Tahltan Risk Assessment – Draft version 1.0

LANDS AND REGULATORY AFFAIRS DEPARTMENT

Last update

25 August 2025

Acknowledgements

To be added in next draft

Acronyms and Abbreviations

BC	British Columbia
DPD	Detailed Project Description
CP	Tahltan Core Priorities
DAA	*Declaration Act Consent Decision-Making Agreement for Eskay Creek Project*
DRIPA	*Declaration on the Rights of Indigenous Peoples Act*
EA Act	*Environmental Assessment Act*
EAC	Environmental Assessment Certificate
EAA	Application for an Environmental Assessment Certificate / Impact Statement
EAO	British Columbia Environmental Assessment Office
ECCC	Environment and Climate Change Canada
ECRP	Eskay Creek Revitalization Project
IAA	*Impact Assessment Act*
IAAC	Impact Assessment Agency of Canada
Hybrid AIR	Hybrid Application Information Requirements
the Project	Eskay Creek Revitalization Project
RIC	Resources Inventory Committee
REAA	Revised Environmental Assessment Certificate Application
RISC	Resources Information Standards Committee
Skeena Resources	Skeena Gold & Silver

TA	Tahltan Assessment
TIA	*Tahltan Impact Assessment Policy*
TCG	Tahltan Central Government
TEASF	Tahltan Environmental Assessment Strategy Framework
THREAT	Tahltan Heritage Resources Environmental Assessment Team
TRA	Tahltan Risk Assessment
TSR	Tahltan Sustainability Requirements

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1. Purpose

1.1. GUIDE TO THIS REPORT

This report represents the Tahltan Risk Assessment of the Eskay Creek Revitalization Project (ECRP) consistent with the *Tahltan Impact Assessment Policy* and meeting the requirements of section 7.38 and 7.39 of the DAA. The Tahltan Risk Assessment will build upon the Tahltan Assessment information reported in the REAA (Chapter 2 and 4) with Skeena Resources' REAA information that was accepted by TCG and EAO on May 30th 2025.

In undertaking the risk assessment, TCG will consider

a) the Tahltan Risk Assessment Factors and their relation to Tahltan Sustainability Factors;

b) information in the Application;

c) Tahltan Knowledge;

d) the EAO's draft Environmental Assessment Report, Sustainability Recommendations, and draft EA Certificate, including proposed certificate conditions and project description;

e) information and conclusions in any assessment that TCG undertakes pursuant to subsection 19(4) of the EA Act;

f) information from the Technical Advisory Committee;

g) input from the public comment period and community engagement undertaken by TCG; and

h) the results of consensus-seeking efforts with the EAO on Project effects.

The risk assessment will report on TCG's conclusions on the potential to cause significant effects and/or cumulative effects to Tahltan Values in accordance with Tahltan Sustainability Requirements and Significance Factors. In addition the Tahltan Risk Assessment will recommend Tahltan Conditions that may reduce the potential effects on Tahltan Values. The conditions will be considered by Tahltan Leadership as part of the process in determining a *TCG Notice of Decision* (section 2.3).

The TRA will also include any aspects of the assessment of potential effects of the Project on Tahltan or Tahltan's Title and Rights that will meet the requirements pursuant to subsection 19(4) of the *EAA*. The summary or content to be included as the 19(4) Assessment can be found in Appendix A. The EAO will include this material, as written, in their Environmental Assessment Report for the Project.

The draft TRA will be shared with Tahltan members prior to being finalized to gather additional knowledge, input, and directions to be incorporated in the document before being delivered to Tahltan Leadership with the additional materials listed in Part 8 Decision-Making of the DAA.

Finally, while the draft TRA and draft Tahltan Conditions will be included in the Public Comment Period with the EAO's draft Environmental Assessment Report; draft EA Certificate, including proposed certificate conditions and project description; and the draft Sustainability Recommendations. The general public is not expected to provide comments as the report is intended to provide transparency and administrative fairness for both government's decision on the Project. Comments submitted may be reviewed but there is no obligation to respond or incorporate the input. The TRA is supporting the final stages of the Tahltan Assessment and DAA and is supporting information for TCG Board of Directors to determine a *Notice of Decision*.

1.2. STATUS OF DRAFT RISK ASSESSMENT

As this is the draft being shared with the EAO, the material provided is without prejudice, and including the draft assessments, conclusions, and conditions which will be further refined through the collaboration with EAO, and where applicable, Skeena Resources. In addition, as this is the first such assessment being delivered for a full environmental assessment process with a consent decision, further information, adjustments, and understandings will be considered as a final draft is finalized under the DAA and through Tahltan Engagement and Public Consultation Period. Finally, it is important to recognise a number of parallel initiatives are occurring with the bilateral discussions on a possible Impact Benefits Agreement, and the Mines Act and Environmental Management Act regulatory reviews that is ongoing while this process is completed and each government makes their respective decisions. It is expected that draft assessments, conclusions and conditions will be adjusted as these progress over the next several months.

There will be sections in the report that will be updated as the draft is reviewed, materials added, and engagement with EAO, Skeena Resources, and internal Tahltan engagement continues in the next month.

2. Declaration Act Agreement

2.1. OVERVIEW

2.1.1. CONTEXT FOR AGREEMENT

On June 6, 2022, the Tahltan Central Government (TCG) and the Province of British Columbia (BC) signed the first consent-based decision-making agreement with an Indigenous governing body under section 7(1)(b) of the Declaration on the Rights of Indigenous Peoples Act (Declaration Act Agreement).

The Declaration Act Agreement (DAA) relates to Skeena Gold & Silver's (Skeena Resources[1]) application for an Environmental Assessment Certificate (Application). The Application relates to the Eskay Creek Revitalization Project, which would restart operations at the Eskay Creek brownfield gold and silver mine located in Tahltan Territory (Project).

Under the Declaration Act Agreement, the Project cannot proceed without TCG's consent. The processes that TCG and BC will follow to assess potential Project effects and decide whether the Project should go ahead are set out in the Declaration Act Agreement.

The Declaration Act Agreement represents a very important step towards the recognition and respect of Tahltan's jurisdiction and decision-making authority when it comes to the use of resources in Tahltan Territory. The context for this recognition and respect, as described in the Declaration Act Agreement, includes:

(a) Tahltan's right of self-determination and decision-making authority in Tahltan Territory;

(b) BC's recognition of Tahltan's Aboriginal Title and Rights throughout Tahltan Territory;

(c) the 1910 Declaration of the Tahltan Tribe signed on October 18, 1910, and reaffirmed by Tahltan on its 100th anniversary on October 18, 2010 (1910 Declaration);

(d) BC's commitment to implementing the UN Declaration on the Rights of Indigenous Peoples; and

[1] Skeena Resources Limited changed its name to Skeena Gold & Silver January 2025; however, due to the use of this term to represent the company since the DAA, and Tahltan Assessment, it will be used throughout the process including the *TCG Notice of Decision*.

(e) TCG and BC's shared goals of advancing reconciliation and achieving coordinated decision making.

The Declaration Act Agreement mean the Project cannot go ahead without Tahltan's consent. Following an assessment of the Project by both TCG and the Environmental Assessment Office (EAO), the Board of Directors of TCG (TCG Board) will decide whether to provide TCG's free, prior and informed consent to the Project proceeding.

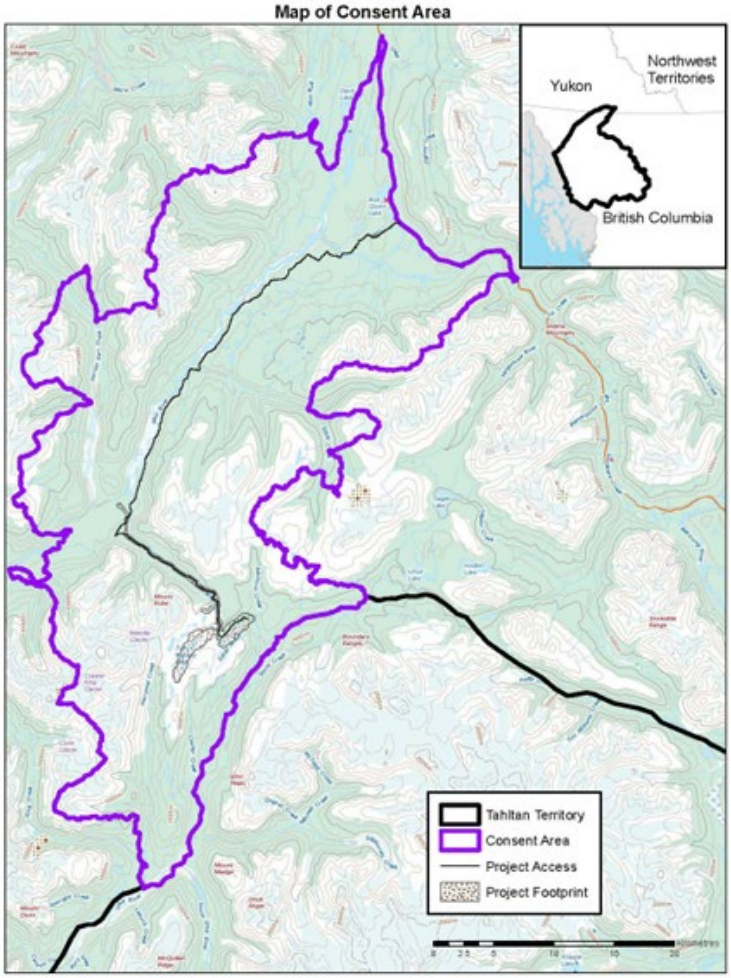
As well as being a decision maker for the Project under the Declaration Act Agreement, TCG is also a participating Indigenous nation for the purposes of BC's assessment as that term is defined in the provincial *Environmental Assessment Act* (EA Act).

2.1.2. **CONSENT AREA**

The Declaration Agreement identifies an area within which Tahltan consent is required for the Project to proceed. This area, referred to as the "Consent Area", is attached at Schedule B to the Declaration Act Agreement and is reproduced below.

Schedule B

Map of Consent Area



The Consent Area encompasses all of the Project components as well as an approximately 10-kilometre buffer along watershed boundaries. The Declaration Act Agreement makes it clear that the Consent Area does

not affect the areas that will be used to assess the Project, as those areas need to be large enough to capture potential Project effects, including downstream of the Project.

2.2. TAHLTAN RISK ASSESSMENT AND EAO EFFECTS ASSESSMENT

2.2.1. TAHLTAN RISK ASSESSMENT

As set out in the Declaration Act Agreement, the TCG Board's decision whether to provide TCG's free, prior and informed consent to the Project proceeding will be informed by the EAO's assessment of the Project as well as an assessment carried out by TCG. This assessment, known as the Tahltan Risk Assessment, has been completed and its conclusions are set out in this Tahltan Risk Assessment Report.

In order to provide clarity and transparency regarding the assessment and decision-making processes for the Project, the DAA sets out how TCG would conduct the Tahltan Risk Assessment and prepare the Tahltan Risk Assessment Report. It also describes how the Tahltan Risk Assessment Report will ultimately be used to inform the TCG Board's decision whether to consent to the Project.

As set out in the DAA, the Tahltan Risk Assessment involves TCG applying Tahltan-specific information and assessment requirements to their review of the Project, including:

(a) TCG policies and guiding documents such as the 1910 Declaration, the Tahltan Resource Development Policy, and the Tahltan Impact Assessment Policy;

(b) the Tahltan Risk Assessment Factors and the Tahltan Sustainability Requirements, as set out at Schedules C and D of the Declaration Act Agreement;

(c) Tahltan information requirements including in relation to Tahltan Knowledge, Tahltan values, and Tahltan scales of assessment and methodologies;

(d) Information and conclusions from TCG's assessment of impacts to Tahltan Aboriginal rights and title from the Project; and

(e) input and information required from Tahltan members.

As set out in the DAA, the Tahltan Risk Assessment will also require TCG to consider:

(a) the information in the Application;

(b) information from the Technical Advisory Committee;

(c) the EAO's assessment of the Project including the draft Environmental Assessment Report, sustainability recommendations, and draft EA Certificate, including proposed certificate conditions and project description;

(f) input from the public comment period; and

(d) the results of consensus-seeking efforts with the EAO on Project effects.

2.2.2. EAO EFFECTS ASSESSMENT

As described in the DAA, TCG and the EAO share a goal of coordinating their respective assessments of the Project. As well as seeking to achieve consensus in relation to the informational and assessment

requirements required to support both assessments, TCG and the EAO have sought to reach consensus in relation to Project effects and the conditions that must be attached to the EA Certificate.

This coordination of assessments means that the EAO's assessment and the results of consensus seeking between the EAO and TCG is an important consideration in the Tahltan Risk Assessment.

In undertaking its assessment of the Project, TCG understands that the EAO has considered:

(a) the requirements of the EA Act and associated policies available on the EAO's website;

(b) information in the Application;

(c) information from the Technical Advisory Committee;

(d) Tahltan Knowledge;

(e) TCG's assessment of the Project including the draft Tahltan Risk Assessment Report and TCG's additional proposed terms and conditions;

(f) information and conclusions from TCG's assessment of impacts to Tahltan Aboriginal rights and title from the Project;

(g) input from the public comment period and community engagement undertaken by TCG; and

(h) the results of consensus-seeking efforts with TCG on Project effects.

In preparing this Tahltan Risk Assessment, TCG has considered the EAO's assessment of the Project and the results of consensus-seeking with the EAO about Project effects.

2.2.3. **PROPONENT ENGAGEMENT**

TCG recognizes the importance of engaging with Skeena in carrying out the Tahltan Risk Assessment and preparing this Tahltan Risk Assessment Report. As described in the DAA, TCG and the EAO share the goal of providing clarity for Skeena about our respective assessment and decision-making processes for the Project.

The DAA identifies opportunities for Skeena to be engaged in TCG and the EAO's assessments and decision-making processes for the Project. These opportunities are aimed at ensuring that Skeena has a reasonable opportunity to:

(a) provide information to inform the assessments and decision-making processes;

(b) participate in the assessments as appropriate in order to support transparent processes that are consistent with the principles of administrative fairness;

(c) discuss strategies with TCG and the EAO for mitigating Project effects;

(d) be informed of concerns that BC or TCG may have regarding the Project; and

(e) respond to concerns that BC or TCG may have regarding the Project.

TCG has worked with the EAO to provide these engagement opportunities to Skeena, and has appreciated the level of engagement provided by Skeena in relation to completing the Tahltan Risk Assessment and preparing this Tahltan Risk Assessment Report.

2.2.4. **PUBLIC ENGAGEMENT**

TCG recognizes the importance of considering the views of the public when assessing potential effects from the Project.

The DAA identifies collaborative processes to be carried out by TCG and the EAO in relation to planning, carrying out, and considering public engagement and input in relation to their respective assessments.

The following steps have been carried out by TCG and EAO to hear from members of the public about the Project:

(a) planning and implementing public engagement in relation to the assessments, including for the public comment periods under subsection 19(5), subsection 27(2)(a), and subsection 28(2)(b) of the EA Act; and

(b) including a draft of Tahltan Risk Assessment Report, subject to the redaction of any sensitive information, in the referral package for the public comment period under subsection 28(2)(b) of the EA Act.

The results of this public engagement have been considered in the Tahltan Risk Assessment and the preparation of this Tahltan Risk Assessment Report.

2.2.5. **TAHLTAN ENGAGEMENT**

The views and perspectives of Tahltan communities and members are a very important aspect of TCG's assessment of the Project. This included opportunities for Tahltan feedback, directions and knowledge sharing during each phase of the environmental assessment. TCG provided feedback to the communities and members through:

- October 2022 community engagement on the Readiness Decision, which is captured in the *TCG ECRP Readiness Decision Report;*
- 2022, and 2023 community engagement and information captured in the *TCG Eskay Creek Mine Community Engagement – What We Heard Report* spring 2024;
- Information packages (2024, and 2025) which included community feedback and knowledge were shared with members for additional feedback and knowledge; and
- Community engagement through the finalization of the Application and issuance of the *Eskay Creek Revitalization Project Joint Notice Regarding Application Review* issued on February 20th, 2025, by TCG and EAO.
- The common themes that were raised during community and members engagement included:
    - Water and water management with concerns on tailings storage, water protection, water treatment, seepage, downstream effects, impacts to fish and aquatic ecosystems;
    - Regional and community effects including the pace and scale of development, existing and future community impacts (see section 3.4.6 Socio-cultural);
    - Cumulative effects;
    - Economics;
    - Tahltan Culture, Heritage, Way of Life;
    - Mine components and design;
    - Wildlife and Habitat;
    - Health and Air Quality;
    - Reclamation and Closure;
    - Quiet Enjoyment of Land and Current and Future Use of the Land;
    - Transportation; and
    - Socioeconomics and Legacies.

All of the knowledge shared feedback, concerns, and questions were captured and included in the risk assessment to aid in the potential effects to Tahltan Values.

The EAO also committed through the DAA to consider the views of Tahltan members throughout their assessment of the Project.

The following steps have been carried out by TCG in relation to hearing from Tahltan communities about the Project:

(c) planning and implementing Tahltan community engagement, including to align with the EAO's public comment periods under subsection 19(5), subsection 27(2)(a), and subsection 28(2)(b) of the EA Act; and

(d) distributing the EAO's draft Environmental Assessment Report, draft EA Certificate, including proposed certificate conditions and project description, and the draft Tahltan Risk Assessment Report for member engagement by TCG.

The results of this engagement with Tahltan communities and members have been considered in the Tahltan Risk Assessment and the preparation of this Tahltan Risk Assessment Report.

2.2.6. CONSENSUS SEEKING BETWEEN EAO AND TCG

TCG and BC established a number of collaborative structures under the DAA to help support their shared goal of coordinated assessments of the Project. The purpose of these structures has been to help TCG and the EAO reach consensus in relation to their assessments.

The two main collaborative structures established under the Declaration Act Agreement are:

(a) **Collaboration Team:**

This team is comprised of the TCG Lands Director and the EAO's Project Lead, along with any other individuals they designate to participate.

They are responsible for working with TCG and BC officials to ensure that the requirements of the Declaration Act Agreement are met, that efforts are made to reach consensus, that engagement occurs with Skeena, and that any unresolved issues or areas where they cannot reach consensus are referred to the Senior Officials Table as needed.

(b) **Senior Officials Table**

This is a leadership group comprised of the TCG President and Vice-President, the Chief of the Iskut Band, the Chief of the Tahltan Band, senior TCG staff, and Assistant Deputy Ministers including from the EAO, the Ministry of Environment, Energy, Mines and Low Carbon Innovation, and the Ministry of Indigenous Relations and Reconciliation.

They are responsible for helping to implement the Agreement and to assist in resolving any issues or areas of non-consensus as needed.

At each stage of the assessments, TCG and the EAO have work together through the Collaboration Team to try to reach consensus on decisions.

These stages have included:

(a) Readiness decision - To decide if the Project was ready to proceed to assessment;

(b) Process planning - To determine what Skeena needed to include in the Application;

(c) Application review - To decide whether the Application was complete; and

(d) Assessment stage - To prepare the Tahltan Risk Assessment and the EAO's Environmental Assessment Report.

This section may be updated if further actions occur to resolve any areas of non-consensus or issues.

2.3. TCG AND BC DECISION MAKING

2.3.1. **CONSENT REQUIREMENT**

As set out above, TCG's consent is required for the Project to proceed. This decision will be made by the TCG Board on behalf of the Tahltan Nation and is consistent with Tahltan's jurisdiction and decision-making authority when it comes to the use of resources in Tahltan Territory

To inform the decision on whether to consent to the Project, the TCG Lands Director will provide the TCG Board with the following materials and information:

(a) this Tahltan Risk Assessment Report;

(b) the EAO's draft Environmental Assessment Report, the draft EA Certificate with proposed certificate conditions and project description, and draft Sustainability Recommendations;

(c) any unresolved inconsistencies that remain between western knowledge and Tahltan Knowledge; and

(d) any unresolved inconsistencies between conditions contained in the draft EA Certificate and any additional conditions considered necessary by the TCG Lands Director.

