministerial Meeting that 'while he understands the concerns of impacts such as noise and dust, he believes Osisko Development is owned and operated with a history of very high standards. Osisko has stated to the Ministries that they will mitigate the impacts.' It already appears the Ministry of Mines will take the company at its word.

I fear Wells residents are entering years of continuing negative impacts and constant vigilance that regulations regarding Valued Components are upheld.

Thank-you for the opportunity to comment.

## A.4 Comment #13

## Sewage treatment for the Mine Camp:

The Proposal for the mine includes a holding tank and 700 m septic field for the residential camp, that will conform to the Municipal Waste Water Regulation.

I have some concerns about the location and size of this facility. A 200 man camp will effectively represent the waste production of the entire community of Wells. The proposal to locate the sewage treatment at the site indicated on the map raises some questions.

Presumably a perk test has been done at this site? Currently, it is a low wet bog, at the confluence of three surface and subsurface streams from the mountainside. These streams have a diffuse discharge along the south side of Lowhee Creek, just a few metres from the end of the septic field. As well, Lowhee Creek exhibits some ongoing erosive effects along that section of unprotected bank.

The District of Wells is in an ongoing flood protection 'dispute' with provincial authorities regarding the armouring of Lowhee Creek. I am concerned that adding the water discharge from a 200 man camp to the already saturated ground in the proposed location may result in additional soil instability which may cause environmental damage or increase the liability of the city or the province regarding stream protection in municipal boundaries. In addition, a significant flood event in the creek could threaten the entire septic system with damage or destruction. Finally, given the ongoing wet draining effect of the existing groundwater, and the short distance to the creek, I am concerned that there may be leaching of bacterial loads into Lowhee Creek above a community recreational swimming area (at the 'Y', or even compromise the community discharge readings from stream flow samples below the community water treatment center.

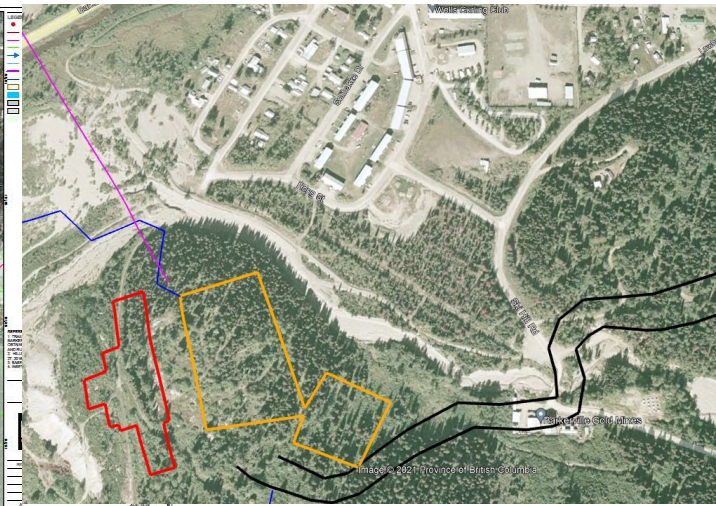


Figure 1: Mine/Camp and Septic Field (Square) *Figure 2: Google earth image of wetland at Septic site.*

What assurances does Osisko have that this site is appropriate for the intended use?

## A.5 Comment #14

# Site Selection – Selection of Alternatives

Submission Analysis by Dave Jorgenson for the Cariboo Gold Project – Community Advisory Committee.

Following is a point by point comparison of Osisko's claimed site selection justifications with appropriate comment refuting their claims. I would like the members of the Technical Advisory Committee to consider this on-site analysis as they draw their own conclusions, and I would like Osisko to address each of the points individually to provide some justifiable response to my comments. Invariably, their site selection criteria erroneously favours Option 4(Mine Site), although our responses indicate overwhelming favourability for Option 5(Cow Mtn Site)

In this document, (section 1.7 of the Project Overview), Osisko appears to be making the facts fit the outcome they wish to achieve. They do this;

1. through the use of inaccurate language, (eg implying Option 4 has a shorter power line, or that an extra 12 Km of road would require upgrades with Option 5 Cow),
2. by misreporting the options available(Failing to address the construction of the Aurum Adit in the site selection process, and failing to note that selecting Option 5(Cow), would include development of the Mine site as a developmental adit, waste rock storage area, and water treatment facility), and
3. by ignoring the cumulative effects of each decision choice(eg failing to account for the additional reclamation impact and expense with Option 4(Mine) from building both the road and the Aurum Adit on the edge of Wells residential boundaries, or, for example, the additional carbon footprint from surface trucking, road construction and maintenance from choosing Option 4 to Bonanza WRSF).

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Documentation from Osisko in blue  
*Alternative analysis in red.*

Topic	Considerations	Mine Site Location	Cow Site Location	Preferred Location
Mining	Paste Network	<ul style="list-style-type: none"> <li>Vertical boreholes for paste backfill</li> </ul>	<ul style="list-style-type: none"> <li>Horizontal paste conveyance on surface requiring more pumping and surface disturbance</li> </ul>	
			<ul style="list-style-type: none"> <li>No explanation why vertical bore holes couldn't also be used at Cow site.<sup>1</sup></li> </ul>	<i>Unknown.</i>
	Material Handling	<ul style="list-style-type: none"> <li>Rail-Veyor© system, vertical conveyor and trucking for ore transport to Services Building</li> <li>Crusher located underground</li> </ul>	<ul style="list-style-type: none"> <li>Rail-Veyor© system and trucking for ore transport to Services Building are more complex</li> <li>Crusher located on surface</li> </ul>	
			<ul style="list-style-type: none"> <li>No explanation for putting the crusher on the surface.<sup>2</sup></li> </ul>	<i>Cow Mtn Site</i>
	Development	Less development required than Cow Site.	<ul style="list-style-type: none"> <li>Additional 800 m of development compared to Mine Site location</li> </ul>	
			<ul style="list-style-type: none"> <li>More explanation needed as to why Osisko believes an additional 800 m of development would be required.</li> </ul>	<i>Unknown.</i>

**Footnote 1:** Both sites sit on the ore body, and both sites will require horizontal transportation at the ore body, during the development of the mine. Given the angle of the ore bodies from Cow to Valley, it is not clear why surface transport of paste backfill would be required.

**Footnote 2:** If the crusher was underground it could be entrenched in the ore body, exactly as proposed in Option 4(mine). Unlike the Mine Site, the Cow site(option 5) will allow for 24 hour surface operations including trucking, increasing operational efficiency and decreasing technical expense.

Documentation from Osisko in blue  
*Alternative analysis in red.*

Topic	Considerations	Mine Site Location	Cow Site Location	Preferred Location
Surface Infrastructure	Electrical	<ul style="list-style-type: none"> <li>• Shorter length of powerline construction required.</li> </ul>	<ul style="list-style-type: none"> <li>• Additional powerline extension to Cow Site</li> </ul>	
		<ul style="list-style-type: none"> <li>• <i>Erroneous to say that less line is required for Option 4. See <b>Appendix 1</b> with route map corrections.</i></li> <li>• <i>High voltage power line crosses Highway at Visitor Centre.</i></li> <li>• <i>Substation visible from community, 200m from residential buildings.</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Less surface disturbances.</i></li> <li>• <i>Lower environmental impact.</i></li> <li>• <i>No disruption of visual quality objects of CCLUP &amp; QSRMP.</i></li> <li>• <i>Low voltage power lines only cross Highway once at tourism gateway.</i></li> <li>• <i>Substation would be hidden from public view.</i></li> </ul>	Cow Mtn Site
	Site Access	<ul style="list-style-type: none"> <li>• Fewer road upgrades required</li> </ul>	<ul style="list-style-type: none"> <li>• Additional 12 km of road upgrades</li> </ul>	
		<ul style="list-style-type: none"> <li>• <i>2.4 km of new virgin mine-site road required to access Bonanza waste rock storage.</i></li> <li>• <i>Aggregate will need to be hauled from Tucker Lake mine via Highway 26 which is a public route.</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>+12 km of road upgrades are NOT needed!</i></li> <li>• <i>Pinkerton FSR is already in use all-season &amp; already a major arterial haul road for West Fraser with GVW capacity exceeding the weight of loaded ore trucks.</i></li> <li>• <i>Osisko will already be using Pinkerton FSR to move material from Tucker aggregate mine. Bonanza waste rock storage is 2.4 km closer on a pre-existing, flat-level road.</i></li> </ul> <p><i>See <b>Appendix 2.</b></i></p>	Cow Mtn Site

## ENVIRONMENTAL CONSIDERATIONS

### Submission from Osisko in blue Alternative analysis in red.

Topic	Considerations	Mine Site Location	Cow Site Location	Preferred Location
Surface Infrastructure	Electrical	<p>*Minimal disturbance required for electrical upgrades</p>	<p>*Additional greenfield disturbance due to powerline extension to Cow Site.</p>	Cow Mtn Site
		<p>Greenfield site disturbance is the exact opposite of this description. By bringing the 69kV line up Slough Creek the line length is identical, however:</p> <ul style="list-style-type: none"> <li>*2 km of travel through Wells viewscape disrupting tourism values</li> <li>*interferes with goals of the CCLUP and the QSRMP</li> <li>*two power lines cross hwy at Visitor Center.</li> <li>*Substation in community viewscape.</li> </ul>	<ul style="list-style-type: none"> <li>*avoids all OGMA surrounding Wells</li> <li>*travels exclusively through working forest</li> <li>*reduced caribou impact by confining development to one side of Island mountain, and combining corridor uses with mine access, forestry, and aggregate mine</li> <li>*substation hidden from viewscape</li> </ul>	
	Site Access	<p>*Minimal disturbance required for site access upgrades</p> <p>*New 2 km mine road req'd on hillside identified as hazardous, by NRCAN (appendix 7.1, 7.2) for site access between Minesite and WRSF</p> <p>*Additional site access impacts at Island Mtn for Aurum Adit, adjacent to Wells residential area</p>	<ul style="list-style-type: none"> <li>• Additional 12 km of road upgrades</li> </ul> <p>*FSR already exists and exceeds GVW design for ore trucks</p> <p>*road is outside mine footprint so it avoids Mines Act design limitations and NRCAN site stability concerns</p> <p>*FSR will also be used by Osisko for Aggregate mine and logging, and electrical, reducing total environmental impact.</p>	Cow Mtn Site



## ENVIRONMENTAL CONSIDERATIONS

Submission from Osisko in blue  
Alternative analysis in red.

Topic	Considerations	Mine Site Location	Cow Site Location	Preferred Location
Water and Waste Management	Water Management	<p>*Smaller watershed limited to infrastructure footprint</p>	<p>Larger watershed on mountainside</p>	<b>Cow Mtn Site</b>
		<p>*The total watershed impact size is identical since both projects impact the watershed of Lowhee Creek and Jack O Clubs Lake and Creek, and both options utilize the Bonanza Ledge WSF which is at the top of the watershed and requires haul road construction from top to bottom in Option 4 but only from middle to bottom in Option 5(Cow).</p> <p>*The pipeline construction from top of watershed to the water treatment plant will occur along the entire length of the watershed regardless of the option.</p> <p>*The analysis implies that the Mine building footprint would be smaller at the minesite, than at Cow, but this will be offset by 1.5 km of new mine road construction on a greenfield site inside the viewscape of the Wells residential area which are necessary components of Option 4 but not necessary for Option 5.</p> <p>*According to the guidelines for Mine Haul Road design, a 4 m wide truck with a passing lane requires 14 m of roadbed, plus a minimum of 3 m or more for the tire berm. This road will be constructed on grades that exceed 10% requiring the construction of runaway lanes as well. Even without the impact on the viewscape of the runaway lanes, and their additional construction square footage of impact on the watershed, this minimum 17 m wide with just 1 m ditching, and just 3 m per side of tree clearing will require over 35,000 sq metres of additional watershed disturbance (more than twice the square meterage of the proposed concentrator building). This Option-4-specific-disturbance offsets the increased disturbance from construction on the Cow site amongst multiple smaller buildings.</p>		
	Waste Management	<p>*Reduced total waste rock volume requiring storage on surface</p>	<p>*Increased total waste rock volume requiring storage on surface due to increased development</p> <p>*Additional surface disturbance relating to increased length of paste fill distribution.</p>	<b>Cow Mtn Site</b>
		<p>*Increased total waste rock from 2.4 km mine road, Increased total waste rock from Aurum Adit on Island Mtn</p>		

**ENVIRONMENTAL CONSIDERATIONS**  
 Submission from Osisko in blue  
 Alternative analysis in red.

Topic	Considerations	Mine Site Location	Cow Site Location	Preferred Location
Closure	Reclamation	*Existing Disturbance	Limited Existing disturbance	<b>Cow Mtn Site</b>
		*Existing disturbance in both locations. *Option 4: Additional disturbance from new Roadbuilding and creation of the Island Mtn Adit. *Due to visual quality impacts noted above, Option 4 has greater reclamation impact on Wells, and CCLUP		

## SOCIO-ECONOMIC CONSIDERATIONS

Submission from Osisko in blue  
 Alternative analysis in red.

Topic	Considerations	Mine Site Location	Cow Site Location	Preferred Location
Surface Infrastructure	Portal Locations	*Valley Portal Proximal to District of Wells	*No Valley Portal Required	Cow Mtn Site
		*Second Portal at Island Mtn (Aurum site) *Additional road construction to access portals.	*Valley Portal becomes secondary entrance, farther from townsite than Island Portal	
	Building Locations	*Services Building located Proximal to District of Wells	*Services Building not visible from District of Wells	Cow Mtn Site
	Site Access	*Minimal Upgrades will not significantly change site access	*Addition 12 km of road upgrades may increase site access and traffic *Cow site would connect to Highway 26 further from Wells, reducing traffic proximal to community	Cow Mtn Site
*Second Portal at Island Mtn (Aurum site) will require additional access construction in Wells *New significant site egress road on Cow and Barkerville Mtn req'd		*No additional town traffic from minimal changes to 12 km road. *No Second Portal or access req'd at Island Mtn(Aurum site) *Shorter, flatter access between portal and WRSF		
Water and Waste Management	Water Management	*Small watershed, limited to infrastructure footprint, therefore minimal impact on water use outside of Project Footprint.	*Large watershed on Mountain side therefore greater possibility that water management for Cow Site may impact water use outside of Project Footprint	Cow Mtn Site
		*Entire watershed will be used, due to WRSF at Bonanza Ledge, Intake Ventilator on top of Cow, WRSF Emergency Access Road.	*Site capitalizes on surface infrastructure already planned for upper Lowhee and removes water management issue from 'B'Road 1.4.1.2.2	
	Waste Management	*Reduced total waste rock volume requiring storage on surface	*Increased total waste rock volume requiring storage on surface due to increased development *Additional surface disturbance relating to increased length of paste fill distribution.	Option 4 Mine Site

## SOCIO-ECONOMIC CONSIDERATIONS

Submission from Osisko in blue  
 Alternative analysis in red.

Topic	Considerations	Mine Site Location	Cow Site Location	Preferred Location
Closure	Reclamation	*Existing disturbance which wouldn't be reclaimed	*Limited existing disturbance; additional disturbance required	Cow Mtn Site
		*The statement above is UNTRUE. Option 5 requires the development and reclamation of this site. *Additional road construction to access second portals, greater impact on Wells	*Large amount of existing disturbance *additional disturbance planned for this area regardless of option selected *Reclamation impact mitigated by distance from residential area. *Less mine road reclamation in residential area is req'd	
Project Timing	Construction Timeline	*18 months. Shorter construction means improve economics for the overall project (better LOM)	*24 months due to additional underground development *Longer construction phase results in increased duration of temporary employment as opposed to full time employees and change of economic for the overall project reducing LOM	Cow Mtn Site
		*From a Socio-economic perspective shorter construction means fewer jobs, less tax base for province, and increases the Life of Mine for the benefit of the community and province.	*Longer construction phase results in increased construction employment, job stability and taxation. *When construction phase overlaps with Operation phase, increased regional employment. Overall economic effect on LOM is small (see Table 1.8.2)	

**ECONOMIC CONSIDERATIONS**  
 Submission from Osisko in blue  
 Alternative analysis in red.

Topic	Considerations	Mine Site Location	Cow Site Location	Preferred Location
Mining	Paste Network	*Vertical Boreholes for paste backfill	*Horizontal paste conveyance requiring more pumping resulting in increased costs and additional surface disturbance	Cow Mtn Site
		*Less of the ore body is available for gravity feed for paste network because plant built in valley bottom	*Less pumping since the higher paste backfill plant will be able to service 50% more ore body by gravity feed (see appendix 9)	
	Material Handling	*Rail-Veyor system(shorter distance and existing tunnel), vertical conveyor and trucking for ore transport to Services Building(\$19M) *Crusher located underground (more expensive)	*Longer distance and tunnel for Rail-Veyor, and longer trucking for ore transport to services Building resulting in significant cost increase (\$35M Approximately 100% increase in cost. *Crusher located on surface,(less expensive)	Uncertain Not enough data
		*Railveyor 1000m to Shaft Zone, 1200m to Cow zone= 2200 m	*Railveyor 2000m to Shaft Zone, 200m to Cow zone= 2200 m *Additional elevator height to surface	
		*Since the increase in expense for rail=veyor is noted, (84% not 100%) but the decrease in expense for surface crusher is omitted, it is impossible to tell the net change in expenses with the data presented. (Also see (Table 1.8.2)Project Cost Summary)		
	Development	*Existing Infrastructure resulting in fewer development costs	*Additional 800m(\$5m) of development compared to Wells,	Cow Mtn Site
		*Unclear what infrastructure pre-exists at this location?	*\$5 million = 1/6 of 1% of project costs *No Ore traffic in Wells, 24 hr operation possible (Table 1.8.2)	

Cow Mtn Site

## ECONOMIC CONSIDERATIONS

Submission from Osisko in blue  
Alternative analysis in red.

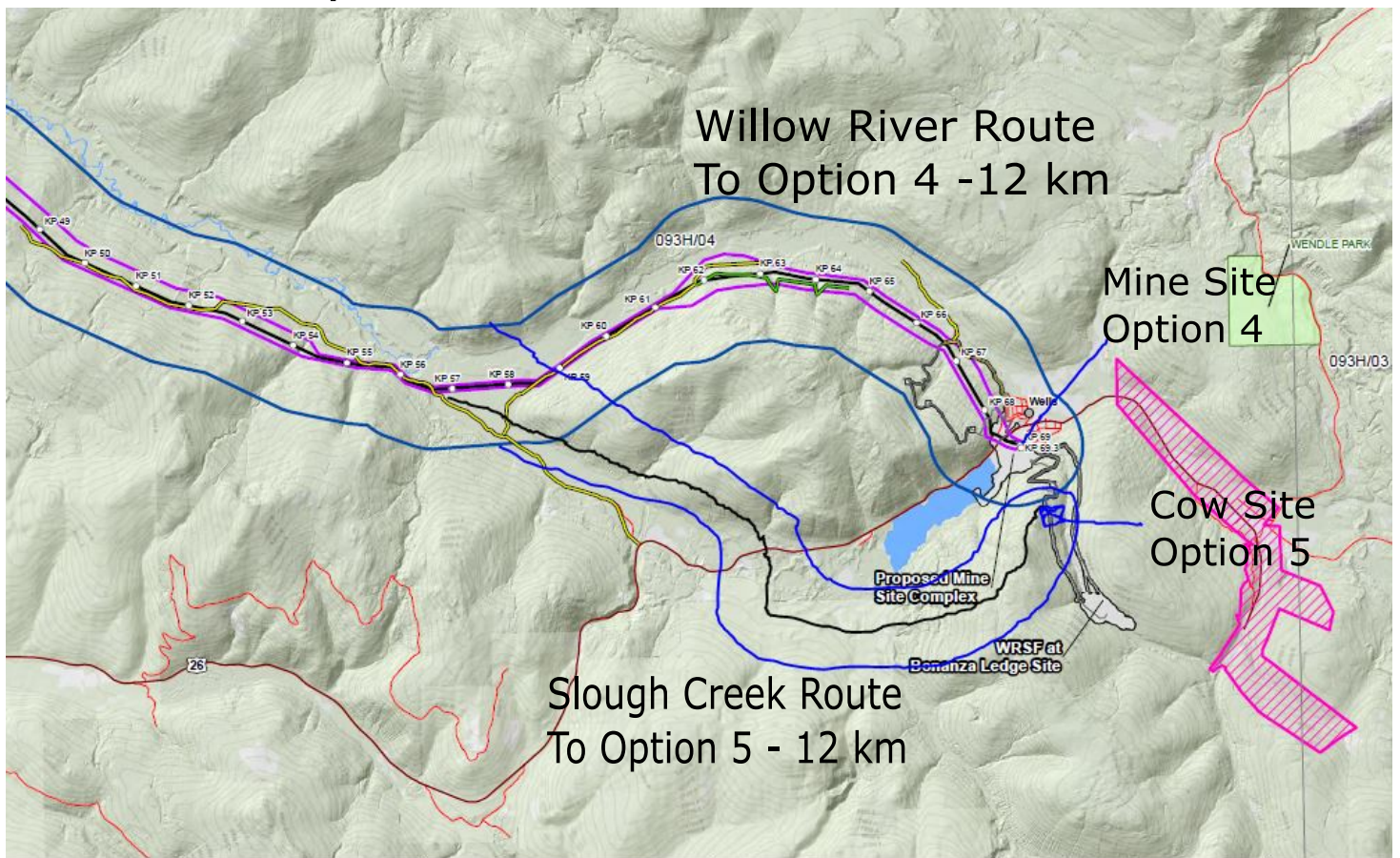
Topic	Considerations	Mine Site Location	Cow Site Location	Preferred Location
Surface Infrastructure	Electrical	*Shorter length of power line resulting in fewer development costs.	*Additional powerline extension to Cow Site, resulting in increased costs	Cow Mtn Site
		*Electrical substation requires visual mitigation due to proximity to town, resulting in higher development costs.	*No new powerline length by choosing lower impact route via Slough Creek resulting in no additional expense (see Appendix 1 Electrical Options)	
Surface Infrastructure	Site Access	*Minimal upgrades required resulting in fewer development costs	*Additional 12 km of road upgrades, resulting in increased costs	Cow Mtn Site
		*New bridge crossing on fishbearing stream req'd at townsite, to B road,(increased cost) *New ore truck road on steep unstable slopes with runaway lanes to access WRSF increased costs	*Pinkerton FSR (12Km) is prebuilt for log trucks exceeding GVW of mine trucks, and outside the mine footprint. lower costs *12 km is shared use with WF resulting in shared maintenance costs *Osisko is using a portion of the FSR already for its aggregate mine. *WRSF 2.4 km shorter on flat road resulting in lower operating costs	
Water and Waste Management	Water Management	*Small watershed, limited to infrastructure footprint	*Larger watershed on mountainside, resulting in increased costs *Additional costs related to increased length of paste fill distribution	Cow Mtn Site
		*Additional watershed expansion due to 2 km haul road to WRSF *On steep unstable hillside (see Appendix 7.1 NRCAN letter to proponent 2001)	*Increase in water catchment costs offset by elimination of 2 km of mineroad at B road extension and associated water management	
Water and Waste Management	Waste Management	*Reduced costs due to decreased total waste rock volume requiring hauling	*Increased total waste rock reequiring hauling resulting in higher costs. *Addition costs relating to increased length of paste fill distribution	Cow Mtn Site
			*surface transportation is flat, and 1 million km shorter over LOM reducing costs *Paste backfill accesses more orebody by gravity feed, reducing costs.	

**ECONOMIC CONSIDERATIONS**  
**Submission from Osisko in blue**  
**Alternative analysis in red.**

Topic	Considerations	Mine Site Location	Cow Site Location	Preferred Location
Closure	Reclamation	*Existing Disturbance	*Increased costs to manage increased watershed	Cow Mtn Site
		<p>*Unclear why "Existing Disturbance" describes Option 4 since the economic measure of closure is the cost of reclaiming the new disturbance, regardless of the location.</p> <p>*Incurs reclamation expenses from both the minesite, and the Aurum Adit on Island Mountain as well as reclamation expense of 2.4 km of haul road. All three sites are under 300 m from residential area in prime viewscaes requiring additional expense due to visual sensitivity.</p>	<p>*Will create a smaller reclamation footprint at CGQ in Wells, eliminate the reclamation expense at Island Mtn(aurum portal) and reclamation of Barkerville Mtn Road.</p> <p>*Being outside of the Wells viewscape, will reduce reclamation sensitivity and design expenses.</p>	
Project Timing	Construction Timeline	*18 months	*24 months due to additional underground development, resulting in increased cost and deferred revenue	Cow Mtn Site
		<p>*Given the existing time limitations on development caused by exploration, infill drilling, and the EA process itself, and the LOM itself, up to 6 months of delay is proportionally small.</p> <p>*Increased costs are relatively insignificant given Osisko's comments in EA documents that "this project has relatively low startup costs".</p> <p>*Estimated maximum increase in startup costs less than 6.2%                      See Table 1.8.2 Project Cost Summary</p> <p>*Proportionally speaking, timeline and cost constraints are small enough that this aspect of the project should not be weighted heavily</p>		

# APPENDIX 1a

## Lidar image of Electrical approach options to Jack O Clubs Lake



69 kV Line:

To Option 4:

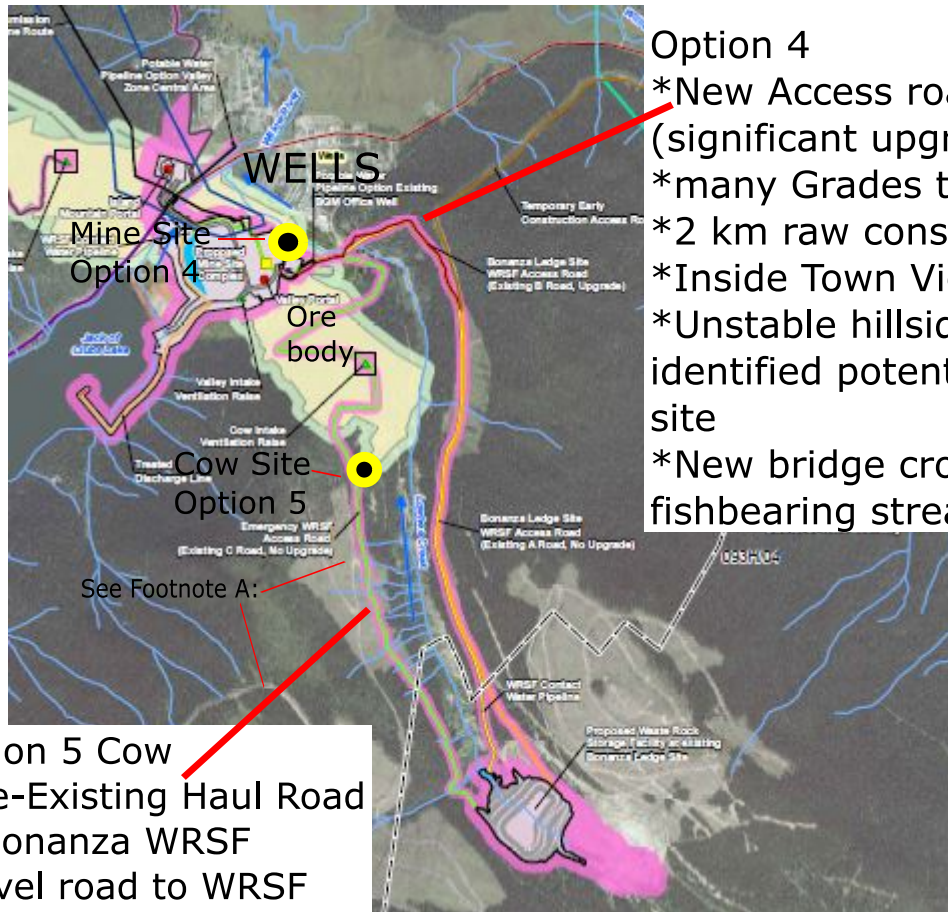
- \*Two line crossings over Hwy 26 in OGMA in tourist/residential area
- \*VQO impacts at town entrance
- \*Substation in view of residential area

69 kV Line to Option 5:

- \*69kV line crosses hwy at existing heavily disturbed site outside of Wells
- \*Line conforms to existing working forest
- \*Less OGMA impact, decreased VQO impact at community and less visibility overall
- \*Substation hidden from viewscape
- \*Better utilization of disturbance corridors, and less undisturbed Cariboo Habitat impacted.



# APPENDIX 2 - Technical Site Access Options



- Option 4
- \*New Access road (significant upgrades required)
  - \*many Grades to 25%
  - \*2 km raw construction
  - \*Inside Town Viewscape
  - \*Unstable hillside above NRCAN identified potential mercury contaminant site
  - \*New bridge crossing, fishbearing stream

- Option 5 Cow
- \*Pre-Existing Haul Road to Bonanza WRSF
  - \*Level road to WRSF
  - \*Watson Gulch Bridge requires less technical engineering
  - \*reduced expense and carbon footprint for surface infrastructure construction.
  - \*1 million km of surface travel and maintenance saved over mine project life
  - \*Zero impact on Wells soundscape/viewscape

## Footnote A

- The existing 12 km Pinkerton FSR is shown on this map
- \*This recently constructed Haul Road connects to the Cow site to an exit 5 km from Wells
  - \*Tucker Lake Aggregate mine is also on haul road (also under development permit by Osisko Gold Project) : Therefore:
    - \*Portions of this FSR are already under use planning by Osisko.
    - \*Tucker Aggregate will not have to impact the hwy, tourism or the townsite to reach minesite by this route.
    - \*Use of this pre-existing timber supply FSR will serve dual purposes for Osisko, reducing cumulative environmental impacts from Forestry and Mining, reduce carbon footprint and decrease economic expenses.

# APPENDIX 2.2 Site Selection Orientation

HWY 26

Wells Residential area

New Haul Rd on steep unstable viewcape

Island Portal Option 4

Water storage both options

Minesite Portal

Ventilator Shaft

Cow Option 5

WRSF HAUL Rd Option 4

Existing WRSF HAUL Rd Option 5, or Emergency Haul Rd Option 4

Exit for Pinkerton FSR(Pink)

Better Power Line Option

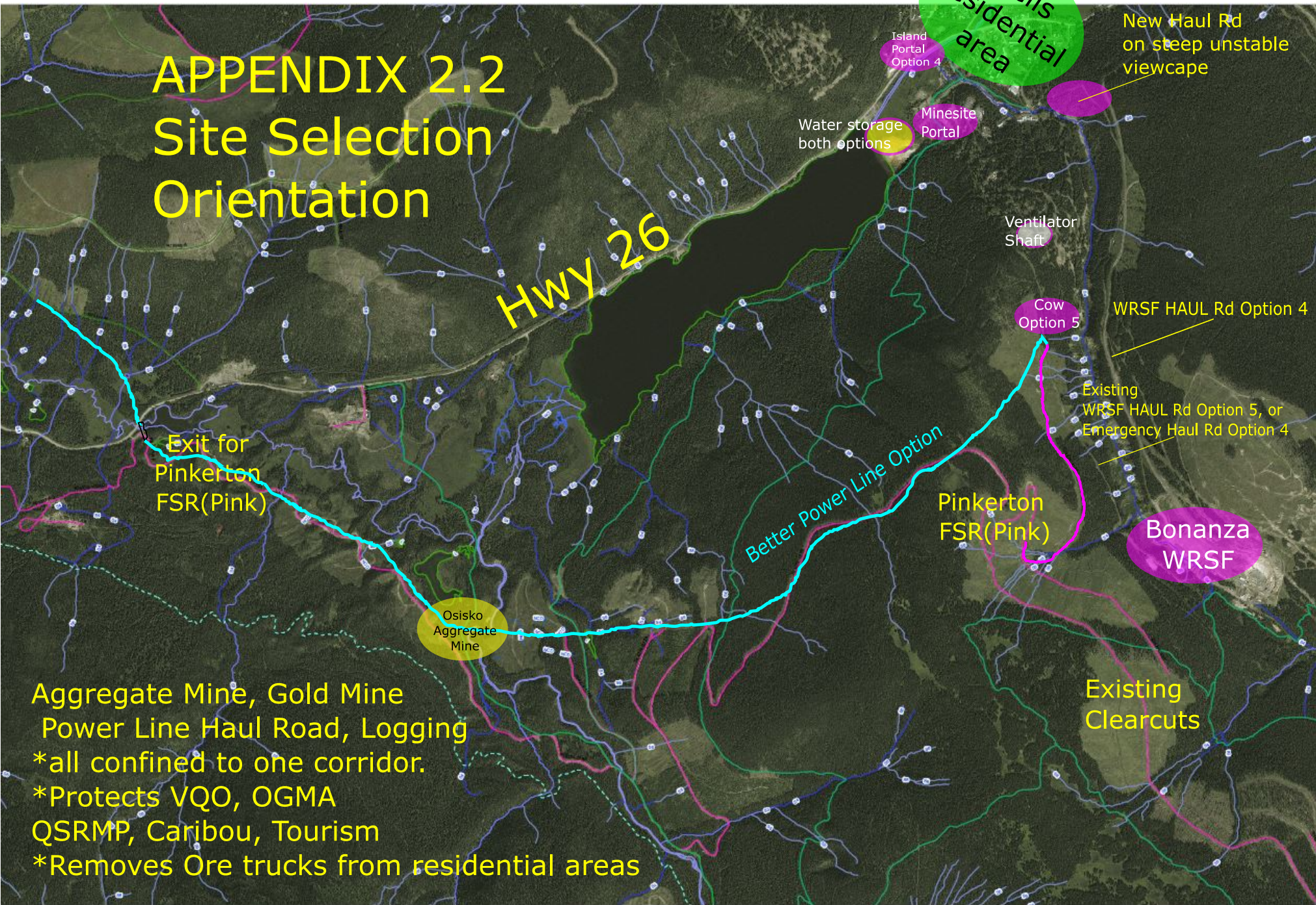
Pinkerton FSR(Pink)

Bonanza WRSF

Osisko Aggregate Mine

Existing Clearcuts

- Aggregate Mine, Gold Mine
- Power Line Haul Road, Logging
- \*all confined to one corridor.
- \*Protects VQO, OGMA
- QSRMP, Caribou, Tourism
- \*Removes Ore trucks from residential areas



**APPENDIX 7**  
**NRCAN SITE STABILITY COMMENTS**  
**2001 Cariboo Gold Project previously submitted**  
**under the 2002 Act**

*In 2000 Barkerville Gold triggered a mine review also called 'The Cariboo Gold Project', which was later withdrawn. The Epic website shows concerns raised at that time by Natural Resources Canada about site stability and Mercury contamination. NRCAN is excluded from review of this project by the tonnes/day size limitation set by Osisko. Nonetheless, the environmental concerns identified are a matter of public record, and remain valid and unaddressed by this current submission.*

**Background:**

*In 1938, Stuart Holland(Geological Survey of Canada) described the hydraulic process used in Lowhee Creek, and the use and loss of mercury in the processes. Lowhee Creek has one of the largest, and longest continuous hydraulic operations in the history in the Cariboo. (from 1862 to 1940 with smaller operations to present, and only exceeded in size by the Bullion Pit at Likely), The after-effect of this practice is documented in the report by Rennie Tupper OEA RPESB NRCAN, in 2001*

**The 2001 report specifically highlights the instability of Lowhee Creek and the danger of Mercury contamination** and can be found at:

[http://a100.gov.bc.ca/appsdata/epic/documents/p69/1036450127697\\_de2877166ec34d018caeda01d8ffe\\_fa5.pdf](http://a100.gov.bc.ca/appsdata/epic/documents/p69/1036450127697_de2877166ec34d018caeda01d8ffe_fa5.pdf)

See Appendix 7.2 NRCAN for a map of the area's of concern and their relationship to site selection:

NRCAN's submission reads, in part:

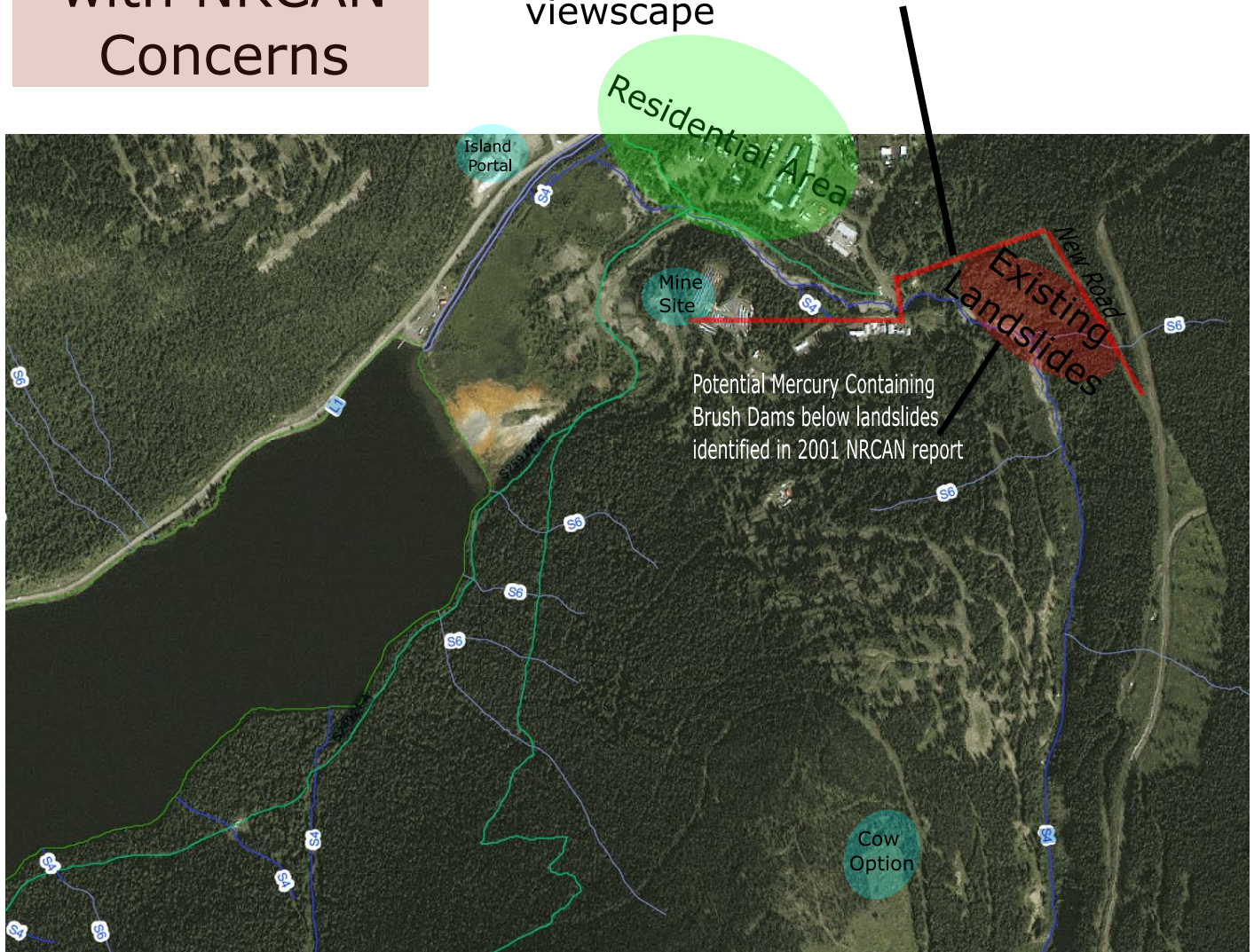
**Rennie Tupper OEA RPESB NRCAN Caribou Gold Project** Please find attached Natural Resources Canada's comments regarding the application to the Cariboo Gold Project.

**Landslide Hazards:** 1. 1. It is strongly recommended that the proponent provide results of detailed mapping of the presence of any landslides in the valley. 2. Identification of landslides should lead to a back-calculated analysis to define values of mechanical parameters and the influence of factors, such as pore pressures, acting when the slope failed 3. Water ponding in Lowhee Creek will raise the water table. This will result in new groundwater conditions that could be suitable for landslides especially if the slopes in mid and upper Lowhee Creek are "visibly unstable" (p. 104). A landslide in that valley could damage the tailings pond or its dam and cause a spill. Therefore, the landslide hazard in Lowhee Creek valley should be better evaluated.

**Geochemical: 1. 1. Mercury** seems to be a metal of potential concern at the project site. For instance, there is a high mercury content in fish of Jack of Clubs Lake. To avoid potential remobilization of mercury following mining activities, the source of mercury should be properly identified. Is the mercury derived from a natural source (bedrock and sediments naturally enriched in mercury) or is it derived from an anthropogenic source (previous mining activities)?

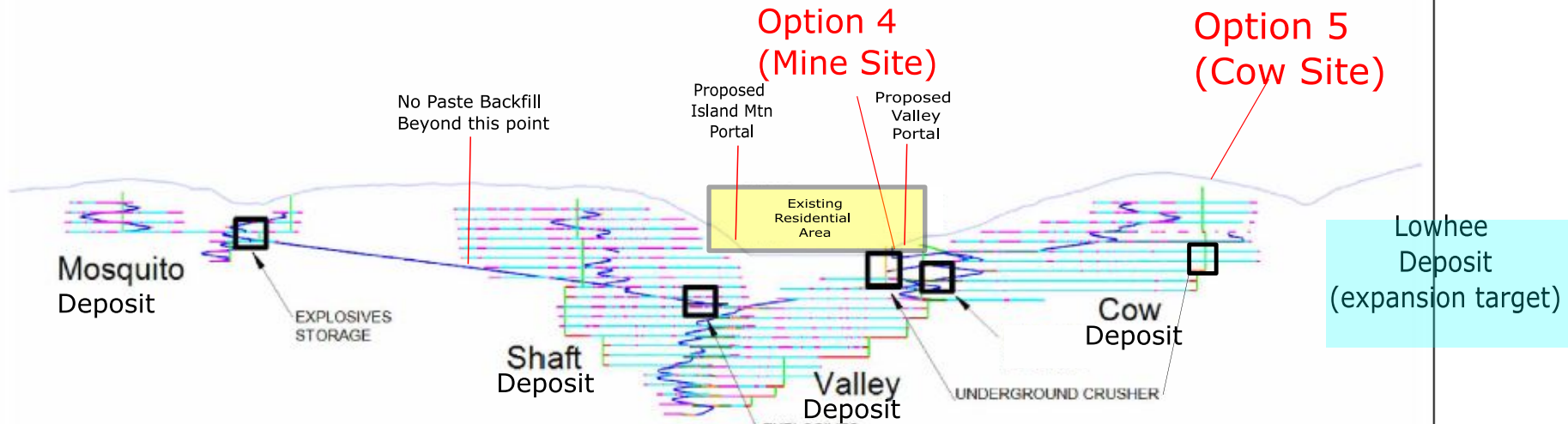
# APPENDIX 7.2 SITE COMPARISON with NRCAN Concerns

Minesite (Option 4) Requires Mine Standard Road to WRSF on decommissioned steep hillside with existing grades to 30%, runaway lanes on unstable hillside in residential viewscape



# ORE BODY MAP

## Looking North-East



By selecting Option 5:  
 More deposit is made available to gravity-feed  
 paste-backfill, improving environmental impact:  
 Offsets economic and carbon footprint  
 Near-zero impact on residential zone.

		CARIBOO GOLD PRO
		LOCATION OF CRUSHING FACILITY AND VERTICAL CIRCUIT
REV	DESCRIPTION	DATE
A		2021-07-
PROJECT NO. 151-11330-70	PHASE 00	REV. B

**TABLE 1.8.2**  
**PROJECT COST SUMMARY**

The Table below is taken from Chapter 1.0 Project Overview.

The original version can be seen on page 1-138 Section 1.8 Cost Estimate

The tables below repeat the data from the Cost Estimate and then a new column has been added (col F) which makes theoretical cost increases for aspects of the project that are specific to the site selection analysis.

The data provided assumes a generous 30% increase in the costs for items related to site selection, and provides a ‘worst-case’ scenario for that price increase. In the case where the increase in costs does not reach 30%, obviously the financial impact will be even less.

A	B	C	D	E	F	G	H	
Table 1.8-1		Project Capital Cost Summary						
Area Description	Total CC (\$M) during Construction	Total CC(\$M) during Operations	Total Cost (\$M) col B+C		Adjusted construction phase expenses with Cow option	comment	Adjusted Total Cost (\$M) Col E+C	
General and Administration	39.0	0.0	39.0		39.0	same	39	
Underground Mining	78.8	320.3	399.1		102.4	30% increase during construction phase	422.74	
Mine Surface Infrastructure	17.8	4.5	22.3		17.8	same (savings and expenses with each option)	22.3	
Electrical and Communications	33.6	0.6	34.2		33.6	same	34.2	
Site Infrastructure	38.0	7.5	45.5		49.4	30% increase during construction phase	56.9	
Processing Mine Site	69.1	80.3	149.4		78.1	30% increase during construction phase	158.383	
Processing QR Mill	31.2	0.0	31.2		31.2	same	31.2	
Tailings, Waste and Water Management	19.2	12.2	31.4		31.4	same (savings and expenses with each option)	43.6	
Indirects	57.1	5.9	63.0		57.1	same	63	
Contingency	48.8	18.1	66.9		48.8	same	66.9	
Total	432.6	449.4	882.0		488.8		938.223	
Closure Costs			17.4			same (savings and expenses with each option)	17.4	
Total	432.6	449.4	899.4				955.6	
						6.2% increase in capital cost		
Table 1.8-2		Project Annual Operating Cost						
Area Description Life of Mine	Life of Mine Cost (\$M)	Annual Average Cost (\$M)	Average Life of Mine Cost \$/tonne mined	Average Life of Mine Cost \$/oz	Adjusted LOM expenses with Cow option			
General and Administration	269.7	16.9	11.06	101.1	269.7	same		
Ore Transport	89.5	5.6	3.67	33.5	89.5	same		
Underground Mining	1129.9	70.6	46.32	423.6	1299.4	15% increase during LOM		
Processing Mine Site	409.0	25.6	16.76	153.3	409.0	same (savings and expenses with each option)		
Processing QR Mill	183.0	11.4	7.50	68.6	183.0	same		
Tailings, Water Treatment and Enviro	92.8	5.8	3.81	34.8	92.8	same		
Total	2173.9	135.9	89.12	814.9	2343.4	7.7 % maximum increase in LOM operating costs		
						\$62.74 increase in cost per ounce.		
						4.5% decrease in profit/ounce at the current price.		

The table above shows that even a theoretically significant cost increase for specific aspects of the project will result in very small increases in the overall cost of the project. (Up to maximum of 6% increase in Capital Cost, and up to 7% increase in LOM operating costs.)

These changes should also be measured against the % impact on profit for the project. Projecting a modest price of CAD \$2200/oz the worst case decrease in profit is just 4.5%

Paragraph 1.1.2 of Osisko’s Project Overview reports the current resource at 6 million ounces. At the current price of Gold this is worth \$13.2 Billion. The submitted Life of Mine Operating Cost plus Capital Cost is \$3.13 Billion, leaving a net profit of \$10.7 Billion for the stakeholder (Osisko Development Corp). With a 30% increase in location related expenses the net profit would be reduced by \$800 million to \$9.9 Billion (at \$2200/ounce). Given their statement that this project already has “relatively low startup costs” the net benefit to the community, the environment and the regional economy, as well as to Osisko shareholders of moving the concentrator out of Wells is worth the proportional expense to the profit of the project.

## CONCLUDING STATEMENTS REGARDING ALTERNATIVES

Osisko concludes the site selection document with the following summary on page 114:

Osisko's summarizing statements are in blue.

Our commentary is in black italic

### 1.7.3.4.3 Selection of Alternatives

The Cow Site location for the Services Building (Option 5) is in an undisturbed area and resides in a larger watershed relative to the Mine Site Services Building location (Option 4).

*This is simply untrue. The Cow site is on a long strike of historic Crown Grants along the same ore body that Osisko has targeted. The earliest recorded mine shaft, in that exact location was the Enterprise Mining Company in 1878. Since that time the Lowhee watershed at the Cow site has been subject to surface disturbance from hydraulic mining, shaft development from the Fred Wells shaft, road building for both the Lohwee Mining Company and the Cariboo Gold Quartz company, additional past and current drill road and drill pad construction, test scrapes to bedrock for exploration, and extensive clearcutting for logging.*

***The site is equidistant and in the same watershed that Osisko proposes its Waste Rock Storage Facility(top), ponds and water treatment facility(bottom), Cow Mtn Intake ventilator shaft(middle), WRSF Mine truck haul road(top to bottom), WRSF emergency access road (top to bottom), and a pipeline to be constructed from the Bonaza Ledge Waste Rock storage site to the Water treatment plant, (top to bottom).*** The Cow site is in the middle of this proposed development regardless of the option chosen.

The Cow Site location would require additional surface development and closure requirements, additional total waste rock generation for the Project, and would require primary crushing facilities to be located at surface in order to save cost that would generate additional noise and dust for the duration of operations.

*Additional Surface development at Cow would be offset by the removal of surface disturbance on Island Mountain at the Aurum Site, and the abandonment of raw road construction on the Lowhee watershed above Wells. Although it's not clear why underground primary crushing is not an option at this site, a study needs to be conducted to weigh the balance of possible additional noise impact in this remoter location from the traffic/dust/noise/social impact of locating the concentrator adjacent to a residential area.*

A key concern raised during the public comment period was related to the location of the Services Building and the size of the building. In relation to the site location, ODV evaluated several different locations for the Services Building. Ultimately, the Mine Site location (Option 4) was selected for multiple reasons, but mainly:

- Central position on the strike length of the deposits (3.8 km) substantially reducing the transport of ore, waste, and concentrate. Less transport and shorter distances result in less carbon footprint and lower vehicle requirements for material transport. The centralized position of the Services Building allows for the use of paste backfill and the ability to return waste rock underground to fill voids from ore extraction without having pipelines on surface or the use of trucks.

1. *Although the Cow site is not as central as the Mine site(Option 4), note the following:*
2. *Strike length is 3.8 km but Osisko proposes paste backfill only for the central 2.5 km. The isolated ore body at Mosquito Creek will not be paste backfilled.*
3. *Although the Lowhee Zone is not included in the current EA, locating the paste backfill at the Cow site would improve the carbon footprint in the case of expansion, since it will be closer to the Lowhee Zone and all current exploration, (which is occurring in a southeasterly direction)*
4. *In addition, Osisko prefers a 60% incline for paste backfill transport. As you can see from Appendix ## Ore body cross section. The ore body rises as it travels south to the Cow. Locating the Paste Backfill at the Cow Mtn site would still allow a 60% decline and also **make at least 30% more of the ore body available to gravity fed paste backfill**, reducing backfill costs, and decreasing surface and carbon footprint.*

The Services Building is located on a brownfield site already disturbed by historical mining that has not been reclaimed and will not be required to be reclaimed if the area is not used. Locating this surface infrastructure in this previously disturbed area will avoid affecting undisturbed areas and contribute to the permit rehabilitation of the historical mining site once the Project is complete. This will help resolve the negative environmental effects of past mining operations.

Besides the fact that Osisko continues to fail to acknowledge that the Cow site is also on a brownfield site, this comment demonstrates a complete lack of understanding of the site comparison process. It deliberately **ignores the fact that putting the primary adit at Option 5 Cow, would not change the other infrastructure requirements proposed for the CGQ "mine site" for locating:**

- **the proposed water treatment plant,**
- **pipeline exit,**
- **sediment pond,**
- **2 million tonne bulk fill area,**
- **ventilator shaft, as proposed in their submission.**

If the Cow option 5 was selected then the Mine Option 4 would become the secondary adit instead of the proposed Aurum adit. **The effect of selecting Option 5 (Cow) will exactly and equally contribute to the permanent rehabilitation of the historical mine site at this location, without the long-term disturbance to the community.**

They will also avoid the creation of additional brownfield along the proposed Haul Road to Bonanza Ledge, and avoid creating a construction zone and permanent secondary adit even closer to residential areas at the Aurum lead.

- Avoids additional effects in less disturbed areas near Wells (nearer core caribou habitat) by utilizing a historically disturbed site.

1. As noted above...Cow is not an undisturbed site. In addition, it's value to Cariboo is already compromised by: the extensive logging in this watershed,
2. clearing and persistent noise and traffic at the Bonanza Ledge mine, which will be ongoing at the Bonanza Ledge Waste Rock dump site,
3. the construction of a pipeline along the length of the watershed.
4. Installation of an Intake shaft.
5. Rimming both sides of the valley with Mine Haul Roads to the WRSF.

In fact, re-routing the powerline to the Pinkerton FSR would avoid sensitive Caribou Habitat recently identified in the Mt Tom area of the proposed route, and decrease the total landscape disturbance resulting in no net change.

Topography and location allow for the grouping of buildings and activities for a smaller overall footprint.

See my notes above about the decrease in the cumulative minesite footprint by relocating to Cow due to shorter surface haul roads, less disturbance in Wells, and less construction activity on unstable hillside.

The Mine Site location for the Services Building (Option 4), which is in a previously disturbed area and resides in a smaller watershed, would allow for material crushing underground, which would reduce dust and noise during construction and operations. This location requires less surface infrastructure, is more amenable to reclamation, and would reduce the duration of the Construction Phase. In response to the feedback received during the Early Engagement Phase, ODV reduced the height of the Services Building to improve the visual aspects (as was proposed in the DPD [October 2020]). By converting the round ore silos to square silos, and rearranging conveyors and the transfer point within the Services Building, the highest part of the building has been reduced in height by approximately 20 m, resulting in a new maximum height of approximately 37 m.



*As I hope my analysis above shows, this concluding paragraph is simply wrong. See responses to Paragraphs 1-5 for further explanation).*

*Also, it seems that they feel they have compromised by reducing a 17 storey building to a mere 12 stories and 200 m long, perched on a hill, it will become the second largest building in the entire Cariboo Chilcotin Region and the only one in an urban environment. As great an eyesore as this will be in a tourism community of one and two storey heritage buildings, the crux issue is really the ongoing operating infrastructure it will take to maintain it, and that effect on the community and the socio-economic mood of a region built on Arts, History and Adventure.*

- 1. In Osisko's alternatives analysis document, they have built silos of information in a dynamic operation.***
- 2. Osisko fails to adequately justify the social, environmental or economic choices it has made to select Option 4.***
- 3. Using the data corrections I have provided demonstrates an unequivocal score preference for Option 5 Cow.***

***For this reason, this project needs rejection by the EAO, or serious reformation by Osisko to address these concerns.***

*For more information or questions contact  
Dave Jorgenson  
Wells, BC  
250-994-2345*

**A.6      Comment #15**

## Comments on Appendix 07.10 Economic Impact Assessment

Prepared by Judy Campbell, M. En. Des. (Planning)

I am commenting as a member of the Community Advisory Committee, and also as someone who has professional experience with the methodology of Economic Impact Assessment, particularly on the community level.

There is one aspect of this the KPMG study that is misleading and has already been misinterpreted within the community. This is in relation to the projected \$36 million in revenues that will accrue to 'municipalities'. Many people are interpreting this to mean that literally Wells (or Wells and Quesnel) as the major municipalities within the area will somehow receive \$36 million in revenues from the project. And regrettably, in recent public dialogue, ODV officials have not dispelled this misconception.

The computer models that are used to generate an economic impact assessment such as the one presented here are based on certain assumptions, particularly about how revenues may be accrued and distributed. These assumptions are based on averages derived over time from more detailed studies. These may be regional, provincial, national or even international averages or a combination thereof. Unfortunately, the assumptions used in the model are not transparent to the reader of the resulting study, and sometimes not even to the user of the model. When looking at very small local economies we often find that these assumptions just don't apply.

This is true for the projected municipal revenues.

In each of the Tables 3, 5, 7 and 9, municipal revenues are projected for the exploration, construction, operation, and closure stages respectively. In each table revenues are predicted to accrue to municipalities from taxes on products and taxes on production. Each of these has an explanatory footnote. The footnote for Taxes on Products reads (bold is mine):

*Includes provincial taxes on environment, trading profits, gas, land transfer, PST, aboriginal trading profits and other provincial tax. For the federal government, it includes trading profits tax, gasoline tax, excise tax, air transport tax, import tax and GST. **At the municipal level it includes municipal land transfer tax, sales tax and Property, Business and Other taxes***

The footnote for Taxes on Production reads (bold is mine):

*Taxes on production consist of taxes payable on goods and services when they are produced, delivered, sold, transferred or otherwise disposed of by their producers plus taxes and duties on imports that become payable when goods enter the economic territory by crossing the frontier or when services are delivered to resident units by non-resident units; they also include other taxes on production, which consist mainly of taxes on the ownership or use of land, buildings or other assets used in production or on the labour employed, or compensation of employees paid. **At the municipal level, this includes property taxes.***

The only tax that actually applies to the District of Wells is property tax. This is the only direct tax revenue the District of Wells will receive from the Cariboo Gold Project. This will be sum of property taxes collected on any mine development within the boundaries of Wells. It would also include taxes on any improvements made to existing properties in Wells. It would not include taxes on properties that

the ODV has purchased that were already part of the tax base. However, an increase in taxes because of an increase in assessed value due to improvements made to the property could be included as a benefit.

Understandably, KPMG did not make an attempt to separate out the economic impact to Wells from the results generated by the computer model. The smallest economy they assessed was the Cariboo Regional District. Neither have they specified which municipalities would be the recipients of the projected revenues. This is left for the reader to interpret, which as mentioned above, has led to considerable misunderstanding.

There should be more detail provided on anticipated municipal tax revenues, with a more detailed analysis of what taxes would apply, how much would be generated, and for which community.

In addition, for Wells, there should be a reasonable and detailed projection with transparent assumptions of tax revenues that can be expected to accrue over the life of the project.

Any analysis of economic benefit to Wells should take into consideration the 'leaky' nature of the local Wells economy. Because of the lack of services in Wells, only a small percentage of every dollar earned in Wells is spent in Wells. Much of the benefit of dollars earned in Wells is accrued in Quesnel and Prince George.

This is the type of detail I would have expected to find in the section specific to Wells, but did not.

**A.7      Comment #21**

COMMENTS: CARIBOO GOLD PROJECT

7 October 2021

Although Osisko’s documentation is extensive, it is too general. Large gaps remain in the practical details of the proposal. The proposal is untenable as planned.

<b>GAP</b>	<b>SPECIFIC ISSUES</b>
<p>Misleading use of the term ‘sustainable.’</p>	<p>Osisko describes its project as “sustainable.” The definition of sustainable is: “1: capable of being sustained. 2: of, relating to, or being a method of harvesting or using a resource so that the resource is not depleted or permanently damaged sustainable techniques sustainable agriculture.”</p> <p>As proposed this mine has a 16-20 year life and is extracting a resource that will not be replenished for millions of years. Using the word “sustainable” to apply to the Cariboo Gold Project is a classic case of greenwashing. It is deliberately misleading, and its use in this proposal and all community/First Nations consultation material is done in bad faith.</p>
<p>Project actively undermines the existing work the community has done to create a tourism and outdoor destination.</p>	<p>Visual and aesthetic damage in prominent locations around the community, especially the infrastructure located at the entrance to the community on the Jack of Clubs Lake.</p> <p>Increased traffic on roads, including heavy industrial traffic.</p> <p>Buying up accommodation in a community where accommodation can already be difficult to find, especially in the summer.</p> <p>Significantly changing the demographic and cultural composition of Wells as an art and music community.</p> <p>Threatening environmental health or perceived environmental health of Wells. The community has worked hard to undo the damage done by historic mining.</p> <p>Disturbing Caribou habitat. Wells residents have worked together on grassroots initiatives (for example, through the Wells wildlife Facebook page) to monitor Caribou and other wild animal populations. The Cariboo Gold Project threatens recent growth in Caribou numbers in the Wells/Barkerville area through the development of its transmission line and the increase in traffic on the highway</p>
<p>Compensation for impacts to community insufficient.</p>	<p>Responses to community feedback are ‘tacked on’ rather than thoroughly integrated measures. Responses do not substantively address concerns (eg. Wildlife cameras as compensation for animal migration/habitat disruption resulting from the transmission line).</p>

	<p>The construction of a new access road to avoid mine traffic in town does not change concerns about mine traffic on the Barkerville highway, which is the only access the community has to grocery stores, schools, and other essential items. This is a food security and education access issue.</p> <p>The highway is also the only evacuation route in case of disaster, and the only access for tourists coming to Wells.</p> <p>Tourism will be discouraged by the condition of the road and the prospect of interacting with mine traffic.</p> <p>There is little consideration in the project description for winter conditions, including severe temperature and heavy winter snow loads. There are no plans for road or pathway clearing. It is unclear if the new proposal for employee housing is resilient to heavy snow loads. Promises to reduce idling of vehicles “where practical” is insufficient because it leaves open the possibility of idling industrial equipment for long periods during cold snaps.</p> <p>One-time payments to cultural institutions such as Island Mountain Arts and Barkerville Historic Town are insufficient, considering the lifetime of the mine. Support must be ongoing throughout the project. Promises to ‘promote art among employees’ are non-specific and unmeasured.</p> <p>No specific compensation or accommodation for loss of wild foods, foraging, hunting, and wood collection opportunities. These activities are important facets of food security for locals.</p>
<p>Visual impacts inadequately studied and addressed</p>	<p>Photos for visual impacts taken at one time of year (spring) when foliage is thickest. This does not accurately or adequately convey the visual impact of the structures at all times of year.</p> <p>Photos for visual impact often taken at a great distance, and do not accurately convey experience of being in town or living close to the mine.</p> <p>Colour choices (brown, green, rust, etc) blend in during summer, but will detract from the landscape in the summer.</p> <p>No effort has been made to blend in with local aesthetics in the town (which include colourful buildings and large murals). Town aesthetics are key for Wells’ identity as well as its tourism industry and major events like Artswells festival.</p>
<p>Demobilization/end of mine plans insufficient</p>	<p>No plan for employee accommodation building. According to the community information night held on September 23<sup>rd</sup>, Osisko plans to “donate” its employee accommodation building to the community after the mine closes. Wells does not want or need these structures, which will by then be nearly 20 years old and require costly upgrading and maintenance.</p>

	<p>There is no plan for decommissioning the sewage infrastructure for the camp, which is located near Lowhee Creek (a stream that flows through town and is used regularly as a swimming spot for locals).</p>
<p>Poor past behaviour suggests high likelihood of continued problems under new project. Past behaviour unacknowledged in current project.</p>	<p>Osisko has a well-documented history of violating provincial and district regulations suggesting pattern of behaviour likely to continue under its proposed project.</p>
	<p>At the municipal level: continues to violate District of Wells noise bylaws. Failure to comply with its fuel storage permit.</p>
	<p>Provincial Level: Multiple fines for failure to comply with tenure agreement, especially discharge regulations and pollution abatement orders, and failure to submit environmental risk assessments.</p>
	<p>Federal level: listed on federal environmental offenders list (under previous name, Barkerville Gold Mines).</p>
	<p>Osisko’s poor environmental record is a useful indicator of how it is likely to continue acting in the future.</p>
<p>No specific measures or strategies to ensure change in behaviour.</p>	<p>There is nothing in the current project description that acknowledges past failures or details plans for ensuring they do not happen again.</p>
	<p>Osisko claimed verbally in the September 23<sup>rd</sup> community information meeting that it has implemented procedures in 2018 to prevent future transgressions but listed no specific measures or strategies for change. No specific measures or strategies for ensuring compliance with municipal, provincial, and federal regulations are listed in the project description.</p>
	<p>Any existing procedure for changing behaviour that does exist is ineffective – Osisko’s violations of municipal bylaws continues to the time of writing, and its last provincial penalty was in the spring of 2021 (for failure to comply with discharge permits at Bonanza Ledge).</p>
	<p>Destruction and damage to local roads has been an ongoing problem for Osisko. Promises to ‘follow BMPs’ have not helped in past case, but no new or different strategy proposed for the current project.</p>
<p>Overreliance on Provincial compliance and enforcement.</p>	<p>Osisko depends entirely on the province to monitor environmental impact and enforce compliance with tenure agreements, rather than policing itself or building internal mechanisms.</p>
	<p>The project description does not include robust plans for environmental monitoring.</p>
	<p>The project as planned depends entirely on the Province’s already strained compliance and enforcement resources to police its activities.</p>
<p>Poor reputation in community a barrier to effective collaboration</p>	<p>Osisko’s poor reputation in the community means there is little faith in its ability or interest in fulfilling its promises. No specific measures for improving relations with community.</p>
	<p>Osisko has damaged its relationship with the community to the point that there is little likelihood of collaboration or cooperation in the future.</p>
	<p>Current plan is dismissive of community concerns about environmental damage and damage to tourism.</p>



<p>Engagement with community of Wells insufficient.</p>	<p>Osisko verbally assured participants of the 23 September information session that air and water quality data would be available to them throughout the project, but there is no infrastructure planned for collecting this data, nor for making this data available or readable to people.</p> <p>The current project is missing specific plans either for collecting or distributing this data.</p> <p>At minimum, Osisko should provide ongoing public water quality data for:</p> <ol style="list-style-type: none"> <li>1. the Willow River at its headwater at the Jack of Clubs Lake</li> <li>2. The Willow River where it joins Williams Creek in Moose meadows (popular swimming spot)</li> <li>3. The Jack of Clubs Lake near its effluent pipe</li> <li>4. The Jack of Clubs Lake at the end of its emergency spillway</li> <li>5. Lowhee Creek above Bonanza Ledge</li> <li>6. Lowhee Creek below bonanza ledge</li> <li>7. Lowhee creek where it joins the Willow River</li> </ol> <p>At minimum, Osisko should provide ongoing air quality data for:</p> <ol style="list-style-type: none"> <li>1. The apartments near Lowhee Creek</li> <li>2. Bowman Crescent</li> <li>3. The visitor centre</li> </ol>
	<p>Project staffing plans do not include liaisons or any mechanisms for dealing with community feedback or maintaining relations through the life of the project.</p>
	<p>Little consideration for seasonal rhythms of tourism and residency in Wells (for example, population fluctuates during the seasons).</p>
	<p>Osisko has already impacted community access to local hiking trails, berry picking locations, fishing spots, bike trails, snowmobile trails, and other important areas on Cow Mountain. The project as proposed will further restrict community access to nearby berry picking and hiking areas, specifically berry picking and skiing trails on Island Mountain.</p>
	<p>Osisko’s plan to work with the community on access issues “where practical” is insufficient, non-specific, and non-measurable.</p>
<p>Engagement with local First Nations insufficient</p>	<p>Capacity to respond to natural resource projects is a known concern for First Nations. Collecting and presenting data to people does not constitute meaningful consultation. Osisko’s engagement summaries for First Nations suggest that Osisko has dumped a significant amount of information on people without providing capacity support for interpreting and actioning it.</p> <p><a href="#">Studies</a> show that gold mining in the Wells/Barkerville area drew First Nations from outside the immediate area to use the land. This kind of use has not been considered in the consultation or engagement record.</p> <p>The history of gold mining in the area means that traditional use was disrupted from an earlier date than other areas. Consultation did not account for this history.</p>

	<p>While the province has provided capacity funding, it is unclear whether Osisko has contributed to capacity funding at this time.</p> <p>One-time monetary contributions at the outset of the project are not enough, and do not embody sustainable or reconciliatory principles.</p> <p>No plans for continual, ongoing engagement through the life of the mine. Meaningful consultation entails working regularly to community and First Nations over the entire life of the project, not just the beginning.</p> <p>Osisko's staffing plan does not include commitments to hire environmental monitors or consultants from First Nations, which were specific requests listed in the consultation record.</p> <p>Although Osisko's Heritage Resources Overview Assessment recommended a Chance Find Procedure, no procedure exists in project plans. Chance Find Procedures are not considered adequate by many First Nations. Osisko should consider Nation-led training for employees and operators.</p>
Employment policy does not benefit locals	<p>Most Wells residents will not be hired by the mine. Osisko defines 'local' hires too broadly (Prince George is not 'local') and most residents in Wells and surrounding First Nations do not have sufficient qualifications to be hired at the mine.</p> <p>No training plan to change the qualifications of Wells residents to increase their ability to be hired by the mine.</p> <p>Wells residents likely to be hired only for entry level positions, given low levels of education and experience in the mining industry in town. No opportunity to work at a decision-making level within the company.</p> <p>Decision to bus employees in for 2-week shifts reduces tangential benefits to the community (no opportunities for personal investment in the area, no opportunities to recreate locally, etc.) and separates the community from the mine.</p>
No consideration for impacts of climate change throughout application	<p>Malfunctions and accidents analysis does not account for impact of climate change (especially increased flooding/fire risk). The project is a high elevation, subalpine environment particularly sensitive to climate change, and Osisko will have to deal with its impacts over the life of the project.</p> <p>Basis for deciding on likelihood of risks in malfunctions and accidents analysis unclear.</p> <p>No consideration of impacts to evacuation routes from community in case of disaster (Barkerville highway remains sole evacuation route and is shared by mine traffic and residents). The highway already requires serious repairs due to erosion from swollen creeks.</p> <p>Wildlife assessment does not deal with increasing bear-human interactions. Black and Grizzly bears are common in the project area especially in the berry patches on Cow Mountain and Mosquito Creek. Black bear habitat reduction has changed grazing patterns and increased human-bear interactions in Wells.</p> <p>Like many parts of BC, local creeks have seen decrease in salmon spawning numbers over the last decade. The surveys conducted by Osisko and its contractors do not account for these recent changes.</p>
Remediation plans insufficient	<p>Osisko's project is located on a contaminated site known to the province, and it lists remediation as a benefit of the project. However, the remediation plan only encompasses the footprint of the proposed mine,</p>

	<p>leaving a large portion of the oxidized tailings currently polluting the Jack of Clubs Lake untouched.</p> <p>Benefits to the Province and Wells will be extremely limited, given the limited extent of remediation.</p> <p>No specific measures for long term follow up for water quality in the Jack of Clubs Lake.</p> <p>Given what Osisko will leave on the land in terms of waste and equipment, it is unclear if there will be any net environmental gain during or after the project.</p> <p>There is low confidence in Osisko to remediate the land according to its plans given the company's poor environmental record.</p>
<p>No acknowledgment or plans for alleviating historic trauma</p>	<p>Residents of Wells and local First Nations have lived with contamination their whole lives. The impacts of that contamination on community health and wellbeing are currently unknown (Ex. Swimming or eating fish out of the contaminated Jack of Clubs Lake). There are no plans to better understand these impacts.</p>
	<p>The community has a long history of trauma and poor trust in the safety of the environment because of historic mining (ie. Not knowing whether berries or fish harvested on the land are safe to eat). There is little understanding of the trauma experienced by the community demonstrated in the project description and no concrete plans that address or even acknowledge it.</p>
	<p>No plans for helping locals to adapt to environmental change, including safety of locally harvested food and water.</p>
	<p>No compensation for extra vigilance required by local community to monitor and police Osisko's work, particularly given Osisko's poor record of abiding by environmental regulations.</p>
	<p>Disproportionate distribution of risks and benefits: Osisko's board and shareholders hold little risk to their health and livelihood, while benefiting financially from the project. Little financial or quality of life benefits for locals, except through (possible) jobs and limited one-time contributions to local organizations.</p>
	<p>No specific analysis of the gender aspects of the Cariboo Gold Project. For example, impacts of a predominantly male workforce on community, specific measures for empowering and supporting female employees, unequal impacts of environmental change and environmental contamination on women. Preventing harassment is not adequate.</p>
	<p>While benefits of clean up are mentioned, detrimental impacts of opening a 15-20 year mine in an area with a history of human and environmental trauma from gold mining is not.</p>

## A.8 Comment #41

## Review of Power Supply Alternatives Assessment analysis (Appendix 1.0-16)

**Concern:** The alternative means assessment for Power Supply lacks methodological rigour. Rigour in this context, referring to the legitimacy, integrity and soundness of the process.