The TCG Board will then decide whether to consent to the Project. They will do so through a TCG Notice of Decision passed by resolution which will be provided to the EAO and Skeena.

2.3.2. **CONDITIONS**

The DAA is clear that if TCG consents to the Project, this consent may be contingent on certain terms and conditions being included in the EA Certificate. Tahltan's environmental and sustainability standards are high due to the stewardship responsibilities held by Tahltan in relation to the Territory.

One of the Tahltan Risk Assessment Factors to be considered in the Tahltan Risk Assessment relates specifically to the conditions to be included in the EA Certificate:

> *17. Have the proponent and/or regulatory agencies applied Tahltan Sustainability Requirements and the above risk criteria? Are they following the consent and decision-making requirements for Tahltan? Are they taking actions in relation to any Tahltan risk and sustainability concerns to require changes to the proposed project, certificate conditions?*

The DAA sets out a process for the EAO and TCG to work together to seek to reach consensus on the conditions to be included in the EA Certificate. This process has involved engaging with Skeena on the proposed conditions as well as provincial permitting agencies.

Reaching consensus with the EAO on the conditions to be included in the EA Certificate is not a requirement, as ultimately the TCG Board can identify any terms and conditions that must be attached to the EA Certificate for TCG to consent to the Project proceeding.

3. Tahltan Risk Assessment Requirements

3.1. ROLES AND RESPONSIBILITIES

3.1.1. TCG LANDS DEPARTMENT

The TCG Lands and Regulatory Affairs Department (TCG Lands Department) has been responsible for carrying out the Tahltan Risk Assessment and preparing this Tahltan Risk Assessment Report.

The TCG Lands and Regulatory Affairs Director (TCG Lands Director) and his staff have worked collaboratively with the EAO to carrying out the Tahltan Risk Assessment. This has included the TCG Lands Director's role on the Collaboration Team and engagement between the TCG Lands Department and the Technical Advisory Committee. The TCG Lands Department has also been responsible for carrying out engagement with Skeena on behalf of TCG so that Skeena has the opportunity to participate in discussions relating to the draft Tahltan Risk Assessment Report and any additional proposed conditions and work to try to address any issues or concerns.

Other responsibilities of the TCG Lands Department have included seeking to address apparent inconsistencies between western knowledge and Tahltan Knowledge in relation to the assessments and seeking to achieve consensus with the EAO on this Tahltan Risk Assessment Report and the EAO's draft Environmental Assessment Report, draft EA Certificate, and draft Sustainability Recommendations.

3.1.2. EAO

The EAO has been responsible for carrying out the provincial assessment of the Project and preparing the draft Environmental Assessment Report, draft EA Certificate, and draft Sustainability Recommendations.

The EAO Project Lead and his staff have worked collaboratively with TCG in carrying out the provincial assessment of the Project. This has included the EAO Project Lead's role on the Collaboration Team and engagement between the EAO and the Technical Advisory Committee. The TCG Lands Department has also been responsible for carrying out engagement with Skeena so that Skeena has the opportunity to participate in discussions relating to the provincial assessment and work to try to address any issues or concerns.

Other responsibilities of the EAO have included seeking to address apparent inconsistencies between western knowledge and Tahltan Knowledge in relation to the assessments and seeking to achieve consensus with the TCG Lands Department on this Tahltan Risk Assessment Report and their draft Environmental Assessment Report, draft EA Certificate, and draft Sustainability Recommendations.

3.1.3. COLLABORATION TEAM

Throughout the review of the Project, the Collaboration Team has been responsible for working with TCG and BC officials to ensure that the requirements of the Declaration Act Agreement have been met, that efforts have been made to reach consensus in relation to the assessments, that engagement has occurred with Skeena, and that any unresolved issues or areas where they could not reach consensus have been referred to the Senior Officials Table.

As required by the Declaration Act Agreement, this collaborative work has included:

(a) meeting regularly;

(b) preparing and maintaining a Work Plan;

(c) participating in meetings of the Technical Advisory Committee;

(d) seeking to achieve consensus in relation to the assessments;

(e) creating and maintaining a Consensus Tracking Tool;

(f) engaging with Skeena;

(g) working to incorporate Tahltan Knowledge and Tahltan Values into the assessments;

(h) carrying out and considering the results of public engagement and Tahltan community engagement; and

(i) collaborating as necessary with the Ministry of Mining and Critical Minerals, the Ministry of Environment, and Canada in relation to the Project and potential conditions.

To further support their collaborative review of the Project, the EAO and the TCG also worked through the Collaboration Team to develop a detailed Issues Tracking Table that outlined:

(a) The comments submitted by the EAO, TCG, the Impact Assessment Agency of Canada, Nisga'a Lisims Government, Tsetsaut/Skii km Lax Ha, the Technical Advisory Committee, and the Alaska Tribal Transboundary Advisory Committee during the course of the various stages of the assessments;

(b) Skeena's responses; and

(c) The status on the resolution of issues that were raised.

TCG acknowledges the high level of commitment demonstrated by the EAO to working collaboratively on the assessments, including through the Collaboration Team.

3.1.4. **TAHLTAN MEMBERS**

Throughout the TCG and EAO assessments of the Project, Tahltan communities and members have been provided with updates and information about the Project, as well as opportunities to ask questions and provide input. Tahltan members have also been asked to provide Tahltan Knowledge relating to the assessment of potential Project effects.

The views and perspectives of Tahltan communities and members are a very important aspect of TCG's assessment of the Project. This included opportunities for Tahltan feedback, directions and knowledge sharing during each phase of the environmental assessment. TCG provided feedback to the communities and members through:

- October 2022 community engagement on the Readiness Decision, which is captured in the *TCG ECRP Readiness Decision Report;*
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- The common themes that were raised during community and members engagement included:
    - Water and water management with concerns on tailings storage, water protection, water treatment, seepage, downstream effects, impacts to fish and aquatic ecosystems;

- Regional and community effects including the pace and scale of development, existing and future community impacts (see section 3.4.6 Socio-cultural);
- Cumulative effects;
- Economics;
- Tahltan Culture, Heritage, Way of Life;
- Mine components and design;
- Wildlife and Habitat;
- Health and Air Quality;
- Reclamation and Closure;
- Quiet Enjoyment of Land and Current and Future Use of the Land;
- Transportation; and
- Socioeconomics and Legacies.

All of the knowledge shared, feedback, concerns, and questions were captured and included in the risk assessment to aid in the potential effects to Tahltan Values.

This section will be further updated as Tahltan engagement occurs with the draft risk assessment in late summer/early fall 2025.

TCG acknowledges the essential contributions made by Tahltan communities and members in reviewing the Project and sharing their knowledge and perspectives.

3.1.5. **TCG BOARD**

Under the Declaration Act Agreement, the TCG Board will decide whether to provide TCG's free, prior and informed consent to the Project proceeding. They will also decide whether any terms and conditions must be attached to the EA Certificate for TCG to consent to the Project proceeding.

3.2. TCG POLICIES AND GUIDING DOCUMENTS

3.2.1. **1910 DECLARATION**

The Declaration establishes Tahltan sovereignty over Tahltan Territory. It was signed on October 10, 1910, by 83 members of Tahltan Nation, including Nanok, Chief of the Tahltans, Nastulta, also called Little Jackson, and George Assadza, Kenetl, also called Big Jackson. The Tahltan Declaration was re-affirmed by Tahltan Nation on the 100th anniversary (October 18, 2010). Tahltans declared sovereignty over all lands and Tahltans who had the foresight to make this declaration stand as role models of sovereignty to the people today, and these principles and values still hold; that only Tahltan speak for Tahltan (Klappan Strategic Initiative 2015).

The following excerpt from the Tahltan Declaration is clear:

> *"We, the undersigned members of the Tahltan tribe, speaking for ourselves, and our entire tribe… We claim the sovereign right to all the country of our tribe—this country of ours which we have held intact from the encroachments of other tribes, from time immemorial, at the cost of our own blood. We have done this because our lives depended on our country. We have never treatied with them, nor given them any such title. (We have only very lately learned the British Columbia government makes this claim and that it has for long considered its property all the territories of the Indian tribes in B.C.) "*

The Declaration also demands that all "questions regarding our lands, hunting, fishing, etc., and every matter concerning our welfare, be settled…." This statement indicates that land and resource decisions in the territory have to be based on the authorities, jurisdictions, laws, principles, and policies of all governments. This holds true to date, where Tahltan governments require decisions on EA's and regulatory matters to be made in this manner.

3.2.2. **TAHLTAN RESOURCE DEVELOPMENT POLICY**

In 1987, Tahltan published a resource development policy to inform proponents, and governments that economic opportunity and resource development is not opposed in the territory; however, that resource development must adhere to Tahltan principles to ensure the protection of rights and a sustainable way of life for Tahltan Nation. The following are the principles approved by the Tahltan Tribal Council (now the TCG) and are still applicable today and provide guidance in how projects undergoing an EA can be evaluated:

1) *assurance that the development will not pose a threat of irreparable environmental damage;*
2) *assurance that the development will not jeopardize, prejudice or otherwise compromise the outstanding Tahltan aboriginal rights claim;*
3) *assurance that the project will provide more positive than negative social impacts on Tahltan people;*
4) *provision for the widest possible opportunity for education and direct employment-related training for Tahltan people in connection with the project;*
5) *provision for the widest possible opportunity for employment opportunities for Tahltan people with respect to all phases of the development;*
6) *provision for substantial equity participation by Tahltans in the total project;*
7) *provision for the widest possible development of Tahltan business opportunities over which the developer may have control or influence;*
8) *provision of the developer to assist the Tahltans to accomplish the objectives stated above by providing financial and managerial assistance and advice where deemed necessary.*

3.2.3. **OUT OF RESPECT - THE TAHLTAN, MINING, AND THE SEVEN QUESTIONS TO SUSTAINABILITY 2003**

The Tahltan Mining Symposium was held April 4–6, 2003, in Dease Lake, British Columbia. The symposium brought together 28 Tahltan, nine representatives from industry and government and the IISD facilitator to undertake a review of the relationship between the Tahltan people and territory, and mining/ mineral activities—past, present and future. The specific output that was sought was a strategy to guide the Tahltan-mining interface in the years to come.

The Seven Questions of Sustainability provides additional information and directions on determining Tahltan requirements for engagement, people, environment, economy and other factors from early exploration to closure or the full life cycle of the project. These approaches are still being used today in the Impact Assessment Policy and Tahltan Environmental Assessment Strategy.

The main outcomes were the formation of a Tahltan Mining Strategy framed on the Tahltan 1910 Declaration, 1987 Resource Development Policy, and IISD Seven Questions of Sustainability. The strategy focuses on

1) *send a signal that Tahltan people are supportive of mining and mineral activity on their land under conditions that such activities are "done right" from a Tahltan perspective;*
2) *facilitate Tahltan participation in mining and mineral activity—not only through direct and indirect employment, but also in terms of overall management/co-management as well as the broad perspective of seeing a fair distribution (considering all participating interests) of all benefits, costs and risks; and*
3) *ensure that the broad range of concerns raised in the "Seven Questions to Sustainability" are addressed, in particular the health/social/cultural implications of mining/mineral activity that continue to receive inadequate attention.*

The report also provides directions to industry and government to meet Tahltan requirements for sustainable resource development.

3.2.4. **TAHLTAN IMPACT ASSESSMENT POLICY**

The Tahltan Impact Assessment Policy was approved by the Tahltan Central Government Board of Directors in November 2022. It the formal policy with the purpose to guide Tahltan and provide information to the Crown, Crown Regulatory Agencies, and Proponents in relation to:

- Tahltan's implementation of Impact Assessments; and
- Tahltan's decision-making in relation to Projects.

It is the policy which is connected to the Declaration Act Agreement (DAA), is the basis for future regulatory and environmental assessment reviews, and future consent decisions for resource development in the Tahltan Nation.

The policy provides clarity and direction on the types of Tahltan Knowledge and its application; Tahltan assessment requirements; related agreements to support impact assessments; Tahltan member engagement; roles and responsibilities; and Tahltan decision making in relation to projects.

The policy provides guidance on establishing Tahltan Sustainability Requirements, and Tahltan Risk Assessment Criteria as each project is unique and depending on where it is proposed in the Nation, its own set of requirements and criteria.

As it is the first impact assessment policy in the Nation, it is expected it will evolve over time as more consent based regulatory and environmental assessment reviews are led by Tahltan.

3.2.5. **TAHLTAN STEWARDSHIP PLAN**

The authority for the *Keep Our Trails Open: The Tahltan Stewardship Plan* (TSP) is ultimately based on the relationship of all Tahltans to Keyeh. All Tahltans means not only the present generation, but our ancestors and all future generations. Land stewardship is the collective and inherent responsibility of all Tahltans. The TSP establishes the basis for future land use decisions. For this reason. it has the potential to shape future impacts to our Aboriginal title and rights more than any other decision we might take regarding a specific initiative. The management direction outlined in the TSP is intended to be faithful to our ancestors' relationship to Keyeh, in this way ensuring that the land can support the ability of Tahltans to exercise our collectively-owned Aboriginal title and rights for generations to come.

The Stewardship Plan covers the entire territory of Tahltan Nation. The 1910 *Declaration of the Tahltan Tribe* asserts our jurisdictional authority over this territory: "We claim the sovereign right to all the country of our tribe—this country of ours which we have held intact from the encroachments of other tribes, from time immemorial, at the cost of our own blood."

An old-time prospector, once told a Tahltan Elder a story about the Mackenzie River. The waters of the Mackenzie are clear until they are joined by the muddy waters of the Liard River. But the two streams don't immediately mix. For over 100 miles, the two powerful streams flow alongside one another, one clear and one muddy. As the Elder puts it, the "rivers walk side by side." This document, *Keep Our Trails Open*, acknowledges that Tahltans, walk in two worlds, one passed down to us from our ancestors, connected to the land and stories about the land, the other represented by Highway 37, which passes through our territory, bringing industry, tourism, jobs, and the pressures and conveniences associated with life today. Both these worlds bring ways of seeing and acting, and both are necessary to ensure the sustainable stewardship of our Tahltan Territory. But these two worlds are different and should not be confused. The TSP outlines how Tahltans, intend to employ the best of both worlds in stewarding the land and preserving it for our children and their children and all future generations. However, as the Elder points out, while the separate streams of the Liard and the Mackenzie flow side by side for over 100 miles, in the end the Mackenzie becomes a muddy river like the Liard, which is fed in part by streams that begin in Tahltan country. In other words, the core principles that guide the Tahltan way of living with and caring for our world (called stewardship today) come from our ancestors.

Our teachings are passed down through stories. For that reason, this document contains many stories. Often, these stories are connected with the land. They describe a way of thinking rooted in the land. A Tahltan Elder asked one of his Elders, how long it takes to solve a difficult question. He thought for a long time before answering. “About as long as it takes to walk from Tahltan to Telegraph and back.” Roughly 40 km—a long day’s walk. Walking and thinking go hand in hand: time is measured in steps across the land and problems are resolved as the landscape unfolds.

The purposes of this document, *Keep Our Trails Open: The Tahltan Stewardship Plan* (TSP), are as follows:

1) Establish that this is our plan and we want everyone to see it through our eyes, and through our spirit;
2) Provide a plan based on our stewardship requirements and our knowledge that supports Tahltan land governance by establishing approved management directions;
3) Ensure that planning priorities are focused on 1) the health of the land (including the earth, air, water and all living things and spirits that inhabit the land) and 2) the continuation of our way of life;
4) Support Tahltan cultural revitalization and strengthen connections between Tahltans and the land;
5) Identify allowable uses of the land and our expectations for others when they use our land;
6) Support existing Tahltan environmental assessment approaches to proposed developments in Tahltan Territory; and
7) Provide a basis for collaborative management of resources, acknowledging that governance is grounded in Tahltan ways of being, that engagement with Elders and community is critical for the success of land use planning, and that the Tahltan Stewardship Plan will inform any future land use plans and decision-making agreements with other governments and proponents.

The title of this document comes from a story told by a Tahltan outfitter, where his father who had started the guide and outfitting company, wrote a letter to his children to be opened when he died. “Keep our trails open!” were the instructions he left. For us, trails are not simply a way of getting from one place to another. They gather the country together into a living whole, like the arteries of a body. To walk the trails is to encounter and engage with the land and its great variety of inhabitants, its moods and seasons. The spirit of our ancestors and the spirit of the land talks to us. Much of our knowledge comes from these encounters along the way. The importance of “keeping our trails open” is not about assuring ease in getting around the bush. The real meaning touches upon what it is to be Tahltan: following the paths of our ancestors as they travel across the land. Keeping our trails open is a way of being with the land, along with our ancestors.

The Tahltan Stewardship Plan is an endorsed Tahltan plan, a public version will not be available until later this year, but the management directions are being applied in our assessment. The directions provide additional support and guidance with the Tahltan Risk Assessment Factors and Sustainability Principles. To assist in advancing Tahltan Assessment information, a limited copy of the plan was shared with Skeena Resources during the Application Review Stage and prior to the release publicly later this year.
The TSP identifies Special Areas of Interests, management directions and allowable land uses for the Areas of Interests (AOI) identified for the Tahltan Assessment. These are measures being evaluated within the approaches identified in the Hybrid AIR, Tahltan Assessment, and reported in this document.

The information was shared through the two drafts of the Tahltan Assessment information in Skeena Resources’ EAA (January 2025) and REAA (May 2025), and a redacted version of the TSP was provided to Skeena Resources and EAO on January 21st , 2025.

3.3. KEY TAHLTAN LAWS, CONCEPTS, AND PRINCIPLES

The word Tahltans use to describe our relationship to the land is Keyeh. This word is usually translated as village or place, but it means much more than this. Keyeh also means home—our home—the unique place where as Tahltans we belong. Keyeh can encompass all the country now called Tahltan Territory, it can refer to Tahltan village on the Tūdeṣe chō (Stikine) River, which is the spiritual centre of the Tahltan homeland, or it can simply refer to a village. Keyeh includes the specific geographic and environmental characteristics of our country, just as it includes all of its residents, human and non-human (Higgins 1982). It is an interconnected whole made up of the relationships between humans, animals, spirits, mountains, waters and weather

systems. This whole has a cultural and spiritual meaning—the place that is home for us. As such, Tahltan Territory must be understood in its entirety, that is, as Tahltan's home.

The Tahltan view of stewardship arises from understanding the relationship Tahltan have to Keyeh. Belonging to the land means there is a reciprocal relationship between us and the land. A Tahltan Elder, says, "If we take care of the land, the land will take care of us." From Tahltan's perspective, stewardship is not only about looking after certain features of the land (for example, dēk'āne (salmon) habitat, hodzih (caribou) migratory routes, soil quality, heritage sites, and so forth), but requires attention to the relationships between these features. Keyeh, is an interconnected whole made up of reciprocal relationships. The human community is part of a larger community.

This means that adverse impacts to the land change the relationships that Tahltan have with the land. Tahltan identity, cultural integrity, community cohesion and individual well-being are connected to the health of the land. Tahltan stewardship means maintaining good relationships to the land (and by "land" we always mean the entirety of land, including all living things, spirits, waters, and mountains, and the relationships between them), across space and through time. It means honouring our ancestors that came before us and caring for the generations still to come. We call this the Tahltan Continuum (Klappan Strategic Initiative, 2015).

3.3.1. **CONNECTION AND HIERARCHY OF SUSTAINABILITY**

Tahltan Law and Knowledge is based on the connection of Tahltan with the land and the inclusion of all Tahltan with land, water, and creatures. This foundational principle is a core element of sustainability (Jones et al. 2021).

> *"All animals were originally born of a woman called Atsentmā', meaning "meat mother" or "game mother" (Teit 1919: 231–32). This woman assigned each animal with its own appropriate habit and food source. The Meat-Mother was thought to live far in the north. Showing disrespect to animals or failing to make full use of them as food, would cause the Meat-Mother to call her children "home." While the punishment lasted, there would be a scarcity of game."*

Tahltan Law allows rights of access and use to non-Tahltan on Tahltan territory, but does not allow for rights of exclusive management or exclusion. Land alienation is not an option under a proprietorship model of ownership, which sees ownership in terms of belonging over generations.