### Comments:

The Socio-economic account scores much higher for the Northern Route due to the particular value choices represented in the sub-account. There are two sub-accounts in the Socio-economic account, *Land Use* and *General aesthetics, amenities, and continued community use*. The indicators used to determine the best option to meet this socio-economic measure are: the amount of Power and Traffic Disruption and Aesthetics. Why isn't sustainable power for the community listed as a sub-account? Especially given that *Community Infrastructure and Services* are identified by Osisko as a Valued Component in the Project, with the rationale that, "*the quality and availability of services and infrastructure in a community or region contribute to residents' overall quality of life.*" What about consideration of *Traditional Land Use Value*, or *Perception*? By leaving out key long-term value components and putting undue weight on lesser values (power and traffic disruption during the one year construction phase), the analysis erodes public confidence and trust in a process that we expect to be fair and objective.

Within the Environment account, The Northern Transmission Line cuts through a permanent Old Growth Management Area (OGMA) which will have a much greater disturbance impact (having inherently higher attribute values) than the previously disturbed OGMA's along highway 26. This is not reflected in the Power Supply Alternatives Assessment analysis (Appendix 1.0-16), with the Northern Route (Alt C) scoring a value of 6 and Highway 26 (Alt B) scoring 3. I would like to request a more comprehensive valuation of the OGMA sub-account, assigning higher value to old growth stand attributes, particularly with regard to Caribou habitat.

More clarification is required as to why the Highway 26 route is more technically complex. For the Northern Route, '*a total of 39 km of access road will be required. 22.7 km will be forest roads that require some clearing and upgrades.*' That leaves 16.3 km of new access road construction, not to mention the crossing of numerous water bodies and fish-bearing streams along the route. To characterize the technical challenges of constructability with *Terrain-related complexity* and *Proximity to existing utility infrastructure* is a grossly simplified and narrow characterization. Presumably, cutting a new linear feature and roads into an area without road access (Northern Route) is more technically complex than widening a right-of-way adjacent to a highway?

## Questions:

1. *The weightings for indicators and sub-accounts were assigned based on multi-disciplinary discussions on relative importance of components. Who was part of the multi-disciplinary discussions and who decided on the relative importance of components?*
2. Why isn't sustainable power for the community listed as a sub-account?
3. The Environment and Climate Change Canada guidelines list *Traditional Land Use Value* to characterize socio-economic impacts? Why was this sub-account not considered?
4. Has a soil sensitivity analysis been conducted along the proposed Northern Transmission Line Route?
5. A qualitative measure is used to determine the alternative means rating for aesthetics. Who determines which option rates higher aesthetically? Aesthetically, the Northern Transmission line would be given a much lower score if a Visual Impact Assessment was conducted from the Wells viewscape.
6. Why have Visual Quality Objectives not been factored into the alternative means assessment with regards to running the Northern Route transmission line within a highly visible stretch of timbered hillside along Island Mountain on the Wells end of the proposed line?
7. Why is the additional *new 4-km access road in mountainous terrain near Wells* to extend the Hwy 26 transmission line required when the Hwy 26 line runs to the same junction in which the Northern Transmission line is proposed to cross the highway (by the ball diamond)?
8. Another question I had where the Highway 26 option scored poorly was regarding the "Potential impact of existing utility infrastructure" category on page 27. It reads as follows: '*Proximity to existing utility lines and infrastructure will require adequate clearance and conformity with technical standards and regulations. Turning off power on existing lines may be required to allow some construction activities. Crossing of other aerial lines or excavation close to buried infrastructure requires additional design, approvals, and execution inputs. Options that avoid any conflicts with existing utility infrastructure are preferred.*'

As permitting and power disruptions are already covered in other categories I wondered whether proximity to existing utility lines and infrastructure is a legitimate constraint to the Highway 26 option? Additional supporting information is required for validation and transparency.

9. The Estimated operational costs for the Northern Route are \$120,000 per year. What type of maintenance (disturbance) will be required along the route? Will there be any work done in winter?
10. Given that the Northern Transmission line costs ten times more annually than the Highway 26 option, has the difference of \$2.16 million been accounted for in the Economic Account of this analysis?
11. In Appendix 1.0-16 it states that *“The lines would be expected to eventually be passed over to BC Hydro, so decommissioning is not anticipated and not considered for the assessment.”* What arrangements have been made with BC Hydro regarding the proposed Northern Transmission line route. In public meetings, the community was told that the line would not be built to BC Hydro standards and would be decommissioned. The assumption was made that Osisko would be responsible for the cost of removal and remediation. Is this not the case?

**Request:** I would request that the proponent re-evaluate the ‘preferred alternative’, the Northern Transmission Line Route, with consideration to the methodology in choosing, valuating, and measuring the sub-accounts. Consideration should be given to Sustainable long-term Community Power Supply and Traditional Land Use within the Socio-Economic account. Additional supporting information for assigned indicator values and specific criteria for why the particular sub-accounts were chosen is required to ensure the integrity and transparency of the alternative means analysis.

**A.9      Comment #43**



## **Comments on Section 7.10 Employment and Economy Section**

I am commenting as a member of the Community Advisory Committee, and as a long-time resident of Wells, a homeowner and landlord.

This section, while placing a heavy emphasis on job creation and employment, glosses over other aspects that one would expect to see in this chapter. It also does not present a full analysis of the topics it discusses.

### **Direct Employment**

This section stresses job creation within the community and touts a 'local first' hiring policy. This claim looks good on paper, and I am sure those from outside the community reviewing the project would think of this as a positive. However, at this point in time, almost everyone who wishes to work for ODV is already working there. So, it appears that most of the future job creation will be outside Wells, and this should be stated as such in the proposal.

### **Negative Impacts on Tourism**

There is insufficient analysis of the interaction of the proposed project with the existing and potential tourism industry. The negative impacts of the project are glossed over.

BGM has already employed a number of Wells residents. This of course is a positive benefit for the individual, especially those who have been able to maintain summer employment at Barkerville and winter employment at BGM. However, in most cases it has moved tourism workers to jobs in mining. This problem is exasperated by the lack of housing in the community. With vacancy rates at zero and a high unfulfilled demand, this means that not only is there a loss of tourism workers, but there is also a loss of housing for tourism workers. It means there can not be an influx of new workers into the community to meet the employment demands of tourism, because there is no housing for them.

In addition, ODV (or its associates) has purchased the two major motels, and recently purchased an additional RV park taking over 80% of the overnight tourism accommodation out of circulation. Elsewhere, (in the subsection on Wells in the Summary) it is stated in several places that Wells aspires to become an overnight stop for people visiting Wells and Bowron. These comments are grossly inaccurate. In the 1970's that was the aspiration. By the 1990s Wells had achieved that goal, and in fact, had become a destination in its own right. People came stayed overnight and longer to pursue a variety of activities in Wells and area, that included culture, history, and outdoor recreation. It is only in the last 5 years, with the removal of accommodation that the situation has changed. These actions by BGM/ODV have already had significant negative impacts on tourism. This situation needs to be more accurately stated in the document.

### **Community Liveability, Arts and Culture as an Economic Driver**

This section lacks detail on the contribution of these factors on economic health and stability. In 1970 Wells was a community that mining had abandoned. An influx of young people with creative ideas transformed the community from a ghost town to a vibrant community. They revived the fire department, restored the Community Hall, restored the Hill Meat Market for an art Gallery, restored the Sunset Theatre, and breathed new life into the Museum. The formation of Island Mountain Arts in 1977

attracted not only students and instructors and established cultural tourism as a valued industry in Wells, but also ultimately attracted full-time residents. Artists moved to Wells and opened studios and galleries. Up until recently, Culture and Tourism were the major employment sectors. Some of the attributes that people have listed that they value about Wells, and that make Wells a desirable community, include:

- Low traffic, pedestrian friendly community
- Friendly close-knit community
- Air quality
- Affordable housing
- Cultural activities and events
- Natural beauty
- Closeness to nature,
- Abundant wildlife

Almost all these attributes are threatened by the current proposal. For example, ODV/BGM has purchased one apartment block and several private residences. Most recent purchases have been well above market value, driving up real estate prices. This in turn will drive up taxes and Wells may become unaffordable for seniors and those on lower or fixed incomes.

While ODV might argue that the loss of this liveability will be compensated by the economic value this project will give to the Province, local residents who have worked hard to preserve the community do not necessarily agree. The graveness of the upheaval that will be caused to the existing way of life is greatly underplayed in the application.

In a previous comment period I had asked for the following questions to be answered. For the most part they were not, so I repeat them here. To date the information provided either does not apply to the situation in Wells, or is too general and vague to be useful.

- What are the jobs to be created and who is going to fill them? Do these people currently live in Wells and if not, where will they live during their employment (camp, commute, etc.)
- Given the information gathered above, what benefits/disbenefits from this employment will accrue to Wells as opposed to the region.
- What will be the impact of the proposed camp on Wells? Will it be a wet camp or a dry camp? Will its residents be allowed to fraternize businesses in Wells? What will be the anticipated level of spending?
- What is an accurate estimate of families that might move to Wells for the duration of this project? On what is that estimate based? What jobs would they be filling? What incentive would they have to move to Wells as opposed to living elsewhere? How will they be housed?
- Will BGM build additional family-friendly housing (instead of draining existing stock) and if so, how much, and where (given the geo-technical challenges of the area)?
- Of the overall economic benefits derived from the project what type and proportion will fall to the Province (or provincially as a whole), to the region, and to the community of Wells?
- Of the overall negative economic impacts of the project what type and proportion will fall on Wells as compared to the region and the province.

The specific section on Wells should have included these detailed answers.

**A.10      Comment #57**

## Comments on the Wells Section – 1.0 Project Summary pages 72-84

I am submitting these comments as a member of the Community Advisory Committee and a long-time resident of Wells.

Overall, this section is disappointing in that it did not answer the questions posed in the last round of comments by myself and other residents of Wells. The data supplies is not quantified and unsubstantiated.

It is also unfortunate that this section is buried in the Project Summary instead of receiving its own Chapter.

The section repeats much of the information provided at various open houses sponsored by ODV/BGM and does not seem to include new analysis. Phrases such as “where possible”, “to the extent feasible” and “where practical” weaken the believability of the statements and promises, especially given the track record of ODV/BGM with provincial and federal environmental infractions, and their very poor track record in dealing with current complaints during the exploration stage. The information provided is not detailed enough to provide Wells residents with a clear idea of what their community will be like if the project goes ahead as proposed. A clear and detailed description of a ‘typical’ day would be helpful, as well as good visual simulations. (The visual simulations provided to date have been inadequate and misleading, using very wide-angle lenses which minimize the visual impact of the proposed buildings and in no way represent what the eye would actually see.)

The language in this section reflects an attitude that the company is willing to do small things that are easily accomplished but is much less willing to make significant changes to the project that would put the community’s values first.

### Location of Above Ground Infrastructure

This section should address, but does not, the largest issue with the proposed Cariboo Gold Project in relation to the community of Wells – ***the location of the above ground infrastructure***. It is frustrating to the local community that a project that could realize all of the projected positive benefits of employment and economic development should also have such devastating negative impacts – **especially when viable alternatives exist**. We could ‘have our cake and eat it too’ if the project design was different. However, ODV/BGM has refused to consider any alternative designs and continues to put company profit ahead of community well-being.

### Table 9: Summary of Potential Impacts and Mitigation

#### Air Quality

- What are the ppm of particulates that are predicted for various areas in Wells at various stages of the project?
- The comments about two portals is misleading – while it will decrease the time for portal development it will increase the level of disturbance. **Why is the alternative to omit the Island Mountain portal and do the complete development underground not discussed?** (while this option is more expensive for the company it eliminates much surface disturbance.)

### **Acoustic**

- Statements such as “Activities for minimizing noise disturbance to Community of Wells residents will be employed **where possible**, particularly activities at the Mine Site Complex” give no sense of security to residents, especially given ODV/BGM inability or unwillingness to mitigate excessive noise during the exploration phase.
- What will be the exact decibel readings in key residential areas and near the school and various time during the project?
- As has been noted several times at open houses and CAC meetings and during the initial comment period, the acoustic baseline data was collected at inappropriate locations and at times when industrial noise had greatly increased over historic levels.

### **Employment and Economy**

- The proposed initiative to develop additional tourism products such as mine tours will not offset the negative impacts to the existing tourism industry in Wells. Industrial tourism is a very small subset and not a big seller in today’s market. The existing market is looking for peace and quiet, a sense of place, easy access to outdoor recreation and cultural activities. All of these things will be negatively impacted by the current proposal – particularly the proposed location of the Service Building and the proposed Island Mountain Portal.
- This section does not adequately describe the negative impacts of the project on the tourism industry (nor does Section 7.10).

### **Land and Resources**

- I am wondering of what possible use is “advance notice” of a negative impact. It does not change or mitigate the negative impact.
- Signage does not compensate for the loss of recreational opportunities
- The proposed mitigation strategies for light, noise and visual quality give no indication of what will actually been seen and heard, which of course the information we are seeking here.

### **Human and Ecological Health**

- This section is insufficient. Human Health factors that need to be accounted for are:
  - deleterious affects of noise and light pollution
  - poor air quality,
  - Higher risk of communicable diseases due to influx of transient workers (as has already been demonstrated with COVID 19)
  - Higher stress levels due to increased traffic, higher cost of living

### **Community Health**

- Much of this section seems to be aimed at the mine workforce not the community
- Are the proposed health services for the employees or for the community in general? How will these be delivered? Is this going to be a private health clinic? More information is needed.

### **Table 10: Positive Benefits to the District of Wells**

The projected benefits included in this table are not specific, not quantifiable, and not supported by any evidence.

### **Air Quality, Surface Water, Soil, Vegetation and Wildlife**

- The only benefit listed here is the clean up of the mine site, including historic tailings at the conclusion of the project. This can hardly be listed as a benefit of the project, because as

current owners of these properties they are legally required to do this regardless of whether or not the project goes forward.

**Subsequent Sections**

- Projected benefits are not quantified nor supported by evidence

**A.11      Comment #60**

Allen Crowe

October 6<sup>th</sup>, 2021

Lakewood Electric Ltd.

**Regarding: The Cariboo Gold Project**

I am reaching out on behalf of Lakewood Electric with regard to the Cariboo Gold Project located near Wells BC.

Lakewood Electric started working at the QR mill and Bonanza ledge for Barkerville Gold Mine several years ago. Lakewood has managed to employ electricians from Quesnel, Williams Lake and the Prince George area on these projects.

BC and the rest of the country are in a downturn due to COVID. The overall state of the deficit in BC and Canada has continued to climb. There are a limited number of opportunities within BC and Canada that have the ability to help grow our economy, create jobs and help to rectify our deficits. I feel that it is of the utmost importance that projects like the Proposed Cariboo Gold Project move forward.

The economical and financial opportunities that projects like the Cariboo Gold Project present for the local citizens, first nations, contractors and our country as a whole cannot go unrecognized.

With the standards put in place by our government to protect our lands, water and air people should feel at ease knowing that these projects are governed and policed for the overall long term protection of the environment for generations to come.

In summary I am excited to see the project move forward. It has been a positive experience watching the project evolve from a small operation to what could become a large successful undertaking for the local communities, first nations and us as Canadians.

Allen Crowe



**A.12      Comment #61**



Building a better  
working world

Will electrification  
spark the next  
wave of mining  
innovation?



The better the question. The better the answer.  
The better the world works.



# Electrification in mining survey

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Electrification of mines is climbing the agenda of mining companies as a driver of cost reduction, energy efficiency and license to operate stewardship. But, reaping the full benefits of an electrified mining future will require reskilling, reaching out across sectors and rethinking the fundamentals of mine design.

# Executive summary

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To uncover both the opportunities and challenges of electrification, we commissioned a survey of miners and original equipment manufacturers (OEMs) with the Sustainable Minerals Institute at The University of Queensland (Australia) and The Norman B. Keevil Institute of Mining Engineering at The University of British Columbia (Canada). Four key themes emerged:

## 1

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### Electrified mines improve economics and strengthen license to operate.

The cost of energy represents up to one-third of a mining company's total cost base, making it a keenly managed component of operations. In addition, demand for carbon reduction in the sector is inevitable, and electrification is one way to achieve it. Diesel engines cannot be replaced with carbon-generating electricity and, therefore, electrification needs to be accompanied with a move to renewable power.

## 3

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### Collaboration will unlock better electrification solutions.

Partnerships and co-creation of solutions with OEMs, other mining companies and governments are needed to successfully integrate electrification in mines.

## 2

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### Electrification needs different skills.

Mine electrification requires different worker skills as it enables other advanced technologies. In developing economies, this challenges the assumption that a mine provides employment for laboring workers.

## 4

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### Mine design needs a rethink to build in optionality for future innovation.

Decoupling mines from diesel is not an easy task, mainly due to the diverse range of technical and financial challenges in mining various deposits, which make a "one-size-fits-all" solution hard to find. Getting full value out of electrification means developing a technology road map in parallel with the mine plan. It is important to start thinking about building agility into mine design to leverage the potential benefits in asset flexibility, lower ventilation requirements and the human footprint.

The future of electrification in mines requires a paradigm shift to embrace new emerging technologies.



## Our survey sample

The Sustainable Minerals Institute at The University of Queensland and the Norman B. Keevil Institute of Mining Engineering at The University of British Columbia undertook extensive interviews of mining companies and OEMs located in Australia, Canada, Colombia, New Guinea, Peru, Russia, South Africa, Sweden, the UK and the US. These companies have operating mines in all continents except Antarctica.

The job roles of the interviewees included CEO, CFO, COO, global head of

underground mining, vice president (VP) - product line, senior project manager - technology, executive head of technology operations, head of technology, chief innovation officer, VP - sustainability and director of digital technology.

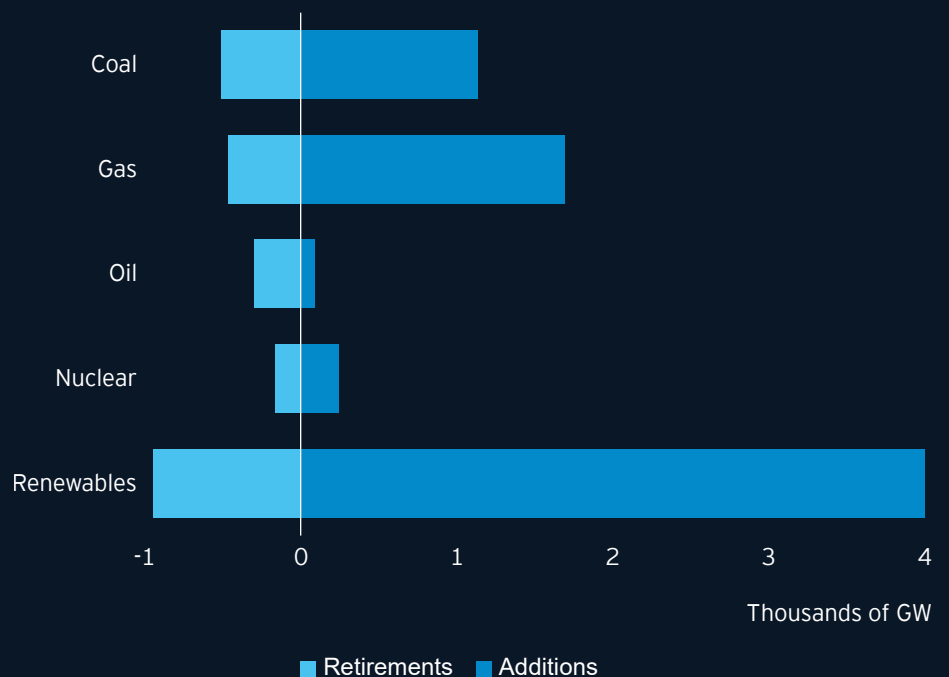
The EY organization has anonymously quoted these participants throughout the report. EY teams would like to thank all the interviewees for their participation and their candid insights.

## Electrified mines improve economics and strengthen license to operate

The cost of energy represents up to one-third of a mining company's total cost base, making it a keenly managed component of operations. Average grades have halved and overburden has doubled over the last 30 years, and, as mines are beginning to extend to depths beyond current norms, their energy demand is growing even larger. Going electric reduces not only ventilation and maintenance costs but also up-front capital costs. For example, automation efforts at Resolute Mining's Syama mine in collaboration with Sandvik have resulted in lower up-front capex and also have the potential to reduce life-of-mine all-in sustaining costs by approximately 16%.<sup>1</sup>

But, to date, we've seen little innovation in providing energy to mines, with operations largely relying on fossil fuels to run equipment and electricity for processing. Mines in remote areas are most likely to use diesel power generation. For example, by the time a Canadian remote diamond mine is decommissioned, it has consumed more than 800 million liters of diesel fuel (accounting for over 20% of its operating costs). In addition, renewable energy has simply not been cost effective until recently. But as technology costs have fallen, the uptake of distributed energy resource has accelerated. By 2040, renewables will outpace all other sources of energy and account for 60% of all capacity additions.

### 5,285GW of net capacity to be added in the period 2018-40



Sources: IEA World Energy Outlook and EY analysis, March 2019.

<sup>1</sup> "Resolute Mining's updated study cuts underground gold mine costs by US\$135 per ounce" Mining Capital, <https://www.miningcapital.com/companies/news/199989/resolute-minings-updated-study-cuts-underground-gold-mine-costs-by-us135-per-ounce-199989.html>, accessed 22 May 2019.

The World Health Organization has declared that diesel engine exhaust emissions cause cancer in humans, outlining that diesel particulate matter belongs in the same potentially deadly category as asbestos, arsenic and mustard gas.<sup>2</sup> This has relevance to underground mining, where diesel equipment is operating in confined areas and workers are subject to potentially hazardous exhaust fumes in their day-to-day operations. As much as 40% of an underground mine's energy

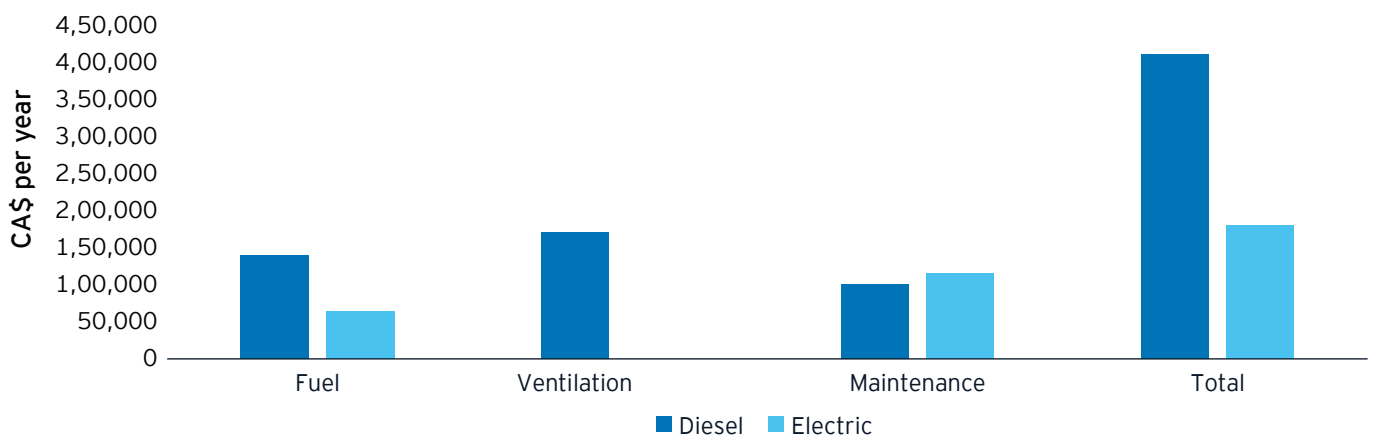
outlay is spent on powering gigantic ventilation systems to remove pollutants from tunnels.<sup>3</sup> And, diesel engines generate twice as much energy as battery-powered vehicles, making it even more necessary to have proper ventilation systems in place. The switch from diesel to electric therefore makes good economic sense, but critically, it also enables a greater level of on-site health and safety.

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The biggest issue I see driving underground is human health. Over time, that's going to push us toward electrification. You don't want any accidents at your mine sites, but you also don't want any long-term implications for the safety of your workers. So, we've got to be investing more in terms of the technology to provide that safer working environment for them. The issues with asbestos are already here. I think that the secondary effects of diesel particulates are coming.



### Comparison of operating costs for similar diesel and electric load haul dump trucks



Source: [http://minewiki.engineering.queensu.ca/mediawiki/index.php/Electric\\_equipment](http://minewiki.engineering.queensu.ca/mediawiki/index.php/Electric_equipment).

<sup>2</sup> "Cancer risk from diesel fumes in underground mines prompts fears of industrial health disaster," ABC News, <https://www.abc.net.au/news/2018-09-15/mining-industry-confronted-over-cancer-risk-from-diesel-fumes/10209762>, accessed 4 April 2019; "Diesel cancer risk in WA mines 'worse than asbestos,'" Perthnow, <https://www.perthnow.com.au/news/diesel-cancer-risk-in-wa-mines-worse-than-asbestos-ng-f4d6e31d42746f1a67053c0e3429b>, accessed 4 April 2019.

<sup>3</sup> Electric vehicle revolution goes underground with mining trucks," Mining Weekly, <https://www.miningweekly.com/article/electric-vehicle-revolution-goes-underground-with-mining-trucks-2018-11-14/>, accessed 2 July 2019

Improving economics and the benefits of license to operate are driving more companies to consider electrification, and some have already begun this journey. Remote mines without access to the grid are mostly continuing with conventional sources of energy, but, for those connected to electricity, electrification increasingly makes economic sense. Most new mines are considering including battery-

based equipment in their mine plans. Tony Makuch, CEO of Kirkland Lake Gold, said, "Ten years from now, I'd think we'll go from 90% to 100% reliance on diesel at some mines to less than 20%, the rest will be using batteries. If all the equipment was developed now, I'd want to pretty much convert all our mines at once."<sup>4</sup>

## Case Study

### Canada's first all-electric operation and the world's first diesel-free hard rock mine: Newmont Goldcorp's Borden mine<sup>5</sup>

Newmont Goldcorp's Borden mine uses a full range of electrified equipment, including load haul dump trucks, drills, bolters and personnel carriers. According to Newmont Goldcorp, electrification at Borden has resulted in benefits that include:

- ▶ Improved safety performance

- ▶ Reduction in annual greenhouse gas (GHG) emissions of 70%
- ▶ Reduction in ventilation costs of 50%
- ▶ Improved staff well-being
- ▶ Reduced megawatt hours of 33,000 per year because of the huge decrease in ventilation requirements

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We've already surveyed the first group of workers that started at our Borden mine," says John Mullally, Newmont Goldcorp Group Executive for Sustainability, North America. "Something like 90% said that they would not want to go back and work in a traditional underground mine alongside diesel engines. Even though they had to adapt to some of the new equipment and technology at this mine site, they said that the noise level and the air quality inside meant this is where they want to stay. They would encourage people to go and work underground at these types of mining operations, because they feel that it's a safer and better working environment for them.

<sup>4</sup> "Even the World's Biggest Miners Are Switching to Electric Vehicles," Bloomberg Quint, <https://www.bloombergquint.com/business/bhp-biggest-miners-are-starting-to-drive-deep-underground>, accessed 4 April 2019.

<sup>5</sup> "Borden: the 'goldmine of the future,'" World Gold Council, <https://www.gold.org/about-gold/gold-supply/gold-development/positive-impacts-mining-case-studies/borden-gold-mine-of-the-future>, accessed April 2019.



## Electrification needs different skills

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We are generating opportunities for our current and future workforce to gain skills and competencies for smart mining. The new curriculum will enhance the capability of those in the mining sector and form part of the learning pathways for those seeking to enter a range of industries, applying automation and technology. By working with South Metropolitan Technical and Further Education and the Western Australian State Government, we will deliver the courses that will prepare young West Australians for the jobs of the future.

**Chris Salisbury**  
Chief Executive, Iron Ore, Rio Tinto.

Electrification will accelerate automation and the internet of things (IoT), as more reliable electric motors require less maintenance and human intervention. With electrification, automation through drones, autonomous vehicles and remote-controlled operational systems will be rolled out more widely across mining operations. There will be increasing demand for data and digital literacy skills across all phases of the mining value chain that will redesign most occupations as the human-to-machine interface evolves and becomes more prevalent. By better understanding the future skills required, industry stakeholders will be able to strategically plan their workforce and sustain their competitive advantage in global markets. However, to achieve this, a significant investment and an adaptive workforce will be required.

Skills such as change management, managing innovation, systems engineering and digital technology are required to break employees out of silos. At the same time, mining companies and universities need to communicate changes in required skillsets and collaborate to develop future courses. In 2018, the number of mining engineers continued to decline, with only 34 first-year enrollments across the four Mining Education Australia universities, which supply 80% of Australian mining engineering graduates.<sup>6</sup> This shows a declining supply of workers and also indicates that universities need to develop and deliver education and training options with new and existing partners to increase the future pipeline, as well as provide opportunities for the existing workforce.

For example, as the skills gap grows, Rio Tinto's US\$2m vocational education and training initiative, Resource Industry Collaboration group, has delivered the first nationally recognized course in automation. This will ensure the next generation of workers is ready for mining's brave new digital world.<sup>7</sup>

Technological advancement and innovation in the industry do not necessarily correlate to an immediate reduction in the workforce, but it will change the skills required. For example, "driverless trucks" will result in shifting skill profiles from heavy-license drivers, to employees with data processing, digital literacy and technical planning skills. A recent EY report, commissioned by the Minerals Council of Australia<sup>8</sup>, found that:

- ▶ **Employment projections are set to increase over the next five years** and approximately 77% of occupations in the sector will be enhanced or redesigned due to technology.
- ▶ **Skills with growing demand** include system evaluation and analysis, mathematics, active listening, instructing, data analysis, data and digital literacy, and judgment and decision-making.
- ▶ **Skills with decreasing demand** include vehicle operations, materials extraction, operations and control, equipment maintenance and blast-hole drilling.

For employees, the ability to transition, upskill, cross-skill and reskill will be essential, while companies will need to provide employees with the platform to do this. Innovation has changed the modality of work – from mine site to remote and integrated operating centers.

<sup>6</sup> "The Future of Work: The Changing Skills Landscape for Miners – A report for the Minerals Council of Australia," <https://minerals.org.au/news/powering-future-australian-mining-people-innovation-and-modern-education>, accessed 4 April 2019.

<sup>7</sup> "Machine learning: Australia's first automation course launched at WA TAFE," *Sydney Morning Herald*, <https://www.smh.com.au/business/workplace/machine-learning-australia-s-first-automation-course-launched-at-wa-tafe-20190612-p51ww4.html>, accessed 24 June 2019

<sup>8</sup> The Future of Work: The Changing Skills Landscape for Miners – A report for the Minerals Council of Australia," <https://minerals.org.au/news/powering-future-australian-mining-people-innovation-and-modern-education>, accessed 4 April 2019.

This brings benefits that include increased employee safety, improved recruitment and retention, and more efficient operations. Moving workers to a safer environment closer to communities can also attract different types of employees, allowing for greater diversity. In these new digitally powered workplaces, employees will move from routine tasks to roles

requiring a higher level of thinking to anticipate and plan activity and manage the human-to-machine interface. For example, automation efforts at Resolute Mining's Syama mine in Mali have not led to any job losses but have created more training opportunities for local workers to operate at higher levels.<sup>9</sup>

## Case Study

"Helping communities thrive well after the mine is gone" Anik Michaud, Group Director of Corporate Relations, Anglo American.<sup>10</sup>

At the Investing in African Mining Indaba 2019 conference, Mark Cutifani, Anglo American's CEO, described a future scenario where five off-site, non-mining jobs are being targeted for every one on-site mining job. The plan is to advance local communities from subsistence farming to commercial agriculture, which will also involve helping them to access water. Achieving this will involve greater collaboration

with government on their country vision and with academia on the creation of the right skills. The company is focused on:

- ▶ Moving from a social license to operate to a social license to innovate
- ▶ Creating a sustainable jobs program in collaboration with academia
- ▶ Upskilling or reskilling employees
- ▶ Identifying transferrable skills to work in any company, industry or country

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There's a lot of work to be done to get people up to the level needed to maintain and service new high-voltage electric equipment in an environment where it can be hot, humid and corrosive. That is going to be a challenge for everybody.