In relation to stewardship, some of the key principles to be aware of include:

1) **Dahts'eni (Kinship)**-There is kinship between all things. This understanding is fundamental to Tahltan worldview. Tahltan are not separate from the natural world. Everything is interconnected and interdependent.
2) **Respect** - respect is owed to all humans, animals, the spirits of the land, rivers, mountains, and forests.
3) **Sharing** - acts of sharing establish balance in the world, and the practice of sharing points to the deeper reality of interconnectedness or kinship. The land is a gift that is shared by all: humans and animals; rocks and rivers; past, present, and future generations. Stewardship requires us to balance the needs of all things that share the land.
4) **Ah'ī -** is sacred and is tied to Tahltan relationship to land and culture. Ah'ī points to the consequences of laws, stewardship, and ways of life has been violated.
5) **Kotah (Visiting)** - 'visiting' is how we concretely enact the principles of kinship, respect and sharing. Visiting relates to visiting the land, visiting with each other, and visiting with non-Tahltan. Visiting facilitates the act of storytelling, the fundamental means to maintain Tahltan's oral history.

Humans are part of the ecosystems and human actions have to be done in a way where the health of the ecosystems are not impaired. Tahltan oral histories, laws, and principles all indicate where these actions are not followed, significant impacts occur and relationships with the land and water are damaged to the detriment to all Tahltan.

The interconnection occurs across the Nation, a Chief or Head of Family area, and a family area as evident of Tahltan Stewardship Principles.

> *"The earth is animate and the same as our mother; for, if there were no earth, there would be no people. The latter are her children, and the animals also. She looks after them all, and provides food for all. The rocks are her bones, and water her milk. A child cannot live without sucking its mother's milk, and people cannot live without water" (Teit 1919: 227).*

> *"Sometimes the grounds of a clan got in bad shape, needed rest, for game and fur were getting scarce. Then they let part or all of it rest until the game became plentiful again, maybe from 2 to 5 years, and the clan hunted on the grounds of other people. This was always arranged in a friendly way without trouble. The Indians looked well after the fur and the game of the country so that they should not get scarce." (Teit n.d.)*

> *"…snares were kept in place until catch the yearlings (the one that walks around with mother) in the springtime, indicates that the mother caribou had chased the yearling away because she is going to have a calf. — the chief made a decision, a chief for the game, just like a game warden. — never set snare until the fall time when the calves are weaned, the young ones get big. Then they just live on fish." (Carlick n.d.)*

3.3.2. **SHARING AND GENEROSITY**

The land is not owned but shared with all living and non-living beings; stewardship requires the balance of providing for all now and for future generations, while setting the rules for allowable uses for accessing the land. In addition, accessing the land is based on the principle of sharing and sharing in a way which provides for today and future generations.

> *"In the Tahltan cycle of stories dealing with Big Raven in his role as transformer or shaper, a recurring theme is how Raven, travelling along the coast in the post-Flood world, destroys the monopoly control that certain powerful figures have over many of the goods and resources necessary to life, such as water, light, fire and knowledge. Raven steals these goods and resources and distributes them among all the people, so that their benefits can be enjoyed by all. The story which explains the origin of the tides (controlled by a man who refused to allow the tides to recede, thus blocking access to tidal foods), begins by describing a world of scarcity: "Now the people in many parts of the country had no food. Game and all kinds of food were in the possession of a few persons (or families), who alone controlled these things. Thus many people were constantly starving" (Teit 1919: 201). Scarcity and the hoarding of food and resources are the realities that define the world as it was before Raven set to work transforming it.*

> *In the words of Carolyn Doody (Thompson 2012: 121), the connection between the Tahltan language and the land points to the reality of "interdependency, the land provides for us and in turn we take care of it."*

Finally, the principles can be summarized as *"…ownership cannot be separated from belonging; in fact, ownership is belonging. To claim possession of a piece of land is to assert not only that the land belongs to you but that you belong to the land."* (Jones and McLaren 2021).

3.3.3. **TAHLTAN CORE PRIORITIES**

Tahltan stewardship guiding principles are critical in our implementation of the Tahltan Risk Assessment for this project. These include the principles and criteria as identified in the below sections, such as the Tahltan Risk Assessment Factors, Sustainability Requirements, and the following Tahltan Core Priorities:

> **Priority 1.** Maintaining the long-term health of the land (including all of its terrestrial and aquatic ecosystems) is a mandatory condition for any kind of land use in all areas within Keyeh.

Priority 2. The land must be able to continue supporting our Tahltan way of life while meeting the "health of the land" condition established under priority 1. Tahltan way of life includes maintaining our personal connection with Keyeh, being able to live off the land, sustaining our harvesting and hunting patterns, engaging in our cultural and spiritual practices, most of which are tied to the land, and earning a reliable living.

Priority 3. Tahltan rights and title must be protected, upheld and continue to be exercisable for current and future generations.

Priority 4. Land that has been impacted or degraded through industrial use must be healed, through reclamation, restoration, and ritual ceremony to support priorities 1, 2, and 3.

3.3.4. **TAHLTAN CONTINUUM**

The Tahltan Continuum is the recognition that "*Tahltan know there is a continuum between the ancient, contact or historic times, contemporary times, and the future, because the continuum is in their blood (Figure 1). They are descended from those noble, brilliant and efficient peoples; and though it is an honour, it also carries a heavy responsibility to continue, especially when sovereignty, lifeways and land are pressured. They left Tahltan with a legacy of the systems of nationhood: Nation to Nation relations, language, spiritual beliefs, culture and values, governance, economics, education, justice and peace making, technology, land and resource management, cultivation and communications to name a few*." (Klappan Strategic Initiative 2015).

> *"the oral data and voices of Tahltan ancestors, cultural restoration and heritage work of multi-generations of Tahltan are evidence of Tahltan sovereignty and should be respected in decision-making to ensure Tahltan can continue to be effective stewards of Tahltan Territory"*
>
> *"there is an inextricable relationship among Tahltan people, Tahltan's way of life, Tahltan Territory, lands, waters and all resources and creatures within Tahltan Territory"*

Tahltan Knowledge is a many faceted understandings as it tied to the Tahltan Continuum of ancient, historic, contemporary and future knowledge and understandings. It is tied to the laws and governance of the Nation, clan, family, and individual. It is the interconnection or relationship of Tahltan to the land and the land to Tahltan.

This means that adverse impacts to the land change the relationships that Tahltan have with the land. Tahltan identity, cultural integrity, community cohesion and individual well-being are connected to the health of the land. Tahltan stewardship means maintaining good relationships to the land (and by "land" we always mean the entirety of land, including all living things, spirits, waters, and mountains, and the relationships between them), across space and through time. It means honouring our ancestors that came before us and caring for the generations still to come. We call this the Tahltan Continuum (Klappan Strategic Initiative, 2015).

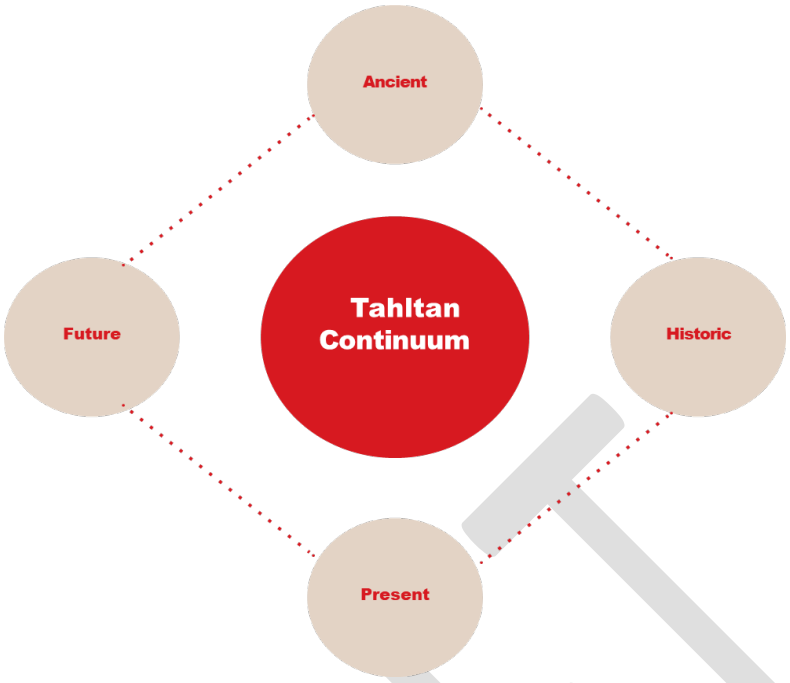


Figure 1. Tahltan knowledge continuum

3.3.5. INTERCONNECTED KEY PRINCIPLES

Tahltan recognize that everything has a spirit and we have taken care of the spirit of everything on the land as our way of living with the land—this way of thinking is the underpinning of our approach to land stewardship. Our land stewardship has this physical and spiritual oneness in which we and the land are as one, where there is no separation between us and the land and all that dwells on the land.

The above is the vision of the TSP and it and the information provided in sections 3.3.1 – 3.3.5 represent the importance stewardship and interconnection of all things living and spirits in Keyeh that the land is shared not owned; importance of maintaining the Core Priorities across the Tahltan Continuum; removal of existing and future barriers to Tahltan from resource development; and balancing land uses in a manner respectful and generous across the past, current, and future generations.

3.3.6. TAHLTAN SIGNIFICANCE FACTORS

The following are the criteria framed to guide the scope and scale of effects, and a potential severity of effects for each AOI:

- Source
    - Indirect Effects where the effects are not tied to the Eskay Creek Mine Project
    - Mixed Effects where the effects are partially contributable to the project
    - Direct Effects where the effects are estimated to be with the project, with the project specific effects being explored through each AOI.
    - Nil to limited effects are occurring from the project and possibly other land use activities in the AOI

- Magnitude – Framed against Core Priorities (CP), and TSP management directions

    - Negligible - no detectable change from existing conditions to Tahltan Values and AOI
    - Low -slightly alter or change the value or AOI based on TSP, and CP without changing the role or function.
    - Moderate - will alter or change the nature, role, or function of the value but will not affect its integrity of the value or AOI based on TSP, and CP without changing the role or function.
    - High - will substantially alter or change the nature, role, or function value or AOI and may jeopardize the valued component's integrity based on TSP, and CP
- Extent

    - Site specific
    - Landscape
    - Regional
    - CE scales (can be intermediate or mixed phases depending on value)

- Duration is framed by generations and is framed on current length a barrier or effect has been in place as well as the additive time for the barrier

    - 1 year or less
    - Less than or equal to ¼ of a generation
    - ½ half of a generation
    - 1 generation
    - 1-3 generations
    - 7 or more generations
- Reversibility is framed similar to Duration

- Frequency: if at higher frequencies then generational measures can be considered

    - Once: the effect is confined to one discrete event.
    - Regular: the effect occurs at consistent intervals.
    - Irregular: the effect occurs at sporadic intervals.
    - Continuous: effects occur constantly.
- Confidence in information and contingencies

    - High - there is a good understanding of the cause-effect relationship between the project, AOI, and Tahltan values with both Tahltan Knowledge and western science. There is sufficient information to support the Tahltan Assessment. The selected mitigation measures have been applied elsewhere with the desired outcomes. There is a low degree of uncertainty associated with Tahltan Knowledge, CP and TSP directions, western science data inputs and/or modelling techniques, and variation from the predicted effect is expected to be low.

    - Moderate - - there is a moderate understanding of the cause-effect relationship between the project, AOI, and Tahltan values with both Tahltan Knowledge and western science. The information is limited, has some gaps, and there is some uncertainties to support the Tahltan Assessment. The selected mitigation measures have been applied elsewhere with variable outcomes or have been applied elsewhere but are untested in the project area or AOI. There is a moderate uncertainty associated with Tahltan Knowledge, CP and TSP directions, western science data inputs and/or modelling techniques, and variation from the predicted effect is has moderate variation or uncertainty of success.

- Low - the cause-effect relationships between the project and between the project, AOI, and Tahltan values with both Tahltan Knowledge and western science are poorly understood. There may be several unknown external variables and/or data for the project area that are incomplete. The effectiveness of the mitigation measures may not yet be proven. Modelling results may vary considerably given the data inputs. There is a high degree of uncertainty in the conclusions of the assessment.

- Risk and uncertainty

  - Low: less than 40 percent chance of effect occurring
  - Medium: 40 to 80 percent chance of effect occurring
  - High: more than 80 percent chance of effect occurring
- Consequence can be assessed as minor, moderate or major based on the combination of

Assess the overall significance of effects from the project taking into consideration:

(a) the severity of expected negative project effects for each AOI

(b) expected positive project effects, including proposed accommodation measures including any social, cultural, economic benefits or legacies from the project

(c) the Tahltan Risk Assessment Factors

(d) the Tahltan Sustainability Requirements, and

(e) the views of Tahltan members.

In reaching this initial determination, the expected positive and negative effects from the project will be weighed against the Tahltan Risk Assessment Factors and the Tahltan Sustainability Requirements.

Answers the questions: Is the project likely to cause significant effects to Tahltan lands, culture, and communities?

3.3.7. **TAHLTAN RISK ASSESSMENT FACTORS**

As identified in the DAA, Tahltan Risk Assessment Factors are factors the Project will be assessed against the Sustainability Requirements Factors through the steps identified in section 3.6. The risk assessment factors are found in Schedule C of the DAA and are listed below:

1) *How will the project affect the following:*
   a) *Tahltan's Title and Rights and the exercise of Title and Rights;*
   b) *high sensitivity areas or environmentally sensitive areas within Tahltan Territory;*
   c) *the quality or quantity of ground water or surface water, or ground and surface water connectivity and aquifers;*
   d) *sacred areas;*
   e) *important habitat areas, including birthing, breeding and wintering areas for fish and wildlife, or wildlife migration corridors;*
   f) *ecosystems or species of importance to Tahltan;*
   g) *Tahltan harvesting areas, traditional use areas or other Tahltan land use areas;*
   h) *archaeological sites, burial sites, historical village sites or other site- specific features within Tahltan Territory; and*
   i) *Tahltan's relationship with the proponent?*

2) *What are the cumulative effects on the values listed in section 1 above?*

3) *What is the proximity of the project to Tahltan communities and will the project affect those communities?*

4) *Will the project cause irreparable harm to Tahltan Territory?*

5) *Does the project align with Tahltan direction on the use of the project area, including in land use plans?*

6) *Does the proposed project in the current design, as a stand alone project, and as part of a cumulative review meet the Tahltan Sustainability Requirements?*

7) *Will the project provide more positive than social impacts on Tahltan?*

8) *What education, employment and training opportunities will the project provide?*

9) *What economic opportunities will the project provide for Tahltan and Tahltan businesses?*

10) *What is the compliance, regulatory, and operational history of the proponent with Tahltan and other Indigenous nations?*

11) *Does the proponent have the financial resources to carry the proposed project to final closure as well as the legacies required by Tahltan?*

12) *Can the land and water in the project area be returned to the existing or desired health as directed by Tahltan laws, principles, policies and knowledge?*

13) *Has a Tahltan land use and occupancy study been completed and used in the design of the project and incorporated into the environmental assessment application?*

14) *Does baseline information meet the confidences of Tahltan that it accurately and precisely captures the current knowledge for the project area and study areas? If not, do the contingencies meet the confidences of Tahltan?*

15) *Does the proposed project design, baseline information, mitigations, monitoring and closure protect the ground and surface water in the area and in downstream land and water areas?*

16) *Is there independent Tahltan monitoring being funded as part of the project design?*

17) *Have the proponent and/or regulatory agencies applied Tahltan Sustainability Requirements and the above risk criteria? Are they following the consent and decision-making requirements for Tahltan? Are they taking actions in relation to any Tahltan risk and sustainability concerns to require changes to the proposed project, certificate conditions?*

18) *Has the proponent committed through binding obligations to meet Tahltan Sustainability Requirements?*

3.3.8. **TAHLTAN SUSTAINABILITY REQUIREMENTS**

As identified in the DAA, Tahltan Risk Assessment Factors are factors the Project will be assessed against the Sustainability Requirements Factors through the steps identified in section 3.6. The risk assessment factors are found in Schedule C of the DAA and are listed below:

1. *Meets the requirements of the 1910 Declaration on Tahltan regarding governance, sovereignty, jurisdiction and authorities;*

2. *Meets the principles of the Tahltan Resource Development Policy;*

3. *Is consistent with applicable Tahltan lands governance policies;*

4. *Is consistent with fundamental Tahltan land and resource principles;*

5. *Allows the land and water to be returned to a level of environmental health to support Tahltan's Title and Rights and land uses across the Tahltan Continuum, with a focus on future land use by Tahltan;*

6. *Does not require mitigations, treatment, or monitoring beyond closure (i.e., will not require treatment of the land and water in perpetuity to maintain them at near normal levels);*

7. *Does not restrict Tahltan from meeting food security needs or conducting social, cultural, and environmental practices;*

8. *Minimizes adverse impacts to Tahltan Values and has Tahltan social, cultural, environmental, and environmental compensation plans in place to support this requirement;*

9. *Does not significantly impact Tahltan Values through residual or cumulative effects; and,*

10. *Contributes, supports, or assists in creating social, cultural, environmental and economic legacies for Tahltan.*

3.4. TAHLTAN KNOWLEDGE

As reported in the Klappan Strategic Initiative (2015), "*Tahltan oral data provides a link to the voices of our ancestors; voices which have provided valuable and insightful knowledge of our sophisticated past. Our knowledge showed that Tahltans extensively used every inch of our territory, every resource provided by the land and that we did so with the utmost connection and respect for the land. Tahltan territory encompasses rugged wilderness; forests, mountains, canyons, glaciers and rushing rivers. Tahltan people inherited the skills to thrive in these landscapes, including the abilities to engineer and build bridges across steep and dangerous canyons. This land and these resources have shaped Tahltans and provided us with a high-quality life*."

Tahltan Knowledge is currently defined as:

- "**Tahltan Knowledge**" means cultural heritage, traditional knowledge and traditional cultural expressions of the Tahltan, and knowledge of traditional Tahltan lifeways and systems, whether embodied in tangible or intangible form, and from ancient and contemporary time, transmitted from generation to generation, and includes:
    - The manifestations of Tahltan sciences, technologies and cultures, including environmental knowledge, use of natural resources, land use and occupation, systems of land tenure and self-management;
    - Governance and laws, including intra- and inter-societal relations;
    - Spiritual knowledge;
    - Immovable cultural property (including sacred and culturally significant sites and burial grounds);
    - Human and genetic resources and remains;
    - Knowledge of fauna and flora, seeds, medicines, water, soils, weather, solar and lunar effects, processes and cycles;
    - Oral traditions, literatures, and visual and performing arts (including songs, dances, music, stories, ceremonies, symbols and designs);
    - Sports and traditional games;
    - Any documentation of Tahltan heritage, including in archives, film, photographs, videotape, audiotape and all forms of media; and,
    - In whatever form or media, including all analysis, compilations, studies, reports or other materials in a variety of media containing or generating from, in whole or in part, Tahltan knowledge;
- "**Tahltan Knowledge Documentation**" means the Inventory, TK Studies and associated maps, including all versions, editions and drafts thereof, generated for and from studies conducted under this Agreement; and,

- "**Tahltan Knowledge–holders**" means Tahltan Members that have been given the responsibility by the Tahltan Nation to act as custodians of particular Tahltan Knowledge to ensure the preservation of such Tahltan Knowledge for future generations.

Tahltan Knowledge spatial information is not just a site, a line, or use area. In discussions with Tahltan hunters and elders, a hunting site such as a camp represents a day or two distance or area of influence where Tahltan would hunt and return or travel to the next camp.

A cabin represents a larger area of connection and use, and a village site is even larger than a cabin, given the multitude of individuals, trade, social, cultural, community, and sharing. Cabin and village sites can represent seasonal importance, a higher density and magnitude of importance.

A hunting or trapping use area relates to interconnection to the living and spiritual beings in the area, their use in and about the area, and the seasonal importance to both Tahltan and the beings can be larger in influence than the use area on a map or in a report.

3.4.1. TAHLTAN ANCESTRAL STUDY (TAS)

Tahltan Knowledge is both spatial and non-spatial with linkages between knowledge sources. It provides strong information on ecological themes within ancient, historic, current, and future settings.

TAS is a study based on map-based interviews with Tahltan elders carried out over a number of years, beginning in the early 1980s and is confidential. Tahltan Knowledge Agreements, with legal protections on its use and ownership, are required by all parties to be able to access the information. The information contained in these interviews is now available in a geographic information system (GIS) database, supplemented with data from an ethnographic/historical literature review.

TAS provides a solid basis for the land use and occupancy component of Tahltan Knowledge; and also has good information relating to Tahltan Knowledge about the environment.

It is a complex source of knowledge and Tahltan are in a good position to use this complex information to support land and resource management by the Nation.

Tahltan Ancestral Study information was compiled and is included in the Tahltan assessment information. Tahltan Knowledge is sensitive and confidential and is not part of the public domain, like the EAC Application. Tahltan Knowledge has and is being shared with the proponent through information sharing agreements and Tahltan and the EAO may share knowledge in ways identified in Part 11 of the Declaration Act Agreement.

3.4.2. TAHLTAN LAND USE STUDIES (TLUS)

TCG through a Tahltan Knowledge Protocol Agreement with Skeena Resources, agreed to develop a Tahltan Land Use and Occupancy Study for the Project which was provided in 2020. The TLUS provides confidential and sensitive Tahltan information, in and around the Eskay Creek Mine project located at the headwaters of the Unuk River in northwestern British Columbia. It was developed from Tahltan Knowledge digital information, maps from interviews, community engagement, Indigenous oral histories, ethnographic monographs and field notes, historical documents and archaeological reports. The report provides evidence of Tahltan use of the region from ancient times up to the present.

The report is not part of the public domain, and remains confidential as it contains sensitive Tahltan Knowledge.

It is a component of Tahltan Knowledge being applied in the Tahltan Risk Assessment.

3.4.3. TAHLTAN ECOLOGICAL KNOWLEDGE

Information on Tahltan ecological values, with a focus on the values identified in REAA Sections 4.2.10 and 4.2.11 were collected as part of compiling Tahltan Knowledge for the environmental assessment. Information from Tahltan Ancestral Study dataset, the Tahltan Land Use and Occupancy Study, socio-cultural assessments, community engagements, and the Tahltan Stewardship Plan are used to support Tahltan assessment

requirements. Where public domain information is available, it is provided in the relevant sections; however, additional information has been provided as Tahltan continued the assessment review with Tahltan communities and members throughout the Application Review, Adequacy Review, and Effects Assessment stages. The potential Tahltan effects and cumulative effects with all the allowable public Tahltan Knowledge and western science information is reported in the TRA.

3.4.4. **ARCHAEOLOGY**

Archaeological sites provide physical, on-the-ground evidence for land use and occupation and time depth. As such, they are an important part of Indigenous Knowledge.

The BC Archaeology and Yukon Heritage Branches maintain databases of archaeology sites and archaeologists working under permit must register all identified archaeology sites with these branches. However, most archaeological sites are unrecorded as only a fraction of the Territory has been surveyed under permit and following alignment with the Tahltan Archaeological Standards.

Archaeological evidence can have significant time depth and provide additional physical evidence of Tahltan land uses and occupancy for the past generations over the Tahltan Continuum.

Archaeological information was collected for the AOIs by THREAT as baseline information to support the Tahltan assessment. Information on the archaeological values are identified by AOI in REAA Section 4.4. In addition, THREAT collaborated with Skeena Resources in reviewing and providing input on archaeology permitting, fieldwork plans, baseline reporting, and REAA Heritage Resources Chapter contents.

Archaeological sites identified in the BC Archaeology and Yukon Heritage Branches databases, were located throughout Tahltan AOIs with the following summary of sites:

1. Regional - 100 known sites
2. Low Elevation – Iskut River – 61 known sites
3. Low Elevation – Unuk River - 11 known sites
4. Low and Upper Elevation – Oweegee – 11 known sites
5. Upper Elevation – More Creek – 6 known sites
6. Upper Elevation – Zippa Mountain, Upper Bell-Irving River, RN Mountain – 2 known sites
7. Upper Elevation - Consent Area and Mountain Pass-Prout Plateau – 13 known sites
8. Upper Elevation – Project Footprint – 5 known sites
9. Cumulative Effects – 387 known sites

3.4.5. **CURRENT USE AND MANAGEMENT OF TAHLTAN TERRITORY**

Tahltan Knowledge is not static and needs updating on current uses to support Tahltan governance as elaborated on below. For EA processes, this is required to add to the knowledge set and support identifying additional current and future uses for the area.

This can be accomplished under additional knowledge collection through Tahltan Knowledge processes, or as part of socio-cultural assessments.

As identified in the above sections, continued Tahltan Knowledge collection has occurred for the EAC Application through the development of a Tahltan Land Use and Occupancy Study in 2020; the Tahltan Stewardship Plan development process with communities and members; knowledge gained through TCG department programs such as land use and harvesting/gathering surveys; knowledge gained through ongoing regulatory reviews with other major projects in the Nation; and through review of the existing knowledge datasets.

The Tahltan Stewardship Plan is an endorsed Tahltan plan, a public version will not be available until later this year, but the management directions are being applied in our assessment. The directions provide additional support and guidance with the Tahltan Risk Assessment Factors and Sustainability Principles. To assist in advancing Tahltan Assessment information, a limited copy of the plan was shared with Skeena Resources during the Application

Review Stage and prior to the release publicly later this year. It is not included with the Application at this time, with further information to be included in the Tahltan Risk Assessment, where applicable.

An aspect of considering current use and management activities is the recognition of the relationship of the land, water, creatures, and Tahltan people. Where permanent or temporary barriers (both direct and indirect) exist to one being, it has an effect on all. An issue that frequently comes up in connection with resource development in general is access. Tahltan have indicated that once a resource development project was put in, access becomes closed or restricted. An example is with Eskay Creek Mine, Coast Mountain Hydro, commercial forestry, and other projects in the area using the industrial roads originating in the Bob Quinn area, access to the lower Iskut by way of Highway 37 was closed/restricted. Prior to the development, the area was used often for hunting and gathering. Closing access to the land presents a barrier to practicing the exercise of traditional land use activities and way of life.

Potential effects on the availability of wildlife and łuwe (fish) are also a significant possible barrier. Ensuring the land and waters are capable of supporting viable łuwe (fish) and wildlife populations is critical for the future of Tahltan culture and traditional practices. Closing access to the land presents barriers to multiple Tahltan values if not mitigated.

Examining barriers and conditions within this context helps to understand the environmental setting and human footprint, along with the Tahltan way of life and its fulfillment. This include the sensory, familial, social, and visual elements, as well as the impact of the non-Tahltan human footprint, which can aid in assessing past conditions and their relation to current conditions and necessary requirements for future conditions.

3.4.5.1. ANCIENT AND HISTORIC KNOWLEDGE

TCG has collaborated with Skeena Resources on collecting information on past resource development activities and human footprints in predominately historic times (7 generations), and where available a longer back cast of up to 15 generations. This includes the materials identified by Skeena Resources in the relevant chapters and additional Tahltan public materials identified in the REAA.

3.4.5.2. CURRENT AND FUTURE USES KNOWLEDGE

TCG has collaborated with Skeena Resources on collecting information for recent and current resource development activities and human footprints in a shorter time frame (1-3 generations), and as part of the ongoing internal work on the Tahltan assessment for future uses of the land. The information is being used to support these assessment requirements and it includes the materials identified by Skeena Resources in the relevant chapters.

Determining the existing conditions for non-Tahltan footprint and engagement was relatively straight forward. There is a spatial component where the existing human footprint is assessed using all information available. The non-spatial component is assessing the existing, and potential barriers to Tahltan. It included determining the ability of Tahltan to meet way of life, the current health of the land and Tahltan relationship with the land, the ability to recover/reclaim the land for future generations against the potential effects, mitigations, and reclamation strategies.

Some of the measures used for existing and future conditions relate to the inability to:

- Use areas due to clearing, industrial development, or habitat fragmentation;
- Lack of access to harvest or gather as in the past (e.g., ebaldzē (mushrooms), kedā (moose), jije (berries));
- Changes in access and non-Tahltan densities having influence in being on the land, land uses, harvesting and/or gathering practices;
- Drink water from streams and water sources;
- Visual, smell, and audible disruptions practicing way of life;
- Not being able to use existing areas and having to go farther to meet Peaceful Enjoyment and way of life needs;
- The importance of visiting (Kotah) and the inability to visit areas to pass along sense of belonging, connection and the spiritual and cultural identify of keyeh through teachings on the land; and

- To share the land with family in the way to support sharing and learning Tahltan way of life with children and grandchildren and share learnings for their future uses.

3.4.5.3. SYNTHESIS OF TAHLTAN KNOWLEDGE FOR AREAS OF INTEREST

Tahltan Knowledge for the project has been compiled, and where gaps are identified additional knowledge has been sought.

To support the synthesis, Tahltan have been following the guiding principles of Tahltan stewardship, which are based on Tahltan worldview. Tahltan worldview understands the reality of the world in a very different manner than what is presented by modern science. We recognize, however, that many disciplines within science have shifted considerably over time. This is especially the case with regard to understanding the natural environment, owing to the development of ecology over the past 100 years. Ecological science has come a long way towards adopting more Indigenous understandings of nature.

For this reason, it is helpful to compare the principles of Tahltan stewardship with some of the principles of ecosystem- based management, which does not focus on single species but on ecosystem relationships, that is to say, on the interconnections between the land, waterbodies, air and all living and non-living beings, including human communities.

The principle of kinship recognizes the interconnectedness between all things. This is fundamental to the ecosystem-based management principle of integrated management, and requires a stewardship approach for environmental assessments and regulatory reviews of resource development and other human activities. Interconnections must be accounted for across spatial and temporal scales, so short-term, long-term, and cumulative effects of land use must be considered. The land as a whole and each of its parts must remain healthy to ensure ecosystem resilience and integrity.

The principles of respect and Ahʔī, which are really two sides of the same coin, require a precautionary approach. Land uses and development can have unexpected and adverse consequences for the land itself and the living and non-living beings dependent upon it. For this reason, developments which pose a threat of irreparable environmental damage are not consistent with Tahltan Sustainability Requirements (Principle 1 of the Tahltan Resource Development Policy).

The scales of assessments are identified by the AOIs where cumulative effects, regional, and landscape AOIs have been identified. Site specific features are included within each of the landscape AOIs and are included within the Tahltan assessment requirements. The updating of the EAC Application during the Application Review stage, and Revised Application stage has attempted to summarize the sensitivities and concerns with values at each scale both singularly and together; sacred or sensitive areas; connectivity features across scales and values; and summarizing Tahltan management directions for the identified areas and values based on the directions, law and stewardship rules, Tahltan land use plans, and community directions. As this is the first of Tahltan Assessments to come in the Nation, approaches being used will be adjusted for future applications and with the lessons learned from this review.

The outcomes presented is part of the public foundation to support Tahltan undertaking the Tahltan Risk Assessment and is intended to support Tahltan considerations in making decisions on the project.

3.4.6. **TAHLTAN SOCIO-CULTURAL ASSESSMENTS**

Socio-cultural assessments are a critical component of a Tahltan Risk Assessment as they provide information across the Tahltan Continuum; directions on potential singular and cumulative effects; and identification of existing Tahltan social and cultural barriers to the land and Tahltan way of life.

TCG participated in a country food baseline project with Skeena Resources, and was involved in a regional socio-economic baseline project led by Skeena Resources and Newcrest Mining Limited. Results from the projects are reported by Skeena Resources in the REA Application and baseline reports.

During the Application Review, Adequacy Review, and Effects Assessment stages, further social baseline information was collected with Tahltan communities through ongoing environmental assessments include issues of community revitalization and the barriers that the communities face with:

- Declining populations in-territory
    - Young-adults and young families were the demographic that tends to leave the territory at the highest rates;
    - Aging population creates pressure on local services and infrastructure;
    - High paid mining jobs can enable people to move away from the territory, contributing to a decline in population; and
    - Attracting skilled workers with communities struggles to attract and retain skilled workers to provide essential services, which can impact living conditions.
- Community infrastructure and housing declines or decreased availability are factors with people leaving the territory, poor health conditions, and attracting/holding skilled workers in the communities. This is linked to declining or poor medical/mental health/emergency services.
- Transportation was identified related to the problems with increased road traffic creating higher potential accidents and declining road conditions/maintenance.
- Other factors identified issues with language revitalization, revitalization of cultural/traditional practices, particularly through harvesting, hunting, and culture camps, and rising costs are creating greater food security issues with community members.

In addition, through Tahltan engagement (Section 5) provides additional socio-cultural Tahltan Knowledge being considered with the TRA.

3.4.7. APPLICATION INFORMATION REQUIREMENTS

Tahltan provided guidance and directions through a number of approaches to support Skeena Resources in their development of the Application in a transparent and administratively fair process, consistent with the DAA. The guidance and direction has been shared with EAO, and BC Ministries of Environment (MOE) and Mining and Critical Minerals (MCM).

The initial guidance is through the DAA and the Tahltan *Impact Assessment Policy* (2022), where definitions; processes; roles and responsibilities; timelines; and relationships to provincial environmental assessment and regulatory processes are provided in these documents.

In addition, guidance was provided through the Early Engagement and Readiness Decision stages of the assessment through Tahltan participation, engagement, and TCG's Readiness Decision.

The Process Order followed this stage and was issued in April 2023, which included:

- Schedule A, Scope of Proposed Project and Environmental Assessment
- Schedule B, Assessment Plan
- Schedule C, Hybrid Application Information Requirements (AIR)

The Process Order is the legal document which the Skeena Resources EAA is evaluated against in the TRA and EAO Assessment Report to support each government's decision on the Project. The Assessment Plan (Schedule B) includes:

- The procedures for the EA and TCG's Risk Assessment, including requirements of the *Declaration Act Consent Decision-Making Agreement for Eskay Creek Project* (Declaration Act Agreement);
- A description for each of the three remaining phases of the EA, which are Application Development and Review; Effects Assessment and Recommendation; and Decision related to each assessment requirements; roles and responsibilities, engagement, information requirements, and deliverables.

The Hybrid AIR (Schedule C) provides specific guidance for developing the Application for both TCG and EAO respective assessment processes. Chapter 2 provides the guidance on the Tahltan Assessment process and information requirements in the below sections:

- Background (2.1);
- General Guidance for Tahltan EA Requirements and Hybrid AIR (2.2)
- Government Roles and Decisions within a Hybrid Environmental Assessment Substituted Process (2.3)
- Section 7 Consent, Tahltan Governance Decisions, and Application Information Requirements (2.3.1); and
- Interpreting and Applying Hybrid Application Information Requirements (2.7) .

Chapter 4 Tahltan Application Information Requirements in the Hybrid AIR provides detailed guidance and direction on the Tahltan Assessment, and the directions the proponent was to follow in preparing the Application.

During the Application Development and Review stage, there was numerous opportunities both bilaterally with Skeena Resources and trilaterally with EAO, where TCG provided input and reviews of the Application Information materials (see EAO Environmental Assessment Report; sections 5-8 of this report) , including the 861 comments on the Application. Skeena Resources responded to all of these comments, including where changes to the Application were to occur in the Revised Application; were closed by TCG based on Skeena Resources responses; or identified, by TCG, as Potential Tahltan Conditions (181 conditions further refined under batching and review to be approximately 50 grouped under 15 Tahltan Values) to be considered under the risk assessment. The summary of these questions, concerns, and uncertainties with the Application, including both Tahltan community feedback and Tahltan technical feedback, is documented in *Application Review Issues Tracking Table* and the *Eskay Creek Revitalization Project Joint Notice Regarding Application Review* issued on February 20th, 2025, by TCG and EAO.

During the Application Review stage, Skeena Resources determined, after two rounds of technical review, to table a project optimization design related to water management and modelling on December 12th,2024 with technical details to be provided in January and February 2025 (Technical Memo 68). This resulted in revisions to the application with the detailed technical results expected to be delivered within the remaining 49 days of the 180 Application Review Stage of the environmental assessment.

During the Application Review period, several water optimization technical submissions were delayed, creating challenges in ensuring sufficient time for comprehensive technical review by all parties. Several of these submissions were delivered later in the review timeline, with some arriving after the formal review period had concluded. These delays affected the ability to finalize the Application within the legislated timeframe.

In response, the Tahltan Central Government (TCG) and the Environmental Assessment Office (EAO) worked collaboratively with Skeena Resources to establish a reasonable process for receiving and reviewing outstanding content after the close of the Application Review Stage. This included aligning efforts with the ongoing closure pathway assignments for comments received up to that point.

The *Joint Notice Regarding Application Review* reflected the completion of the 180 day Application Review phase of the Environmental Assessment for the Eskay Creek Revitalization Project. The contents of this Notice included:

- An overview of the feedback, the questions, concerns, and uncertainties TCG received from Tahltan communities during community engagement sessions;
- An overview of the questions, concerns, and uncertainties related to technical and Tahltan reviews of the Application, including the potential effects to Tahltan;
- An overview of the feedback the EAO received from the public during the public comment period, including feedback received from the Community Advisory Committee;
- The EAO's and the TCG's direction to Skeena Resources respecting the next steps in the EA process.

Skeena Resources was provided direction on updating the Application materials and resolving issues and outstanding gaps to support development of a Revised Application.

After the Application Review stage was completed, Skeena Resources had up to a year to address the items in the Joint Notice and submit a Revised Application. Skeena Resources identified it was working to submit a Revised Application by mid April 2025 (approximately 8 weeks). This resulted in the ongoing review of technical submissions related to the potential effects to groundwater, surface water, water quality, fish and fish habitat, and the interconnected Tahltan Values into early April. In addition, over the 8 weeks, TCG worked with Skeena Resources and EAO on assigning closure pathways for comments to determine if they were closed, updated in the Revised Application, a follow up commitment, carry forward to permitting, a potential EA condition, or a potential Tahltan condition.

Between December 2024 and March 2025, TCG engaged with Tahltan communities to share information about the Application, gather feedback on the proposed project, and incorporate additional Tahltan Knowledge and guidance into the assessment process. Further details related to socio-cultural information, potential effects, and proposed mitigations are provided in Sections 4.3, 4.4.9, and 4.4.10 of the REEA.

At each round of community meetings, TCG distributed information packages to ensure members had time to review project materials from Skeena Resources, as well as TCG's assessments and proposed mitigation measures. In support of ongoing transparency and accessibility, TCG finalized an internal website and other digital media tools to provide members with continued access to relevant information as the assessment transitions into the Tahltan Risk Assessment stage.

The delivery of new and revised information related to water optimization sections and chapters—alongside the technical reviews of these materials, Skeena Resources' responses, and the extension of reviews beyond the legislated Application Review period—required additional time and effort. Additionally, the process of assigning closure pathways to technical comments further constrained the timeline. As a result, TCG did not have sufficient time to complete a comprehensive review of Skeena Resources' technical methods, baseline conditions, and potential singular and cumulative effects, integrated with Tahltan Knowledge, in alignment with the expected timeline for the Revised Application submission.

This necessitated additional time for TCG to update REAA Chapter 4 following the Revised Application submission. From TCG's perspective, the priority was to support the delivery of Skeena Resources' Revised Application, engage with Tahltan communities, and advance the closure pathway process—efforts that collectively enabled the initiation of the 45-day Adequacy Review period.