<sup>9</sup> "Sizing up Syama: the world's first fully automated mine," *Mining Technology*, <https://www.mining-technology.com/features/sizing-syama-worlds-first-fully-automated-mine>, accessed 14 June 2019

<sup>10</sup> "Innovation mining's biggest challenge – Anglo," *Engineering News*, [http://www.engineeringnews.co.za/article/innovation-minings-biggest-challenge-anglo-2019-02-04/rep\\_id:4136](http://www.engineeringnews.co.za/article/innovation-minings-biggest-challenge-anglo-2019-02-04/rep_id:4136), accessed 4 April 2019.

## Collaboration will unlock better electrification solutions

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It's got to be done in partnership. The mining houses can't do it by themselves, and the OEMs can't do it by themselves.

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I don't believe that mining companies or OEMs need to develop the technology independently. I believe a lot of these technologies will be commodity technology at the end of the day, so none of this should be proprietary or be seen as a competitive advantage.

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When there's an accident at a mine site, we share the findings across the sector so that we all learn from it. If we're going to embark on an innovation strategy that will improve the overall reputation and viability of our industry, we have to start sharing some of the knowledge that's going to be out there.

Mining organizations tend to be risk-averse and conservative, contributing to a conventional and typically fixed perception of the value chain and how it should be managed. Miners tend to view supplier relationships as zero sum, rather than exploring mutually beneficial opportunities with the potential to maximize value for both parties. A more open perspective around the role of suppliers as strategic partners expands the possibilities for miners to benefit through innovation, cost reduction and competitive advantage. In the case of electrification, miners are clear that they can't go it alone.

Interestingly, many of the participants felt that not only was it time to work more collaboratively with OEMs, but it was also time to collaborate across the sector and, potentially, in a noncompetitive way.

Collaboration can create value for both parties. The partnership among Newmont Goldcorp, Sandvik and MacLean at the Borden mine is an example of this. Future mines will be carbon-free, electrified and autonomous, which will require new technologies to be developed and tested to ensure that the mining industry will remain competitive. This not only requires new control systems and equipment but also efficient management systems that meet future demands for a sustainable industry. This will need a new type of collaboration, a digital ecosystem, where the miners' and OEMs' digital systems and operations are in sync.

For example, LKAB, Epiroc, ABB, Combitech and AB Volvo have joined forces in a partnership and are starting a unique test-bed in the ore fields of northern Sweden. The implementation of this project will require significant investment, and the partners are therefore seeking collaboration with more suppliers, the Swedish state, research institutes and universities. According to

Johan Söderström, Managing Director of ABB Sweden, "LKAB is taking a whole new approach to the development of future mines with unique digital and sustainable solutions. We look forward to partnering with LKAB, Epiroc, Combitech and AB Volvo, and contributing our knowledge of automation and electrification of underground mines and services. Digitalization presents tremendous opportunities and, together with our partners, we are creating the safe and efficient mines of tomorrow."<sup>11</sup>

Data collaboration will be a critical element to mine electrification. But, although the benefits of data sharing are widely publicized, concerns, such as loss of intellectual property, competitive advantage or perceived loss of data monetization-related opportunities, have created a protectionist attitude toward data from mining organizations, suppliers and OEMs. This has limited the ability to unlock the full potential of data-driven decision-making:

- ▶ **Mining organizations:** Mining's end-to-end systems rely on a common integrated data model to support related business processes. For example, optimizing maintenance planning, scheduling and execution requires an integrated view of equipment performance, asset health, maintenance costs and the economic impact to production. The inability to access, or only partially access, this data compels organizations to explore alternatives, including moving away from tier 1 OEM providers.
- ▶ **Suppliers:** Suppliers need to understand how their equipment is used to ensure consistency and quality of service and achieve greater levels of customer satisfaction. Suppliers also require a real-time understanding of equipment performance, operating behaviors and conditions, and key operational KPIs, such as mean time to recovery and mean time between failures.

<sup>11</sup> "New world standard for sustainable mining," Epiroc, <https://www.epiroc.com/en-in/newsroom/2018/new-world-standard-for-sustainable-mining>, accessed 4 April 2019.

## What does good look like?

European Sustainable Intelligent Mining Systems for the global mining industry is a three-year-old Horizon 2020-funded, European-wide project to create the digital mine. The project has a total budget of €16.2m (about US\$18.3m), and Atlas Copco is leading the consortium of 12 partners, including miners, METs and universities. The aim is to make a connected, efficient, safe and attractive workforce. Existing test sites for successful demonstration of technologies are in Germany, Poland, Sweden and Finland. Technologies include using battery rigs to reduce diesel emissions and improve underground air quality and the use of semi-autonomous battery vehicles plus 5G technology to link people, machines and data.<sup>12</sup>

## Battery Electric Vehicles Underground Project

The Global Mining Guidelines Group and Canada Mining Innovation Council outline the recommended practice for the use of battery electric vehicles (BEVs) in an underground mining environment. It can be used by both mining companies and OEMs in designing and accommodating BEVs. It aims to strike an appropriate balance between standardization and innovation, providing a global scope while acknowledging that regional differences exist in standards and regulatory frameworks.<sup>13</sup>



Source: Sustainable Intelligent Mining Systems.

<sup>12</sup> "Sustainable Intelligent Mining Systems," *Bergforsk*, <http://www.bergforsk.se/wp-content/uploads/2018/05/morgan-rody.pdf>, accessed 12 April 2019.

<sup>13</sup> "Recommended practices for battery electric vehicles in underground mining v2.0" *Canada Mining Innovation Council*, <https://gmgroup.org/wp-content/uploads/2019/01/BEVs-Poster.pdf>, accessed 12 April 2019.

## Mine design needs a rethink to build in optionality for future innovation

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You can change open pit very quickly at a small capital cost. But for underground mining, what you do today will be there forever. You're making a decision you're going to have to live with for a long time. You can't mine through it.

But ... if you're developing a new mine, then we've got all sorts of other degrees of freedom, such as intelligent ventilation, much less ventilation and other things now that you have this new equipment. So, you can actually start changing your capital quite dramatically.

Reaping the full value of electrification requires a rethink of mine design that considers a technology road map in parallel with the mine plan.

The long-term view is almost like a prequalification for near-term work. An electric mine looks different, and that differentiation will grow optionality in mine design, which is critical now. At the same time though, the mine plan needs a technology road map, so that technology options can be incorporated as they come onto the market. It may not be possible to predict the operational tactics and assets for the duration of mine plans, but it's important to start thinking about building agility into mine design to leverage the potential benefits in asset flexibility, lower ventilation requirements and the human footprint. This requires a fundamental change in mindset: alternate asset life cycle strategies, ownership models and duty cycles.

Companies also need to understand the risk-reward profile of investing in technology and automation, as well as whether they will be able to generate returns or reduce costs and not just change the risk profile of their operations. This move toward electrification is happening in phases. A phased approach enables mines to immediately lower costs and carbon footprints, while advancing

progressively as technology becomes more scalable and cost effective. A phased approach also helps limit up-front capital investment for the miner.

The future of electrification requires a paradigm shift to embrace new, higher-risk technologies.

Many of the technologies enabling the shift are still at the prototype stage, and getting them from lab to mine will require patience – and a new mindset. While safety must remain the priority, the traditionally risk-averse culture of mining must embrace a new commitment to support and shape the development of emerging technologies.

For example, electric fleets present sector-specific challenges that go beyond the relative newness of the technology. The range of electric haulage vehicles is limited compared with traditional diesel equipment and, as a result, charging the vehicles without overloading the system adds a layer of complexity. Miners need to follow a staggered approach to charge vehicles in order to manage the charging time and minimize downtime.



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You've got to make a call on technology, but don't get yourself stuck with that technology for 20 years. Acknowledge that in five years' time the technology will be different ... It's a big leap of faith.

## There are challenges for both capital and technology

### **Making the right capital investment decisions**

The fundamentals are different in conventional mining projects compared with those that use renewables. A renewables-based energy system has high capital expenditure (capex) and low operating expenditure (opex), whereas conventional projects have comparatively low capex and high opex. While it is comparatively easier (and cheaper) to change open-pit operations, it takes a lot of investment to make changes to underground operations. Decisions around making changes will also depend on the stage of the mine cycle – toward the end of mine life, it may not make economic sense to invest.

### **Ensuring technology remains agile**

Miners must recognize the fact that technology will evolve over the years and whatever makes economic sense today might not have similar results five years down the line.

Mining and metals continue to lag behind other sectors in the realm of technological effectiveness. The value from technology will only be realized when companies change how they work, rather than succumbing to the lure of individual technology programs and pursuing local optimization, which is not necessarily transformational.

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You need to look at it from a feasibility level scope and look at the entire operation ... Look at the mine plan and consider ... Is that the best way to plan this mine, or should we attack it from a different direction with this different thought process altogether? You've got to get a task team together of the whole operation, maintenance and miners, and geologists, even metallurgists, the whole gamut to come in and look at it from a real holistic point of view; otherwise, you're going to miss those opportunities.

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Through my career, I've seen many organizations where, when you push technologies from the top down, you've got people in the field who probably know better than the people pushing it to begin with. Then there's resistance, and they're not buying in. It has to be their idea for it to really come together.

Change the hearts and minds of the people, challenge them to think differently and then the rest will flow. If you go and employ the right people to be able to do this, then we can change down to the business.

## Case Study

### Local energy policy: competitive edge or disadvantage?

Countries implementing policy and regulatory changes in a move toward carbon pricing and the reduction of GHG emissions will have first-mover advantage in accelerating the electrification or greater use of renewables in the sector. Both Chile and Canada have announced carbon-pricing schemes in a bid to incentivize miners to opt for electrification or renewable sources of energy. As a result, companies such as Barrick, Newmont Goldcorp and Rio Tinto have invested, or have plans to invest, in mine electrification.

Chile has outperformed other countries in terms of miners adopting renewables, following a law in 2013 mandating that 20% of its energy should be from renewable sources. This law has been so successful that it recently reset the target to 70%, which is anticipated to be accomplished by 2050.<sup>14</sup> Leading practices include:

- ▶ The Zaldívar copper mine in Chile, a joint venture between Barrick and Antofagasta, has become the first mine to operate with 100% renewable energy.
- ▶ A floating island of solar panels is being tested in Chile as a way to generate clean energy and reduce water loss at mine operations. The experimental "Las Tortolas" power-generating island is being run by Anglo American at its Los Bronces mine.

India and China are also pushing forward with measures to reduce GHG emissions, and South Africa implemented a carbon tax effective from 1 June 2019.

Countries with competitive energy policies will increasingly become more attractive for miners, unless we see breakthroughs that change the energy consumption of heavy processes, such as electrowinning and comminution. Comminution, in particular, will grow as a proportion of mining energy costs for certain commodities.

<sup>14</sup> "These Massive Renewable Energy Projects Are Powering Chilean Mines," *Bloomberg Businessweek*, <https://www.bloomberg.com/news/features/2018-08-07/these-massive-renewable-energy-projects-are-powering-chilean-mines>, accessed 4 April 2019.

## Prepare now to mine tomorrow's deposits

Consider a world where:

- ▶ The supply of energy to mining sites goes far further than fuel mix.
- ▶ The IoT forms part of site design, sending data on energy usage and production schedules to central or area processors.
- ▶ AI identifies patterns in usage, intensity, frequency, or mixture of staff or assets.
- ▶ Power supply is based on renewables and battery storage. Conventional power is directed only to the parts of the site that require it, leaving batteries to charge in other areas or excess power to be sent back to the grid

Integrated, linked, thinking and responsive systems will bring the new technologies that are transforming the power grids of today into the mining sites of tomorrow – thereby converging real estate, mining, automotive, technology and utilities through the lens of the employee, the operator and the shareholder. Precision mining with small-scale automated equipment could make small narrow-vein orebodies economically viable. The minimum-efficient mine scale could fall dramatically.

Electrification represents a viable channel for the mining sector to increasingly adopt or develop new technologies, and processes to explore mineral resources,

while meeting environmental and social expectations. The integration of conventional and renewable energy is critical to ensure reliable and safe power for the mine. The mining sector is not only calling for technical integration but also for commercial integration between conventional and renewable energy, with an eagerness to retain a single point of accountability for power. In the event of power outage, the manager will want one point of contact, rather than separate points of contact for conventional and renewable energy.

With the costs of wind and solar generation and energy storage falling so rapidly, managers may be tempted to hold off for a further tender cycle before adopting renewable energy. A balance may be achieved by proceeding with a level of renewable capacity now and having the flexibility in power contracts to incrementally increase the renewable portion during the contract term.

Above all, miners need to remain competitive in terms of productivity, reduced operational risks and improved mineral recovery rates and recover metals and minerals of higher quality. As deposits are increasingly becoming deep, remote and difficult to access, new innovative processes are required – yesterday's expertise may not be able to mine tomorrow's deposits.



## How EY's Global Mining & Metals Network can help your business

The sector is returning to growth, but mining and metals (M&M) companies face a transformed competitive and operating landscape. The need to improve shareholder returns will drive bold strategies to accelerate productivity, improve margins and better allocate capital to achieve long-term growth. Digital innovation will be a key enabler but the industry must overcome a poor track record of technology implementations. If M&M companies are to survive and thrive in a new energy world, they must embrace digital to optimize productivity from market to mine.

EY takes a whole-of-value-chain approach to support each client to help seize the potential of digital to fast-track productivity, balance portfolios and set a clear road map for their new energy future.

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**A.13      Comment #63**

Wells is the town most affected by the proposed mine. During the Public Comment Period last winter (*Process Planning Phase*), a stand-alone chapter about the mine's impact on Wells was requested. Instead, the July 2021 Application contains only a scant and superficial few pages buried in *Chapter 1 – Application Summary* (Section 1.7, pp. 72-82).

- I will again request a stand-alone and much more comprehensive chapter on Wells. Please include information embedded in other chapters, such as Wells history, governance, demographics, education, employment and labour market, housing, current health services, local infrastructure, and baseline studies (such as they exist) for noise, light and other valued components. At present, a reader has to poke through thousands of pages to figure out if reference to a Local Assessment Area is Wells or not, and what the relevance could be for those who live here, the most directly-affected community.
- Please include measurable impacts of activities and proposed mitigation actions. Also, how will accountability be achieved? Using phrases such as 'where practicable' and 'where possible' aren't specific enough.
- The Cumulative Effects for Noise (Acoustics) need to be identified. Why are these not in the application?
- If 2020 census figures are available, please use those.

Several other Public Comments address the concerns and gaps in information specifically related to Wells, which I support and also seek answers for:

- Judy Campbell, CAC Member  
– Economic Impact Assessment / KPMG (Appendix 07.10) – Oct 4, 2021<sup>1</sup>
- Dave Jorgenson, CAC Member  
– Visual Quality Effects Assessment ( Appendix 7.11-4) – Sept. 22, 2021<sup>2</sup>  
– Traffic Impact Assessment (Appendix 01.0.09) – Sept. 24, 2021<sup>3</sup>  
– Services Building Site Selection – Alternative Means (Chapter 01.7) – Oct. 4, 2021

The location of the gigantic Services Building at the entrance to Wells, within sight and sound of homes and businesses, is the biggest issue many of us have with the Cariboo Gold Project Application. Osisko's insistence of this location is both disappointing and frustrating. Its rationale and defence is weak, often misleading, and unconvincing. A new alternative site analysis is required.<sup>4</sup>

- Anonymous  
– Comments on Employment and Employment (Chapter 07, Section 07.10) – Oct. 6, 2021<sup>5</sup>
- Anonymous  
– Comments on the Wells Sub-section to 1.0 Project Summary – Oct. 6, 2021<sup>6</sup>

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1 <https://projects.eao.gov.bc.ca/api/public/document/615b779bf342340022049a37/download/Comments%20on%20Appendix%2007-10.pdf>

2 <https://projects.eao.gov.bc.ca/api/public/document/614b995e3ea9a600228871fb/download/VQ%20Effects%20Assessment%207.11-4%20Response.pdf>

3 <https://projects.eao.gov.bc.ca/api/public/document/614e64b5ad1b2c00229f4945/download/EPIC%20-Traffic%20Study%20Assessment.pdf>

4 <https://projects.eao.gov.bc.ca/api/public/document/615b55a35c6d1f0022c44abe/download/Alternative%20Site%20Selection%20Analysis%20for%20Cariboo%20Gold%20Project.pdf>

5 <https://projects.eao.gov.bc.ca/api/public/document/615dc75479f5d800237454c9/download/Comments%20of%20Employment%20and%20Economy%20Section%207.10.pdf>

6 <https://projects.eao.gov.bc.ca/api/public/document/615e0462d8360200221f041c/download/Comments%20on%20the%20Wells%20Section.pdf>

*- D.L. Funk, long-time Wells homeowner and CGP Community Advisory Committee member*

**A.14      Comment #76**

Comments on the  
Cariboo Gold Project EAC Application  
Cameron Beck, Community Advisory Committee member  
October 7, 2021

As a person looking forward to the benefits, both to the community of Wells and to all of British Columbia, of Osisko Development's Cariboo Gold Project, I am seriously disappointed by the company's Environmental Assessment Certificate application.

Sadly, the project will likely be delayed until the company can make an adequate application. I hope the following suggestions will help speed up the development and approval of that application.

Be specific

The application should avoid vague, meaningless suggestions for mitigating or offsetting negative impacts of the project. Suggestions that plans "will be developed" and that the proponent "will work with" other parties may be well intentioned but are quite nebulous. The application should avoid suggestions the proponent will do something vague in the undefined future.

Instead the application should provide commitments for mitigation and impact offsets that are measurable and enforceable.

This was the directive provided by BC Auditor General Carol Bellringer in her May 2015 *Follow-Up Report: Environmental Assessment Office* when she stated the Environmental Assessment Office must "ensure commitments are clearly written in a measurable and enforceable manner" (emphasis added).

This means, quite simply, that an application should

- identify measurable maximum impacts, not only on the natural environment but on the socio-economic environment as well
- identify specific, measurable initiatives the proponent will undertake to mitigate or offset negative impacts

This also means an application should explain how these measures will be enforceable, with the impacts and the mitigating or offsetting measures monitored by an independent agency, and how the proponent will respond to any failure to meet its commitments.

Minimize the footprint and negative impacts (1)

The application identifies the environmental impact of a project with an unnecessarily large footprint and, consequently, environmental and visual impacts that are far more extensive than they need to be.

These impacts substantially increase the likelihood the application will be rejected by the Environmental Assessment Office.

As others have shown, a new application could propose a considerably reduced footprint, and fewer negative impacts, by constructing the proposed service building at the “Cow Site”, 500 m south of the currently proposed location at the “Mine Site”.

Access to and from the service building would then be along the Pinkerton Forest Road. Trucks hauling ore from the service building to the QR mill and trucks hauling aggregate from the Tucker Lake aggregate mine to the project would not have to travel along Highway 26 on the north shore of Jack of Clubs Lake, nor cross the proposed bridge over the Willow River on the west side of the community.

Moreover, there would no longer be a need for a new road on Barkerville Mountain for trucks hauling waste rock from the service building to the waste rock storage facility.

Additionally, the 69 kV transmission line could be routed along the Pinkerton rather than along a proposed swath to be cut through a forested Old Growth Management Area and across the east slope of Island Mountain immediately above, and in plain sight of, the community.

In summary:

- the impact of ore trucks traveling across a bridge on the west side of the community and along the shore of Jack of Clubs Lake would be eliminated
- the impact of aggregate trucks traveling that same route would be eliminated
- the impact of a new road on an unstable slope up Barkerville Mountain would be eliminated
- the 69 kV's impact on an Old Growth Management Area and on the scenic forest above the community would be eliminated.

Instead, all this truck traffic and the transmission line would be routed along a single pre-existing industrial corridor, the Pinkerton Forest Road.

This also eliminates another significant, negative socio-environmental impact. The proposed service building would not loom over the community as it would if built at the “Mine Site” but instead would be out of the community’s sight. The proponent would no longer need to pretend the hulking 12 story high building won’t have a huge negative impact on the visual quality of the community if built at the “Mine Site”.

“In response to the feedback received during the Early Engagement Phase, ODV reduced the height of the Services Building to improve the visual aspects. . . . the highest part of the building has been reduced in height by approximately 20 m, resulting in a new maximum height of approximately 37 m” the current application states (p 1-114).

Improved visual aspects? Really? The application merely replaces an 800 pound pig with a 700 pound pig, and the façade treatments and landscaping suggested elsewhere in the application is just (you knew this was coming) lipstick on the pig.

#### Minimize the footprint and negative impacts (2)

The project footprint and negative environmental impacts are unnecessarily large for another reason: the proposed Island Mountain portal. This portal should be omitted from a new Environmental Assessment Certificate application.

This portal was not part of the proponent's *Preliminary Economic Assessment* (August 2019). Figure 16.4 (p 197) and figure 16.8 (p 206) in that document illustrate carefully designed mine access and underground development with just one mine access portal. Figures 16.4 and 16.8 show that portal on Cow Mountain and, from there, underground access to both Cow Mountain and Island Mountain. No Island Mountain portal is identified, and no Island Mountain portal is required.

The Island Mountain portal was also not part of the proponent's *Initial Project Description* (October 2019). That document identified just one portal "with the entrance near the historic Cariboo Gold Quartz 1500 portal on Cow Mountain, near the northeast end of Jack of Clubs Lake" (p 33).

Excluding the portal from the Project is obviously a technical and economically viable alternative!

The Island Mountain portal is clearly an afterthought. It was added to the proponent's *Detailed Project Description* (October 2020) "to accelerate the development of the underground infrastructures. This will reduce the surface construction period and enable underground connection between the mine extraction zones of Shaft, Valley and Cow" (p 77).

But: as was clear in the *Preliminary Economic Assessment* and *Initial Project Description*, an Island Mountain portal is not required to "enable" the underground connection!

And: though the application suggests the Island Mountain portal will reduce the dust and noise caused by construction from two years to one year, it fails to acknowledge the dust and noise created during the projected one year construction period will be much closer to homes in the community.

#### Minimize the footprint and negative impacts (3)

The project footprint identified in the application, and the resulting negative environmental impacts, are also unnecessarily large because it includes a 69kV transmission line that follows a corridor north of Highway 26.



As already noted, the line would have a significant impact on the view from the community of Wells: the proposed corridor crosses the lower eastern slope of Island Mountain directly above the community.

But: the negative impact on the habitat of the endangered Southern Mountain Caribou, is the biggest reason to propose a new route in a new Environmental Assessment Certificate application. This was made evident in a submission by Jake Bradshaw, a UNBC caribou researcher and PhD candidate, during the Project's early engagement period in July 2019. Mr Bradshaw noted the proponent stated, in a public engagement session on July 13, that the northern corridor avoids critical caribou habitat.

That statement was incorrect, said Mr Bradshaw, who went on to state the northern corridor would intrude on and eliminate critical habitat (emphasis added). It would also add, he said, another "linear feature", that is, another wide, continuous and cleared right-of-way, to the landscape between Quesnel and Wells, and explained such linear features "are known to increase the efficiency and speed that predators travel". By predators he was referring, of course, to bears and wolves that kill caribou.

Mr Bradshaw also described the constraints imposed on mine infrastructure development by a December 9 2009 provincial government order protecting caribou habitat in this area, constraints that could make it difficult if not impossible to construct a transmission line along the northern corridor.

Further constraints are a distinct possibility. In 2018 the Government of Canada suggested a possible federal government Critical Habitat Protection Order as provided for by Section 63 of the *Species At Risk Act (SARA)*. This prompted the provincial government to begin developing caribou herd plans. In the Peace River region this led to significantly increased constraints on industrial development in caribou habitat. A herd plan for the Barkerville Caribou herd is now being developed.

Clearly, the proposed northern corridor's impact on critical caribou habitat makes a reconsideration of alternative corridors highly desirable. Existing and potential additional regulatory constraints on development in this critical habitat make the reconsideration a virtual necessity.

#### Mitigate and offset negative impacts on the socio-economic environment

An applicant should provide specific, measurable objectives for initiatives to mitigate and offset negative impacts on human and community wellbeing.

Instead, as with other vague ideas in this Environmental Assessment Certificate application, there is absolutely no commitment except such vague notions as: "develop a socio-economic monitoring plan"; "work with"; "engage with"; "provide ongoing communication".

A new application should include initiatives, with measurable objectives, to address those in the community of Wells who will not be able to directly benefit from employment and business opportunities provided by the mine. This includes, obviously, retirees and the disabled.

It also includes many people who have invested heavily in acquiring skills and developing markets for their services and products, particularly people engaged in the arts and tourism. The unprecedented demand for housing generated by the project will significantly increase land values.

Unless mitigating measures are employed, the increased property values will make rents or taxes unaffordable to many of these long-time community residents.

Increased property values will also increase the property taxes for existing businesses in the arts and tourism sectors. The continued existence of these businesses, negatively impacted as they already were by the current pandemic, would be severely jeopardized.

If the community loses most, if not all, of these residents and businesses the project will not diversify the community's economy. Instead it will have the opposite effect: it will stifle arts and tourism enterprise, and curtail economic diversity. It will make Wells a one-industry town subject to the whims of international gold prices and of distant investors with no interest in the community.

The application should also include initiatives to address the project's elimination, already, of all motel accommodation in the community (one motel was taken over by the proponent and the other was acquired by a third party to serve the proponent's contractors).

Significantly reduced visitor accommodation in the community has reduced the number of people patronizing local restaurants, gift shops and art galleries: the application should address this impact and provide measurable objectives for initiatives to mitigate and offset these impacts.

#### Be "sustainable", or not

Don't claim the mine is "sustainable": how better to lose credibility than to claim a mine with a projected life of 16 years is "sustainable"? Only, of course, by claiming the ore body is "sustainable": but when it's gone, it's gone!

The project could be sustainable if the application includes a concrete plan for preserving and enhancing a sustainable community during and after the closure of the mine, and a concrete plan for sustaining caribou during the life of the mine.

But: if the mine or project isn't going to be sustainable, then don't engage in the farce of claiming it is!

#### Conclusion

Development of the Cariboo Gold Project has already provided both Wells and the region with significant benefits. These benefits will be eclipsed by the benefits arising from the eventual approval of the project. A revised Environmental Assessment Certificate application that will yield the same results but with a reduced footprint and with reduced negative impacts should be developed without delay.

**A.15      Comment #88**

## State of Socio-Economic Health 7.1-1

Factors that affect health are identified in this document as income, education, employment, physical environment and deprivation. I have done my best to highlight deprivation under each of the subheadings.

### **INCOME:**

Throughout this document, reference is made to imply that folks living in Wells are anticipated to supply services to the mine.

Similar to mountain towns overrun by silicon valley VC's, the mine and folks working directly for the mine set up the region for gross wages disparity. As per the EAO open house in September 2021, wages for workers sit around 70,000 per annum - this is almost DOUBLE the current living wage in this area. While no one is disparaging the mine for paying employees adequately, this influx of cash disproportionately affects local housing markets, preventing investment from groups that see themselves in this region beyond the lifetime of the mine. From here, you get property monopolies, the rich get richer, the poor stay poor.

This adversely affects the very factions of worker that the District of Wells should be looking to attract. As the population of public sector workers age, new teachers or childcare workers for the school cannot make the choice to move here because it is impossible to have their public sector salaries, and face the reality of paying off grotesque student loans in an environment when houses are overvalued, and quality of life is reduced to 24 hours of drilling and transport.

### **EDUCATION:**

Everywhere the mine is investing money seems to be with the intention of putting post secondary efforts towards trades programs to help support people who can work at an arm's length of the mine. If population is to adjust sustainably, supports need to be put in place to also encourage the education of other factions of the public sector that provide indispensable services. Better investments into emergency services for the region, specifically fire and EMS, are going to be crucial in our changing climate as well.

### **EMPLOYMENT:**

Though a large fraction of jobs will be available, the time period is incredibly finite.

In the worker policies section, the company states that they encourage promotion from within and expanded job experience through lateral job moves.

When employees are promoted from within, what does their contract renegotiation look like? Are they being adequately compensated as they absorb tasks?

What work does Osisko do to ensure these lateral moves are not taking advantage of their workers (setting tasks outside of expertise to save time and/or money)

What is the level of supervision that supervisors with proper training are able to give to folks being asked to do a certain job for the first time?

How is this activity continuously monitored?

How does Osisko prevent communication breakdown for specified job tasks?

How are these tasks monitored ongoing to make sure they have not eroded from best practices?

These are key and crucial processes. You are working in a town with a singular water source. One miscommunication will drastically affect the livability of this area, and if we are working to make this a viable livable township beyond the life mine, there is much work to be done beyond tourism and industry to ensure that we have regional food security and climate change mitigations like firesmart initiatives in place.

#### **PHYSICAL ENVIRONMENT:**

There are a multitude of comments in this period that point out the robust effects that the exploration period has had on the quality of life for residents in Wells. It is important to acknowledge that one of the main reasons for moving to rural locations is for the quality of life found in a rural space's proximity to nature. It is frustrating to see in the community recreation section ( 11) that people, instead of retaining the outdoor activity in the area, should just go elsewhere in the CRD. This is an unfair economic assumption of people living here. Not everyone can afford to travel in the way this document seems to suggest.

**In summary**, this report highlights the development of the Cariboo Gold project as a diversification from the forestry industry. This is not diversification - it is a regime shift from one extractive industry to another, one where the economic value is dictated by the price at which gold fetches at a market level.

In general, Much of the language choice in this document is already pushing the reader to see only the alternatives as opposed to what is lost through direct impact. This is readable in viewing the loss of Wells recreation space as inconsequential because there's lots of other places to go in the CRD, and saying that it wouldn't be so hard to move the elementary population in Wells to Barlow Creek.

**A.16      Comment #99**

I am commenting as a member of the Community Advisory Committee and a long-time resident of Wells.

Although I have not been able to read this application in its entirety, I have reviewed large sections of it, including several Appendices, and I have submitted comments relevant to certain sections. However, recently I stepped back and started to think about this situation as a whole.

That we are having to consider an application for an industrial project of this size and scope which is to occur literally on top of and inside of a tourism destination is astounding. I really have no idea why a company would think that it is “ok” to place this type of development within yards of residential areas. I think we can safely say that very few of ODV's Montreal staff or their Board of Directors would want this type of development close to their neighbourhood, where they were raising their families. In fact, a local representative of the company told several CAC members in a private meeting that ‘if he lived here, he would move’. So why is it ok for ODV to propose that we be subjected to this development?

Why did they not begin planning this project with the basic premise “we need to locate this development away from the community” and work up their logistics around that? More expensive initially, yes, but they would have had much more community support. And local residents are aware (as laid out in many of the comments received) that it would have been feasible, regardless of ODV's claims – it just would have been more expensive.

It is interesting to note that ODV has convinced a resident of Malartic to comment. Comparing Wells to Malartic is definitely apples to oranges. While they might appear similar on the surface (they both have had gold mines) on closer examination they have little in common. The mines in the Malartic area operated well into the 1980s with a resurgence in the early 2000s, and unlike Wells, Malartic did not realign its community vision and goals to pursue a future based on outdoor adventure, culture and the arts.

Wells was abandoned by major mining interests in 1967 and aside from sporadic small projects, hard rock mining has played a minor role in economic development. An examination of archival records for every community visioning exercise that has been conducted since the 1970s (and there have been quite a few) will reveal tourism development, particularly that based on outdoor recreation, cultural and heritage tourism and Wells' unique sense of place, have been the lead objectives. The continuance of mining (particularly placer mining) has continued to place a minor role. By what right is a private for-profit interest allowed to completely ignore community aspirations and destroy community achievements that have been hard won over that last 50 years? Wells was a mining town from 1933 to 1967 – 34 years. It has been a tourism destination since 1958 (the official opening of Barkerville) a total of 63 years.

This project, as currently proposed, with the major infrastructure and camp located so close to tourism assets and residential areas, will destroy the character of the community, one of the main things that attracts visitors and residents alike. It will drive up the cost of living so that many existing residents will be displaced. The quality of life for those remaining will diminish. The current population will be replaced by workers who only intend to stay a few years and are not invested in the community. And when the mine's life is over, what will be left. How will the collapse of a viable and sustainable community in Wells affect the Province's investments in Barkerville?

And of course, this could all be avoided. The project, with a different proposal, could be truly synergistic with Wells. With major infrastructure located out of view, with different traffic routes, with more attention to the visual integrity of the viewscape of Wells, the benefits of the project could be enjoyed without the destruction of the livelihoods of others.

Unfortunately, this current proposal before the EAO does not offer these alternatives. Further it is lacking in detail and the impacts are not quantified. The reader is left with the choice – do I trust that they will do what they say and that their proposed mitigations (mainly unspecified) will work? Or do I not?

Based on what I have read, and the information I have been provided with, I do not trust that this proposal will be successful in achieving the mitigations they propose, nor do I trust that ODV will even implement all the mitigations they are promising.



**A.17      Comment #100**

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I am a member of the Community Advisory Committee, and a full time resident and home owner in Wells. I want to thank the EAO for the opportunity to submit public comments on ODV's application in this current phase of the Cariboo Gold Project.

I found it impossible in the time allowed to cover the entire application. In future public comment periods, I would suggest that more than 30 days be allotted to review and comment on the material provided. I feel the size of the application deters some people from taking the time to review and give important feedback because the amount of information is so overwhelming.

Here are some points I'd like to comment on.

It is evident from Chapter 7 and parts of Chapter 17 of the application that ODV discovered through community outreach that the sustainable success of the Tourism/ Arts & Culture sector in the community of Wells are of the utmost importance for the livelihood of many people who live in Wells.

It may interest the EAO and ODV to know that a recent survey completed by Urban Systems and Dynamic Community Planning - in prep for updating the District of Wells Official Community Plan - revealed that 30% of the population of Wells is reliant on Tourism/Arts & Culture for their livelihood. Comparatively, only 1% of the BC population can say the same. That speaks to how much a thriving Tourism/Arts & Culture sector is paramount to the economic success of the community of Wells.

In Chapter 17.2.1 Environment & Economy the proponent outlines that:

*“Local concerns were raised about ensuring the various sectors that support the Wells economy can co-exist. These concerns focused on the need to balance the tourism, outdoor recreation, mining, and arts and culture sectors in Wells and prevent the mining industry from negatively impacting the others. Comments were raised about finding potential collaborative or cooperative opportunities between various sectors of the community with this Project that could be mutually beneficial. Comments discussed the need to ensure lasting benefits to the community through legacy investments into infrastructure or programs. ODV is working with the community to balance mining and other economic activities in Wells.”*

While ODV has generously contributed financially to a number of projects in the works in Wells, I don't agree that they are working with the community to *“balance mining and other economic activities in Wells.”* If they feel they are working towards that balance, what are they doing specifically? I would suggest that the EAO ask ODV to expand on the details of this claim in point 17.2.1.