Skeena Resources formally submitted their Revised Environmental Assessment Application (REAA) on April 15, 2025, commencing the 45-day Adequacy Review period. The Adequacy Review was led by the TCG Lands Director with support from THREAT where technical reviews and recommendations were required to assist in making the May 31st decision using the following criteria:

- Compliance with the Process Order;
    - Review of the technical material against the Process Order, Hybrid AIR, and Assessment Plan;
- Whether the EAO and TCG information requirements have been met with the review of the RA against;
    - Review of the Joint Notice Regarding Application Review;

    - Review of the ITT related to closure pathways and revisions made in the RA;
    - Whether TCG's information requests have been met;
    - It could also include identifying additional information requirements relating to new sections of the revised Application(both TCG and EAO can submit IR's to Skeena within this scope) ;
- Whether the baseline information and/or contingencies set out in the Revised Application meet the confidences of TCG and the EAO;
    - an opportunity to identify any baseline information or technical contingencies in the revised Application that are either (a) unreliable, or (b) incomplete to technically assess whether it is able to complete the Tahltan Risk Assessment or make an informed decision about the Project;
    - More general issues relating to the quality of the baseline information and contingencies can be addressed in the Tahltan Risk Assessment;
    - Concerns raised at this stage should be focused on actual gaps rather than concerns with quality;
- if the Application accurately captures the current technical knowledge for the Project and study areas;
- whether the Application or revised Application has adequately incorporated Tahltan Knowledge;
    - This was completed in review of socio-cultural effects assessment, Tahltan Technical Advisors review and input, community and member reviews and feedback of the project, and review of the use of publicly available Tahltan Knowledge using a similar scope and perspectives for the technical reviews;
- whether the Application or revised Application addresses the decision-making requirements of TCG, the Province and, if applicable, Canada; and
    - This will be determined by the Lands Director based on the decision-making requirements being finalized for the DAA, feedback from THREAT, community and member feedback. This will be done in collaboration with EAO, and where applicable, IAAC.

Generally, with the support of THREAT, community engagement feedback, and Tahltan Knowledge, the Lands Director agreed with the EAO that while there are still uncertainties with:

- Potential effects related to alternative assessment, water management, mine components, reclamation and closure, terrestrial and aquatic ecosystems, air quality, human health, fish, wildlife, ecosystems, CFUTLP, QEL, and heritage and the interconnection with land, water, fish, wildlife, plants, and Tahltan way of life;
- interpretations, risks, and uncertainties with these items including the lack of field verification and with items such as groundwater and surface water, information gaps with monitoring sites in key areas such as hydraulic containment of the TMSF, MRSA, and Open Pits adding to the potential seepage issues, and water quality issues. In addition, the current water treatment approach is resulting in water treatment into perpetuity which is inconsistent with sustainability requirements;
- THREAT provided summaries of these matters on Human Health, Socio-Economic, Socio-Cultural, Air Quality, Fish and Fish Habitat, Geochemical Source Terms, Geotechnical, Groundwater, MLARD Management Plan, Surface Water, and Alternatives Assessment with additional items summarized for Wildlife and Wildlife Habitat, Heritage Resources, Current and Future Uses of Land and Resources for Traditional Purposes (CFULTP), and Quiet Enjoyment of Land (QEL) for the Adequacy Review;
- While there are these concerns, including design or the method of mining, the technical information does appear to capture the current knowledge of the Project and the baseline information required for Adequacy;

- The technical reviews were not intended to address THREAT perspectives and understandings of the uncertainties, potential effects, mitigations, and outcomes but to focus on the directions provided above;
- To assist with review of the Tahltan Knowledge incorporation component of the Adequacy Decision, the information provided by TCG as member information packages, including community and member feedback, and the information reported in the Joint Notice Report was used with the above criteria to support the recommendation on the matter;
- As this is the first such assessment for Tahltan, the evaluation of Tahltan Knowledge is an area where future assessments can build upon. Past environmental assessments in the Nation occurred under the older provincial and federal legislation where this was considered;
- Skeena Resources provided summaries of the effects by Tahltan Common Values and in additional relevant chapters in the Application. For REAA chapters 12-27, a dedicated section for each chapter provides the summary of the potential effects, including positive, negative, and cumulative effects with Tahltan Knowledge weaving to support the Application Review stage and the Tahltan Assessment;
- TCG and Skeena Resources entered into a Tahltan Knowledge Agreement and TCG provided a Tahltan Land Use and Occupancy Study that Skeena Resources has used, after receiving consent from Tahltan, to support the development of the REAA. Publicly available Tahltan Knowledge has been included on Tahltan way of life in the project area, past and current conditions, reporting on the barriers to Tahltan, existing conditions on Tahltan Values in the public reporting, and with some chapters, it has extended into the potential effects on Tahltan values. For each chapter which included Tahltan Values, Skeena Resources, as identified in the Hybrid Air and Assessment Plan, provided their perspectives on the potential effects to the Tahltan Core Priorities and Sustainability Requirements. Finally, in the REAA, there are consistent approaches with Tahltan language, oral histories, governance recognition, and recognition of foundational documents (e.g., 1910 Declaration, 1987 Resource Policy, 2003 Out of Respect);
- Overall, there is a stronger presence of Tahltan Knowledge, Tahltan information respecting the Tahltan Continuum, recognition of Tahltan foundational documentation and governance, Skeena Resources capturing community feedback during public sessions, and building mitigations to address community socio-cultural concerns and barriers to Tahltan. Skeena Resources also reported Tahltan perspectives of the potential effects from the project with the interconnected relationship of land and people and identified reported uncertainties by Tahltan. The inclusion of the Quiet Enjoyment of Land as a chapter is a new approach and the chapter is attempting to bridge the relationship of the spiritual connection of the land with the legal criteria of loss of land and access, creating potential effects on current and future generations from the project; and
- Skeena Resources collaborated with TCG on the use of Tahltan Knowledge, followed Tahltan directions on its use and interpretation, and has been transparent in its use in the REAA. Where there has been some limitations is a stronger connection of Tahltan Knowledge into the potential effects and mitigations, where greater understanding of the interconnections of aquatic and terrestrial values with Tahltan way of life and traditional practices will come through the Tahltan Risk Assessment.

C. Pritty, TCG Lands Director and D. Grace EAO Project Assessment Director formally accepted the Revised Application (REAA) which commenced the 150-day Effects Assessment Stage resulting in decisions by both governments on the Project in the fall of 2025.

3.4.8. **METHODOLOGY**

A Tahltan Risk Assessment is initiated

A project is proposed within Tahltan Territory and a Tahltan Risk Assessment is initiated

STEP 1: What is the condition of Tahltan lands, culture, and communities?

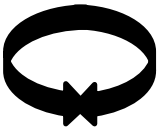
Identify Scales of Assessment

Scales of Assessment are identified across the Tahltan Continuum and across: (a) regional scales, (b) cumulative effects scales, (c) landscape scale, (d) site scales, and (e) project footprint scales

Identify Tahltan Values and connections between them

Tahltan Values are identified across the Tahltan Continuum and across the Scales of Assessment. They can include: (a) social, (b) seasonal, (c) cultural, (d) environmental, (e) economic, and (f) cumulative values.

A temporal scope for each Tahltan Value is identified across the Tahltan Continuum. Tahltan Values and the connections between them can be grouped to help identify the AOIs.



Identify Areas of Interest

AOIs are identified across the Scales of Assessment. They can be in relation to: (a) family areas, (b) head family territories, (c) sacred areas, (d) place names, (e) ethnographic and Tahltan history, (f) archaeology, (g) cultural areas, (h) settlement and assembly areas, (i) harvesting and gathering areas, (j) environmentally sensitive areas, (k) trade areas, (l) warfare and boundary areas, and (m) any Consent Areas identified in a Declaration act Agreement.

Describe the condition of the AOIs

Assess and describe the condition of the AOIs, taking into account:

(a) the current distribution, density, sensitivity, uniqueness, abundance, and status of the Tahltan Values across the Scales of Assessment and the Tahltan Continuum

(b) a back-casting approach and identifying trends, including the pace and scale of development

(c) existing designations/management directions as set out in the Tahltan Stewardship Plan (TSP) and the extent to which there are existing violations of these designations/management directions

(d) the Tahltan Core Priorities

(e) Tahltan Knowledge, and

(f) the views of Tahltan members

Answers the question: How are Tahltan lands, culture, and communities in each AOI?

Tahltan perspective

Tahltan Continuum

Ancient-historic-current-future conditions are considered, and a trend is established from ancient to future

STEP 2: What are the expected project effects on Tahltan lands, culture, and communities?

Identify expected project effects

Assess the expected positive and negative effects from the proposed project on Tahltan Values at site specific, landscape, cumulative, and regional scales and describe per AOI taking into account:

(a) TCG policies including the 1910 Declaration, the Tahltan Resource Development Policy, and the Tahltan Impact Assessment Policy (including the interconnected key principles set out at section 9.2 of the Tahltan Impact Assessment Policy)

(b) the Tahltan Stewardship Plan and Tahltan Stewardship Principles

(c) the Tahltan Core Priorities

(d) Tahltan Knowledge

(e) potential cumulative effects

(f) whether Tahltan has confidence in the application submitted by the proponent, and

(g) the views of Tahltan members.

Answers the question: What are the expected positive and negative effects from the project to Tahltan lands, culture, and communities?

Tahltan perspective

Tahltan Continuum

STEP 3: How severe could the effects from the project be?

Assess how severe the project effects could be

Assess the severity of expected negative effects from the project for each AOI, taking into account:
(a) the Tahltan Significance Factors (this is the criteria set out at section 9.22 of the Tahltan Impact Assessment Policy)

(b) the views of Tahltan members

(c) the proponent's proposed mitigation measures

(d) uncertainty, including by considering confidences, contingencies and risks, and

(e) whether the Tahltan Core Priorities are met.

Specific Tahltan Values may be assessed individually when warranted, but otherwise the assessment will be at the AOI level, organized by Tahltan Core Priority.

Answers the question: How severe could the expected negative effects from the project be to each AOI?

Tahltan perspective

Tahltan Continuum

STEP 4: What are the overall project effects to Tahltan lands, culture, and communities?

Initial determination of the overall significance of project effects

Assess the overall significance of effects from the project taking into consideration:

(a) the severity of expected negative project effects for each AOI

(b) expected positive project effects, including proposed accommodation measures including any social, cultural, economic benefits or legacies from the project

(c) the Tahltan Risk Assessment Factors

(d) the Tahltan Sustainability Requirements, and

(e) the views of Tahltan members.

In reaching this initial determination, the expected positive and negative effects from the project will be weighed against the Tahltan Risk Assessment Factors and the Tahltan Sustainability Requirements?.

Answers the questions: Is the project likely to cause significant effects to Tahltan lands, culture, and communities?

Tahltan perspective

Tahltan Continuum

STEP 5: Are further mitigation measures or terms and conditions needed for the project to address project effects?

Identify any further mitigation, terms and conditions

Assess whether any changes need to be made to the proposed mitigation measures or anticipated project conditions to address project effects.

Assess whether any Tahltan terms and conditions need to be added to the project to address project effects.

Answers the question: What, if any, further mitigation measures or terms and conditions are needed to address project effects?

Tahltan perspective

Tahltan Continuum

STEP 6: Conclusion

Final determination of the overall significance of potential effects from the project

Taking into account any mitigation, terms and conditions identified at Step 5, what are Tahltan's final conclusions about whether the project is likely to cause significant effects to Tahltan lands, culture, and communities?

Answers the question: If the mitigation, terms and conditions identified at Step 5 are applied to the project, is it likely to cause significant effects to Tahltan lands, culture, and communities?

Tahltan perspective

Tahltan Continuum

3.4.9. **19(4) ASSESSMENT**

Please note until the Tahltan Risk Assessment is a final document, all information provided to support the Tahltan Risk Assessment and 19(4) assessment are without prejudice and draft subject to change.

The 19(4) assessment is tied to the EA Act and pursuant to subsection 19(4) where it states:

> *(4) If a participating Indigenous nation notifies the chief executive assessment officer of the nation's intent to carry out an assessment with respect to the potential effects of the project on the nation and on its rights recognized and affirmed by section 35 of the Constitution Act, 1982, the chief executive assessment officer, in the order made under subsection (2), must specify*
>
> > *(a) the portion of the assessment to be carried out by the nation, and*
> >
> > *(b) the date by which the assessment by the nation must be completed.*

The Eskay Creek Assessment Plan provides EAO direction in Appendix 1on what is required for Tahltan to report on the potential effects of the project on Tahltan Nation and its Section 35 rights (*Constitution Act*, *1982*) for this assessment to be included in the EAO decision documentation. The following are components that are identified to be included in the assessment:

- Supporting Principles – the Tahltan Risk Assessment Report conclusions will inform the Tahltan 19(4) Assessment, it will also be guided by the principles in Part three of the DAA and Section 4.1 of the Hybrid AIR;
- Scope – the scope of the assessment will include all the Tahltan Values and interests identified in Section 4.3 of the Hybrid AIR.
- Areas of Interest – The impacts on Tahltan rights will be assessed using the spatial boundaries identified in the Hybrid AIR (cumulative effects, regional, landscape and site specific scales, project footprint) with finalized boundaries reported in the Revised Environmental Assessment Application (REAA).
- Methodology –TCG will consider the information, using Tahltan methodology, with factors outlined in Section 7.38 of the DAA to report on potential effects and impacts to rights.
- Information Requirements – the information provided by both Skeena Resources and TCG as identified in the Hybrid AIR, which can include additional Tahltan Knowledge shared by TCG, the application of Tahltan Knowledge in the REAA, and the use of the information in the Tahltan Risk Assessment.
- Roles and Responsibilities – TCG and EAO will collaboratively write Part C chapter of the EAO's Environmental Assessment Report that pertains to the potential effects of Eskay Creek on Tahltan and its Aboriginal rights. This work will be consistent the Assessment Plan, DAA, and workplans endorsed through the Collaboration Team.

Based on the requirements in the Assessment Plan the following identifies the structure of current proposed assessment

1. Tahltan Nation
    - 1.1. Introduction
    - 1.2. Supporting Principles
    - 1.3. Scope
    - 1.4. Methodology
    - 1.5. Information Requirements
    - 1.6. Roles and Responsibilities
    - 1.7. Tahltan Assessment
    - 1.8. Proposed Key Mitigations Measures by Skeena Resources
    - 1.9. Key Issues Raised
    - 1.10. Tahltan Conditions Relating to Tahltan Rights and Titles
    - 1.11. Tahltan Conclusions

The information reported in the TRA, including Skeena Resources information, and where applicable, information reported by EAO in the draft Assessment Report will used in developing the submission. EAO will include the submission as part of its Assessment Report and referral package being provided to the Ministers to support a provincial decision on the Project.

4. Project Overview

4.1. PROJECT DESCRIPTION

The following are summaries of the project provided by Skeena Resources in the Revised Environmental Assessment Application (REAA) and reported in BCEAO and Tahltan related documentation and Process Orders. Additional details can be found at the EAO Epic[2] and Skeena Resources[3] websites.

The project is an existing permitted underground mine which has been under Care and Maintenance orders since 2008 (it ceased operations) , it has required ongoing reclamation and water treatment maintenance. Skeena Resources acquired the Eskay Creek Mine in 2020 and commenced the process of determining the detailed feasibility of developing an open pit mine design within the existing mine and transportation permitted footprints. A 2023 detailed feasibility study[3] has identified significant financial expectations of 1.2 year pay back to recover costs; $ 467 million annual profits (after tax), over 2 billion in total profits with the Life of Mine (not adjusted to today's commodity prices, where it is 2-4 times greater), and 43% annual return (after taxes). This is being assessed against the existing and future environmental, social, cultural, economic barriers, negative and positive effects to Tahltan now and for future generations. The economic effects (both positive and negative) are explored in more detail in Section 9 of the TRA.

As Skeena Resources reports in the REAA Chapter 2 (Application Summary):

> *The Project is located within the Regional District of Kitimat-Stikine in what is known to some as the "Golden Triangle" region of northwestern BC, approximately 83 km northwest of Stewart, 265 kilometres northwest of Terrace, and 295 kilometres northwest of Smithers.*
>
> *The Project will be an open pit gold and silver mine using a conventional truck and shovel mining method and will include the development of two open pits: the North Pit, and the South Pit. The estimated total annual production in the Process Plant during Operations will be 3.0 million tonnes of material in Years 1 to 5 and up to 3.6 million tonnes (i.e., approximately 10,000 tonnes per day) of material in Years 6 to 13. These production rates will produce an average of 0.20 to 0.25 million ounces of gold annually, and 5.5 to 7.0 million ounces of silver annually.*
>
> *The area taken up by the Project infrastructure includes facilities that were part of the historic Eskay Creek Mine and those constructed as part of the Eskay Creek Technical Sample Project. Figure A-1 presents these existing facilities, which include:*
>
> - *Material management facilities (including the Technical Sample pit, non-potentially acid generating quarries, and the crushing/screening plant);*
> - *Tailings management facilities, including the Tom MacKay Storage Facility;*
> - *Waste rock management facilities;*
> - *Topsoil/overburden management facilities;*
> - *Water management facilities;*

[2] https://projects.eao.gov.bc.ca/
[3] https://skeenagoldsilver.com/

- *The Eskay Creek Mine Access Road and other roads;*
- *Explosive storage facilities;*
- *Waste management facilities; and*
- *Ancillary infrastructure, such as camps, a helipad, and an assay laboratory.*

In addition, the Project's electrical supply will be from a transmission line, which is being constructed to support the existing Eskay Creek Mine.

The new infrastructure built to support the Project includes:

- *Two open pits (the North Pit and South Pit);*
- *Ore processing and management facilities, including the Process Plant and stockpiles;*
- *Tailings management facilities, including expansion of the existing Tom MacKay Storage Facility;*
- *Waste rock management facilities, including the Mine Rock Storage Area;*
- *Topsoil/overburden management facilities;*
- *Mine Water Treatment Plants;*
- *Tom MacKay Storage Facility South Dam Haul Road and secondary roads;*
- *Power supply facilities;*
- *Waste management facilities; and*
- *Ancillary infrastructure, such as an extension of the existing camp, mine warehouse, and emergency station.*

The Project will have a 18-year Life of Mine from the beginning of its Construction phase, through its Operations phase, to the end of its Reclamation and Closure Phase. This third phase will be followed by the Post-closure phase (Table A-1).

Table A-1: Eskay Creek Revitalization Project Phases and Durations

Project Phase	Duration	Project Years
Construction	2 years	Year -2 to Year -1
Operations	13 years	Year 1 to Year 13
Reclamation and Closure	3 years	Year 14 to Year 16
Post-closure	Continue until conditions in permits are met.	

During the 2-year Construction phase, key activities will include the Construction of Project facilities, the first stage of the development of a North Dam embankment at the Tom MacKay Storage Facility, and commissioning of the Mine Water Treatment Plant. Mining in the open pits will be performed year-round from the beginning of Construction until the end of Year 10, when open -pit development is completed.

Ore will be mined at the Project's two open pits. The Process Plant will process ore to a capacity of 3.0 million tonnes per year in Year 1 through Year 5, and its capacity will be expanded to 3.6 million tonnes in

Year 6 through Year 13. A gold-silver concentrate will then be trucked from the Project site, along provincial Highways 37 and 37A, to existing offsite port facilities in the District of Stewart to be shipped to offshore smelters and refineries.

The existing Tom MacKay Storage Facility will be expanded to permanently store potentially acid generating materials and mine water. The Project will produce approximately 39 million tonnes of tailings and approximately 160 million tonnes of potentially acid generating waste rock and overburden. The Tom MacKay Storage Facility will also function as the primary contact water management facility, and contact water from across the Project mine site will be pumped to the Tom MacKay Storage Facility before treatment and discharge into Tom MacKay Creek.

Waste rock that is not classified as potentially acid generating will be permanently stored in the Mine Rock Storage Area, or used as construction material.

The Reclamation and Closure Phase of the Project will occur over 3 years (i.e., Year 14 to Year 16).Progressive reclamation will begin in the later part of the Operations phase, where practicable, and will continue during the Reclamation and Closure Phase. The goal of the Reclamation and Closure Plan is to re-establish the health of the land and maintain the Tahltan Way of Life at the Project mine site and for surrounding communities. Key activities during the 2-year Reclamation and Closure Phase will include dismantling and removal of facilities, reclamation cover placement and revegetation, and continuing water treatment.