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ODV are aware how important it is for locals that Tourism/Arts & Culture are sustainable, and yet the action of buying up, or renting, precious tourism accommodation in Wells shows a complete disregard for the Tourism sector. These actions do not reflect those of a company that professes to want to find a balance between economic sectors even though their report acknowledges that there's already a concern that the mining industry will negatively impact the other economic activities in the community of Wells.

At the last ODV open house on September 22 & 23, 2021, François Vézina said, "*Those properties have been on the market for a few years.*" That is not a valid point. Those properties - even though they may have been for sale for a while - were still being run as tourist accommodations up until the ODV purchase of them. That action took those accommodations off the market and drastically reduced the available accommodation for tourists visiting the area. Island Mountain Arts, the Sunset Theatre Society and other Non Profit groups that organize events have attested to cancellations to a number of activities due to a lack of accommodation for tourists, and this issue has already arisen despite the Cariboo Gold Project only being in the exploration phase. I'd like to request that in advance of the CGP moving forward, that the EAO and the Ministries of Mining and Environment require ODV to address the housing problem they have added to by purchasing local tourist accommodations, which is negatively affecting the Tourism sector in the community of Wells.

#### Location of the Service Building

The Tourism based economy in Wells is in jeopardy if the community becomes a visibly active mining town. I am not against the mine, but I am 100% against the service building, the concentrator and the hotel like accommodation existing at the gateway to our community as outlined in the Project Overview in Chapter 1 of the application.

The Wells area is frequented by tourists because of the natural beauty, the trails, the star filled night sky and the quaintness of the town. This has been true for decades.

If ODV builds the service building and other proposed infrastructure at the gateway to the community, the Tourism industry and the quaintness that Wells is known for will be lost, especially if ODV cannot mitigate the anticipated light and noise pollution.

If ODV really wants to find a balance between economic sectors they will seriously consider building the service building/concentrator and camp behind Cow Mountain as other people have suggested in this public comment feedback, or in another location. That suggestion has been repeatedly brought up at ODV open houses over the past year, and there has never been a sufficient answer as to why this option will not be seriously considered by ODV. I would ask the EAO to require the proponent to consider the serious impact this project will have on Tourism to the Wells/Barkerville/Bowron Lake area if an alternate location is not seriously considered.

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The attached “support a responsible mine plan” shows a much greener and balanced footprint for the service building and for traffic corridor plans. This alternate location may go a long way to reducing dust, noise and light pollution to the community of Wells. It may be more expensive for Osisko to complete, but it will vastly improve the chances of Tourism still thriving in this community, and for a real balance between mining and Tourism/Arts & Culture to exist in harmony.

### Lighting

Since public consultation started on this project, the proponent has known that lighting and noise have been major concerns brought up by local Wells citizens on numerous occasions. There has never been an adequate reply to what the lighting and noise mitigation will be other than to say both will have mitigation measures implemented. Where are the details? Where are the visuals showing us what the project will look like at night in the proposed location in Wells? The 3D visuals supplied to date do not give the community of Wells and visiting tourists a real sense of what this project is really going to look like as they drive into Wells. More transparency is needed on the visuals.

The application states that the lighting that locals have complained about to date is being dealt with, but as of Oct 7, 2021, the lighting that is being used in the exploration phase of the CGP is not directional lighting nor is it being dealt with.

When you currently enter Wells as soon as you pass the Jack of Clubs Lake there are no less than 3 areas of exploration that are completely over lit. If the concentrator and camp are built at the JOC Lake the light pollution that will emanate may completely wipe out the night sky that is currently enjoyed by the locals and the tourists who come here from all across BC, Canada and around the world to enjoy its natural beauty, and the peace and quiet of the area.

The proponent does state in the application that the lighting for this project will be “directional lighting”. If this is true, that is a positive note, and shows that they are willing to address industrial lighting concerns in the community, but the 3D visuals provided do not give a true picture of what the project will look like at night with the full lighting details pictured. With lighting being such a concern, perhaps the EAO could insist that the Visual Quality Effects Assessment include nighttime views of the service building with 100% of the proposed lighting.

### 3D Imaging

Appendix 7.11-04 Visual Quality Effects Assessment was presented at the ODV/EAO open house on September 22 & 23. This is the first time any 3D visuals have been presented in this whole process, aside from one 3D image supplied in July 2020 of a draft rendering of what the service building could look like at the gateway to Wells at Jack of Clubs Lake.

Since Wells experiences winter for 6 to 7 months of the year, it would be helpful for future 3D renderings to also have a perspective of what the proposed service building location will look like in the winter. The current visuals only shows the view with summer vegetation.

That 3D visual back at the July 2020 open house was the image that actually got a lot of locals more actively engaged in this process because it gave them a glimpse into what this project - just hundreds of metres away from residential areas - could actually look like. The image presented - albeit it a draft sample - was an eye sore to many, and people were quite vocal and concerned about how this project will look in its currently proposed location and how it will ultimately affect the Tourism sector of this area and the every day lives of the local residents of Wells.

I would request that when the EAO asks the proponent to go back and update its current application so that the 3D imaging for each aspect of the project should reflect visuals in winter and summer and daytime and nighttime views. Many of the images in the visual quality appendix were also perspectives from very far away.

I encourage the EAO to ask that the proponent create an application that can truly balance Mining and Outdoor Recreation and Tourism/Arts & Culture. My personal opinion is that in order for that to happen, the major construction components of this project in Wells - specifically the service building/concentrator/camp and traffic routes - need to be Out of Sight, Out of Mine - a mantra that would actually enable an authentic and viable balance between industry and the Tourism/Arts& Culture sectors.

In closing, I want to say that this has been and continues to be an exhausting process both emotionally and mentally. The lack of ability to meet face to face for this entire EA process - and for the ODV Open Houses - because of the Covid19 pandemic has been incredibly discouraging. I believe the lack of in person meetings has really taken away the community's ability to fully engage, ask questions and receive adequate answers in what is a life altering project, and one that could become a negatively life altering project for many people in Wells who do not work in the mining industry, and who continue to want the quiet and peaceful community of Wells to be their forever home.

**A.18      Comment #101**

The Environmental Assessment Office has already heard, and continues to hear, a number of concerns about the Cariboo Gold Project from those who live within the District of Wells, where the mine will be located. The July 2021 Application has not satisfactorily addressed these issues.

### Services Building

- The massive concentrator [Services Building], as proposed, will dominate the southern skyline of Wells and create an unacceptable visual environmental impact. To say nothing of noise, dust, traffic (especially during construction) and other possible impacts. The solution is to move the Services Building to an alternate location on the other side of Cow Mountain, not visible to the town. At the same time, access roads would be moved away from the scenic entrance to Wells (one corridor).
- Osisko was asked to provide an alternate site analysis for the Services Building. Their rationale (Chapter 01.7) is weak and superficial. The deficiencies are pointed out in CAC Member Dave Jorgenson's *Site Selection Analysis*<sup>1</sup> and need to be addressed. As do the deficiencies he pointed out in his response to ODV's *Visual Quality Effects Assessment*<sup>2</sup>
- The proposed Services Building location, close to existing homes and businesses, will make Wells look and feel like an industrial camp. (We're already experiencing that effect during the current and mostly unregulated Exploration phase, which, incidentally, was not subject to an Environmental Review). Osisko's refusal to seriously consider a different location is extremely disappointing, worrying and frustrating. ODV says it can mitigate the impact. So far, it has not shown it can. I don't think it's possible, either, given the proximity to Wells. In fact, as one senior Osisko official has said to some of us, 'if I were you, I'd probably want to move, too.'
- It's often said that Wells is a mining town, suggesting that 'anything goes' with the Osisko's proposal. It should be pointed out that industrial mining stopped in 1967 when Cariboo Gold Quartz ceased operations, leaving a shell of a town. Some placer mining has continued, balanced by artists and others who moved here, had faith in Wells' future and created a tourism economy based on a vision of recreation, culture and history. Yes, the tourism economy has been fragile and could use a boost from a mining project. But the aim should be diversification, not a takeover by a mining giant, which is the danger now.

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1 <https://projects.eao.gov.bc.ca/api/public/document/615b55a35c6d1f0022c44abe/download/Alternative%20Site%20Selection%20Analysis%20for%20Cariboo%20Gold%20Project.pdf>. October 4, 2021.

2 [https://projects.eao.gov.bc.ca/api/public/document/614b995e3ea9a600228871fb/download/VQ Effects Assessment 7.11-4 \\_Response.pdf](https://projects.eao.gov.bc.ca/api/public/document/614b995e3ea9a600228871fb/download/VQ%20Effects%20Assessment%207.11-4%20_Response.pdf). September 22, 2021.

- I'm surprised existing environmental regulations even allow locating such massive infrastructure so close to a small community. Maps such as Fig. 2 in *01 Application Summary* show a Mine Site that totally dominates the small town of Wells. This footprint needs to be, and can be, reduced.
- Osisko talks about being a good neighbour and part of the Wells community. **A balanced and community-centric approach would be to move the concentrator out of sight of Wells.** It's a viable option and I suspect a lot of opposition to the Application as it now stands would drop if Osisko did this.
- I request Osisko be required to submit a more thorough, good faith and serious alternative site analysis for the Services Building. This issue remains unresolved and if the Services Building location remains unchanged, the Cariboo Gold Project *as proposed* is unacceptable.

### Island Mountain Portal

- Another outstanding concern is the proposed portal on Island Mountain to haul ore to the concentrator across the highway at the entrance to Wells . This means noise, dust and safety issues from trucks regularly crossing the road where tourists and locals enter Wells. This, after initially telling us the ore would be transported underground, with no indication trucks would be hauling above-ground for a couple of years first.
- The impact of Island Mountain Portal traffic has not been adequately addressed.

### Acoustic / Noise

- A quiet town is highly valued by Wells residents. During a survey earlier this year by a consultant working with the District of Wells on a new Official Community Plan, residents used the word 'quiet' most frequently to describe an ideal version of our town. Yet, the Valued Component *Acoustic (Noise)* has continuously been given short-shrift by Osisko.
- I have said before, and will repeat, that noise data collection is inadequate with only three noise monitoring locations in Wells. Sound can vary throughout the town and more locations are needed to adequately measure future impacts.
- I'm also concerned that excessive drilling noise during the Exploration phase will result in flawed data, if those measurements are used as the baseline.
- Osisko has not provided information about Cumulative Effects related to Noise.
- At this stage, **any Acoustic data submitted by Osisko are unreliable** and unless its monitoring improves, will continue to be unreliable. An effort should be made to collect and provide baseline data when drills are not operating.



- Question: Why does Osisko continue with such poor noise monitoring and data collection?
- Question: Will Osisko commit to doing noise monitoring at additional locations? I recommend the Wells-Barkerville School, Pooley Street, the Wells Meadow Trail, the new Cornish Mountain boardwalk trail, Wells Visitor Centre, and Highway 26 business district. There may be others.
- Question: Why is there no projection of, and mitigation for, Cumulative Acoustic Effects in Wells? I request that the Environmental Assessment Office make this a requirement for a Revised Application.

### **Light**

- Wells is a town where you can see the stars at night. This is highly valued by residents, who are therefore sensitive to excessive light emissions.
- Wells residents have already experienced instances of unwelcome excessive light emissions during the Exploration stage, and are understandably concerned about similar or worse impacts during construction and operation of the proposed mine.
- The Application has inadequate data regarding the impacts of light emissions and mitigation which needs to be rectified in an amended Application.

### **Impact on Tourism**

- Much of Wells' tourism infrastructure has been lost already and those impacts noted in other Public Comments.
- Question: What will Osisko do to compensate for or replace the tourism infrastructure?

### **Cumulative Effects**

- In general, not enough consideration has been given to the cumulative effects of noise, light, visual disturbances, traffic and other impacts on community health. It is hard to grasp what it will be like to live in Wells during mine construction and operations. Please provide this information in a manner that is understandable and easy to grasp.
- We've had a taste of the cumulative impacts (noise, dust, etc.) during the Exploration stage which have been troublesome at times (and are described in other Comments).
- It should be noted that the town of Malartic, Quebec has experience with an Osisko gold mine at its doorstep (now Canadian Malartic). As noted elsewhere, residents initially welcomed the

massive open pit development. However, environmental regulations were violated and after a few years, residents launched a multi-million dollar class action suit for damages related to noise, dust and explosions. While the Cariboo Gold Project would be underground, there are substantial above-ground structures and activities. And once built or underway, there's no going back. It's preferable if cumulative impacts are properly identified and mitigation measures in place earlier, rather than Wells residents contending with a lawsuit or settlement compensation later.

- Question: I ask the Environmental Assessment Office consider the Malartic mine development and residents' experience there as a cautionary tale for the Cariboo Gold Project and apply lessons learned about cumulative effects to this proposed mine.

### **Transmission Line**

- Osisko is proposing a Northern Transmission Line north of Highway 26 to bring three-phase power to its mine, rather than a line, meeting the standards of BC Hydro, along the existing Highway 26 route.
- The proposed route, north of Hwy 26, could affect caribou habitat.
- The proposed line would eventually be abandoned when the mine closes, which is wasteful.
- The Northern Transmission Line would not benefit the municipality of Wells, whereas a line developed with BC Hydro could potentially leave a legacy of three-phase power for Wells.
- I ask that BC Hydro make an investment, and also come to an agreement with Osisko, to use the existing Highway 26 corridor for three-phase power, benefitting not just the mine and Wells, but Barkerville and other businesses along the way.

### **Summary**

The Cariboo Gold Project has a lot to offer in terms of jobs and other economic benefits. Community contributions so far to Wells and Barkerville have been welcome, and a Community Benefits Agreement with the District of Wells could result in badly-needed improvements to local infrastructure and other amenities.

At the same time, what we cherish about Wells (the many Valued Components) are in danger of being lost if concerns outlined above are not addressed. Moving the Services Building out of sight of Wells would go a long way to minimizing these concerns.

**A.19      Comment #111**

**Additional Comments on the  
Cariboo Gold Project EAC Application**

**Alternative Means for Ore Management (mine site location) - Project Overview**  
**1.7.3.4**

**Concern:** The alternative means assessment of the locations for the Mine Site Services Building and the Cow Site Services Building lacks methodological rigour. Rigour in this context, referring to the legitimacy, integrity and soundness of the process.

**Comments:**

The preferred location of the Project's massive industrial complex at the entrance to Wells, and the Island Mountain portal within 250 metres of residences and across from the community ball diamond is extremely concerning and would have significant impacts on community and human wellbeing which is not captured in the socio-economic section of the alternative means analysis.

A thorough and comprehensive review of the alternative means for the Services Building site selection has been submitted by a Community Advisory Committee member<sup>1</sup>. The submission of the CAC member provides relevant and accurate information that is missing from the proponent's site selection analysis. I support the comments and clarifications outlined in the document below (see link<sup>1</sup>) and ask that the proponent not dismiss or devalue this information. Local knowledge is invaluable.

1. <https://projects.eao.gov.bc.ca/api/public/document/615b55a35c6d1f0022c44abe/download/Alternative%20Site>

**Questions:**

1. The proponent states that the Mine Site Services Building location would *reduce dust and noise during construction and operations*. Given that the Cow Site is over a kilometre further from the residential areas in Wells and eliminates the Island Mountain portal, what is this statement in relation to, and how was it measured? Could the proponent provide a detailed description of the methods

and criteria used to compare and evaluate the potential effects on community and human wellbeing (particularly noise, dust and light) between the two sites?

2. Another comment in favour of the Mine Site location is that the site *'would reduce the duration of the Construction Phase'*. As the difference in duration is a mere 6 months, and the life of the mine is projected at approximately 20 years, the socio-economic impacts of the construction phase duration are negligible. Has a community impact assessment around site location been considered to capture authentic and relevant socio-economic impacts?
3. The project overview (1-30) states that, *"the associated infrastructure at each portal during this period will include a generator, sound barrier, ventilation fans and heater, water management infrastructure, and sound-proofed fans employed during the decline development stage."* What is the projected noise level with the associated portal infrastructure (quantitatively). How will you meet the noise bylaw requirements for residences within a few 100 metres of the proposed Island Mountain Portal?
4. *"At closure, under the Reclamation and Closure Plan, underground mine openings, including portals and ventilation raises, will be sealed with engineer designed plugs preventing ingress by people and animals and permitting the underground workings to be flooded to minimize further Metal Leaching (ML)/ARD."* 'To minimize further Metal Leaching' implies leaching during operation. What type and quantity of metal leaching is projected?
5. *Figure 1.5-6 provides a view of the portal showing the proposed landscape concept during the Closure Phase. This proposed landscape concept for the Island Mountain Portal was designed in order to address concerns raised in public comments on the Project.* Correction: The majority of concerns raised in public comments were not around the landscape concepts at portal closure but rather the proposed location. Landscape design projections do not address the actual concerns raised regarding noise, light, dust, emissions that are created alongside a portal proposed in a residential neighbourhood. Does Osisko have the capability to meet any residential bylaws within a 0-1km radius of the proposed Island Mountain portal location?

**Request:** I would request that the proponent re-evaluate the 'preferred alternative', the Mine Site Services building, with the inclusion of the Technical Advisory and Community Advisory comments, and with consideration to the methodology and rigour of the alternatives analysis to meet the standards of an independent third party review.

## **Land-Use Plans**

**Concern:** The proponent has not ‘considered consistency’ with the CCLUP and other landscape level government plans.

### **Comments:**

The EAO User Guide also stipulates that the Project proposal must consider consistency with any government land-use plan. The Cariboo Chilcotin Land Use Plan (CCLUP) establishes the long-term balance of environment and economy in the Cariboo-Chilcoltin region. The Cariboo Gold Project is not consistent in meeting the CCLUP’s objectives and strategies for the management of natural resources and the maintenance of environmental values, specifically concerning Caribou Management (with regards to the Northern Transmission Line) and Visual Quality Objectives.

**Request:** The proponent aligns the Project with the CCLUP’s objectives and strategies for the management of natural resources and the maintenance of environmental values.

## **Visual Quality Objectives**

**Concern:** With regards to Visual Resources as a Valued Component, the Project Plan does not include VIA’s or provide mitigation measures beyond very superficial ‘landscaping features.’

### **Comment:**

The EAO recommends engaging with Forests, Lands, and Natural Resource Operations (FLNRO) in the development of a Visual Impact Assessment (VIA). Visually sensitive areas are:

1. Areas visible from communities, public use areas, or travel corridors;
2. Areas seen by a large number of viewers;
3. Areas where public expectation for scenic quality is well above average

**Request:** That a VIA is developed for the current Mine Site location, Island Mountain Portal and Transmission line considering FLNRO’s criteria for visually sensitive areas. If a VIA was included in the alternate means analysis for location, the proponent could ensure the scenic quality expectations of the public and the tourism industry are met.

### **Additional Transmission Line Questions**

1. Have Cariboo Region government biologists been contacted regarding new linework identifying critical habitat that is more extensive along the Northern Transmission line route?
2. Has Osisko contacted government biologists to get more recent (2021) Caribou population data?
3. Telemetry data for the Barkerville mountain caribou subpopulation is available and should be included as an overlay for the proposed transmission line route? Why is this relevant information not included in the report?

**A.20      Comment #117**



## Chapter 18

### For Clarity

Definition of sustainable (Merriam Webster)

1: capable of being sustained

2a: of, relating to, or being a method of harvesting or using a resource so that the resource is not depleted or permanently damaged

b: of or relating to a lifestyle involving the use of sustainable methods

sustainable society

From Chapter 18

“A sustainable community effectively balances economic, social, cultural, and environmental interests to meet the needs of the present generation without compromising the ability of future generations to meet their needs.”

Definition of resiliency (Merriam Webster)

1: the ability of something to return to its original size and shape after being compressed or deformed

2: an ability to recover from or adjust easily to adversity or change

From Chapter 18

“A resilient community has the capacity to adapt to changes such as shifting demographics and housing affordability, and "bounce back" from events such as economic downturns and the effects of a changing climate”

I have spent most of my life in Wells and hold it as a cherished place in my heart for helping me to become the person that I am today. I want the safe, supportive environment that I grew up in for the children in Wells today and into the future. I am very concerned that in Chapter 18 of the Cariboo Gold Mine Project document Osisko/BGM claims that their impacts on current and future generations have been sufficiently mitigated and that if the community experiences any challenges it will be due to external forces. First, this is an unbelievably brief chapter (only 3 pages to address this topic) compared to the other documents in this assessment. This in itself is concerning and while one is directed towards other chapters this does not show due consideration for the impacts on current and future generations. Without properly identifying such impacts I question how Osisko/BGM proposes that they are capable of even beginning to mitigate them?

Osisko/BGM claims that “it’s conservative to assume that...future generations are likely to experience the positive Project’s effects and their contribution to the overall improvements of socioeconomic settings in the area” (Chapter 18, p.3). They further claim that “negative effects that could be experienced will be driven by external factors...which the Project has no influence” (Chapter 18, p. 3). These claims are justified in four categories with only one of these sections containing two sentences, the rest having only one sentence.

In the Economic Opportunities section they propose that they will “sustainably” use finite and nonrenewable resources which have significant environmental and social impacts. How will this be measurably achieved? Perhaps, as another commenter has pointed out, the word

“sustainable” cannot be used in such a context. They will also cut down their costs and inefficiencies by using local services (and very few justifications for their lofty claims). Missing entirely from the phenomenally superficial analysis are the impacts on the economic opportunities that have existed in this town long before Osisko/BGM ever showed up. There have been multiple concerns brought forward relating to the detrimental impacts that Osisko/BGM is already having on the community. In buying the Hubs Motel and now the Cariboo Joy Campground they have severely limited accommodations within a community that’s economy relies heavily on tourism to sustain itself. To argue that the increase in jobs for the mine offsets the negative impacts on local businesses is insulting and shows a conscious disregard for the work that people have put into creating Wells as a tourist destination. What is Osisko/BGM doing to ensure that the tourism industry that makes Wells a resilient and sustainable community can continue.

Resilience and sustainability are also brought up in this chapter and yet for both to be present within a community there cannot be a single entity from which a community derives its financial stability from. Resilience comes with redundancy, meaning that while one thing may serve a certain function alone it will always be susceptible to collapse unless there are several different things serving the same function. The suggestion that Osisko/BGM will have no negative impacts on the resiliency of the community of Wells is preposterous seeing as their actions so far seem determined to stunt the local economy. This is seen in their purchase of businesses and property, and by the fact that they propose that the concentrator can only be placed as the first thing one will see when coming into Wells as some examples. Wells has been able to market itself as a historic, natural, and artistic place to explore. Such a concentrator is damaging to this image. Unless Osisko/BGM puts more thought into their true impacts on this community they cannot argue that their presence will do anything to support resiliency. What measurable ways will the proposed project support a resilience community?

For the Social and Cultural category Osisko/BGM claims they will “support community safety, health and diversity”. How is this support being achieved? What measures are being taken to mitigate the impacts of a resource extraction camp being built in the community? Has BGM considered the negative impacts such camps and increased traffic has on communities? The freedom that I felt as a child and a teenager growing up in Wells will not be possible with a mining camp in Wells. My parents felt comfortable letting me roam about Wells because there was a sense of community and trust. With many strange people and increased traffic I am concerned that future generations of Wells will not be able to experience this. Where is this impact in this assessment? What is Osisko/BGM doing to ensure that the community of Wells is still a safe, supportive, and healthy environment to raise a family and to live?

They also claim that they are encouraging “a design that facilitates physical activity, community connection, housing affordability, food security, cultural diversity, and accessibility to services”. There is no evidence of this. What is Osisko/BGM actively doing to facilitate physical activity, community connection, housing affordability, food security, cultural diversity,

and accessibility to services? Each one of these aspects deserves their own section and yet they are limited to a single line.

For the Environmental category Osisko/BGM claims that their proposed project “support[s] the natural environment and its ecosystems so they are better able to resist damage and recover quickly”. This is a very large claim (almost suggesting a godlike status) that I would like to see substantiated. The best way to support such “natural environments and ... ecosystems” is to not destroy or harm them. A mine inherently will have negative impacts on the environment and the surrounding ecosystems. I therefore ask how, considering these inevitable negative impacts, Osisko/BGM is improving the environment’s ability to “resist damage and recover quickly”? I also question how they can claim to be mitigating impacts on “wildlife corridors [and] habitats” when their proposed Northern Transmission Line directly and negatively impacts both these aspects.

The final category of Land use claims that the project “supports existing land uses and ensures the efficient movement of people, goods and services”. I for one have been blocked from accessing some of the hiking trails that I used to enjoy. The reason given for blocking access is because Osisko/BGM is working in the vicinity. I understand that one cannot enter an active worksite but such a worksite need not extend kilometers beyond the actual work being done. This was also experienced by community members trying to access the Old Cariboo Wagon Road which Osisko/BGM blocked with a gate. I contest the claim that existing land use is being supported and would further claim that it is being negatively impacted. How will Osisko/BGM ensure that recreation around the town will be maintained. They are after all claiming to facilitate physical activity for community members. With increased traffic the claim that efficient movement of people is also not properly addressed within this document. What is Osisko/BGM doing to mitigate impacts to infrastructure (roads)?

After reading this chapter I am disconcerted by the future proposed by Osisko/BGM as the missing information says much to future dealings. While I recognize that this chapter is to function as a summary I am astonished that for a project of this size my comment (on this chapter alone) is almost the same length as their entire chapter. The paucity of information and consideration of all impacts is astounding. To even begin to think of titling this chapter “Impacts on Current and Future Generations” Osisko/BGM must provide an authentic analysis, which includes the negative impacts, on the subject. This should also take into consideration the voice of local residents which from what I have read in this document has been blatantly ignored.

## **Further Questions I Would Like Addressed**

### **Chapter 8**

Why is the indirect emissions as a result of the production of all types of fuel used not included (namely that of producing fossil fuels)?

What about housing emissions, emissions from construction, and emissions from employee transportation (flights taken by executives)?

### **Appendix 7.2-1 Air Quality Effects Assessment**

Will there be airborne mercury?

How will the tailings be stored?

What are the safety measures for the tailings storage?

According to the document baseline air quality data has been taken from the Quesnel Secondary school. Has BGM contacted the Ministry of Environment regarding setting up local (Wells) air quality monitoring stations to collect baseline data? Why weren't baseline assessments done in Wells? How were the impacts of the mill and much higher human activity accounted for?

**A.21      Comment #118**

## Cariboo\_Gold\_Appendix1.0-16\_Power\_Supply\_Alternatives\_Assessment.pdf

### PwrAlternativesQuestions\_01

According to the analysis in this Assessment, the Hwy 26 option is

- only 7 million more dollars
- less impact on wildlife
- less road building required
- 10 fold cheaper to maintain/operate

I found it particularly interesting that “Case 4” in the “Sensitivity Analyses” (where Economics were excluded) that the Merit Value of each alternative gap, became much closer (Hwy 26=3.4 and North of Hwy 26= 3.9).

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### PwrAlternativesQuestions\_02

**69kV Power line (no documentation provided, relating to the new line’s design specs).**

We get snow for 7-8 months of the year (which creates an enhanced environment for the creation of the Corona Effect, typically associated with High Voltage Power Lines)

What Corona Effect mitigation will be used?

Will the new line produce visible Corona Effects?

Will the new line produce UV light from the Corona Effects?

Will the new line produce audible Corona Effects?

Will the new line produce the Ozone and NOx gases typically associated with the Corona Effect?

EMI generated by Corona Effect gap discharges extends to frequencies in the GHz range.

What extra mitigation will be in place to prevent interference with emergency services and other wireless shrives in town?

There is no mention of maintenance procedures for the 69kV line components. Due to temperature and weather extremes, the components of the line may wear faster. Will there be a more rigorous inspection schedule for the line’s components?

## Cariboo\_Gold\_Appendix7.2-3\_Noise\_and\_Vibration\_Technical\_Data\_Report.pdf

For those who might be curious, I have been a sound professional for 40 years (sound recording, creation and mixing). I live, work, record and recreate throughout the Wells/Bowron area.

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### Appendix7.3-1\_NoiseVibrationTechData\_01

#### 2.1.1 OPERATION AND CONSTRUCTION - NOISE

“Environmental noise relates to the propagation of audible sound (from about 31.5 Hz to 8 kHz)”

Humans hear from 20Hz to 20kHz. Please explain why sound below 31.5Hz and above 8kHz aren't considered to propagate. This is an odd assertion.

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### Appendix7.3-1\_NoiseVibrationTechData\_02

#### 2.1.1 OPERATION AND CONSTRUCTION - NOISE

This section appears to speak only of attenuation and alteration as it relates to sound propagation. Those are things that occur for sure, but an environment can also reflect and amplify sound propagation. Wells is in a natural amphitheater. Please confirm that reflection and apparent amplification have been taken into account in this modelling.

---

### Appendix7.3-1\_NoiseVibrationTechData\_03

**2.2.1.1 SPATIAL BOUNDARIES** “3 km from the boundaries of the PDA (i.e., a further 1.5 km beyond the LAA) for Mine Site and QR Mills. At a distance of **3 km from the PDA, the distance attenuation alone is adequate to reduce the sound pressure level and vibration level from a source to be below baseline** acoustic conditions and the potential cumulative effects of the Project beyond 3 km is expected to be negligible.” This is flat out incorrect for our area. For example, on prevailing winds, current Osisko drilling can be heard well above the ambient sound from the 1 Mile Bridge, which is only 2.5kms from the drilling on Island Mountain. Please ask WPS to justify this statement in light of the facts, which plainly differ.

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### Appendix7.3-1\_NoiseVibrationTechData\_04

#### 2.3 AMBIENT ENVIRONMENT

This section has inherent flaws. I refer to my comments on the **Cariboo\_Gold\_Appendix7.3-1\_Noise\_Existing\_Conditions.pdf**

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### Appendix7.3-1\_NoiseVibrationTechData\_05

#### 2.4 POINTS OF RECEPTION

“Since noise and vibration diminish with distance, compliance at receptors within LAA indicates compliance ...”

Again, distance does not equal compliance at receptors here in Wells! I repeat my comment above: This is flat out incorrect for our area. For example, on prevailing winds, current ODV drilling can be heard well above the ambient sound from the 1 Mile Bridge, which is only 2.5kms from the drilling on Island Mountain. Please ask WPS to justify this statement in light of the facts, which plainly differ.

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### Appendix7.3-1\_NoiseVibrationTechData\_06

#### 2.5.4.1 MUNICIPAL BY-LAWS

“However, they exempt for facilities with written authorization, or if activities are of industrial nature taking place on property appropriately zoned for the use being conducted that such as use is conducted in a manner and at such times as would be carried out like other business and within generally accepted practices. Therefore, it is assumed that the by-laws generally do not apply to the Cariboo Mine and associated activities as it demonstrates compliance through assessment, it is an industrial facility and conduct operation within generally accepted practices for a mine construction and operation.”

This is incorrect and should be struck from the reports. The Noise By-laws for Wells are set out by the District of Wells. In those bylaws, there is **no clause that gives exemption for “activities are of industrial nature taking place on property appropriately zoned for the use”**. Despite ODV insistence, their current and future activities are NOT occurring on Industrial land. These areas are zoned as “On Space Parkland”. See “District of Wells Official Community Plan:Schedule B Sept 2001”. I am fascinated to find out why ODV insist otherwise.

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#### Appendix7.3-1\_NoiseVibrationTechData\_07

##### 2.6.1 OPERATION SCENARIO -Table 2-3

MISSING from this section is Surface Drills. They aren’t listed at all. Please recalculate the models with the # of surface drills that will be running during the Operation phase.

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#### Appendix7.3-1\_NoiseVibrationTechData\_08

##### 2.7.1 OPERATION AND CONSTRUCTION NOISE & LFN

“The assessment considered source specific sound data, Project-specific source and receiver location data, and building locations and construction types (e.g., façade construction).” To my understanding, there isn’t a locked down Services Building design. How can they assert that they have an understanding of buildings that aren’t chosen yet? Please show us the information that they have based their Assessments on.

---

#### Appendix7.3-1\_NoiseVibrationTechData\_09

##### 3.1.1 ASSESSMENT USING HC GUIDELINES

In this chart, the “TWO (2) RECEPTORS NEAR MINE” are listed as having 56dB of Cumulative Levels - without mitigation. This is impossible. The Valley Portal Exhaust is rated (earlier in this document) as having a volume of 137dB and will be less that 300 meters away from receptor R01-5! This assertion seems absurd. I formally request an explanation of how they have arrived at this conclusion.

---

#### Appendix7.3-1\_NoiseVibrationTechData\_10

##### 3.1.2 ASSESSMENT USING ECPMM GUIDELINES

Again, the assessment of 55/45 dB (day.night) at receptor R01-5 is literally unbelievable. This is the sound level of light rainfall. I formally request an explanation of how they have arrived at this conclusion.

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#### Appendix7.3-1\_NoiseVibrationTechData\_11

##### Table A-1: Summary of Points of Reception

This is bizarre. Is height in this document, relational or is just the height of a visual microphone?  
\*All\* receptors are listed as being at the same height, 1.5 metres. If they used this data point for all sound sources and receptors, then any topological modelling is completely unrelated to this project in Wells. Did they account for actual elevation of all sound sources and receptors in their modelling?

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#### Appendix7.3-1\_NoiseVibrationTechData\_12

##### 4.1 MITIGATION - OPERATION

“A barrier on the Island Mountain Portal extending 75 metres on the north side and 60 metres long on the east side at height of 4 metres. It should be constructed of material providing a surface density of 20 kg/m<sup>2</sup>. The barriers should also be constructed without gaps within or below its extent.”

I have commented elsewhere about this, but a barrier of 4m height will not entirely occlude sound for receptors at higher elevations. There are residences 400m away, at some elevation. Additionally, it will do nothing for the reflected sound that is pronounced in that area. People on the Crescent can hear radio chatter from the parking lot and the drill sites on Island Mntn.

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#### Appendix7.3-1\_NoiseVibrationTechData\_13

**4.3 BLASTING NOISE AND VIBRATION MITIGATION** “It is also recommended to conduct vibration monitoring at the same location as noise monitoring during the first few blasts, especially when they occur near the surface area.” Due to the bowl like land features of the mountains around Wells, and the nature of Low Frequencies, I would encourage multiple testing sites. At least: the station proposed “appropriate setback that is representative of receptors” and 1-2x300 to 500m away, to better represent Low Frequency effects. I’m guessing that wildlife on Cornish Mountain will feel those blasts at 500+ metres away.

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#### Appendix7.3-1\_NoiseVibrationTechData\_14

##### Table B-2b: Noise Source Summary - Operation

There appears to be a number of noise sources that would contribute to the overall cumulative noise effects, missing from the list (and presumably therefore, from the modelling).

- **Surface drills!**
  - **Underground works vibration effects**
  - All other traffic driving on the mine property (Admin, personal and individual work vehicles vehicles. Mass transit vehicles (with air brakes). Snowplows, sanders, first aid vehicles.
  - Camp building noise
  - Hand held and truck radios
  - Gate operations
-

#### Appendix7.3-1\_NoiseVibrationTechData\_15

##### **Table C-3(all): Predicted Low Frequency Sound Level at Poitns of Reception - Operation**

There is a header on these charts called "Is there tonal below 250 Hz". From top to bottom for all receptors) the answer is "No". Since the assessment summaries are based on fallible predictive analysis, based on incomplete information (as per WSP's own statement), how can this data point be 100% known? Yes/No cannot be 100% known.

Along with the modelled effects, I would like to know what the policy will be on the volume of worker's communications on the Mine Site. Loud equipment and safety concerns lead to people to yelling to each other to be heard. This is a highly annoying noise source that travels far and easily, in all seasons, but particularly in winter.

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#### Appendix7.3-1\_NoiseVibrationTechData\_16

##### **5.0 CONCLUSIONS**

I am very disappointed to see such a boldly confident assertion from the Consultant, that noise will not be a problem for this project, only because their analysis suggests that the noise won't "bother" government guidelines. How can this be asserted when everything is theoretical? Noise pollution from the Explorations phase (which will continue through the life of the project, is already is a problem for those of us living here. There is a LOT of theoretical practice applied to the assessment and in practicality, it's highly likely that the assessment will not match the actual experience.

Based on what is revealed in this document, there appears to be large gaps in information, which miss informs the analysis. To not speak more of potential mitigation AND to say that the project's noise output will be in compliance, is highly suspect. Also, the fact that WSP's asserted project compliance is based on an incorrect reading of the District of Wells' Noise By-laws, means that the assertion is based on mis-information. Confidence in this report should not inform Osisko's compliance and mitigation expectations.

---

#### Appendix7.3-1\_NoiseVibrationTechData\_17

##### **5.1.4 BLASTING VIBRATION**

I don't know how the Consultant arrived at a 96 metre boundary for Low Frequency effects from blasting, but I would like to know. Low Frequency propagation, whether airborne or vibrational, are HIGHLY unpredictable and more often than not, has unexpected spurious effects. Again, to not be presenting (or expecting) problematic noise pollution strikes me as naive.

<https://www.sciencedirect.com/topics/engineering/low-frequency-vibration> "Whereas air is essentially a uniform medium, the ground can have a layered structure and its properties vary considerably from one site to another and even within a single site. Thus prediction of absolute levels of vibration and ground-borne noise is extremely difficult"

---

## 5.2 CLOSURE

“The acoustic analysis highlighted in this report is based on information obtained from BGM and its design team. The assessment represents the design conditions as provided at the time of the assessment, and the conclusions are the best judgment of the assessor based on current environmental standards. WSP Canada Inc., attests that to the best of our knowledge, the information presented in this report is accurate.” Bravo to WSP for their work and report but as they say, they are only as good as their info. The absence of key information/facts/design plans means that their job is to provide a “best guess”. Their above declaration is exactly why I am not confident in the assessment results.

## Cariboo\_Gold\_Appendix7.3-1\_Noise\_Existing\_Conditions.pdf

*For those who might be curious, I have been a sound professional for 40 years (sound recording, creation and mixing). I live, work, record and recreate throughout the Wells/Bowron area.*

### Appendix7.3-1\_NoiseExisting\_01

This is a very detailed Report, however, there are 2 serious flaws in it, where it pertains to Residential and Recreational locations.

It seems unfortunate that there wasn't more consultation of local knowledge, before these tests were performed. The main issues are:

1. Measurements were done AFTER exploration drilling had begun. This renders a higher baseline than the Community expects to live within.
2. The choice of Monitoring sites inadequately represents an accurate sonic picture of both the whole of The District of Wells, including Residential and Recreational users noise experiences.

There were only 3 Monitor Stations placed in the town of Wells, which is inadequate coverage for the areas that people live, play and work.

1. The first monitor (R01-ODV Wells Camp) looks to be in a decent location to show the noise from the Camp, however it's not a great place for representing a residential experience. Additionally, the monitoring failed around 2pm, missing most of the afternoon. *This data set is flawed.*
2. R02 (District of Wells residence south of Highway 26) This is another interesting choice as it's close to the highway and the much used, Ski Hill Road. The R02 site is primarily a business area and is close to mine accommodation and parking. The majority of Wells Residences are \*not\* along the highway. So, this data set is biased towards showing a baseline that is much higher than a residential neighbourhood.
3. R03 (ODV office on Sanders Avenue) appears to be behind the ODV offices. This location is beneficial in that it's sheltered more from the highway noise, however, there are large buildings which would cast a sound shadow from the Exploration activities. This is perhaps the most "Residential" location in that the drills would not show up as much.

My first question is then, will ODV re-test for baselines, without active drilling?

Next question, will ODV expand the testing areas to include representative locations for Residents and Recreational Users?

Suggested locations would be:

- the school yard
- Margaret & Dawson Streets
- a residence on the west end of Crescent
- a residence on the east end of Crescent
- the Lodge on Pooley
- at the SW bend of Mooney Ln
- on Lowhee Dr by the abandoned cabin
- in the Meadow at the silver bridge

- in the Meadow at the foot of Cornish Mntn
- at the entrance to the Learning forest.
- Stromville
- 1 Mile Bridge

To not measure at sites like these, is to ignore the Community & Tourism experiences.

-----

#### **Appendix7.3-1\_NoiseExisting\_02**

**7.3.4.1.1 Operation and Construction – Noise (Audible and Low Frequency Noise)** “The predictive analyses were performed using the commercially available software package Computer Aided Noise Abatement (CadnaA), which implements the algorithm contained in the ISO 9613”

**Can we review screen captures or video of a walkthrough of the model as it is in the software?**

-----

#### **Appendix7.3-1\_NoiseExisting\_03**

During Construction & Operation:

Will there be someone on-site continuously measuring sound at multiple receptors?

If not, how often will they be observing the measurements?

Where are those receptors?

**Cariboo\_Gold\_Application\_Summary.pdf**

**AppSummary\_01**

A few years ago, BGM stated a 10-15 year mine life. Now you state: "The mine has an estimated operational mine life of 16 years, with an overall mine life of approximately 25 to 35 years (construction through post-closure)." Elsewhere in your docs you say it's a 20 year life.

**Which duration is Osisko is actually applying for?**

-----

**AppSummary\_02**

Regarding the Septic Field at the camp (above Lowhee Creek), what testing procedure will be implemented for ground water seeping into the Willow or the town's potable water?

**How frequently will the testing occur?**

**Will Residents be able to review the regular results anytime they need to? If not, does that not seem logical?**

-----

**AppSummary\_03**

**Same question as above for the Water Treatment plant discharge.**

-----

**AppSummary\_04**

**What sound mitigating measures will be put in place to prevent sound from the camp, bridge overpass and services building? Be specific please, with each mitigation measure and its timeline for implementation.**

-----

**AppSummary\_05**

**What analysis has been done of the surface/slope stability and water movement on the north end of Barkerville Mtn, below the proposed haul road?**

**Is there a study that can be reviewed?**

-----

**AppSummary\_06**

**I didn't see any reference to the reclamation the land below the Mine Site settling pond. Aka the Flats at the east end of the Jack. This is something that has been mentioned several times at BGM & Osisko community meetings. Is this something that Osisko intends to follow up on?**

-----

**AppSummary\_07**

**"Osisko Development Corp. (ODV) recognized early in Project planning that the key to a successful engagement program was ensuring that stakeholders were identified and had the opportunity to participate in a manner that was both meaningful and practical for them."**

**What was the rational for \*not\* consulting the Community, Indigenous Peoples and other Stakeholders on the Services Building location, before the EAO Application was submitted?**

**It's truly unfortunate, as there would have significantly less resistance to the project if Osisko had located the Services building on back of Cow Mountain.**

-----

#### AppSummary\_08

The bridge that's shown in Figure 3 and mentioned several times in the document, kindly show a rendering of it.

---

#### AppSummary\_09

There seems to be a second crossing of the Willow indicated. For "Transport", in Figure 3.

#### Are you planning for two crossings?

The bridge and "transport crossings" are very unclear and could significantly alter the entrance view to town. **We need more understanding of this.**

---

#### AppSummary\_10

Could we please see a 3D render showing the composition of the underground sedimentary layers around the Services building, including the location of the underground workings?

---

#### AppSummary\_11

**Section 7.2** "Where practicable, select equipment with low emissions and engines that meet latest applicable Canada emissions standards and guidelines."

**Please define the all the parameters that affect a "Where practicable" decision?**

**Are these decisions reviewed during the life of the project, to include Cumulative Effects?**

**Who decides and monitors the "where practical" line when budget is the main defining factor on using Electric equipment, or not? ODV or an external group?**

---

#### AppSummary\_12

**Section 7.2** "Equipment will be turned off when not in use, where practical".

**Please define what "where practical" means?**

---

#### AppSummary\_13

#### **Section 7.3**

"Monitor blasting noise and vibration at an appropriate setback that is representative of receptors, or at the closest receptor during the first few blasts, especially when they occur near the surface area. "

**Kindly define "Appropriate setback".**

---

#### AppSummary\_14

**Section 7.8** "A wildlife education program will be developed and provided to employees, contractors, and site visitors."

**Who specifically will develop this program?**

**If the intention is to be internally developed, will external specialists be consulted?**

---

#### AppSummary\_15

**Section 7.9** "Installation of a clear-span bridge over the Willow River to avoid any instream works and to limit impacts to fish habitat."

Will the clear span be over the entirety of the spring flooding zone, or will footings be used within the flood area?

---

AppSummary\_16

**Section 7.11**

“Provide advanced notice to stakeholders of Project activities and schedules, including road impacts and peak Project traffic times. “

What form will this take, and why are you not doing it already, in the Exploration phase?

---

AppSummary\_17

**7.11**

“Provide advanced notification to relevant stakeholders of Project schedules prior to commencing activities that may be outside conditions considered normal (i.e. noise, dust, or vibration during blasting).”

Why are you not doing this already?

And what/who defines “activities that may be outside conditions considered normal”?

---

AppSummary\_18

**7.11**

“Place signage on affected recreational trails if there is the potential for conflicts with Project activities.”

Please explain how Exploration and the CGP will be consulting stakeholders on closing of Recreational Access! So far it seems that someone(s) just decides to block access, then does so. Most efforts to regain access to Public Land that have occurred so far are either slowed or blocked. Please explain how ODV can usurp Public Rights.

---

AppSummary\_19

**7.11** “Discuss appropriate mitigation and access requirements with tenure holders.”

Please explain why this is not happening already, in the pre-production phase of the project.

---

AppSummary\_20

**7.11** “Develop a strategy to mitigate pressures on recreation and tourism in the Project area due to increased population and visitors.”

The same should be said of mitigating pressure of noise and light, on recreation and tourism. Currently, there is significant noise disruption in the meadow, a huge recreational tourist attraction. I haven’t heard anyone discuss that issue, except for locals.

What will the effects be on wildlife and humans be, in the meadow and Community Learning Forest?

What studies have been performed out there?

---



#### AppSummary\_21

##### 7.11

“Minimize the disturbance areas to the extent practicable.”

Practical... for whom? Who determines this and how does the public participate in those decisions?

---

#### AppSummary\_22

##### 7.11

“The emission of light towards the sky will be limited by using Luminaires that produce a sober and uniform lighting that will meet operational lighting needs. Luminaires will not produce any emissions above 90 degrees.” AND “Use structure surface treatments such as non-reflective surfaces and colours to blend in with the natural surroundings and reduce visibility.”

Please explain how reflected light will be stopped, while snow is on the ground?

---

#### AppSummary\_23

##### 7.14 Community Health.

Is this section meant to only reference the community of ODV workers or does this allude to more?

---

#### AppSummary\_24

7.16 “Develop and implement a Community Involvement Plan.”

Please outline the purpose and goals of this Plan.

---

#### AppSummary\_25

##### 7.16

“Contact Indigenous elders on at least semi-annually to inquire about their opinions on if the Project has resulted in any changes to Indigenous language and teachings.”

This is great. How about doing that for residents of Wells and surrounding area, as well? The project is surely having an impact on the community of Bowron as well.

---

#### AppSummary\_26

##### 1.5.2 Summary of Positive Effects- Infrastructure and Services

“Improvement to recycling in the Wells area”

Please outline what BGM/ODV is imagining, as no such discussions have happened with those that run the recycling depot.

---

#### AppSummary\_27

##### 1.5.3 Summary of Negative Residual Effects Effects-Human Health

Add “Addition of Noise Pollution” to this section. Not having it in there suggests that Noise Pollution does not have a negative effect on human health. As you know, Noise Pollution is a significant Value Component in Human Health everywhere, as proven by many studies. Even small increases in noise pollution can lead to anxiety, depression, increased medication use and

heart disease, in addition to the obvious, hearing loss. ***We are already experiencing Negative Residual Effect from the Noise being produced by the Exploration Drilling activities.***

---

AppSummary\_28

### **1.5.3 Summary of Negative Residual Effects Effects- Culture**

As the town becomes an Industrial camp and work zone, community members are, and will, continue to leave. This has and will continue to shift the non-mining Culture of the town. The things that have made Wells the unique and peaceful destination that it is, came from the people living here. Events and tone will drop away, leaving a tangible Cultural void.

---

AppSummary\_29

### **1.5.4 Table 5 Potential Cumulative Effects– Acoustic**

“Potential cumulative effects for Acoustics were not identified.”

Traffic is a huge factor in the increased noise pollution in Wells. Also, construction of additional housing and businesses, related to the Project’s existence would present Acoustic Cumulative Effects. **Please add this or justify why not.**

---

AppSummary\_30

**1.7.2 Predicted Benefits to the District of Wells** Historically ODV has suggested “Predicted Benefits” which it has then taken off the table. While all of these ideas are nice, they are nothing but carrots dangling in front of the Application Cart. Until ODV has committed to any Benefits, they present more as sales tactics. **Which Benefits has ODV firmly decided to deliver on/made promises to engage with on Project Certification?**

## Cariboo\_Gold\_Chapter7\_Section7.3\_Acoustic.pdf

### Ch7-Section7.3Acoustic\_01

**7.3 Acoustic** “Project components considered in the assessment include:

- Noise and vibration due to construction and closure activities;
- Noise and vibration due to operations; and
- Noise and vibration due to blasting (construction and operations).”

A huge issue that is happening now, even before the project has been certified is drill noise. This should really be a bullet point on the above list.

---

### Ch7-Section7.3Acoustic\_02

#### 7.3.1.1 Health Canada Noise Guideline

How do plan to solicit honest feedback from the Community? There are many people in Wells that are currently Highly Annoyed with the drill noise, but they are “afraid” to make a complaint for many different reasons, or they feel it’s futile.

---

### Ch7-Section7.3Acoustic\_03

#### 7.3.1.1.1 Environment Canada’s Environmental Code of Practice for Metal Mines

This is all well and good for a larger centre but our noise floor in Wells was WAY below those numbers before ODV set the drills to work. It’s great that ODV is considering HC’s recommendation on Impact and Tonal sounds but the worst aspects of acoustics issues right now is the ambient or continuous droning type sounds that never stop. This relentless noise pollution has an unconscious impact on people’s health and should not be overlooked.

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---  
“Concussion noise of a maximum of 128 dB.” For your reference, this is the volume of a jet taking off. This will provoke all out panic and anger in the streets if it happens unexpectedly.

---

### Ch7-Section7.3Acoustic\_04

#### 7.3.1.1.2 BC Oil and Gas Guideline

“Presence of a distinct tonal component below 250 Hz.” Is this dBA or dBC weighted, or a composite? Will you be collecting Sound Measurement data broken down into 1/3 octave bands once measuring the actual activities?

---

### Ch7-Section7.3Acoustic\_05

#### 7.3.1.1.3

Osisko has quoted Noise Bylaws from the CRD as if they apply to Wells, and given this info to their Consultants. This is straight up fraudulent behaviour.

The CRD’s bylaws are not the District of Wells’ bylaws. There is no exemption for “Activities of a commercial or industrial nature taking place on property appropriately zoned for the use being conducted”, in the District’s bylaws. Also the land that they are applying to use is NOT zoned as Industrial. It is zoned as Parkland. ODV has been in contravention to the District of Wells’ Noise bylaws, continuously, for months and is now trying to impose its will on Wells’ Bylaws.

---

**Ch7-Section7.3Acoustic\_06**

**7.3.2.2.1 A. Mine Site**

“1. Portal activities at the Valley Portal located at the east side of the main mine site between Jack of Clubs Lake and the Community of Wells, primarily resulting from ventilation and movement of equipment in and out of the Portal; “ We have knowledge of the volume of such activities, from the Bonanza adit. It’s LOUD. How on earth do you plan on mitigating that sound when it’s up against a mountain that reflects sound into town? Will this activity conform to the District’s Noise Bylaws?

---

“4. Building breakout and exhaust emissions from the Services Building, associated with the operation of various equipment inside the building (i.e., conveyors, blowers, hoppers, screens, sorters, crushers, ball and sag mills, dust collection equipment, and building ventilation, etc.); “  
What will the projected cumulative volume of these activities be inside the building?  
What will the projected cumulative volume of these activities be outside the building?  
Will the inside of the building be acoustically treated to reduce reverberation and therefore the overall SPL vibrating the building?  
What materials will the Services building’s walls be constructed from? (Metal is a resonator (and metal walls are more flexible and lower mass than other materials, so will transmit sound more easily.)

---

Same questions as above, for the Water Treatment Plant.

---

“6. Building breakout and exhaust emissions from the Services Building, associated with the operation of various equipment inside the building (i.e., conveyors, blowers, hoppers, screens, sorters, crushers, ball and sag mills, dust collection equipment, and building ventilation, etc.);”  
Can you please outline what will be contained in the Airborne emissions that emirate from within the Services building, Water Treatment Plant, Electrical Substation, Camps, Bulk Fill Area, Sedimentary Pond, as well as from the Ventilation Raises? I read through the Emissions docs but they were not specific about the outputs from the specific locations. Also, please include data regarding any extreme/overload exhaust events that might occur.

---

**Ch7-Section7.3Acoustic\_07**

**7.3.2.2.4 D. Transmission Line**

“The operations of the new 69 km transmission line (which encompasses noise emissions associated with its operation). A corona noise effect is audible noise from electrical discharge caused by the ionization of a fluid such as air surrounding a conductor carrying a high voltage. Noise from corona effect was considered in the assessment.”  
Super! What are those values?

---

## Ch7-Section7.3Acoustic\_08

### 7.3.3.1 Information Sources

“Data bases of similar sources as well as site plans;” Could you please outline the “similar sources as well as site plans” used? As far as I can tell, there are no gold mines whose centres of production within 100 metres of Residents on surface, with mining occurring under the town. I am stunned that you think this will be liveable.

-----

## Ch7-Section7.3Acoustic\_09

### 7.3.3.3 Project-Specific Existing Conditions Studies

*Taken, in 2018 & 2019 ... AFTER related surface drilling had begun on the edge of town. The baseline study is a misrepresentation of what Wells was pre-Exploration drilling.*

-----

## Ch7-Section7.3Acoustic\_10

### 7.3.4.1 Methods

“Sensitive receptors within the spatial assessment boundaries were identified (as shown above in Figure 7.3-2 and in the Acoustic Technical Data Report in Appendix 7.3-2);”

Again, the receptor locations that were chosen for the measurements, simply do not capture a cogent picture of pre-drilling Residential & Recreational users’ ambient noise levels.

---

“A predictive computer modeling and analysis were completed to predict sound levels from the Project activities at the receptors; “

While this may be the case, the modelling is based on current plans, as provided by the proponent, which was made up of an incomplete list of activities, mechanicals and final building designs at the Mine Site. Again, statements by the Consultants and Osisko that the Mine Site plans are Compliant with government standards as asserted in the Acoustics reports, have NOT been proven in situ. Claiming that the project will meet those standards in practice, is false.

---

“Predicted noise levels were compared to applicable limits establish in accordance with regulatory guidelines to assess potential effects; and” AGAIN, there is no exemption for “Activities of a commercial or industrial nature taking place on property appropriately zoned for the use being conducted”, in the District’s bylaws. Also the land that they are applying to use is NOT zoned as Industrial. It is zoned as Parkland.

---

“Where required noise control measures were included to demonstrate compliance and such control measures are included as recommendations.”

While the mitigation suggestions are a good start, however, they are based on “quantified based on modelling and analysis”. Solutions are suggested based on “practicality and experience”, however, that is the ‘practicality and experience’ as used in a different acoustic environment.

---

It is also very interesting to me that the reports lack screen captures or video tours of the model. I would have liked to analyze the details of the models. ***Since no final design for the Services building has been provided ... how could the Consultant properly model its sonic contribution to the environment?***

I would also be very interested to see what wind modelling they used and how it played into their predictions.

---

#### Ch7-Section7.3Acoustic\_11

##### 7.3.4.4.2 Noise from Blasting (Construction and Operations)

“Figure 7.3-6 shows a 250-metre buffer zone from the receptors adjacent to the Mine Site and since blasting is to occur within that buffer zone then there is a potential to exceed the criteria limit and not meet the endpoint.”

What time of day do you intend to do this blasting?

Since this activity has the potential to create long term hearing loss, please outline the plan for informing the Community about the blasting. Ahead of time and at the time. of blasting. How many blasts will be required over what period of time (estimated), before the blasting is considered ‘underground’ and ‘contained’.

---

#### Ch7-Section7.3Acoustic\_12

##### Figure 7.3-6

This image is difficult to understand. Perhaps an image that shows the estimated noise and vibration radius’?

---

#### Ch7-Section7.3Acoustic\_13

##### Table 7.3-13 Proposed Mitigation Measures and Their Effectiveness – Acoustic

“Buildings or enclosures that are used to enclose noise processing equipment will include, at a minimum, an enclosure of sandwich sheet metal (about 18 to 20 gauge or better) cladding or an enclosure providing insertion losses shown below.” This is a great start. What will the noise level be inside the building?

130dB inside -30 to -40 dB from wall structure treatment is still potentially 80dB outside of the build. The volume of a lawnmower.

---

“Generators will include Sound Attenuated enclosures with an engine muffler providing a total sound power of no more than 98 dBA.” ... the volume of a snowmobile.

---

“Substation transformers (32 MVA) were assumed to be no more than 100 dBA of total sound power level and includes a noise barrier on north and east side of the transformer yard. The barrier is of 4.5 metres height and constructed of material providing a surface density of 20 kg/m<sup>2</sup>. The barriers should also be constructed without gaps within or below its extent.” Why only on the north and east sides!? What about users on the Lake. The acoustics of the Lake should be protected as much as possible as well!

---

“All ventilation openings (including intakes and discharge) were assumed to have an acoustic louvre (6 inches or better). If the total area of ventilation openings exceeds 8% of the total façade area, an acoustical louver a 12-inch acoustic louvre will be required.”

Why not use the larger loaves, right off the bat? What happens if plans change... at any point in the project and 8% is exceeded?

---

“Fans at ventilation raises at Shaft Zones are required at least 20 dB sound attenuation and Valley Zones ventilation raises require at least 10 dB sound attenuation.”

20dB off of a 130dB noise source is still 110dB (the volume of a snowblower and above the sound volume that is capable of producing hearing loss, with prolonged exposure). Based on this, I would question if the answer to “Residual Effect” should actually be Yes.

---

“A barrier on the Island Mountain Portal extending 75 m on the north side and 60 m long on the east side at height of 4 m. It should be constructed of material providing a surface density of 20 kg/m<sup>2</sup>. The barriers should also be constructed without gaps within or below its extent.”

I’ve already covered this elsewhere but this barrier will not prevent reflected sound off of the mountain.

---

#### Ch7-Section7.3Acoustic\_14

##### **Table 7.3-15 Residual Effect Characterization for Construction Noise and Low Frequency Noise**

“Minimal changes to the baseline conditions and project contribution is below the limits”

While I respect and am grateful for legislated limits on sound in populated environments, Wells is no regular acoustic environment. In 2017, I could hear the sound of my blood moving in my body, while outside. Ambient noise has already taken that away. I could hear snow hitting my fleece jacket, an ant crawling on a leaf. All gone since the Exploration program began. I moved to Wells for these things. Not only for my soul, but for my sound recording profession. Ambient noise coming from the drills, is now an infringement on my lifestyle, profession and peace of mind. Should the standards not be adjusted for the baseline that Wells used to have (before 2018)?

---

#### Ch7-Section7.3Acoustic\_15

##### **7.3.9.6 Mitigation Measures**

“Potential adverse cumulative effects were not identified. Additional mitigation measures are not required.”

The Cumulative Effects study appears to have not included Exploration drilling. My understanding is that surface drilling of around the same number of drills as currently in operation, will continue from now until the end of operation. Is there a Cumulative Effects assessment report that includes the surface drilling program?

---

#### Ch7-Section7.3Acoustic\_16

##### **7.3.10 Follow-up Strategy**

“Noise and vibration mitigation measures will be implemented as part of the Construction Environmental Management Plan and Explosives Management Plan. These plans will be developed prior to the start of construction. A Noise Monitoring Plan will also be developed to verify that measures are in place to minimize acoustic effects, and to ensure these measures are effective.”

When will the Noise Monitoring Plan be available to review? It would seem critical component to achieve Certificate approval.

“As part of ongoing consultation and engagement with interested parties (including community representatives, Indigenous nations, and local government representatives), ODV will confirm interest in receiving regular updates on monitoring results and preferred mechanisms for sharing data and information. These groups will also be engaged on strategies to be employed if predicted effects and mitigation effectiveness are not as expected.”

Sounds great. I'm interested.

---

#### Ch7-Section7.3Acoustic-Tables\_17

**7.3-3** “Where possible, implement administrative controls such as plan activities considering timing constraints, or scheduling of specific construction activities to minimize disturbance to receptors (e.g. not concentrate equipment near a receptor).” “Where possible”? And what if you deem it not possible, then what?

---

#### Ch7-Section7.3Acoustic-Tables\_18

**7.3-4** “Investigate persistent complaints and implement corrective actions.” Does this mean that you will only investigate persistent complaints? Does this mean that if ODV's activities negatively affects only one individual's living, that the must write you over and over again, to see effort and change by ODV? How many times does one complain before your define complaints as “persistent”?

---

#### Ch7-Section7.3Acoustic-Tables\_19

**7.3-9** “Generators will include Sound Attenuated enclosures with an engine muffler providing a total sound power of no more than 98 dBA.” This is helpful, but lacks the specificity of distance. A generator at 98dBA a kilometre away, is VERY different than one half a kilometre away, let alone 200 metres. For example, 98dbA for the generator that you plan to use during Construction at the Island Mountain portal is far too loud for the residences in Upper Wells and will add to the Cumulative Acoustic Effects all across town. This is the equivalent loudness of a helicopter.

---

#### Ch7-Section7.3Acoustic-Tables\_20

**7.3-12** “All ventilation openings (including intakes and discharge) were assumed to have an acoustic louvre (6 inches or better). If the total area of ventilation openings exceeds 8% of the total façade area, an acoustical louver a 12-inch acoustic louvre will be required.” This is all well and good but if there is 130dB of loudness behind the wall, then these measures are likely to be substantially inadequate.

---

#### Ch7-Section7.3Acoustic-Tables\_21

**7.3-13** “Fans at ventilation raises at Shaft Zones are required at least 20 dB sound attenuation and Valley Zones ventilation raises require at least 10 dB sound attenuation.”

**\*\*\* The Valley Vent Raise Intake is quoted as having a volume of 129!! 10db off of a 130dB noise source is still the volume of a police siren and can result in permanent hearing loss!\*\*\***

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## Ch7-Section7.3Acoustic-Tables\_22

### 7.3-13

“A barrier on the Island Mountain Portal extending 75 metres on the north side and 60 metres long on the east side at height of 4 metres. It should be constructed of material providing a surface density of 20 kg/m<sup>2</sup>. The barriers should also be constructed without gaps within or below its extent.”

This strikes me as an incomplete solution to the noise at the Island Mntn Portal. 4 meters in height will not stop the sound from projecting at the houses on the Crescent. In fact, with the barrier being so far from the noise source(s), it will do little for anyone except for those walking by at ground level. Mitigating noise from the Portal for residents will be all about measures taken at the noise source.

---

## Ch7-Section7.3Acoustic-Tables\_23

**7.4-40** “Speed limits will be enforced.”

How will they be enforced?

### AccidentsQuestions\_01

#### 9.3.1 Potential Malfunctions or Accidents

Noise pollution or extreme volume events appear to be missing from table 9.3.1 Explosions and Vehicle incidents, as example.

As is the hazard of a 40,000L LP tank rupture. A critical, rare and extreme risk event that could harm people up to 1km away.

### AccidentsQuestions\_02

#### 9.3.2 Differential Effects (Affected Populations)

- “Any incidents affecting vegetation, surface water, freshwater fish, or wildlife may disproportionately affect sub-populations, particularly Indigenous communities, that rely on their ability to fish, hunt, trap, gather, and harvest in the area. For Indigenous communities, these are captured where interactions between a potential incident and Indigenous interests are identified (in Section 9.4: Moderate Risk Incidents and Section 9.5: Low Risk Incidents).

- Any incidents affecting air quality or surface water may disproportionately affect members of the community with pre-existing health conditions.”

While not specifically sited in EAO’s AIR, it seems odd that acoustic effects are not included in either two bullet points in this section. Noise effects animal and human, so fitting to be included.

### AccidentsQuestions\_03

#### Table 9.4-1 Moderate Risk Malfunctions and Accidents

“Notification of appropriate authorities.” If this includes notifying the District (so that the public is notified), please note that the District doesn’t seem to work onsite more than 3 days a week, so notification of the public could be dangerously compromised. Please please please work out a system that supports a 24/7 notification system.

### AccidentsQuestions\_04

#### Table 9.4-1 Fire Description

“Regardless, a major fire would likely be contained to the Project site and would have a minor localized effect on the surrounding environment.”

What is the plan for a worst case scenario? Say one of the LP tanks explodes during fire season, and lights the side of Island Mountain on fire. What is your plan for that?

Ch20\_AppendixQuestions\_01

**20.1 Summary of Mitigation Measures**

“The table also identifies the means through which mitigation will be achieved (Project Design Management / Monitoring Plan, or Permitting).”

*Thinking Like a Neighbour:* An obvious line of mitigation is to not have problems arise in the first place. Starting a new process/activity for the Mine? \*Have an ODV role to review the process experience, as if they live next door. Noise, dust, light, vibration, access limits etc. Any effect that might occur.

*Complaint Resolution*

What is the channel and resolution process for Community Members when life is being disrupted by Mine activities?

Does ODV promise to act on Complaints immediately and follow through in a timely fashion, until completely resolved?

If mitigation efforts fail to provide resolution, what further processes can be taken?

What if ODV decides that there is no other mitigation measure available, and the complainant is still suffering from the effects of Mine’s activities? Then what?

---

I don’t see any of the Plans that are mentioned in 7.10-3 (Community Involvement Plan, Socio-Economic Monitoring Plan) but would like to know more about them and the “Community Monitoring Committee” that you propose.

---

Ch20\_AppendixQuestions\_02

**20.1.1 Existing ODV Management Plans**

Mitigation Measure Plans that appear to be missing from the list: Acoustic, Light, Dust.

---

Ch20\_AppendixQuestions\_03

**20.1.3 Project-Specific Monitoring Plans (Noise Management & Monitoring Plan)** “The plan includes the following key objectives:

- ...
- Mitigation measures planned to reasonably minimize effects from Project noise; and
- ...

Please define “reasonably”.

How does “reasonably” defend the public from ODV’s reimagining of Wells as an Industrial Town.

How does it defend the personal peaceful enjoyment of my home, and my professional ability to record wildlife and sound effects in the environment, which has already been compromised enough to stop trying? I moved up here for these things which have been significantly eroded over the last year plus.

---

#### Ch20\_AppendixQuestions\_04

##### 2.1.2 Surface Infrastructure

Ventilation Raises appear to be missing, along with related machinery and buildings.

---

#### Ch20\_AppendixQuestions\_05

##### 2.1.2 Surface Infrastructure

“Security fence and access gate”

Can this (and all gates) be visually designed to match the quaintness of Wells, verses a typical industrial gulag gate?

---

#### Ch20\_AppendixQuestions\_06

##### Cariboo\_Gold\_Chapter20\_PLANS - OVERALL comment

Will these Plans be submitted as a part of the Certificate Application? Awarding of a Project Certificate based on a plan for plans, leaves way too much blowing in the wind.

---

#### Ch20\_AppendixQuestions\_07

##### Table 20.1-1 Summary of Proposed Mitigation Measures for the Cariboo Gold Project

“Where practicable, select equipment with low emissions, such as Tier 4 generators, and engines that meet latest applicable Canada emissions standards and guidelines.”

“Where practical” is far from good enough.

## Cariboo\_Gold\_General Questions

### GeneralQuestions\_01

Where will the new (Wells) highway bypass be exactly, and what will it look like?

---

### GeneralQuestions\_02

There is a significant lack of discussion across the Application, with regard to the effects of winter temps, the icy highway and snow loads and clearing.

Example questions:

- Will speeds of all vehicles be reduced by any amount, during the winter?
  - Sound Propagation increases significantly as temperatures drop. None of the Acoustics related studies have air temperature factored in.
  - Where will the Mine Site & Haul roads cleared snow be stored in the winter?
  - Will the stored snow be trucked out in the spring to avoid unexpected flooding down hill
  - Will idling rules be upheld in the winter? Or will rules be put in place that workers set schedules that won't have them sitting waiting in their vehicles for 15 mins in the cold?
- 

### GeneralQuestions\_03

When will Osisko be presenting information on Light Effects & Mitigation?

---

### GeneralQuestions\_04

Is there a plan for stated system of rules and ramifications for worker behaviors across procedures? Something that will give weight to the importance following the rules.

---

### GeneralQuestions\_05

Not a question so much. There is already an unacceptable level of noise from ODV/BGM activities. Please explain how this is acceptable.

---

### GeneralQuestions\_06

Completely missing from these docs, is the use of surface drilling throughout the duration of the project. Am I missing something?

---

### GeneralQuestions\_07

Will the interior of the Services building be treated for acoustics?

---

### GeneralQuestions\_08

There is very little info on the ventilation raises, and these almost require their own section.

How will they be constructed?

How will the power lines run to the fans?

Please provide a visual mock up of any ROW clearing that you are required to do around the ventilation raises and their power lines.

---

### GeneralQuestions\_09

There is a \*lot\* of vague and interpretable language in all of these documents.

---

### GeneralQuestions\_10

There are significant gaps in information based on stated Planned for Plans that aren't in the application. This makes it impossible to assess some of the provided information. References to a yet to be created "Community Involvement Plan" for example. Considering there is no chapter on Community Effects (other than a few pages in the Application Summary), the Community Involvement Plan is a critical missing piece. Until we can read a plan, everything is speculation and hearsay.