During Post-closure, water treatment at both the Tom MacKay Storage Facility and North Pit will continue until no longer required, and environmental monitoring of the site will continue. The extent and duration of monitoring activities in the Post-closure phase will be established through future regulatory requirements, engagement with Indigenous Nations, and monitoring results.

At the time of this assessment, the current design and development of the project is not fully consistent with all the Tahltan Sustainability Requirements, and currently has water treatment requirements in perpetuity. This is further explored in Section 9.

The Application Summary (Chapter 2) and Project Overview (Chapter 1) report the following overviews in relation workforce estimates:

The workforce estimates by Project phase are presented in Table 1.6-1. Additional information, including breakdowns of full-time and part-time positions, is provided in Section 1.6.1.2, Workforce Estimates – Construction, to Section 1.6.1.5, Workforce Estimates – Post-closure. Accommodations for the workforce in each phase, including occupancy and rotations, is provided in Section 1.4.2.9, Ancillary Infrastructure.

Table 1.6-1: Estimated Overall Peak Workforce by Phase

Project Phase	***Duration***	***Workforce Estimate***	***Total Employment Impact (person-years)***
Construction	*2 years*	*Up to 949 workers*	*1,814*
Operations	*13 years*	*Up to 771 workers*	*6,428*
Reclamation and Closure	*3 years*	*Up to 79 workers*	*130*

Post-closure1	*Continue until conditions in permits are met*	*Up to 8 workers*	*Continue until conditions in permits are met*

Note: [1] Post-closure workforce approximately estimated as 10% of the Reclamation and Closure workforce.

4.2. PREVIOUS OPERATIONS AT THE MINE SITE

Eskay Creek Mine operated as an underground mine from 1995 to 2008, when it ceased operations. It had been under Care and Maintenance orders since 2008, where it has required ongoing reclamation and water treatment maintenance. The following is a description by Skeena Resources (REAA section 1.1.5):

> *The Eskay Creek Mine area has been the focus of considerable exploration activity. From 1935 to 1938, Premier Gold Mining Company Ltd. held the property under option and were responsible for defining 30 zones of surface mineralization in the area. The first adit (i.e., a horizontal underground tunnel used to access an orebody), MacKay Adit, was driven in 1939, followed by a period of exploration respite during World War II in 1940 to 1945. In 1946 through 1963, some minor work was completed on the property, such as claim re-staking and changes in claim title.*
>
> *In 1963, Western Resources Corp. drove the Emma Adit, and in 1964, the property registration changed to Stikine Silver Ltd. Exploration continued through to 1987, where seven different options were undertaken on the property. In 1986, the company was renamed Consolidated Stikine Silver Ltd.*
>
> *In 1988, Calpine Resources Inc. entered into an option agreement with Consolidated Stikine Silver Ltd. And conducted exploration drilling, which led to the discovery of the deposit that would become the historical underground Eskay Creek Mine. In 1989, Prime Resources Group Inc. acquired a controlling interest in Calpine Resources Inc, which later led to a merger of the two companies in 1990. At the same time, Homestake Canada Inc. acquired an equity position in Consolidated Stikine Silver Ltd. and eventually acquired the property. Further underground exploration began in 1990, and after a feasibility study that was completed in 1993, the Eskay Creek Mine was officially opened in 1995 as an underground operation.*
>
> *Homestake Canada Inc. operated the mine from 1995 to 2001 and continued exploration on the surrounding claims. In 2002, Barrick Gold Inc. assumed control of the Eskay Creek Mine through a merger with Homestake Canada Inc. Barrick Gold Inc. continued mining operations and exploration until the mine closed in 2008. Over its 14-year mine life, approximately 2.2 million tonnes of ore were mined, with cut-off grades ranging from 12 grams per tonne (g/t) to 15 g/t gold equivalent for mill ore and 30 g/t gold equivalent for direct ship smelter ore (Ausenco 2019).*
>
> *The Eskay Creek Mine has been in Care and Maintenance since 2008 when mining operations ceased, with ongoing site reclamation (since 2007) and treatment of water (up to 2014, when required) from historical underground operations. In 2011, the Eskay Creek Mine was considered a 'Recognized Closed Mine' under the federal Metal Mine Effluent Regulations (MMER; now the Metal and Diamond Mining Effluent Regulations [MDMER], SOR/2002-2222) of the Fisheries Act (RSC 1985, c F-14). Under the BC Mines Act (RSBC 1996, c 293), the Eskay Creek Mine has several valid Mines Act (RSBC 1996, c 293) permits and is considered to be in Care and Maintenance with ongoing exploration since 2018.*
>
> *Skeena Resources acquired the Eskay Creek Mine from Barrick Gold Corporation's wholly owned subsidiary, Barrick Gold Inc., in August 2020. In November 2021, Skeena Resources initiated the process to amend existing permits to authorize collection of a technical bulk sample of ore in 2023 (Skeena Resources 2024) to establish the metallurgy and processing studies required to advance to the full development of the Eskay Creek Revitalization Project. In December 2024, Skeena Resources received authorization for the Technical Sample under the amended Mines Act (RSBC 1996, c 293) Permit M-197 (M-197) and amended Environmental Management Act (EMA) Permit PE-10818.*
>
> *Skeena Resources registered a subsidiary company in British Columbia, Eskay Creek Mining Limited, in July 2024 for the Eskay Creek Mine. Eskay Creek Mining Limited is wholly owned by Skeena Resources, and Skeena Resources remains the administrative company.*

Tahltan have a long and complex history with the Eskay Creek mine, encompassing both historical involvement and evolving relationships with mining companies over historical and current times. While the Tahltan have a long tradition of resource management and mining in our territory, including prospecting for obsidian and supporting miners during the gold rush, the Eskay Creek mine represents a more modern and evolving relationship.

Tahltan members have a history of working at the underground mine, and many members reflected on their past experiences at the underground mine during community engagements. Many identified the work as being their initial experience at a mine site, the employment and benefits with the project; and many identified how they were able to be on the land, harvesting, and gathering while on the mine site and access road on their own time.

Tahltan were joint venture partners with Ledcor Joint-Venture Partnership to build 68km road into mine site, camp construction, site work, mill construction, earthworks, long term road maintenance contract and with 42% of all employment in lab, mill, surface, maintenance shop, underground work. These were significant outcomes from this relationship; however, at the time of operations, there were no Impact Benefits Agreements or revenue sharing, so the economic benefits were much more limited that today's situation, where direct employment or contracting opportunities were only available to members and the Nation from the proponent or the provincial government. It is another example of revenue and benefits leaving the Nation from resource development.

4.3. THE PROPONENT

Skeena Resources has shown commitments in advancing Tahltan governance and decision-making through supporting Tahltan and the Province entering into the first consent-based decision-making agreement under the *Declaration on the Rights of Indigenous Peoples Act*. Eskay Creek will be the first mining project to be authorized for its Environmental Certificate by the Tahltan Nation undergoing a full environmental assessment.

The relationship with Skeena Resources, has existed since 2017 at a company wide level including all its corporate interests, just not Eskay Creek Mine. This included the transfer of the Spectrum Properties where Tahltan Central Government, the Province, Skeena Resources, the Nature Conservancy of Canada, and BC Parks Foundation worked in partnership to create the Tenh Dz̲etle Conservancy in 2021. This included the Tahltan Nation investing $5 million in Skeena Resources, becoming equity shareholders in the company. This investment was facilitated by the province and other partners to support the establishment of the Tenh Dz̲etle Conservancy.

Currently, Skeena Resources and TCG have been exploring Impact Benefits Agreement, and bilateral commitments to aid in the delivery of the Tahltan Risk Assessment. In addition, Tahltan have been exploring benefits, revenue sharing, infrastructure, services, and other items with the provincial government to support addressing the socio-cultural, environmental, and economic items identified in this report.

5. Results of Tahltan Engagement

5.1. SUMMARY OF TAHLTAN ENGAGEMENT

Throughout the EA process, the Tahltan Nation has been in constant communication between Skeena, the EAO, and our members. The Tahltan Nation has had over 100 virtual and in-person meetings with Skeena, which included:

- Weekly meetings between Skeena and TCG's Tahltan Heritage Resources Environmental Assessment (THREAT) Team. Weekly meetings helped to identify issues that required more focused attention, which sometimes led to topic-specific workshops, such as:
    - Inclusion of Tahltan Knowledge (what, how, and where);
    - Tahltan technical review;
    - Tahltan Application Information Requirements; and

    - Engagement planning and activities with the Tahltan community.
- Meetings in advance of all Technical Advisory Committee meetings (TAC)
- Technical workshops for two-way knowledge sharing and collaboration on the development of the EAC Application
- 23 community open houses and presentations by Skeena and the EAO to the Tahltan community
- Other meetings between Skeena and Tahltan Nation and its representatives, as and when requested.

As of April 2025, TCG collaborated with Skeena Resources in the development of the following environmental assessment deliverables and documents, with the majority of the work being technical review, but with some opportunities for scoping and co-drafting, including the following:

- Engagement Plan;
- Initial Project Description;
- Detailed Project Description;
- Hybrid Application Information Requirements;
- Public Engagement Plan;
- Application Development Engagement Plan;
- Indigenous Engagement and Collaboration Plan;
- Draft sections of the EAC Application and technical memos developed in Application Review; and
- Indigenous Engagement Report.

The parties followed and aligned with the Assessment Plan dated April 18, 2023, as issued as part of the Process Order. A breakdown of engagement activities by phase in the EA process follows by phase.

Early Engagement (July 30, 2021, to August 12, 2022)

The Early Engagement phase is a preparatory phase where participants began by discussing the proposed Project to identify engagement approaches, potential interests, issues, and concerns early in the EA process. There is no legislated timeline, and it relied on Skeena to engage with Tahltan, BC, Canada, and other Nations on the Project. It provided up to a year for Skeena to share information, engage, draft Detailed Project Descriptions (DPD) for technical review, and work with all parties on developing a Detailed Project Description.

Engagement between Skeena and TCG began in January 2015 with the initial exploration program. As it became clear that the Project would be progressing to an EA, in June 2021 TCG and the Government of BC agreed to negotiate a consent agreement under the *Declaration on the Rights of Indigenous Peoples Act* (DRIPA), relating to the consent of TCG for specific major projects (Order In Council No. 348). Skeena, EAO and TCG worked together to review the preferred regulatory pathway, and the best course of action was determined to be a Reviewable Project Designation under the BC Environmental Assessment Act. TCG made an application to the EAO in 2021, and in July 2021, the Project was designated under Section 11 of the Act as a Reviewable Project requiring an environmental assessment process under provincial legislation.

In July 2021, Skeena submitted an Initial Project Description to TCG, EAO and the Impact Assessment Agency of Canada (the Agency or IAAC), which officially commenced the Early Engagement stage of the EA. The Early Engagement stage occurred until TCG accepted the Final DPD, and on August 12, 2022, the project proceeded to the Readiness Decision stage of the EA.

In August 2021, the EAO requested that the conduct of the federal impact assessment process be substituted to the province, should the Project proceed to an EA and should an impact assessment be required. The federal Minister of Environment and Climate Change made the substitution decision following the Readiness Decision and

Impact Assessment Determination, pursuant to the *Impact Assessment Cooperation Agreement Between Canada and British Columbia.* In May 2022, TCG wrote a letter to the Agency to indicate support for substituting the impact assessment to BC.

In September 2021, Skeena Resources initiated a Closure and Reclamation Planning Oversight Team with TCG participation and hosted five workshops to initiate the development of an initial broad conceptual Closure and Reclamation Plan. There has been and will be further discussion on future process requirements for reclamation and closure as information becomes available in future permitting reviews. Examples of some of the key outcomes of these workshops include changing the approach/language in the plan from "end land use objectives" to "returning land use objectives", incorporating the reconnection of Tahltan's to the land as a key vision, and planning Tahltan engagement sessions to receive community input on the draft vision statement.

In October 2021, TCG presented Skeena Resources, EAO, and IAAC with the draft Tahltan Application Information Requirements. Skeena Resources subsequently participated in eight meetings and seven workshops related to the development of the Hybrid Application Information Requirements (AIR), which incorporated the Tahltan Application Information Requirements. Additional workshops were held in 2022 to support the regulatory process, including on the topics of:

- Application development roles and responsibilities, requirements for Tahltan Knowledge usage;
- Tahltan Knowledge / Tahltan Values: information availability;
- Selection of spatial boundaries for Tahltan Nation Values Assessment;
- Back casting and forecasting approaches, and the role of modelling;
- Selection of temporal boundaries for Tahltan Nation Values Assessment;
- Methods for Tahltan Nation Values Assessment: holistic approach, mitigation evaluation, effects;
- Characterization and scales of significance;
- Approach to preparing Valued Component (VC) effects assessments as appropriate inputs to Tahltan;
- Nation Values Assessment;
- Approach to Cumulative Effects Assessment: provincial/federal effects assessment and Tahltan Nation; and
- Discussion on incorporation of Free, Prior, and Informed Consent (FPIC), and the role of engagement.

In June 2022, the parties signed the Declaration Act Agreement setting out the Tahltan environmental assessment and consent requirements for the Project. TCG conducted Community engagement during the week of October 24 to 28, 2022, with sessions held in Iskut (October 25th), Telegraph Creek (October 26th), and Dease Lake (October 27th), with the Dease Lake meeting being open for Tahltan members to participate virtually. Each community session allowed for an internal Tahltan meeting to discuss the Declaration Act Agreement and the Tahltan EA Strategy Framework, followed by the EAO joining in person, and the Agency participating virtually to provide information on their role in the process and next steps in the regulatory reviews.

Readiness Decision (August 12, 2022, to November 18, 2022)

On November 18, 2022, there were a series of decisions that advanced the EA process for the Project:

- The Impact Assessment Agency of Canada (IAAC) determined that Eskay Creek required a federal impact assessment under the *Impact Assessment Act.*

- The TCG Lands Director, after considering community engagement, notified the EAO and Skeena of the decision that the Project should proceed to Process Planning, as required under Sections 7.13 and 7.14 of the Declaration Act Agreement.

- The EAO published the Notice of Readiness Decision Pursuant to Sections 16 and 18 of the Environmental Assessment Act, S.B.C. 2018, c.51.

Process Planning (November 18, 2022, to April 18, 2023)

On November 29, 2022, IAAC approved a substitution for the EA, meaning that the EAO would conduct the impact assessment on behalf of IAAC and fulfill all federal requirements.

In February 2023, the TCG Lands Department held community engagements in Telegraph Creek on February 15, 2023, in Iskut on February 16, 2023, and in Dease Lake on February 17, 2023. These engagements were meant to update Tahltan members and provide an opportunity to ask questions and provide feedback on the EAO Process Planning Documents and Tahltan Risk Assessment criteria. In addition, a mapping workshop captured a number of areas of value including for water, fish, and wildlife habitat, Tahltan rights and way of life, and environmental protection. The communities also discussed questions and concerns about capturing project and cumulative effects with these values through the Tahltan Risk Assessment.

On April 18, 2023, prior to the finalization of the Process Planning phase of the Eskay Creek EA, the TCG Lands Director provided notice to the Chief Executive Assessment Officer that consensus had been achieved on the Process Order and supporting schedules for Eskay Creek. That same day, the EAO issued the Process Order Joint Permitting/Regulatory Coordination Plan under Section 19(2) of the Act. The Process Order and Joint Permitting/Regulatory Coordination Plan provided the procedures and methods for the EA, and detailed the scope of the project, what information must be provided, how the information must be gathered and analyzed, who must be involved, how they must be engaged, and the timing of each of the subsequent phases of the EA.

Application Development and Review (April 19, 2023, to May 30, 2025)

The EAO, Skeena, and TCG held a joint Application Development and Planning workshop in July 2023, establishing the Technical Advisory Committee (TAC), as well as a number of TAC subgroups. The subgroups included air quality, greenhouse gases, archaeology and paleontology, fisheries and aquatics, human health, noise, socioeconomics and visual resources, quiet enjoyment of the land and Current and Future Use of Land and Resources for Traditional Purposes (CFULRTP), wildlife and vegetation, water and geochemistry, alternatives assessment, malfunctions and accidents, soils, reclamation and closure. These TAC subgroups reviewed information packages and held meetings between August 2023 and December 2023.

In January 2024, TCG and Skeena Resources met to discuss alignment of the EAC Application and the Tahltan Information Requirements, as well as means to incorporate Tahltan Knowledge. TCG subsequently hosted a workshop with Skeena Resources on the consideration and integration of Tahltan Knowledge in the EAC Application in April 2024. This workshop is complementary to written guidance provided by TCG to Skeena Resources, and covered topics including: Tahltan governance and stewardship principles, the Tahltan Continuum, Tahltan Sustainability Requirements, Tahltan Risk Assessment Criteria, and topical guidance on quiet enjoyment of land, current and future land and resource use, water, fish, wildlife, plants and ecosystems, heritage, and more.

On August 21, 2024, Skeena submitted the Application for the Project, starting the 180-day Application Review phase. The EAO and TCG collaboratively reviewed the Application pursuant to section 7.27 of the Declaration Act Agreement and decided not to accept the Application. On February 20, 2025, TCG and the EAO provided joint feedback to Skeena by way of a Joint Notice Regarding Application Review report (Joint Notice) and a detailed Issues Tracking Table. This Joint Notice summarized the Application Review Phase activities, and stated that the Application submitted August 21, 2024, was not sufficient, as there were outstanding issues and information requirements.

The first round of in-person community engagements included attendance by Skeena and the EAO in October 8-10, 2024, in the Tahltan communities of Iskut, Dease Lake, and Telegraph Creek, respectively. Additionally, on October 17, 2024, a virtual engagement session was held by TCG, at which Skeena and TCG presented information about the Application Review process to Tahltan membership. Throughout these engagements, Tahltan community members had the opportunity to discuss the findings and predicted outcomes of the Application's contents and

technical review, ask questions, seek clarification and express perspectives related to the positive aspects, negative aspects, and uncertainty and risk around the Eskay Creek Project. The discussions enabled TCG to further gather feedback and membership input to assist in informing TCG's understanding of Tahltan perspectives on the Application.

The TCG also conducted community-only engagements, where community members were provided a comprehensive information package containing materials from the Application and perspectives from TCG technical reviewers, which were developed by the THREAT team. During December 1-6, 2024, TCG hosted a series of multi-day in-person open house sessions in the Tahltan communities of Iskut, Dease Lake, and Telegraph Creek. These sessions were designed to provide Tahltan membership further opportunities in the absence of Skeena and the EAO to review detailed information and facilitate open discussions on the Application through the distribution and review of the TCG Eskay Creek Revitalization Project Information Package.

Members of the Tahltan Elders Council toured the site with Skeena Resources in July 2024 and were provided with a Project update. Tahltan Nation leadership also attended a site tour in October 2024, were provided with an update on the Project, and discussed economic and environmental assessment matters.

On April 14, 2025, pursuant to Section 27(3) of the *Environmental Assessment Act* (2018), Skeena submitted a revised application based on the requirements set out in the Joint Notice and the Issues Tracking Table, and the EAO and TCG worked together to collaboratively review the revised application. A process was put in place for addressing any outstanding requests, and so the EAO and TCG reached consensus that the revised application adequately addressed the Joint Notice and satisfied the requirements under Section 27(4) of the Act. Following the collaborative review, and separate discussions with Skeena about remaining requests, BC EAO and TCG notified each other under Section 7.35 of the Declaration Act Agreement of their respective decisions to accept the Revised Application.

Joint Notice and EAC Acceptance (May 30, 2025)

On May 30, 2025, the BC EAO and TCG sent a letter to Skeena pursuant to Section 7.35 of the Declaration Act Agreement and Section 27(4) of the Act that stated the acceptance of the Revised Application provided April 14, 2025. This acceptance moved the process to the Effects Assessment and Tahltan Risk Assessment phase of the environmental assessment.