---

### GeneralQuestions\_11

There really should be specifics on Environmental Monitoring during Construction and Operation. When is that coming?

---

### GeneralQuestions\_12

ODV's history is to implement new activities and wait to see what fall out there might be. There is nothing which leads me to believe that ODV will stop working from 'figure it out later'. This shoulders the Community with post complaints (which has been nearly every week for a year). This is effectively a form of servitude.

## Cariboo\_Gold\_Project\_Overview.pdf

### ProjectOverview\_01

#### 1.4.1.3.1 Ventilation Raises

What is the specific location of the Vents?

There are only 3 that are marked in diagrams, as far as I can see. There is considerable noise related to such infrastructure.

Please outline vent raises on a topographical map.

What significant noise mitigation is planned for these vents, especially the ones within town, the meadow and Caribou habitat.

---

### ProjectOverview\_02

**1.4.1.3.1 Ventilation Raises** “During the Project's development, additional underground ventilation raises may be required, or the currently planned raises may be extended to reach the lower levels of the underground mine zones.”

Please outline who would review and approve any additional Vents and if the public would be informed about such plans.

---

### ProjectOverview\_03

#### 1.4.1.3.1 Ventilation Raises

“Existing access roads will be used to access the ventilation raises.”

Please ensure that the vent infrastructure fencing, does NOT block any access roads or other trails on public land.

---

### ProjectOverview\_04

#### Figure 1.4-15

Figure 1.4-15 shows non-contact water emptying into the Willow River. Figure 1.4-18 appears to be missing what appears to be the 3 potential inputs to the River as noted in Fig. 1.4-15

---

### ProjectOverview\_05

#### Figure 1.4-18

What defines an “Emergency” which would require the discharge of untreated water from the Sediment Pond and Inflows, into the Jack of Clubs Lake?

---

### ProjectOverview\_06

If “Emergency” included overflow due to seasonal weather/rain, how often do you expect the discharging to occur?

Will water testing increase in times that the discharging is happening?

Will the Community be notified when discharging is happening?

How will the Community be notified?

Will there be an audible notification associated with Emergency Water Releases?

---

#### ProjectOverview\_07

##### 1.4.1.2 Figure 1.4-2

This map shows the Valley Portal as being accessed outside of the Services building. I thought you said access would be from within the Services building. So to be clear, equipment traffic will be transiting the portal on the outside of the Services building?

---

#### ProjectOverview\_08

##### 1.4.2 Transportation Route

“18 to 20 transport truckloads per day (roundtrip; maximum 25 per day)”

This is already a lot of heavy traffic using highway 26 and there can be a shortage of passing infrastructure opportunities. It’s easy to get stuck behind a slower moving truck for 15 minutes. You state “Upgrades to the existing Transportation Routes are not required as part of the Project.” This project’s traffic increase represents a significant change to timely and safe use of Highway 26 by all users. Please explain why you do not think additional infrastructure is required, based on your planned and other unexpected/mentioned increased use.

---

#### ProjectOverview\_09

##### 1.4.2 Transportation Route

“A Project traffic study was completed and is provided in Appendix 1.0-9.”

The Appendix is empty?

---

#### ProjectOverview\_10

##### 1.4.4 Transmission Line

“The Transmission Line would require ROW dimensions of a maximum of 40 m in width” 131 feet of cleared land from Barlow Creek to Wells?

Please explain the logic for how the transmission line won’t affect the Caribou’s habitat?

Additionally, please show mock ups of how a 131 foot gash (ROW) along Island Mountain as the line enters town, will look from town!

Please include the towers in the mock ups.

I would suggest showing the ROW mock up from multiple views: Driving west from Barkerville (around Stromville), from the silver bridge in the meadow, from the school field and, on the highway between Pooley & the bridge.

Also please create a mock-up of what the lines will look like, crossing the highway at the entrance to Wells.

---



## ProjectOverview\_11

**1.4.4 Transmission Line** “Generators will be installed near the Mine portal areas for use during Mine Site construction and until the Transmission Line is operational.”

Please explain how loud these generators will be, when exactly they will be running, and how you plan to mitigate the noise.

---

## ProjectOverview\_12

### 1.5.1 Project Phases

The Project Phases Duration chart seems off in relation to the duration of the EA. The EA process is ~2 years. There appears to be a Construction Phase starting before the project is Certified. In the *Project Overview 1.5.2 Project Schedule* there is the statement “Construction start dates are subject to receipt of the EAC and required permits and approvals, and are presented as estimates based on current schedule assumptions.”

Please clarify this contradiction.

And, if the CGP needs to get ahead of Year 1, by constructing without a project Certificate, wouldn't that be presumptuous and potentially leave Wells in disarray, should the certificate not be approved or a new application be submitted with the Services building somewhere else?

---

## ProjectOverview\_13

### 1.5.1.4.5 Reclamation Strategy

Thank you for these images, but it's not sufficient to show such mock ups from one location only. Especially, from a vantage point that minimizes the impact. Please add images from 3-4 additional vantage points, at a further distance away.

---

## ProjectOverview\_14

### 1.5.3 Summary of Changes from Detailed Project Description

“The locations for Mine Site effluent discharge have been adjusted. Locations for effluent discharge can be seen on Figure 1.4-17.” In looking at this new location for Effluent Discharge, I'm perplexed as to the justification for the risk of discharging potentially harmful substances directly into a recreational area. People paddle the river and swim less than a kilometre downstream. How can this be justified?

---

## ProjectOverview\_15

### Table 1.5.2 Cariboo Gold Project Milestones

Please describe how you plan to mitigate all of the Acoustic and Dust effects that will occur as a result of such a massive amount of sporadic and new upwind (of town) construction activities.

Also, it's stated elsewhere in the application, that all Production Equipment will be outfitted with mitigation (Electric, noise based back up alarms, etc). Will this be the case with any Contractor Construction Equipment as well?

## APPENDIX B COMMENT #14 TECHNICAL MEMO

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# TECHNICAL MEMORANDUM

OSISKO DEVELOPMENT

TO: Katherine St James (Environmental Assessment Office)

FROM: Francois Vezina (Osisko Development Corporation)

DATE: November 6, 2021

**SUBJECT: Public Comment #14 Response**

The purpose of this memo is to provide the Environmental Assessment Office (EAO) with a response to Public Comment #14 – Alternative Site Selection Analysis for the Cariboo Gold Project. This comment relates to the Cariboo Gold Project (the Project) Environmental Assessment Certificate Application (the Application) and was submitted during the Application Development and Review Phase public comment period of the BC Environmental Assessment Process.

## Introduction

The Services Building location was assessed in the Ore Management alternatives analysis of the Application (Section 1.7.3.4 of the Project Overview). The location of the Services Building has been comprehensively analyzed and considered to date as part of the development of the Project. In addition, Osisko Development Corp. (ODV) has engaged with the District of Wells, the Cariboo Regional District, and with the three participating Indigenous Nations in the EA process: Lhtako Dené Nation, Williams Lake First Nation, and Xat'sull First Nation. During this engagement process, the Services Building was redesigned to reduce the overall height and landscaping design concepts have been developed to further reduce visual and noise impacts; ODV is continuing to refine the building appearance and overall Mine Site Complex design to be more aesthetically pleasing.

Nevertheless, ODV acknowledges that some additional information could be provided to increase clarity of both the alternatives assessment process itself, and the alternatives assessment completed for the Services Building location; Public Comment #14 has been reviewed, and where additional information was available, a series of sub-responses are provided to address key topics raised in the comment:

- Response 14A – Alternatives Assessment Approach
- Response 14B – Paste Network
- Response 14C – Development and Material Handling
- Response 14D – Electrical
- Response 14E – Site Access
- Response 14F – Portal Locations
- Response 14G – Water and Waste Management
- Response 14H – Reclamation and Existing Disturbance
- Response 14I – Construction Timeline



# TECHNICAL MEMORANDUM

OSISKO DEVELOPMENT

## Public Comment Response 14A – Alternatives Assessment Approach

### Detailed Review Comment:

Public Comment #14 makes the following statements associated with the overall alternatives assessment:

- “In this document, (section 1.7 of the Project Overview), Osisko appears to be making the facts fit the outcome they wish to achieve. They do this...by ignoring the cumulative effects of each decision choice...” (PC #14, pg. 1 of 21).
- “In Osisko’s alternatives analysis document, they have built silos of information” (PC #14, pg. 1 of 21).

### ODV Response:

ODV highlights that one of the key elements of an alternatives assessment in an EAC Application is the independent consideration of alternatives assessment criteria (e.g., technical, environmental, socio-economic, economic). These criteria have been intentionally analyzed separately and individually to reduce the potential for cumulative bias through cross consideration of criteria. This approach, which is widely accepted as a standard practice in the permitting process, allows for objective assessment of all considerations independently, so that no one set of criteria can overweight or over influence other criteria, and therefore misrepresent the alternatives analysis as a whole.

In light of this alternatives assessment approach, please refer to Attachment A, where ODV has offered a reorganization of the comment’s bulleted statements by the appropriate criteria type in each of the four main Services Building assessment tables (i.e., Technical Suitability, Environmental Considerations, Socio-Economic Considerations, and Economic Considerations). The EAC Application table text is shown in black, with Public Comment #14 text shown in red.

## Public Comment Response 14B – Paste Network

### Detailed Review Comment:

Public Comment #14 makes the following statements associated with the Paste Network Technical Suitability (Table 1.7-1):

- Mine Site Location:
  - Less of the ore body is available for gravity feed for paste network because plant built in valley bottom
- Cow Site Location:
  - Less pumping since the higher paste backfill plant will be able to service 50% more ore body by gravity feed (see Public Comment #14, Appendix 9)
  - No explanation why vertical bore holes couldn’t also be used at Cow site. Both sites sit on the ore body, and both sites will require horizontal transportation at the ore body, during the development of the mine. Given the angle of the ore bodies from Cow to Valley, it is not clear why surface transport of paste backfill would be required.

### ODV Response:

The paste backfill for the Project is distributed by a network of vertical and horizontal pipes into the exhausted underground mine workings. This paste material has approximately 60-80% solids with a high viscosity and low flow capability, similar to the properties of toothpaste. Figure 14-1 and Figure 14-2 show the approximate extent of the paste distribution cone (yellow circle) for the Mine Site and Cow Site paste backfill plants, respectively (orange stars). These distribution cones were calculated using three-dimensional software and represent how far paste can flow into the underground stopes without the use of additional energy besides gravity. To deposit paste beyond these natural distribution cones, high-pressure booster pumps are required.



# TECHNICAL MEMORANDUM

## OSISKO DEVELOPMENT

### Mine Site Paste Backfill Plant

ODV acknowledges that the Mine Site Paste Backfill Plant is near the valley bottom, however, this location at surface has limited relevance to the paste distribution cone. The key distance for paste distribution consideration is maximizing the relative vertical depth of underground workings below the paste backfill plant, with a greater vertical distance leading to a greater natural horizontal distribution of paste deposition using gravity; the Mine Site Paste Backfill Plant location allows for approximately 1,000 m of vertical depth.

### Cow Site Paste Backfill Plant

ODV notes that while a Cow Site Paste Backfill Plant would have a higher relative topographic elevation at surface than the Mine Site location, the decentralized and peripheral nature of the Cow Site would dictate that many additional high-pressure booster pumps would be required to reach the same paste distribution cone at the Mine Site Plant location. In the current design, the Mine Site Paste Backfill Plant location requires two paste booster pumps to economically reach parts of Cow and Shaft zones; a Cow Site Paste Backfill Plant would require four to six booster pumps to bring paste to Valley and Shaft zones. As a standard design practice in paste distribution, the number of high-pressure booster pumps (i.e., 3,000 psi) is minimized to the extent possible to limit the amount of staff exposure to high pressure distribution lines. In the current Mine Site Paste Backfill Plant operation, paste distribution and personnel access are staggered such that the paste distribution system is active only when staff are not present. At the Cow Site Paste Backfill Plant location, the main paste distribution pipeline would enter the underground via the main access ramp; this pipeline location, in combination with other operating requirements, would dictate that paste pumping activities and personnel access could not be staggered, which would increase the amount of time personnel were exposed to an operating high-pressure pipeline.

With respect to vertical holes being used at Cow Site, vertical holes themselves would be feasible, however a dedicated drift or excavation would be required to receive paste at those underground destinations. In the current mine plan, there is no planned underground development in this area as it is outside the mineralization zone. The additional, dedicated waste rock mining required to utilize these locations would generate additional waste rock requiring management at surface, as well as additional development time and costs that could not be offset by ore processing by the material removed.



OSISKO DEVELOPMENT

Figure 14-1: Mine Site (Option 4) Paste Backfill Plant – Paste Distribution Cone Schematic

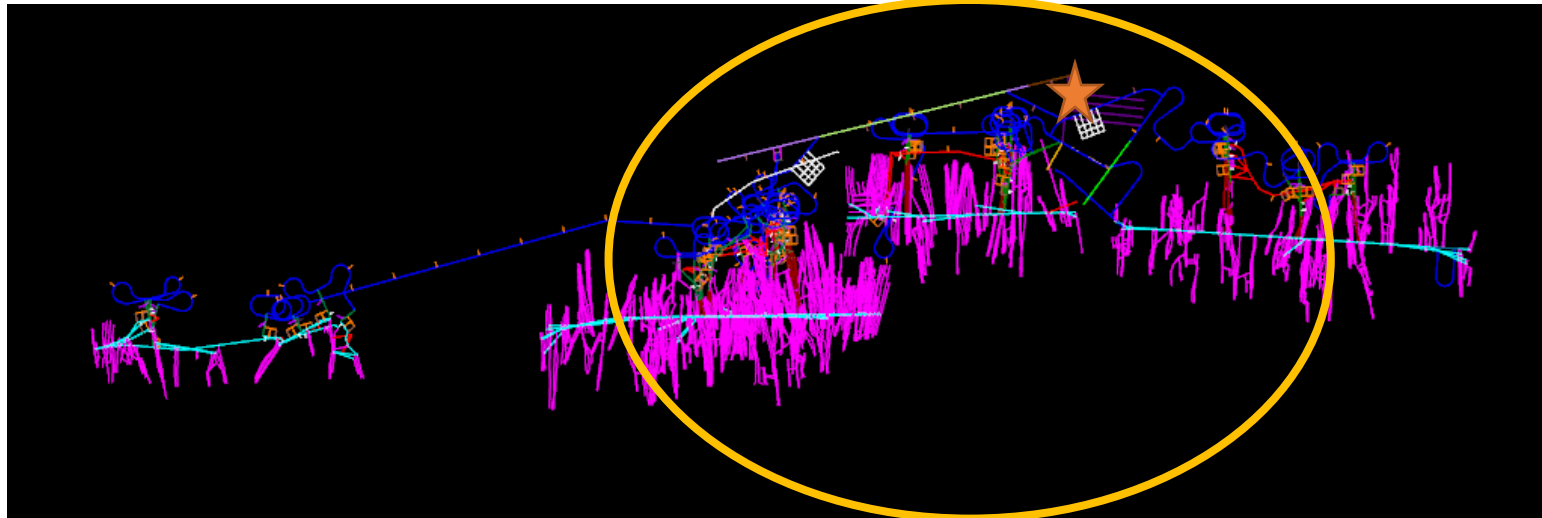
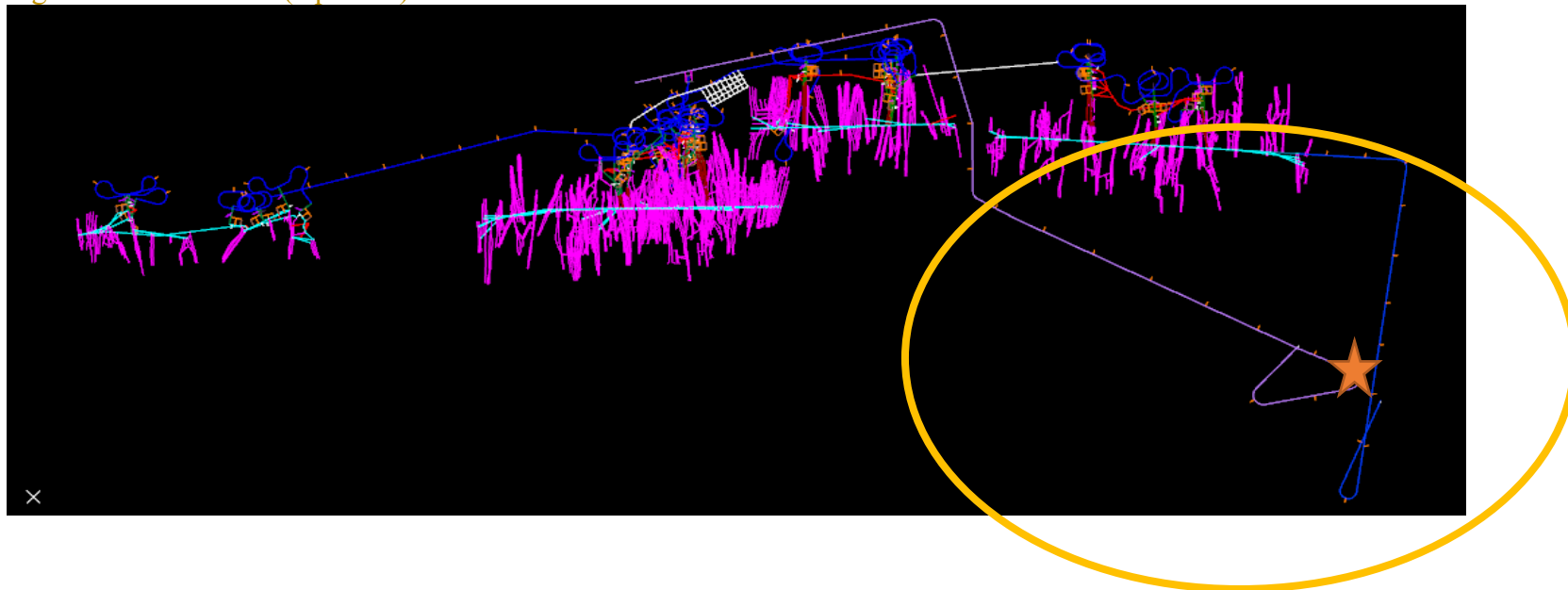


Figure 14-2: Cow Site (Option 5) Paste Backfill Plant – Paste Distribution Cone Schematic





# TECHNICAL MEMORANDUM

OSISKO DEVELOPMENT

## Public Comment Response 14C – Development and Material Handling

### Detailed Review Comment:

Public Comment #14 makes the following statements associated with development and material handling at the Cow Site under Technical Suitability (Table 1.7-1):

- Development – Cow Site: More explanation needed as to why Osisko believes an additional 800 m of development would be required.
- Material Handling – Cow Site: No explanation for putting the crusher on the surface. If the crusher was underground it could be entrenched in the ore body, exactly as proposed in Option 4(mine). Unlike the Mine Site, the Cow site (option 5) will allow for 24-hour surface operations including trucking, increasing operational efficiency and decreasing technical expense.

Development is also discussed under Development for the Cow Site under Socio-Economic Considerations (Table 1.7-3):

- No Ore traffic in Wells, 24 hr operation possible (Table 1.8.2)

### ODV Response:

ODV also clarifies that the additional 800 m of development would be related to the Rail-Veyor© system extension and associated underground tunnel that would be required due to the decentralized nature of the Cow Site Services Building location. Figure 14-3 and Figure 14-4 show the approximate extent of the Rail-Veyor system (yellow circle) for the Mine Site location and the Cow Site location, respectively. This additional development would not be in the mineralization zone, and therefore would generate additional waste rock, require additional development time, waste rock storage and increase costs.

With respect to why the crusher is proposed at surface for the Cow Site location, ODV highlights the green dashed line in Figure 14-4, which shows the approximate location of the geologic basal transition and basal facies area. On the north (i.e., top) side of this line, the ground is geotechnically competent and generally sound; on the south (i.e., bottom) side of this line, poor ground conditions and less competent rock are present, which has been shown in geotechnical studies for the Project. A Cow Site underground crusher would be located in this area of poor ground conditions.

If underground crushing was considered at the Cow Site (Figure 14-5), additional development in waste rock (vs. mineralized material) would be required to access this new location; as seen in Figure 14-5, the additional development for a horizontal Rail-Veyor and vertical conveyor (blue dashed lines) are both located in areas without underground development (red blocks). Underground crushing in this location would require both additional excavation for transportation (i.e., Rail-Veyor and vertical conveyor) and for the crushing facilities themselves. Based on the geotechnical information available for the Project, larger underground chambers or openings in an area with poor ground conditions as noted above is not recommended for safety reasons, as well as economic considerations associated with both the additional waste rock development and additional ground control measures that would be required in this area. Furthermore, this underground peripheral location would require farther total trucking distances, increased truck total haul volumes, as well as the associated increased diesel use and ventilation requirements, increased greenhouse gases, and increased safety concerns from higher underground total traffic volumes.

If surface crushing was considered for the Cow Site (Figure 14-6), the Rail-Veyor and associated tunnel would traverse within the existing underground mining footprint, requiring less dedicated development in unmineralized zones and no vertical conveyor would be necessary. In addition, the amount of underground development in the area of poor geotechnical ground conditions would be reduced.



# TECHNICAL MEMORANDUM

## OSISKO DEVELOPMENT

With respect to statements around 24-hour operations, ODV clarifies that the Mine Site Services Building location (Option 4) currently assumes 24-hour operations.





OSISKO DEVELOPMENT

# TECHNICAL MEMORANDUM

Figure 14-3: Mine Site (Option 4) – Rail-Veyor Extent

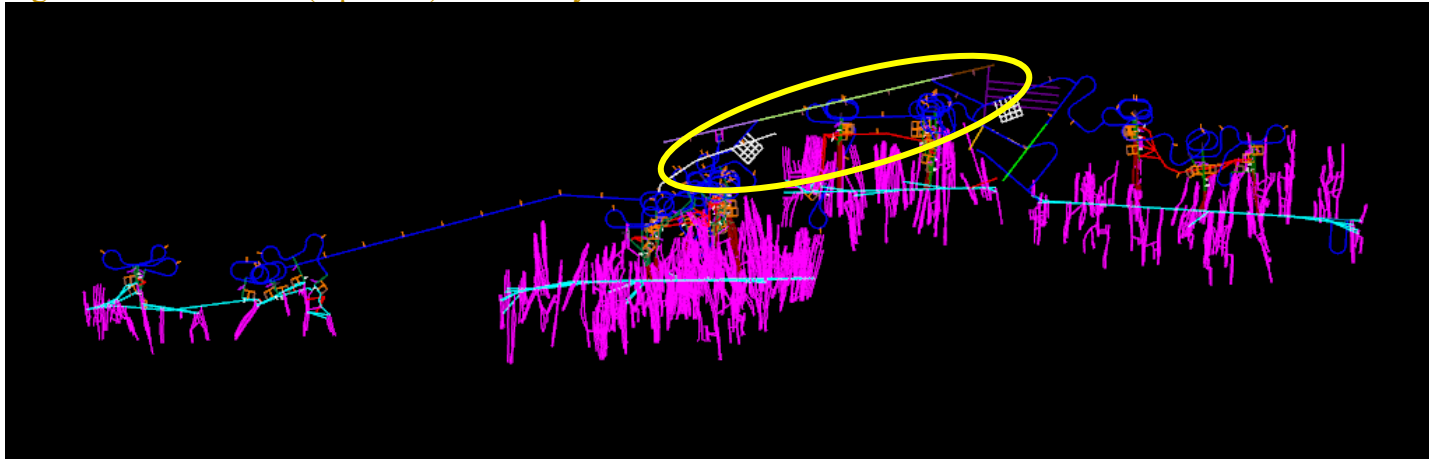
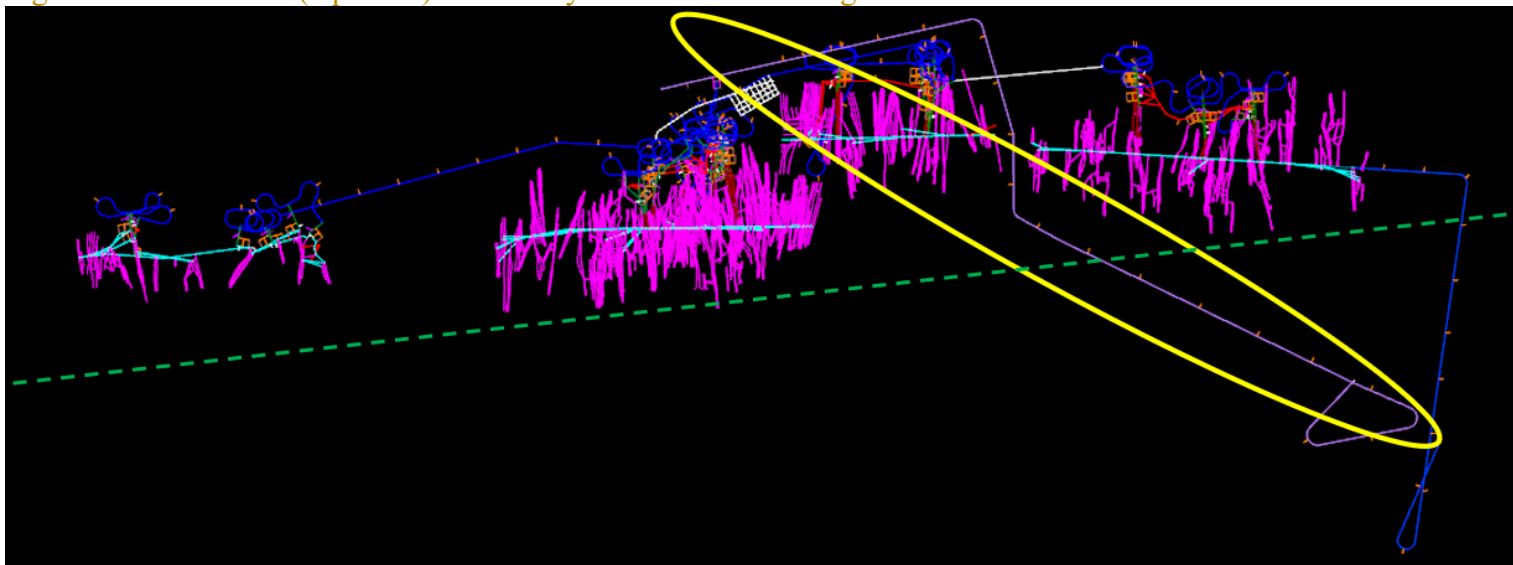


Figure 14-4: Cow Site (Option 5) – Rail-Veyor Extent and Geologic Basal Transition





# TECHNICAL MEMORANDUM

OSISKO DEVELOPMENT

Figure 14-5: Cow Site Crusher Location – Underground

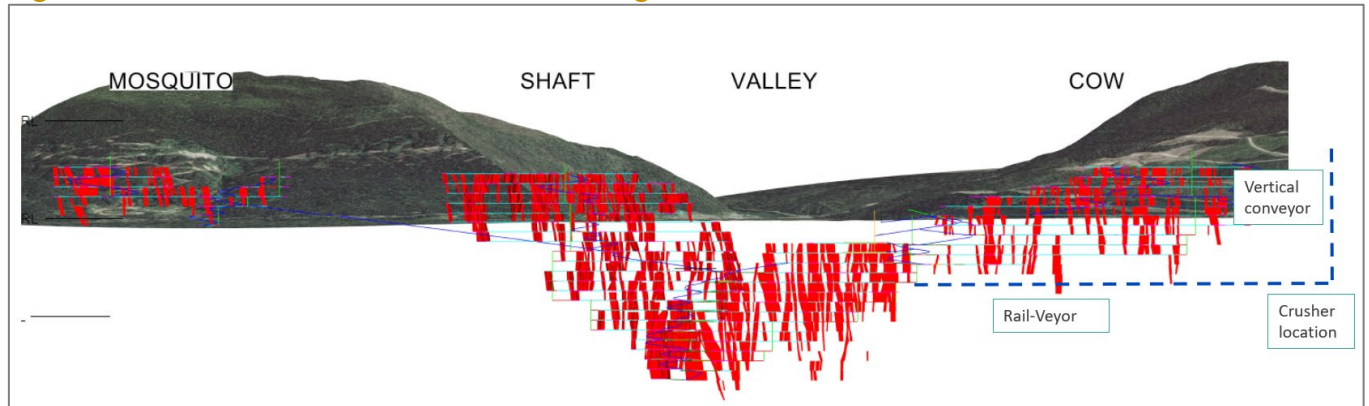
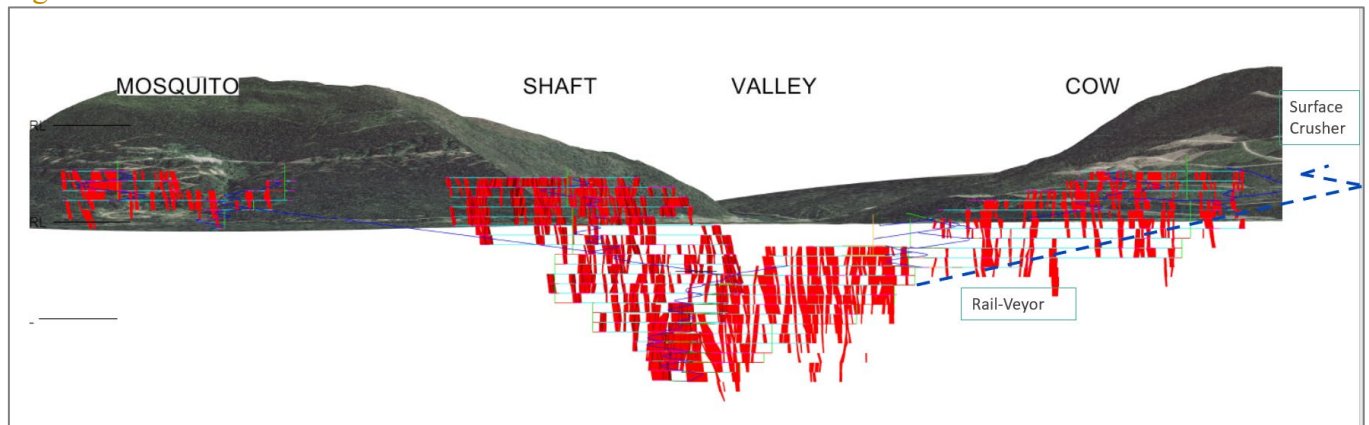


Figure 14-6: Cow Site Crusher Location – At Surface



## Public Comment Response 14D – Electrical

### Detailed Review Comment:

#### Mine Site Services Building

- Technical Suitability (Table 1.7-1):
  - Erroneous to say that less line is required for Option 4. See Appendix 1 with route map corrections.
- Socio-Economic Considerations (Table 1.7-3):
  - High voltage power line crosses Highway at Visitor Centre.
  - Substation visible from community, 200m from residential buildings.
  - 2 km of travel through Wells view scape disrupting tourism values
  - interferes with goals of the CCLUP and the QSRMP
  - two power lines cross hwy at Visitor Center.
  - Substation in community viewscape.
- Economic Considerations (Table 1.7-4):
  - Electrical substation requires visual mitigation due to proximity to town, resulting in higher development costs,

#### Cow Site Services Building

- Environmental Considerations (Table 1.7-2):



# TECHNICAL MEMORANDUM

## OSISKO DEVELOPMENT

- Greenfield site disturbance is the exact opposite of this description. By bringing the 69kV line up Slough Creek the line length is identical, however:
- avoids all OGMA surrounding Wells
- travels exclusively through working forest
- reduced caribou impact by confining development to one side of Island mountain, and combining corridor uses with mine access, forestry, and aggregate mine
- Lower environmental impact.
- Less surface disturbances.
- Socio-Economic Considerations (Table 1.7-3):
  - No disruption of visual quality objects of CCLUP & QSRMP.
  - Low voltage power lines only cross Highway once at tourism gateway.
  - Substation would be hidden from public view.
  - substation hidden from viewscape
- Economic Considerations (Table 1.7-4):
  - No new powerline length by chasing lower impact route via Slough Creek resulting in no additional expense (see Appendix 1 Electrical Options)

### **ODV Response:**

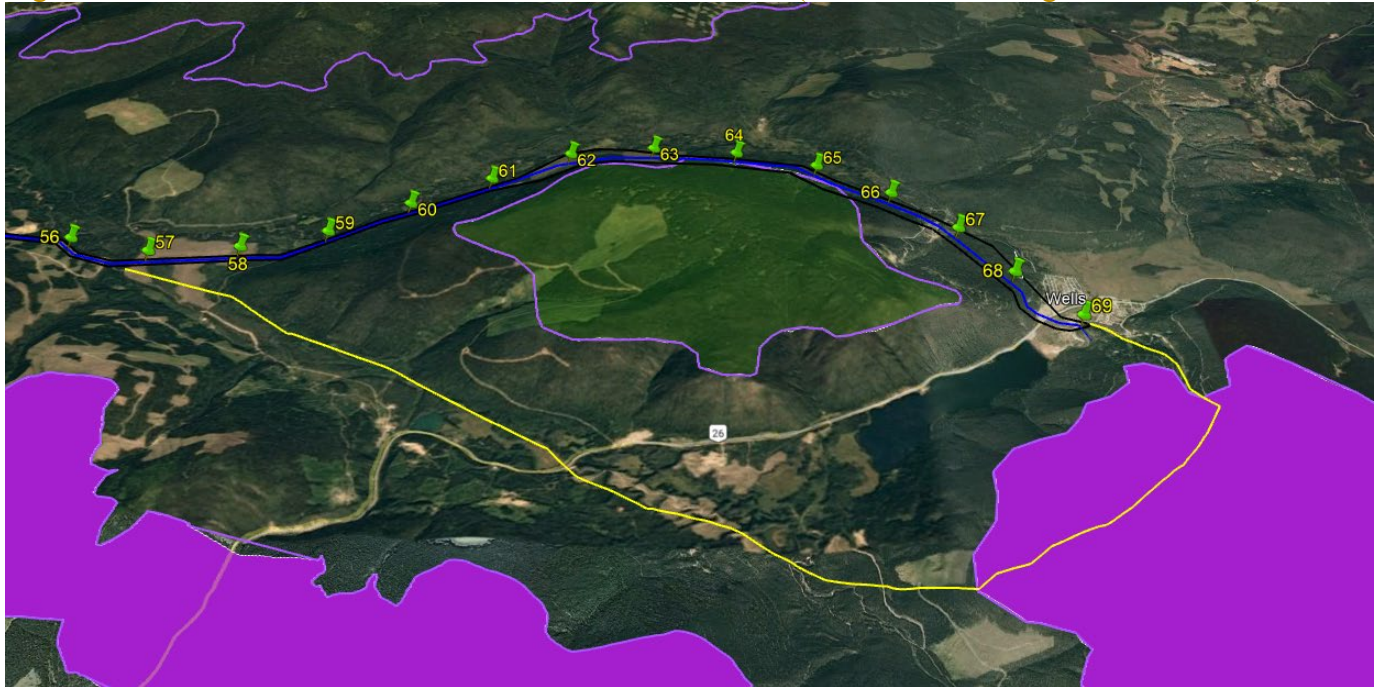
ODV confirms that the alternative transmission line route offered in the comment, called the ‘slough creek route’, was considered early in the Project in 2019 as a potential route for the Project Transmission Line. However, this option was screened out for multiple reasons. ODV clarifies that the slough creek route is 3 km longer than the Project’s proposed route (i.e., northern route) to reach the Mine Site location, and this longer route exposes the transmission line to increased elevations. The preferred northern route maintains a maximum transmission line elevation of 1,300 meters above sea level (masl), while the slough creek route reaches maximum elevations of 1,700 masl. This increased elevation exposes the slough creek route transmission line to more severe weather considerations (e.g., rain, ice, wind) than the northern route, and could require the use of larger H-frame structures over an approximate 10 km distance to address these high elevation conditions. This higher altitude of the slough creek route may also require use of longer insulator chains, a key component of the transmission line construction, to compensate for the effect of this additional altitude. The high-elevation could increase visual impacts of the transmission line, as well as increase the economic cost of the Project. ODV also notes that the slough creek route alignment crosses near several surveyed parcels where owners are unknown and for which an authorization would be required before transmission line construction could be considered and, at a minimum, access roads through some of these parcels would be required. Based on the high-altitude design changes and the additional authorizations and construction required, ODV estimates that the slough creek route could delay the overall Project schedule by up to two years.