Effects Assessment and Recommendation (Ongoing)

During the 150-day EAO Effects Assessment and Tahltan Risk Assessment phase, Skeena will have the opportunity to work with members of the TAC and THREAT on any questions, potential conditions or mitigations identified in the Issues Tracking Table, or additional requests for information that arise regarding the Revised Application as work is conducted on the respective assessments of the Eskay Creek Project.

5.2. HOW TAHLTAN ENGAGEMENT INFORMS THIS REPORT

As detailed in the above section, TCG conducted a number of community engagement events throughout the EA process, both in-person in multiple communities, and virtually. These engagements were meant to help inform the Tahltan Risk Assessment of the Eskay Creek Project through values scoping, reviewing documents from Skeena and the EAO, verifying assessment findings, updating members on the process, and asking questions and expressing perspectives related to the positive aspects, negative aspects, and uncertainty and risk around the Project. These engagements provided Tahltan members opportunities to meet and hear from Skeena and the EAO, as well as having closed Tahltan-only sessions to facilitate open and honest communication. The TCG Lands and Resources Department and the THREAT Team have the obligation to protect the rights of all Tahltan members, and so all feedback was invaluable to informing all aspects of this Tahltan Risk Assessment.

5.2.1. **TAHLTAN SOCIO-CULTURAL ASSESSMENTS**

Socio-cultural assessments are a critical component of a Tahltan Risk Assessment as they provide information across the Tahltan Continuum; directions on potential singular and cumulative effects; and identification of existing Tahltan social and cultural barriers to the land and Tahltan way of life.

TCG participated in a country food baseline project with Skeena Resources, and was involved in a regional socio-economic baseline project led by Skeena Resources and Newcrest Mining Limited. Results from the projects are reported by Skeena Resources in this EAC Application.

During the Application Review stage, further social baseline information was collected with Tahltan communities through ongoing environmental assessments include issues of community revitalization and the barriers that the communities face with:

- Declining populations in-territory
    - Young-adults and young families were the demographic that tends to leave the territory at the highest rates;
    - Aging population creates pressure on local services and infrastructure;
    - High paid mining jobs can enable people to move away from the territory, contributing to a decline in population; and
    - Attracting skilled workers with communities struggles to attract and retain skilled workers to provide essential services, which can impact living conditions.
- Community infrastructure and housing declines or decreased availability are factors with people leaving the territory, poor health conditions, and attracting/holding skilled workers in the communities. This is linked to declining or poor medical/mental health/emergency services.
- Transportation was identified related to the problems with increased road traffic creating higher potential accidents and declining road conditions/maintenance.
- Other factors identified issues with language revitalization, revitalization of cultural/traditional practices, particularly through harvesting, hunting, and culture camps, and rising costs are creating greater food security issues with community members.

In December (1st -6th), 2024, TCG hosted a series of multiday in-person open house sessions in the Tahltan communities of Łuwechōn - Iskut, Tatl'ah - Dease Lake, and Tlēgōhīn - Telegraph Creek. These sessions were designed to provide Tahltan membership further opportunities in the absence of Skeena Resources and the EAO to review detailed information and facilitate open discussions on the Application through the distribution and review of the TCG Eskay Creek Revitalization Project Information Package provided in December.

Throughout these engagements, Tahltan community members had the opportunity to discuss the findings and predicted outcomes of the Application's contents and technical review, ask questions, seek clarification and express perspectives related to the positive aspects, negative aspects, and uncertainty and risk around Eskay Creek. The discussions enabled TCG to further gather feedback and membership input to assist in informing understanding of Tahltan perspectives on the Application.

During March (10th -15th), 2025, TCG hosted a series of multiday in-person open house sessions in the Tahltan communities of Łuwechōn - Iskut, Tatl'ah - Dease Lake, and Tlēgōhīn - Telegraph Creek. These sessions were designed to provide Tahltan membership further opportunities with Skeena Resources being present the first day to facilitate open discussions on the findings and predicted outcomes of the Application's contents and technical review, ask questions, seek clarification and express perspectives related to the positive aspects,

negative aspects, and uncertainty and risk around Eskay Creek. The second day in each community, allowed community members to meet with TCG to have similar discussion on the project. As in December, TCG distributed and sought feedback of an updated TCG Eskay Creek Revitalization Project Information Package, reflecting more of the updated content and effects still being reviewed with the Application. These meetings occurred before Skeena Resources provided all their technical content and before the Revised Application was submitted.

The following are a summary of themes expressed during these meetings and also information in the Joint Notice report:

Water and Water Quality

Questions, feedback and concerns were raised about Eskay Creek's impacts and influence on both surface and groundwater values in Tahltan Territory;

Questions on the snowpack in the project area, with past projects challenges with snow and water in these ecosystems with the potential effect of greater contact water volume to manage with the proposed water management systems;

Questions on the current knowledge of aquifer mapping and understandings of seepage pathways with the range of proposed mitigations;

Questions, feedback and concerns were raised around seepage and water retention and treatment of water from the Mine Rock Storage Area (MRSA) and Tom MacKay Storage Facility (TMSF); and

Questions, feedback, and concerns with water quality, water treatment requirements, duration of water treatment, potential effects related to the current and future health of plants, and wildlife.

Reclamation and Closure

Questions around Tahltan co-management and further integration of Tahltan laws, principles, and sustainability into Eskay Creek's closure and post-closure designs were raised;

Requests to ensure that the end closure and post-closure state of Eskay Creek provide opportunities for Tahltan to re-establish use and access long-term;

Questions around the proposed life of mine timeline and short operational duration for an open pit; and

Questions, and feedback on bonding; ensuring it is an amount that can recover the health of the land and water in the area; not be a negative legacy; and Tahltan input and co-management with the bonding amount and requirements.

Noise, Vibration and Air Quality

Questions and concerns on the dust and its effects on human health, air quality, and ecosystems; and

Questions and concerns were raised around air quality, noise and vibration disturbances on human and animal health when using the land for traditional purposes and while working at Eskay Creek.

Associated Projects

Questions and concerns with the connections to other Skeena Resources properties, such as Snip, and not associating any positive outcomes with the Eskay Creek Project decisions with support for Snip and other potential projects in the Lower Iskut River. Concerns on potential cumulative effects and potential effects on salmon, water and Tahltan way of life were identified for the Lower Iskut River.

Workforce and Project Timeline

Concerns around the proposed life of mine timeline and short operational duration for an open pit mine;

Questions on the opportunities for partnerships with communities to support community growth and economic development; and

Questions and interest were raised around employment and business opportunities for Tahltan members.

Human Health and Socioeconomics

Concerns over increased stress on existing health, social and community services in Tahltan Territory;

Concerns on mining revenues, benefits, services, infrastructure, housing, and employment have been leaving Tahltan Territory with communities shrinking over time. It is important to ensure communities are growing with the benefits, services, housing, and employment being available to meet specific community needs;

Concerns on the social impacts with addiction, trauma, and other related factors with mine work life and shift work schedules;

Concerns and questions related to impacts associated with mine work life and shift work schedules on Tahltan families;

Interest about business, contracting, training, employment and educational opportunities; and,

Recommendations for positive legacy contributions (Benefits to Tahltan): Community housing, in-territory treatment facilities, elders care homes, youth recreational facilities.

Wildlife and Wildlife Habitat

Questions and concerns with the current and future health of wildlife, plants and habitats associated with the project area and transportation corridor;

Questions and concerns around impacts on wildlife and wildlife habitat; and

Questions and concerns around land disturbance, increases on stress of traditional food availability, food security, wildlife health and successful harvest of traditional foods.

Tahltan Culture, Heritage, Way of Life

Questions and concerns about the amount of Tahltan archaeological and cultural sites that could be influenced or impacted by the Eskay Creek Mine;

Questions, concerns, and feedback on Tahltan managing access to harvest, gather, and traditional practices for the lands within the Eskay Creek Mine Access Road and Project Area;

Concerns and questions raised around ensuring the protection of Tahltan cultural activities relating to access along the Eskay Creek Mine Access Road and Project Area; and

Questions and concerns raised around Tahltan spirituality, connection to the land and waters and potential access barriers on Tahltan way of life.

Transportation

Concerns on the vehicle combinations and concentrate tonnage with the estimated daily trips during operations; and

Concerns around the transportation increases on Highway 37 and impacts on safety for Tahltan members and increases in wildlife mortality.

Fish and Fish Habitat

Questions and concerns around potential impacts of the Eskay Creek Mine on salmon and other aquatic resources that could be impacted by the project in surrounding and downstream rivers and waterways.

Mine Design and Project Components

Questions, feedback, and concerns identified with the TMSF, open pits, and MRSA related to mitigations to maintain hydraulic containment including seepage barriers, partial liners, seepage interception, and other approaches;

Questions on the use of covers and liners with topsoil, ore and waste rock stockpiles, MRSA, and open pits;

Questions, feedback, and concerns identified with the estimated duration for water treatment currently identified as in perpetuity; and

Questions, feedback, and concerns on the potential for downstream effects with the proposed water management system, stability of the mine components, and potential effects from component failures.

TCG has identified potential mitigations and strategies to address these themes which are found in REAA Sections 4.4.9 and 4.4.10 and summarized in Section 9.6.

Tahltan Advisors, as members of THREAT, and working with THREAT Technical Advisors, reviewed the socio-cultural studies, assessment and mitigations developed by the proponent, and other mining companies in the Nation. The findings, mitigations, and recommendations related to the socio-cultural assessment for this project and others will be included as part of the Tahltan Risk Assessment.

Additional Tahltan information has been obtained through the confidential and sensitive information of the Tahltan Stewardship Plan process, community engagements, and through related projects through the TCG departments. As well, internal work is occurring as part of the THREAT review of the EAC Application and other major project regulatory reviews occurring in the Nation as identified in Section 4.2.

Further information has been included in this chapter after review to allow it's use as public information to support the Tahltan Assessment and additional information are expected to be addressed through the Tahltan Risk Assessment.

5.2.2. OTHER SOURCES OF TAHLTAN ENGAGEMENT

At this time, this draft section will be updated with additional information as the Effects Assessment stage advances.

6. Results of Public Engagement

6.1. SUMMARY OF PUBLIC ENGAGEMENT

Skeena and the EAO conducted public engagements throughout the EA process to keep various public organizations, governments, academic institutions, community organizations, and business groups updated on the Project and to obtain feedback on concerns. As both Skeena and the EAO have developed extensive engagement reports[4], this section will focus on the public engagement where TCG was involved.

The public engagements where TCG was involved includes:

- **Early Engagement**: During the 30-day joint IAAC and EAO public comment period TCG presented at the first of two virtual sessions (September 16 and 21, 2021) on Tahltan government structure, the THREAT Team, and the environmental assessment history in their territory, alongside presentations by Skeena, IAAC, and the EAO.
- **Process Planning**: The EAO held virtual information sessions via Zoom on January 31, 2023, and February 2, 2023. The virtual information sessions consisted of a presentation by the EAO, IAAC, and TCG providing an overview of the Process Planning phase and the documents the EAO was seeking public input on, a presentation by Skeena Resources on the Project, and an opportunity to ask questions online to the EAO, IAAC, TCG, and Skeena Resources.
- **Application Review**: During the public comment period, the EAO held virtual information sessions via Zoom on November 5 and 7, 2024. The virtual information sessions consisted of a presentation by the EAO and the TCG providing an overview of the EA and Tahltan Risk Assessment processes, respectively, a presentation by Skeena on Eskay Creek, and an opportunity for attendees to ask questions online to the EAO, TCG and Skeena.

Public engagement was conducted through a number of mediums, including:

- Information sessions;
- Letters, notices, and newsletters;
- Social Media;
- The Eskay Creek Project website;
- Community workshops;
- Participation in community and public events;
- Community relations offices and personnel; and
- Phone calls and emails.

In addition to the public engagement sessions, TCG was also involved in engagement with the Southeast Alaska Indigenous Transboundary Commission (SEITC). During the Early Engagement phase, on 16 September 2021 and 21 September 2021, TCG and the EAO led virtual information sessions, which were attended by the Metlakatla Indian Community and SEITC representatives.

[4] Skeena Resources. March 2025. Eskay Creek Revitalization Project Revised Application for an Environmental Assessment Certificate / Impact Statement; BC EAO. February 18, 2025. Eskay Creek: Notice Regarding Application Review.

6.2. HOW PUBLIC ENGAGEMENT INFORMS THIS REPORT

The Tahltan Assessment recognises the role the public has in ensuring transparency, accountability, administrative fairness, and the ability for public concerns and feedback to be captured in the process. In this process, this is the role and responsibility of the BCEAO, and through the process, Skeena Resources.

The Tahltan Assessment has a similar role with Tahltan Nation leadership, communities, and members to ensure there are the necessary opportunities for Tahltan to provide knowledge, questions, concerns, issues, and input into the Tahltan regulatory review of the project. This includes confidential and sensitive information related to Tahltan Knowledge and the potential effects to Tahltan rights from the Project; however, information has been made available to the public, including this draft risk assessment, and will continue through the conclusion of the process.

Where public engagement feedback has been provided, it is considered within the context identified above. TCG continues to work to provide public information on the DAA and review process, with the focus on ensuring Tahltan engagement is providing the directions to advance the Tahltan Assessment to the TCG *Notice of Decision*.

At this time, this draft section will be updated with additional information as the Effects Assessment stage advances.

7. Results of Consensus Seeking Between TCG and EAO

7.1. SUMMARY OF CONSENSUS SEEKING EFFORTS BETWEEN TCG AND EAO

The Declaration Act Consent Decision-Making Agreement for Eskay Creek Project (Declaration Act Agreement) includes provisions for TCG and the EAO to work collaboratively throughout the assessment to identify and seek to achieve consensus on the information and assessment requirements required to support their respective decision-making in relation to the Project. Section 6.4 in the Declaration calls for the establishment of a Collaboration Team between TCG and the BC Government, and the creation and maintenance of a Consensus Tracking Tool. TCG has maintained this consensus tracking tool as a table, which is updated to ensure that any issues identified during bi- or multi-party check-ins are appropriately followed up on by Skeena or the EAO, and includes the views of technical advisors for TCG, and from the EAO on options for achieving consensus. Overall, this table shows that in TCG's view that efforts for consensus have been successful throughout the Tahltan Assessment and the EA.

As noted, on June 6, 2022, TCG and the Government of B.C. (the Province) entered into the first consent-based decision-making agreement under the Declaration on the Rights of Indigenous Peoples Act for Eskay Creek, known as the Declaration Act Agreement. Under this Agreement, TCG has conducted a separate assessment which is based on Tahltan principles, policy, methods, and processes. The Agreement includes provisions for TCG and the EAO to work collaboratively throughout all phases of the assessment to identify and seek to achieve consensus on the information and assessment requirements required to support their respective decision-making. Section 6.4 in the Agreement establishes a Collaboration Team between TCG and the Province, and the creation and maintenance of a consensus tracking tool. TCG has maintained this internal consensus tracking tool as a table with the EAO, which is updated to ensure that any issues identified during bi-lateral or multi-party check-ins are appropriately followed up on by Skeena and/or the EAO. The tool includes the views of technical advisors for TCG and from the EAO on options for achieving consensus in their respective processes. Overall, the consensus tracking table shows that in TCG's view that efforts for consensus, to date, have been consistent with positive outcomes for both parties, with the acknowledgement the work continues as both assessments are in the final stages of the Effects Assessment stage of the processes.

7.2. HOW CONSENSUS SEEKING BETWEEN TCG AND EAO INFORMS THIS REPORT

The efforts to track concerns and achieve consensus by both the TCG and the Province has supported both parties in working collaboratively towards building comprehensive assessment processes, and ensuring the DAA requirements are being met in the delivery of both parties' assessments. The efforts to date, has been collaborative, respectful, and has been open in both government's world views, perspectives, laws and stewardship principles in the delivery of the DAA. The consensus seeking has also included working with the provincial ministries with the overlapping permitting processes to determine how TCG's concerns, and proposed conditions are informing the permitting processes.

TCG finds that the consensus seeking efforts by the EAO were positive and consistent during Tahltan Assessment and the EA for Eskay Creek, and these efforts continue to inform the TRA as the review advances to the TCG *Notice of Decision*.

At this time, this draft section will be updated with additional information as the Effects Assessment stage advances.

8. Results of Engagement with the Proponent

8.1. SUMMARY OF ENGAGEMENT WITH THE PROPONENT

Engagement between Skeena and TCG began in January 2015 with the initial exploration program. As it became clear that the Project would be progressing to an EA, in June 2021, TCG and the Province agreed to negotiate a consent agreement under the *Declaration on the Rights of Indigenous Peoples Act* (DRIPA), relating to the consent of TCG for specific major projects (Order In Council No. 348). Skeena, EAO and TCG worked together to review the preferred regulatory pathway, and the best course of action was determined to be a Reviewable Project Designation under the BC Environmental Assessment Act. TCG made an application to the EAO in 2021, and in July 2021, the Project was designated under Section 11 of the Act as a Reviewable Project requiring an environmental assessment process under provincial legislation.

Throughout the EA process, TCG has been in continuous communication between Skeena, the EAO, and our members. TCG has had over 100 virtual and in-person meetings with Skeena, which included:

- Weekly meetings between Skeena and TCG's Tahltan Heritage Resources Environmental Assessment (THREAT) Team. Weekly meetings helped to identify issues that required more focused attention, which sometimes led to topic-specific workshops, such as:
    - Inclusion of Tahltan Knowledge (what, how, and where);
    - Tahltan technical review;
    - Tahltan Application Information Requirements; and
    - Engagement planning and activities with the Tahltan community.
- Meetings in advance of all Technical Advisory Committee meetings (TAC);

- Meetings of the Closure and Reclamation Planning Oversight Team with TCG participation, including five workshops to initiate the development of a Closure and Reclamation Plan;
- Technical workshops for two-way knowledge sharing and collaboration on the development of the EAC Application;
- Meeting and workshop to discuss alignment of the EAC Application and the Tahltan Information Requirements, as well as means to incorporate Tahltan Knowledge;
- 23 community open houses and presentations by Skeena and the EAO to Tahltan members; and
- Other meetings between Skeena and TCG and its representatives, as and when requested.

As of April 2025, TCG collaborated with Skeena Resources in the development of the following environmental assessment deliverables and documents, with the majority of the work being technical review, but with some opportunities for scoping and co-drafting, including the following:

- Engagement Plan;
- Initial Project Description;
- Detailed Project Description;
- Hybrid Application Information Requirements;
- Public Engagement Plan;
- Application Development Engagement Plan;
- Indigenous Engagement and Collaboration Plan;
- Draft sections of the EAC Application and technical memos developed in Application Review; and
- Indigenous Engagement Report.

At this time, this draft section will be further updated with additional information as the Effects Assessment stage advances.

8.2. HOW ENGAGEMENT WITH THE PROPONENT INFORMS THIS REPORT

As it has been reported in the REAA and in this draft report, there is a long history and relationship with Eskay Creek Mine, and with Skeena Resources. It has been positive and respectful, and company has made a number of commitments with Tahltan communities, and continues to provide ideas and feedback on how to advance REAA and TRA matters raised by TCG through the regulatory processes.

The engagement with Skeena Resources has included bilateral actions, including collaboration for additional site investigation drill sites to collect information related to groundwater and mine components. It has included regular scheduled engagement at senior and technical levels to share information and for TCG to raise information, questions, and items related to the project. Through agreements with Skeena Resources, TCG has provided Tahltan questions, concerns, knowledge, and recommendations to the company from TCG's work with members and technical advisors. Skeena Resource acknowledges the importance of Tahltan Knowledge, Sustainability Requirements, and Core Priorities as it is reported in the REAA. Skeena Resources funded a Tahltan Traditional Land Use and Occupancy Study, entered into a Tahltan Knowledge Protocol, worked with TCG on an agreement on consent required by TCG for the consideration of knowledge in the Project and REAA. With the REAA, there was collaboration on ways to consider Tahltan Values in the multiple account analysis, incorporation of Tahltan Values,

including Tahltan views and uncertainties with the project in the REAA, and conducted early work on Tahltan interests and values to be considered the REAA reclamation and future generations use of the land planning. There continues to be discussions on how to address the existing barriers to Tahltan from the Project and others in the region while reducing additive effects from the ECRP. TCG has shared throughout the processes to date the concerns, questions, and strategies to reduce or remove barriers, reduce potential effects, and establish Tahltan regulatory requirements through the Life of Mine and beyond. TCG has also been open in sharing throughout the stages of the DAA, concerns where there are inconsistencies with the DAA factors and requirements, and ways to consider better alignment as the TRA process continues.