In addition, the comment raises questions concerning the visibility of the 69 kV electrical substation that will be located within 200 m of residential buildings. ODV is committed to employing low profile structures to limit potential visual impacts from this infrastructure; the tallest structure in the substation (i.e., the line-incoming structure) will be limited to a height of 15 m.

Engagement with Indigenous nations has move beyond a discussion of transmission line routing alternatives, and is now focused on effects characterization and mitigation options for the northern route. In addition, the slough creek route crosses through critical wildlife habitat, which is a significant environmental consideration for the Project. Figure 14-7 shows the proposed northern route (blue line) and the slough creek route (yellow line), as well as the critical wildlife habitat (solid purple and purple outline).



Figure 14-7: Transmission Line and Critical Wildlife Habitat (Northern and Slough Creek Routes)



## Public Comment Response 14E – Site Access

### Detailed Review Comment:

Public Comment #14 makes the following Site Access statements associated with the Mine Site and Cow Site in Technical Suitability, Environmental Considerations, Socio-Economic Considerations, and Economic Considerations:

#### Mine Site Location Site Access

- Technical Suitability (Table 1.7-1):
  - 2.4 km of new virgin mine-site road required to access Bonanza waste rock storage.
  - New 2 km mine road req'd on hillside identified as hazardous, by NRCAN (appendix 7.1, 7.2) for site access between Mine site and WRSF
  - New significant site egress road on Cow and Barkerville Mtn req'd
  - On steep unstable hillside (see Appendix 7.1 NRCAN letter to proponent 2001)
- Socio-Economic Considerations (Table 1.7-3):
  - Second Portal at Island Mtn (Aurum site) will require additional access construction in Wells
  - Aggregate will need to be hauled from Tucker Lake mine via Highway 26 which is a public route.
  - Additional site access impacts at Island Mtn for Aurum Adit, adjacent to Wells residential area
- Economic Considerations (Table 1.7-4):
  - New bridge crossing on fish bearing stream req'd at townsite to B road (increased cost)
  - New ore truck road on steep unstable slopes with runaway lanes to access WRSF (increase costs)
  - Additional road construction to access portals.

#### Cow Site Location Site Access

- Technical Suitability (Table 1.7-1):
  - +12 km of road upgrades are NOT needed!



# TECHNICAL MEMORANDUM

## OSISKO DEVELOPMENT

- Pinkerton FSR is already in use all-season & already a major arterial haul road for West Fraser with GVW capacity exceeding the weight of loaded ore trucks.
- Osisko will already be using Pinkerton FSR to move material from Tucker aggregate mine. Bonanza waste rock storage is 2.4 km closer on a pre-existing, flat-level road. See Appendix 2.
- road is outside mine footprint so it avoids Mines Act design limitations and NRCAN site stability concerns
- Shorter, flatter access between portal and WRSF
- Environmental Considerations (Table 1.7-2)
  - FSR already exists and exceeds GVW design for ore trucks
  - FSR will also be used by Osisko for Aggregate mine and logging, and electrical, reducing total environmental impact.
- Socio-Economic Considerations (Table 1.7-3):
  - No additional town traffic from minimal changes to 12 km road.
  - No Second Portal or access req'd at Island Mtn (Aurum site)
- Economic Considerations (Table 1.7-4):
  - Pinkerton FSR (12 Km) is prebuilt for log trucks exceeding GVW of mine trucks, and outside the mine footprint (lower costs).
  - 12 km is shared use with WF resulting in shared maintenance costs
  - Osisko is using a portion of the FSR already for its aggregate mine.
  - WRSF 2.4 km shorter on flat road resulting in lower operating costs

The site access road is also discussed under Water Management in the Environmental Considerations (Table 1.7-2):

- According to the guidelines for Mine Haul Road design, a 4 m wide truck with a passing lane requires 14 m of roadbed, plus a minimum of 3 m or more for the tire berm. This road will be constructed on grades that exceed 10% requiring the construction of runaway lanes as well. Even without the impact on the viewscape of the runaway lanes, and their additional construction square footage of impact on the watershed, this minimum 17 m wide with just 1 m ditching, and just 3 m per side of tree clearing will require over 35,000 sq metres of additional watershed disturbance (more than twice the square meterage of the proposed concentrator building). This Option-4-specific-disturbance offsets the increased disturbance from construction on the Cow site amongst multiple smaller buildings.

### **ODV Response:**

#### Mine Site Location Site Access

With respect to the above statements regarding the Mine Site location access road, ODV clarifies that the noted new 2 (or 2.4) km road already exists and is currently in use by ODV. This road, called 'A Road' in the EAC Application, has already been developed to the maximum footprint required for the Project, and the only planned upgrades are the addition of resurfacing material. ODV also clarifies that only a small portion of this existing road exceeds a greater than a 10% grade; this small stretch is also the location of the existing runaway lane. ODV has confirmed that the current road design criteria have been approved by the Energy, Mines & Low Carbon Innovation Office (EMLI), which includes single lane with appropriate vehicles pullouts for the Project vehicles planned, and no additional runaway lanes. ODV also confirms that no additional tree clearing, water management, or additional watershed disturbance is required on this road for the Project.

With respect to an unstable hillside in this area (Public Comment #14, Appendix 7.1), ODV would suggest that this potential hazard is well understood along the alignment of the existing road and is typical of many areas in British Columbia. As no road expansion is planned and this existing road is already at the maximum footprint, ODV notes that



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any potential landslides associated with this existing infrastructure would be minimal. Nevertheless, ODV intends to maintain safe access to this road, and confirms that appropriate monitoring is currently completed to achieve this objective, and such monitoring will be continued as required along the road alignment.

### Cow Site Location Site Access

With regard to the Cow Site location access road, ODV clarifies that the referenced existing 12 km road, called the Pinkerton Forest Service Road (FSR), could not be used to support the requirements of the Project without significant upgrades. ODV currently uses a portion of this FSR to access the Tucker Lake quarry, however this hauling is only completed during the winter months where the road is firm, and material is stockpiled for year-around use.

While the forestry industry may use this road year-round, this industry has reduced requirements associated with permitting, gross vehicles weights (GVWs), geotechnical obligations, and water management than would be necessary for the Project. Were the Pinkerton FSR used for year-round traffic associated with the Project, significant civil engineering, geotechnical road upgrades, and water management would be required to meet *Mines Act* regulations over this 12 km road segment. In addition, this expanded FSR alignment would be within critical wildlife habitat (Figure 14-7), which is a significant environmental consideration for the Project.

### Public Comment Response 14F – Portal Locations

#### **Detailed Review Comment:**

Public Comment #14 makes statements associated with the Aurum Adit under multiple categories, including Portal Locations, Site Access, Waste Management, Reclamation, with the recommendation that this historical underground access be utilized by the Project to replace one of the proposed Project portals.

#### **ODV Response:**

ODV clarifies that while the location of the Aurum Adit near Island Mountain would be beneficial as an underground portal, this existing infrastructure cannot be employed by the Project for safety reasons. The current dimensions of this old opening are too small to meet the needs of the Project and would require re-design and re-engineering to enlarge the opening. During such an expansion process, old adits have demonstrated a significant risk of explosion from unblasted explosives in historic drillholes; such an incident was experienced most recently when century-old explosives denoted during the Montreal light-rail tunnel expansion project in 2020.

### Public Comment Response 14G – Water and Waste Management

#### **Detailed Review Comment:**

Public Comment #14 makes the following statements associated with waste and waste management under Environmental Considerations (Table 1.7-2) and Economic Considerations (Table 1.7-4):

- Water Management – both sites (Table 1.7-2):
  - The total watershed impact size is identical since both projects impact the watershed of Lowhee Creek and Jack O Clubs Lake and Creek, and both options utilize the Bonanza Ledge WSF which is at the top of the watershed and requires haul road construction from top to bottom in Option 4 but only from middle to bottom in Option 5(Cow).
  - The pipeline construction from top of watershed to the water treatment plant will occur along the entire length of the watershed regardless of the option.
  - The analysis implies that the Mine building footprint would be smaller at the mine site, than at Cow, but this will be offset by 1.5 km of new mine road construction on a greenfield site inside the view scape of the Wells



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residential area which are necessary components of Option 4 but not necessary for Option 5.

- According to the guidelines for Mine Haul Road design, a 4 m wide truck with a passing lane requires 14 m of roadbed, plus a minimum of 3 m or more for the tire berm. This road will be constructed on grades that exceed 10% requiring the construction of runaway lanes as well. Even without the impact on the view scape of the runaway lanes, and their additional construction square footage of impact on the watershed, this minimum 17 m wide with just 1 m ditching, and just 3 m per side of tree clearing will require over 35,000 sq metres of additional watershed disturbance (more than twice the square meterage of the proposed concentrator building). This Option-4-specific-disturbance offsets the increased disturbance from construction on the Cow site amongst multiple smaller buildings.
- Water Management – Mine Site (Table 1.7-2):
  - Additional watershed expansion due to 2 km haul road to WRSF
  - Entire watershed will be used, due to WRSF at Bonanza Ledge, Intake Ventilator on top of Cow, WRSF Emergency Access Road.
- Water Management – Cow Site (Table 1.7-2):
  - Site capitalizes on surface infrastructure already planned for upper Lowhee and removes water management issue from 'B' Road 1.4.1.2.2
- Waste Management – Mine Site (Table 1.7-2):
  - Increased total waste rock from 2.4 km mine road, Increased total waste rock from Aurum Adit on Island Mtn
- Waste Management – Cow Site (Table 1.7-4):
  - surface transportation is flat, and 1 million km shorter over LOM reducing costs
  - Paste backfill accesses more orebody by gravity feed, reducing costs.

### **ODV Response:**

#### Water Management

With respect to water management not addressed in other responses, ODV clarifies that there is no surface infrastructure planned for the upper Lowhee area associated with the Project. This area is in the exploration stage only, is not in the current mine plan, and is not part of the permitting scope associated with the current EAC Application.. ODV would like to clarify that the reference to “watershed” in the alternatives assessment was not as precise as it could have been. In this context, watershed refers to the catchment area immediately around the services building that would contribute to the total quantity of water needing to be managed in addition to water on the footprint of the facility itself. The Cow Site Location is on the valley wall of Lowhee Creek and would require the management of water from upgradient around the facility. In comparison, the selected option sits near the top of a topographical feature and would thus not intersect with a catchment upgradient of the facility. Overall, this results in a lesser quantity of water needing to be managed and less disruption to natural hydrologic processes, which was one of the resource protection objectives used to guide the design of water management approaches.

#### Waste Management

With respect to waste management at the Cow Site location, the comment is correct that the total waste rock haul distance from the underground to the Bonanza Ledge Waste Rock Storage Facility (WRSF) would be reduced. However, when all material hauling is considered for the Project, including all surface and underground ore and waste rock, the total overall haul distances would be greater at the Cow Site Services Building location than the Mine Site Services Building location; this increased total distance is due to the decentralized nature of the Cow Site relative to the majority of underground mining zones. In addition, the use of the Cow Site would also dictate a greater total material volume handled for the Project, including increased fill requirements for the Cow Site pad foundations and additional potentially acid generating (PAG) material generated from the increased underground development required.



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See Response 14B and Response 14E for information associated with paste backfill and site access, respectively.

### Public Comment Response 14H – Reclamation and Existing Disturbance

#### Detailed Review Comment:

Public Comment #14 makes the following statements associated with Reclamation under Environmental Considerations (Table 1.7-2), Socio-Economic Considerations (Table 1.7-3), and Economic Considerations (Table 1.7-4):

- Reclamation – both sites (Table 1.7-2):
  - Existing disturbance in both locations.
  - Option 4: Additional disturbance from new Roadbuilding and creation of the Island Mtn Adit.
  - Due to visual quality impacts noted above, Option 4 has greater reclamation impact on Wells, and CCLUP
- Reclamation – Mine Site (Table 1.7-3):
  - The statement above is UNTRUE. Option 5 requires the development and reclamation of this site.
  - Additional road construction to access second portals, greater impact on Wells
- Reclamation – Mine Site (Table 1.7-4):
  - Unclear why ‘Existing Disturbance’ describes Option 4 since the economic measure of closure is the cost of reclaiming the new disturbance, regardless of the location.
  - Incurs reclamation expenses from both the mine site and the Aurum Adit on Island Mountain as well as reclamation expense of 2.4 km of haul road. All three sites are under 300m from residential area in prime viewscapes requiring additional expense due to visual sensitivity.
- Reclamation – Cow Site (Table 1.7-3):
  - Large amount of existing disturbance
  - additional disturbance planned for this area regardless of option selected
  - Reclamation impact mitigated by distance from residential area.
  - Less mine road reclamation in residential area is req'd
- Reclamation – Cow Site (Table 1.7-4):
  - Will create a smaller reclamation footprint at CGQ in Wells, eliminate the reclamation expense at Island Mtn (aurum portal) and reclamation of Barkerville Mtn Road.
  - Being outside of the Wells viewscape, will reduce reclamation sensitivity and design expenses.

Existing site disturbance is also discussed under Mine Site Development in the Economic Considerations (Table 1.7-2):

- Unclear what infrastructure pre-exists at this location?

#### ODV Response:

With respect to existing disturbance at the Mine Site Services Building, ODV confirms the presence of historical waste rock and tailings stored at this location, including contamination from multiple metals (e.g., arsenic, lead, nickel). At the Mine Site location, waste rock and tailings remediation associated with the historic Cariboo Gold Quartz Mine operation is under the jurisdiction of the Provincial Government (Crown Contaminated Sites Program in the Ministry of Forests, Lands, Natural Resource Operations and Rural Development [FLNRORD]) (Section 1.1.4.2 of the EAC Application). Should ODV develop the Services Building at the Mine Site location (Option 4), the reclamation of this historical material will be completed at part of the Project.

With regard to existing disturbance at the Cow Site location, ODV confirms this area includes minimal historical mining disturbance (e.g., 20 m by 20 m shaft) and other minor historical disturbances; in addition, this area has already started to revegetate naturally. Significantly, no contamination is documented at this location, unlike the Mine Site location. ODV





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does acknowledge that there is additional existing disturbance farther down the valley from the Cow Site location, however, this specific disturbance is beyond the footprint of the Services Building and associated infrastructure and would not be reclaimed as part of the Project. Should ODV develop the Services Building at the Cow Site location (Option 5), the Project would not be responsible for the reclamation of Mine Site location (Option 4).

See Response 14E and Response 14F for information associated with site access and portal locations, respectively.

### Public Comment Response 14I – Construction Timeline

#### Detailed Review Comment:

Public Comment #14 makes the following statements associated with the Construction Timeline Economic Considerations (Table 1.7-4):

- Given the existing time limitations on development caused by exploration, infill drilling, and the EA process itself, and the LOM itself, up to 6 months of delay is proportionally small.
- Increased costs are relatively insignificant given Osisko's comments in EA documents that "this project has relatively low startup costs",
- Proportionally speaking, timeline and cost constraints are small enough that this aspect of the project should not be weighted heavily.

#### ODV Response:

ODV appreciates the above statements, which has highlighted a language ambiguity that should be corrected. In Table 1.7-4 of the EAC Application, ODV stated that the Project construction timeline at the Mine Site and Cow Site would be 18 months and 24 months, respectively; as written, these timelines imply a 6-month difference in overall construction timelines between the two locations. However, ODV clarifies that the Cow Site construction timeline should have indicated an additional 24 months above the Mine Site construction timeline for the Services Building; in summary, Project construction timeline at the Mine Site would be 18 months (with the use of the Valley and Island Mountain Portal locations as proposed) and at the Cow Site would be 42 months (due to new road access construction and the much longer development sequence underground). ODV reaffirms the previous statements that this additional 2-year construction period, which would more than double the current construction timeline, would result in significant early costs increases and deferred revenues.



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**ATTACHMENT A: REORGANIZATION OF PUBLIC COMMENT #14'S BULLETED  
STATEMENTS REGARDING THE ALTERNATIVES ANALYSIS FOR THE MINE SITE  
AND COW SITE SERVICES BUILDING LOCATIONS**



Table 1.7-1 Mine Site and Cow Site Services Building Locations – Technical Suitability

Topic	Considerations	Mine Site Location	Cow Site Location	Preferred Location
Mining	Paste Network	<ul style="list-style-type: none"> <li>Vertical boreholes for paste backfill</li> </ul>	<ul style="list-style-type: none"> <li>Horizontal paste conveyance on surface requiring more pumping and surface disturbance</li> </ul>	Mine Site
		<ul style="list-style-type: none"> <li>Less of the ore body is available for gravity feed for paste network because plant built in valley bottom</li> </ul>	<ul style="list-style-type: none"> <li>No explanation why vertical bore holes couldn't also be used at Cow site.<sup>1</sup></li> <li>Less pumping since the higher paste backfill plant will be able to service 50% more ore body by gravity feed (see appendix 9)</li> </ul>	
	Material Handling	<ul style="list-style-type: none"> <li>Rail-Veyor© system, vertical conveyor and trucking for ore transport to Services Building</li> <li>Crusher located underground</li> </ul>	<ul style="list-style-type: none"> <li>Rail-Veyor© system and trucking for ore transport to Services Building are more complex</li> <li>Crusher located on surface</li> </ul>	Mine Site
			<ul style="list-style-type: none"> <li>No explanation for putting the crusher on the surface.<sup>2</sup></li> </ul>	
Development		<ul style="list-style-type: none"> <li>Less development required than Cow Site.</li> </ul>	<ul style="list-style-type: none"> <li>Additional 800 m of development compared to Mine Site location</li> </ul>	Mine Site
			<ul style="list-style-type: none"> <li>More explanation needed as to why Osisko believes an additional 800 m of development would be required.</li> </ul>	
Surface Infrastructure	Electrical	<ul style="list-style-type: none"> <li>Shorter length of powerline construction required.</li> <li>Erroneous to say that less line is required for Option 4. See Appendix 1 with route map corrections.</li> </ul>	<ul style="list-style-type: none"> <li>Additional powerline extension to Cow Site</li> </ul>	Mine Site
	Site Access	<ul style="list-style-type: none"> <li>Fewer road upgrades required</li> <li>2.4 km of new virgin mine-site road required to access Bonanza waste rock storage.</li> <li>New 2 km mine road req'd on hillside identified as hazardous, by NRCAN (appendix 7.1, 7.2) for site access between Mine site and WRSF</li> <li>New significant site egress road on Cow and Barkerville Mtn req'd</li> <li>On steep unstable hillside (see Appendix 7.1 NRCAN letter to proponent 2001)</li> </ul>	<ul style="list-style-type: none"> <li>Additional 12 km of road upgrades</li> <li>+12 km of road upgrades are NOT needed!</li> <li>Pinkerton [Forest Service Road] FSR is already in use all-season &amp; already a major arterial haul road for West Fraser with GVW capacity exceeding the weight of loaded ore trucks.</li> <li>Osisko will already be using Pinkerton FSR to move material from Tucker aggregate mine. Bonanza waste rock storage is 2.4 km closer on a pre-existing, flat-level road. See Appendix 2.</li> <li>road is outside mine footprint so it avoids Mines Act design limitations and NRCAN site stability concerns</li> <li>Shorter, flatter access between portal and WRSF</li> </ul>	Mine Site

**Footnote 1:** Both sites sit on the ore body, and both sites will require horizontal transportation at the ore body, during the development of the mine. Given the angle of the ore bodies from Cow to Valley, it is not clear why surface transport of paste backfill would be required.

**Footnote 2:** If the crusher was underground it could be entrenched in the ore body, exactly as proposed in Option 4 (mine). Unlike the Mine Site, the Cow site (option 5) will allow for 24 hour surface operations including trucking, increasing operational efficiency and decreasing technical expense.

Table 1.7-2 Mine Site and Cow Site Services Building Locations – Environmental Considerations

Topic	Considerations	Mine Site Location	Cow Site Location	Preferred Location
	Electrical	<ul style="list-style-type: none"> <li>Minimal disturbance required for electrical upgrades</li> </ul>	<ul style="list-style-type: none"> <li>Additional greenfield disturbance due to powerline extension to Cow Site</li> </ul>	Mine Site



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Surface Disturbance		Greenfield site disturbance is the exact opposite of this description. By bringing the 69kV line up Slough Creek the line length is identical, however:		
			<ul style="list-style-type: none"> <li>• avoids all OGMA surrounding Wells</li> <li>• travels exclusively through working forest</li> <li>• reduced caribou impact by confining development to one side of Island mountain, and combining corridor uses with mine access, forestry, and aggregate mine</li> <li>• Lower environmental impact.</li> <li>• Less surface disturbances.</li> </ul>	
Site Access		• Minimal disturbance required for site access upgrades	• Additional disturbance due to 12 km of road upgrades	Mine Site
			<ul style="list-style-type: none"> <li>• FSR already exists and exceeds GVW design for ore trucks</li> <li>• FSR will also be used by Osisko for Aggregate mine and logging, and electrical, reducing total environmental impact.</li> </ul>	
Water and Waste Management	Water Management	• Smaller watershed, limited to infrastructure footprint	• Larger watershed on mountain side	Mine Site
		<ul style="list-style-type: none"> <li>• The total watershed impact size is identical since both projects impact the watershed of Lowhee Creek and Jack O Clubs Lake and Creek, and both options utilize the Bonanza Ledge WSF which is at the top of the watershed and requires haul road construction from top to bottom in Option 4 but only from middle to bottom in Option 5(Cow).</li> <li>• The pipeline construction from top of watershed to the water treatment plant will occur along the entire length of the watershed regardless of the option.</li> <li>• The analysis implies that the Mine building footprint would be smaller at the minesite, than at Cow, but this will be offset by 1.5 km of new mine road construction on a greenfield site inside the viewscape of the Wells residential area which are necessary components of Option 4 but not necessary for Option 5.</li> <li>• According to the guidelines for Mine Haul Road design, a 4 m wide truck with a passing lane requires 14 m of roadbed, plus a minimum of 3 m or more for the tire berm. This road will be constructed on grades that exceed 10% requiring the construction of runaway lanes as well. Even without the impact on the viewscape of the runaway lanes, and their additional construction square footage of impact on the watershed, this minimum 17 m wide with just 1 m ditching, and just 3 m per side of tree clearing will require over 35,000 sq metres of additional watershed disturbance (more than twice the square meterage of the proposed concentrator building). This Option-4-specific-disturbance offsets the increased disturbance from construction on the Cow site amongst multiple smaller buildings.</li> </ul>		
	<ul style="list-style-type: none"> <li>• Additional watershed expansion due to 2 km haul road to WRSF</li> <li>• Entire watershed will be used, due to WRSF at Bonanza Ledge, Intake Ventilator on top of Cow, WRSF Emergency Access Road.</li> </ul>	• Site capitalizes on surface infrastructure already planned for upper Lowhee and removes water management issue from 'B' Road 1.4.1.2.2		
Waste Management	Waste Management	• Reduced total waste rock volume requiring storage on surface	<ul style="list-style-type: none"> <li>• Increased total waste rock volume requiring storage on surface due to increased development</li> <li>• Additional surface disturbance relating to increased length of paste fill distribution</li> </ul>	Mine Site
		• Increased total waste rock from 2.4 km mine road, Increased total waste rock from Aurum Adit on Island Mtn		
Closure	Reclamation	• Existing disturbance	• Limited existing disturbance; additional disturbance required	Mine Site
		<ul style="list-style-type: none"> <li>• Existing disturbance in both locations.</li> <li>• Option 4: Additional disturbance from new Roadbuilding and creation of the Island Mtn Adit.</li> <li>• Due to visual quality impacts noted above, Option 4 has greater reclamation impact on Wells, and CCLUP</li> </ul>		

Table 1.7-3 Mine Site and Cow Site Services Building Locations – Socio-Economic Considerations



Topic	Socio-Economic Considerations	Mine Site Location	Cow Site Location	Preferred Location
Mining	Development		•No Ore traffic in Wells, 24 hr operation possible (Table 1.8.2)	
Surface Infrastructure	Portal Locations	• Valley Portal proximal to District of Wells	• No Valley Portal required	Cow Site
		•Second Portal at Island Mtn (Aurum site)	•Valley Portal becomes secondary entrance, farther from townsite than Island Portal	
	Building Location	• Services Building located proximal to District of Wells	• Services Building not visible from District of Wells	Cow Site
	Site Access	• Minimal upgrades will not significantly change site access	• Additional 12 km of road upgrades may increase site access and traffic • Cow Site would connect to Highway 26 further from Wells, reducing traffic proximal to community	Mine Site
		•Second Portal at Island Mtn (Aurum site) will require additional access construction in Wells • Aggregate will need to be hauled from Tucker Lake mine via Highway 26 which is a public route. •Additional site access impacts at Island Mtn for Aurum Adit, adjacent to Wells residential area	• No additional town traffic from minimal changes to 12 km road. • No Second Portal or access req'd at Island Mtn (Aurum site)	
Electrical	• High voltage power line crosses Highway at Visitor Centre. • Substation visible from community, 200m from residential buildings. •2 km of travel through Wells viewscape disrupting tourism values •interferes with goals of the CCLUP and the QSRMP •two power lines cross hwy at Visitor Center. •Substation in community viewscape.	•No disruption of visual quality objects of CCLUP & QSRMP. • Low voltage power lines only cross Highway once at tourism gateway. • Substation would be hidden from public view. •substation hidden from viewscape		
Water and Waste Management	Water Management	• Small watershed, limited to infrastructure footprint, therefore minimal impact on water use outside of Project Footprint.	• Large watershed on mountain side, therefore greater possibility that water management for Cow Site may impact water use outside of Project Footprint	Mine Site
	Waste Management	• Less development required than Cow Site, therefore lower impact on local landfills. Less hauling of waste required, therefore lower impacts to traffic.	• Increased development leading to increased hauling required for the Project	Mine Site
Closure	Reclamation	• Existing disturbance which wouldn't be reclaimed	• Limited existing disturbance; additional disturbance required	Mine Site
		• The statement above is UNTRUE. Option 5 requires the development and reclamation of this site. • Additional road construction to access second portals, greater impact on Wells	• Large amount of existing disturbance • additional disturbance planned for this area regardless of option selected • Reclamation impact mitigated by distance from residential area. • Less mine road reclamation in residential area is req'd	



Project Timing	Construction Timeline	<ul style="list-style-type: none"> <li>• 18 months. Shorter construction means improve economics for the overall project (better LOM)</li> </ul>	<ul style="list-style-type: none"> <li>• 24 months due to additional underground development</li> <li>• Longer construction phase results in increased duration of temporary employment as opposed to full time employees and change economics for the overall project reducing LOM</li> </ul>	Mine Site
		<ul style="list-style-type: none"> <li>• From a Socio-economic perspective shorter construction means fewer jobs, less tax base for province, and increases the Life of Mine for the benefit of the community and province</li> </ul>	<ul style="list-style-type: none"> <li>• Longer construction phase results in increased construction employment, job stability and taxation.</li> <li>• When construction phase overlaps with Operation phase, increased regional employment.</li> <li>• Overall economic effect on LOM is small (see Table 1.8.2)</li> </ul>	

Table 1.7-4 Mine Site and Cow Site Services Building Locations – Economic Considerations

Topic	Considerations	Mine Site Location	Cow Site Location	Preferred Location
Mining	Paste Network	<ul style="list-style-type: none"> <li>• Vertical boreholes for paste backfill</li> </ul>	<ul style="list-style-type: none"> <li>• Horizontal paste conveyance requiring more pumping resulting in increased costs and additional surface disturbance</li> </ul>	Mine Site
	Material Handling	<ul style="list-style-type: none"> <li>• Rail-Veyor© system (shorter distance and existing tunnel), vertical conveyor and trucking for ore transport to Services Building (\$19M)</li> <li>• Crusher located underground (more expensive)</li> </ul>	<ul style="list-style-type: none"> <li>• Rail-Veyor© system (longer distance and longer tunnel required) and trucking for ore transport to Services Building, resulting in significant increase in costs (\$35M, approximately 100% increase in cost)</li> <li>• Crusher located on surface (less expensive)</li> </ul>	Mine Site
		<ul style="list-style-type: none"> <li>• Railveyor 1000m to Shaft Zone, 1200m to Cow zone= 2200 m</li> </ul>	<ul style="list-style-type: none"> <li>• Railveyor 2000 m to Shalt Zone, 200m to Cow zone= 2200 m</li> <li>• Additional elevator height to surface</li> </ul>	
	Development	<ul style="list-style-type: none"> <li>• Existing infrastructure resulting in fewer development costs</li> <li>• Unclear what infrastructure pre-exists at this location?</li> </ul>	<ul style="list-style-type: none"> <li>• Additional 800m (\$5M) of development compared to Wells, resulting in increased costs</li> <li>• \$5 million = 1/6 of 1% of project costs</li> </ul>	Mine Site
Surface Infrastructure	Electrical	<ul style="list-style-type: none"> <li>• Shorter length of powerline resulting in fewer development costs</li> <li>• Electrical substation requires visual mitigation due to proximity to town, resulting in higher development costs,</li> </ul>	<ul style="list-style-type: none"> <li>• Additional powerline extension to Cow Site, resulting in increased costs</li> <li>• No new powerline length by chasing lower impact route via Slough Creek resulting in no additional expense (see Appendix 1 Electrical Options)</li> </ul>	Mine Site
	Site Access	<ul style="list-style-type: none"> <li>• Minimal upgrades required resulting in fewer development costs</li> </ul>	<ul style="list-style-type: none"> <li>• Additional 12 km of road upgrades, resulting in increased costs</li> </ul>	Mine Site
		<ul style="list-style-type: none"> <li>• New bridge crossing on fish bearing stream req'd at townsite to B road (increased cost)</li> <li>• New ore truck road on steep unstable slopes with runaway lanes to access WRSF (increase costs)</li> <li>• Additional road construction to access portals.</li> </ul>	<ul style="list-style-type: none"> <li>• Pinkerton FSR (12Km) is prebuilt for log trucks exceeding GVW of mine trucks, and outside the mine footprint (lower costs).</li> <li>• 12 km is shared use with WF resulting in shared maintenance costs</li> <li>• Osisko is using a portion of the FSR already for its aggregate mine.</li> <li>• WRSF 2.4 km shorter on flat road resulting in lower operating costs</li> </ul>	
Water and Waste Management	Water Management	<ul style="list-style-type: none"> <li>• Small watershed, limited to infrastructure footprint</li> </ul>	<ul style="list-style-type: none"> <li>• Larger watershed on mountain side, resulting in increased water diversion/capture and increased costs</li> </ul>	Mine Site
		<ul style="list-style-type: none"> <li>• Increase in water catchment costs offset by elimination of 2 km of mine road at B road extension and associated water management</li> </ul>	<ul style="list-style-type: none"> <li>• Increase in water catchment costs offset by elimination of 2 km of mine road at B road extension and associated water management</li> </ul>	



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	Waste Management	<ul style="list-style-type: none"> <li>• Reduced costs due to decreased total waste rock volume requiring hauling</li> </ul>	<ul style="list-style-type: none"> <li>• Increased total waste rock volume, requiring hauling resulting in increased costs</li> <li>• Additional costs relating to increased length of paste fill distribution</li> </ul>	Mine Site
			<ul style="list-style-type: none"> <li>• surface transportation is flat, and 1 million km shorter over LOM reducing costs</li> <li>• Paste backfill accesses more orebody by gravity feed, reducing costs.</li> </ul>	
Closure	Reclamation	<ul style="list-style-type: none"> <li>• Existing disturbance</li> <li>• Unclear why “Existing Disturbance” describes Option 4 since the economic measure of closure is the cost of reclaiming the new disturbance, regardless of the location.</li> <li>• Incurs reclamation expenses from both the mine site and the Aurum Adit on Island Mountain as well as reclamation expense of 2.4 km of haul road. All three sites are under 300m from residential area in prime viewsapes requiring additional expense due to visual sensitivity.</li> </ul>	<ul style="list-style-type: none"> <li>• Increased costs to manage increased watershed</li> <li>• Will create a smaller reclamation footprint at CGQ in Wells, eliminate the reclamation expense at Island Mtn (aurum portal) and reclamation of Barkerville Mtn Road.</li> <li>• Being outside of the Wells viewscape, will reduce reclamation sensitivity and design expenses.</li> </ul>	Mine Site
Project Timing	Construction Timeline	<ul style="list-style-type: none"> <li>• 18 months</li> <li>• Given the existing time limitations on development caused by exploration, infill drilling, and the EA process itself, and the LOM itself, up to 6 months of delay is proportionally small.</li> <li>• Increased costs are relatively insignificant given Osisko's comments in EA documents that "this project has relatively low start up costs",</li> <li>• Estimated maximum increase in startup costs less than 6.2% See Table 1.8.2 Project Cost Summary</li> <li>• Proportionally speaking, timeline and cost constraints are small enough that this aspect of the project should not be weighted heavily</li> </ul>	<ul style="list-style-type: none"> <li>• 24 months due to additional underground development, resulting in increased cost and deferred revenue</li> </ul>	Mine Site



OSISKO DEVELOPMENT

# TECHNICAL MEMORANDUM