At this time, this draft section will be further updated with additional information as the Effects Assessment stage advances.

9. Risk Assessment

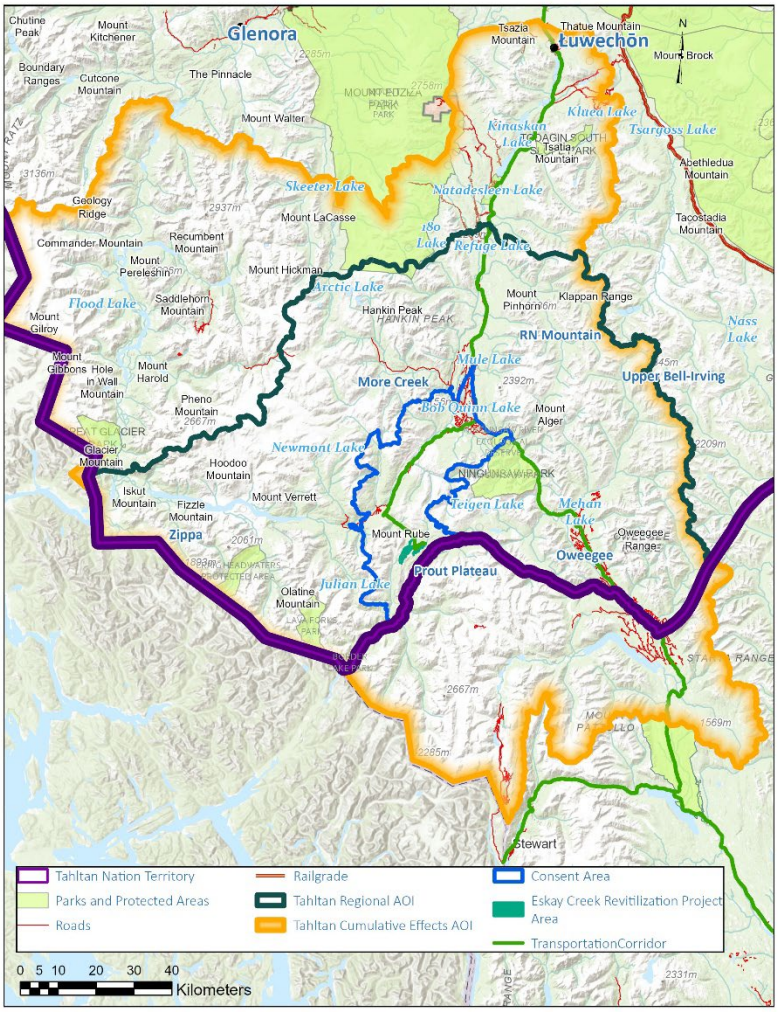
9.1. AREAS OF ASSESSMENT

Based on Tahltan values and knowledge, Tahltan identified the following Areas of Interest (AOI) for the environmental assessment process (Map 1-3), with additional details for each area identified in REAA Section 4.4 The spatial assessment boundaries were defined and designated by Tahltan through the DAA and represent Areas of Interest (AOI) where a wholistic approach to determining potential effects on Tahltan Values, Core Priorities, Risk Assessment Factors, and Sustainability Requirements. These areas were defined by Tahltan Knowledge and Values, building out from the Consent Area (see DAA) AOI with the following additional AOIs:

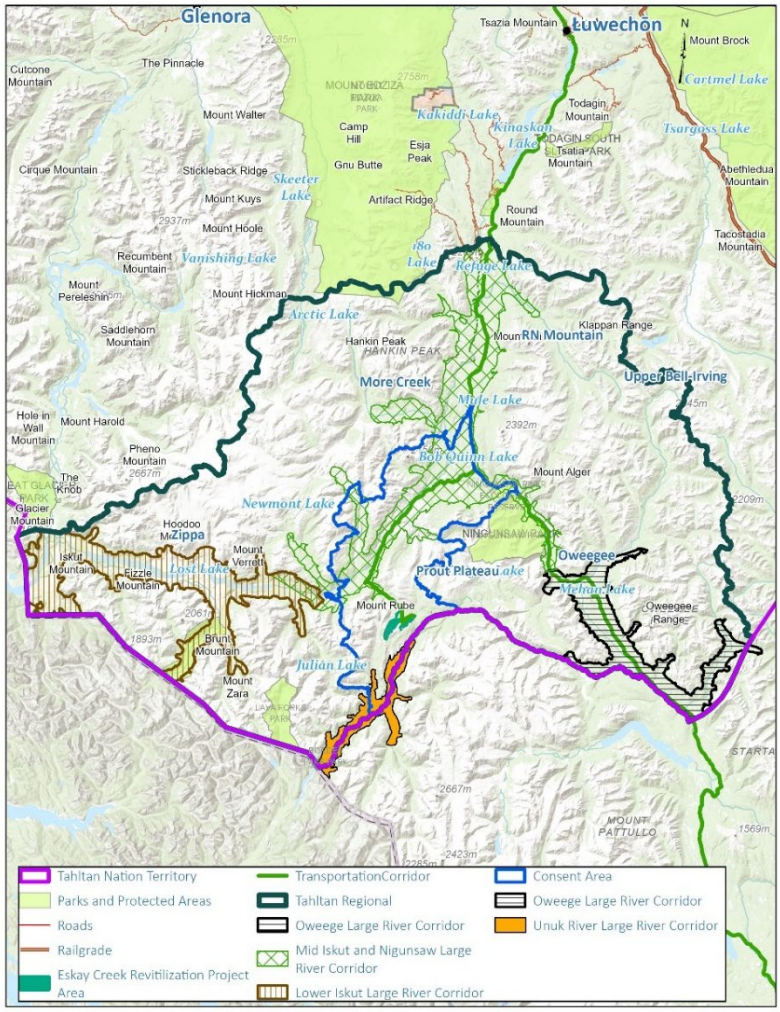
1. Regional (section 4.4.3 of the REAA)
2. Low Elevation – Iskut River (section 4.4.4 of the REAA)
3. Low Elevation – Unuk River (section 4.4.5 of the REAA)
4. Low and Upper Elevation – Oweegee (section 4.4.6 of the REAA)
5. Upper Elevation – More Creek (section 4.4.7 of the REAA)
6. Upper Elevation – Zippa Mountain, Upper Bell-Irving River, RN Mountain (section 4.4.8 of the REAA)
7. Upper Elevation - Consent Area and Mountain Pass-Prout Plateau(section 4.4.9 of the REAA)
8. Upper Elevation – Project Footprint(section 4.4.10 of the REAA)
9. Cumulative Effects (section 4.4.11 of the REAA)

The AOIs are identified by geographic areas for now, but Tahltan terms for the areas are possible if approved by Tahltan through the internal review of information. Where applicable, new terms for the AOI's will be finalized in the Tahltan Risk Assessment.

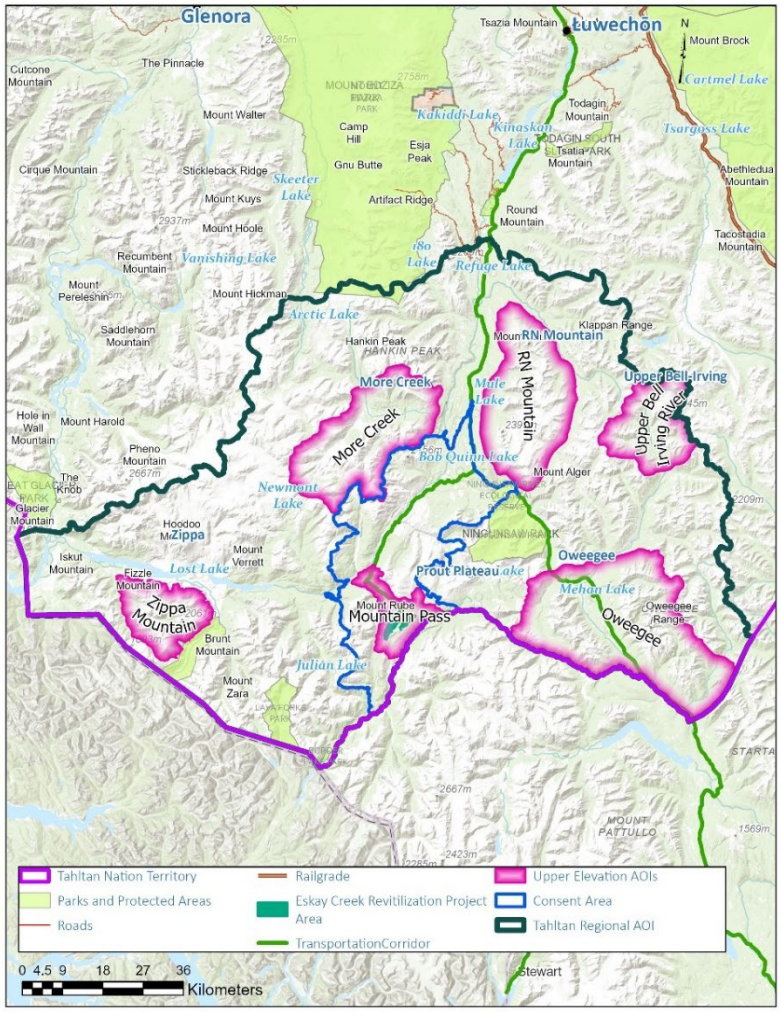
The site-specific AOIs are situated within the regional and landscape AOIs, and include sensitive confidential information. The AOIs were shared through community engagement and were part of the ongoing internal reviews throughout the stages of the environmental assessment. In addition, the project footprint and infrastructure as defined in the Process Order documents will be considered as site-specific AOIs. This includes site specific features situated in the mountain pass from the mouth of Ketchum Creek north to Iskut River; sites identified within the consent area; and sites identified within the transportation corridor in Tahltan Nation Territory.



Map 1. Regional, Cumulative Effects, and Consent Area Areas of Interest boundaries.



Map 2. Low elevation Areas of Interest boundaries.



Map 3. Upper elevation Areas of Interest boundaries.

9.1.1. **TAHLTAN CORE PRIORITIES**

Tahltan stewardship practices are guiding principles in our implementation of the Tahltan Risk Assessment for this project. These include the principles and criteria as identified in the Tahltan Risk Assessment Factors, Sustainability Requirements, and the following stewardship priorities (Tahltan Core Priorities). The Core Priorities establishes a ranked list of priorities to guide land use and resource development planning and decision-making in Tahltan Territory:

Priority 1. Maintaining the long-term health of the land (including all of its terrestrial and aquatic ecosystems) is a mandatory condition for any kind of land use in all areas within Keyeh.

Priority 2. The land must be able to continue supporting our Tahltan way of life while meeting the “health of the land” condition established under priority 1. The Tahltan way of life includes maintaining our personal connection with Keyeh, being able to live off the land, sustaining our harvesting and hunting patterns, engaging in our cultural and spiritual practices—most of which are tied to the land—and earning a reliable living.

Priority 3. Land that has been degraded and polluted through industrial use must be healed, through reclamation, restoration, and ritual ceremony.

Priority 4. Other uses will be considered, provided they meet all of the territory-wide and site-specific principles, objectives and constraints under priorities 1 and 2.

9.1.2. **REGIONAL**

The Regional AOI represents the height of land that best captures the distribution, density, and abundance of Tahltan Values including family areas, dwellings, place names, cultural areas, settlements, harvesting and gathering areas, trade areas and travel routes; and warfare/boundary areas. The trails and travel routes include all the major river corridors with Tahltan use of mountain passes and valleys to move seasonally to gather, harvest, trap, medicinal, and cultural activities all with the associated camps, cabins, villages, and gathering places to support seasonal use of the land. While the closest modern day Tahltan community is Łuwechōn – Iskut, there existed several villages and clusters of dwellings in the Regional AOI. In addition, the importance of salmon (Lower Iskut, Oweegee, Bell-Irving, and Unuk) added to the use of the area over the year.

The importance of this mountainous southwestern corner of the territory has, in part, to do with the resources provided by the rivers and forests: nust'ihe (marten), tsa' (beaver), tehjishe (mink), naghā (wolverine), sas and khoh (bear), isb̲ā (mountain goat), ch'iyōne (wolf), ts̲e'des̲ (fisher), ts̲abā'e (trout) and dēk'āne (salmon). It was also the trade that travelled up the rivers and trails (coast-interior trade network which stretched from the Pacific coast to the boreal forests east of the Rocky Mountains).

Tahltan sites, land uses, and practices includes villages, obsidian mining, trapping, gathering, harvesting, fishing, travel, placenames, and trails throughout the region. Infrastructure includes bridges, stream and river trails, villages, cabins, campsites, and hunting/fishing/trapping/gathering camp sites.

Tahltan frequently travelled back and forth between villages on the Iskut and upper Nass and the tribal headquarters at the confluence of the Tūdes̲e chō (Stikine) and Tāłtān (Tahltan) rivers, using ancient trails that followed the course of rivers, including Treaty Creek, Ningunsaw River, Unuk River and Iskut River and mountain passes and valleys (e.g. Prout Plateau, Upper Bell Irving River, and More Creek).

The Tahltan Regional AOI is situated within the Boundary Ranges and Skeena Mountains Ecoregions. The Boundary Ranges area is a rugged, largely ice-capped, granitic and metamorphic-based mountain range that rises abruptly from the coast. It has large alpine areas (Boreal Altai Fescue Alpine) mainly of large icefields, glaciers and barren rock dominating the region with the coastal forested valley bottoms being found at constrained lower elevations. Forested vegetation consists of the subalpine or Mountain Hemlock zone on the lower valley slopes; and Coastal Western Hemlock zone on the valley bottoms where Sitka Ts'ū (Spruce) becomes codominant with western hemlock. The Boundary Range is a coastal rainforest ecosystem and is heavily affected by moist Pacific air lying in the Gulf of Alaska and by cold Arctic air that passes over these mountains from the northeast. The large western facing valleys allow moist Pacific air to pass through to the interior and for cold Arctic air to pass onto the neighbouring Alaska panhandle.

The Skeena Mountains Ecoregion is an area of high rugged mountains and a moist, coast/interior transition climate. They are composed of folded sedimentary rocks with complex folds and recumbent outlines. Typically, the valleys and saddles are characterized by tight complex folding, whereas the broader massifs are commonly gently contorted or even flat lying. The peaks and ridges present a serrate and jagged profile that has developed under intense glaciation. Glaciation was heavy with much ice originating here then flowing northward or southward to coalesce with other moving ice. Many glaciers persist in the regional area. Interior Gatēle (Cedar) – Hemlock forests occur in the lower valleys; while Sub-Boreal Ts'ū (Spruce) forests occur in some of the northeastern valleys. Engelmann Ts'ū (Spruce)– Subalpine Ts'ōsts'iye (Fir) forests occur on all the middle slopes and alpine vegetation or bare rock occur on the upper slopes and ridges. There are glaciers occurring on the upper slopes in the northwest nearest the Boundary Range. The area is a transitional ecosystem from the coastal rainforest to the northern boreal ecosystems to the east and north. Westward flowing moist Pacific air can bring heavy cloud cover and precipitation either as rain in the summer or deep snow in the winter. Cold Arctic air is often stalled outside this ecosection, but it can often push westward over these mountains and through the valleys bringing intense cold conditions.

In addition, the Prout Plateau, a subalpine highland situated on the eastern flank of the Boundary Ranges, just west of the Unuk River is located in the range with numerous lakes interspersed among the rolling meadows and narrow ridges of this highland are drained by tributaries of the Unuk and Iskut Rivers. Creeks flowing through the mine

property – Tom MacKay, Ketchum and Eskay – all drain into the Unuk. The 54.5 km access road to the mine begins at Highway 37 just south of Bob Quinn Lake, and follows the Iskut River Valley south for most of its length, before turning east and ascending a valley to the plateau. The high country of the upper Unuk River lies along the southernmost boundary of Tahltan Territory, which stretches from the confluence of the Iskut and Tūdeṣe chō (Stikine) Rivers 80 km to the west, across the Unuk River, and east to "Groundhog Country" around the upper Nass, Tūdeṣe chō (Stikine) and Skeena Rivers.

The descriptions for the landscape and site specific AOIs will focus on biophysical and ecological information specific to the areas as all are situated within this broader regional area.

Tahltan Stewardship Plan (TSP) Management Directions

The TSP is at this time an internal plan, but a version has been provided to Skeena Resources in early 2025. Additionally, it is expected that a publicly available version to be shared in 2025. The Tahltan Core Priorities under the TSP are based on the same Tahltan Core Priorities for major projects and are an integral part of the multi-layered approach and application of Tahltan Stewardship Principles and Tahltan worldview under the Tahltan Assessment. Resource development and other land-based activities must ensure that they are meeting or being consistent with the TSP planning priorities.

Within the Regional AOI there are 3 main designations providing management directions for allowable land uses and to be applied with the Tahltan Risk Assessment:

Large River Corridor (Mid Iskut and Ningunsaw, Lower Stikine and Iskut, Oweegee, and Unuk Rivers)

Water is sacred to Tahltan, and rivers speak to the cycle of life, and cycle of renewal. Large rivers tend to be at lower elevations, with broad floodplains, riparian habitats, mosaic of wetlands, lakes, or oxbows, and with critical habitats for many important Tahltan salmon, wildlife, and plant species. Large rivers are also important for animal movements or migrations. Tahltan trails, hunting and fishing places, gathering areas, sacred areas, grave sites, and communities are found in large river valleys. Outside of the specific management directions for each river, the foundational management direction is to Implement large river corridors for major rivers and maintain at least 80% of the corridor as continuous forested habitats with connections to higher elevation habitats and plateaus, especially in the interior boreal areas. The specific management directions will reported for each AOI, with recognition, it is additive to this information.

Klappan Range and Burrage Management Area (upper elevation areas outside of the Large River Corridors)

This area extends from Ningunsaw Pass and the upper Bell-Irving River in the south to Todagin Creek and Kluea Lake in the north. The western border runs along the east side of Highway 37 and Iskut River, and the eastern border roughly follows the divide between the Klappan watershed and the Iskut watershed. This is an area of rugged mountains and high plateaux, with forested valleys and rushing creeks below. Stone's sheep and mountain goats occupy the high country. Moose, grizzly bears and wolves range throughout the area.

Tahltan continued trapping in this area for much of the twentieth century, with traplines along Burrage Creek and Alger Creek, in the Ningunsaw Pass, and along the forested slopes east of the Iskut River. Berry picking and medicinal plant gathering sites are abundant in the Iskut valley. The mountains south of Todagin Creek remain important for our sheep hunters today, much as they were in the past, as witnessed by different place names. One of the mountains at the headwaters of Tsetia Creek, for instance, is called Chosyan mīkeh, meaning "ram's snare."

The focus is on conserving Tahltan values such as wildlife, fisheries, archaeology, community uses, sacred areas, gravesites with some level of other activities being allowed if meeting TSP stewardship principles and land use priorities with Tahltan approval of the activities. The Klappan Range and Burrage Management Area covers the upper elevation areas outside of the river corridors on the east side of Highway 37.

Edoxtotene Management Area

The high mountainous terrain of the coastal Boundary Range between the Stikine and Iskut rivers is steep and rugged, much of it covered year round in snow and extensive glaciers. The management area extends from Glenora on the Stikine River south and west to the Alaskan border. Its eastern edge follows Mess Creek south, bending around Mount Edziza Park, then north again following the Little Iskut River, and finally south along the main Iskut River. In the southeast corner of the management area, a peninsular-shaped area takes in the headwaters of the Unuk River and Treaty Creek. This area overlaps substantially with what is known as the "Golden Triangle" within the mining industry.

The focus is on conserving Tahltan values such as wildlife, fisheries, archaeology, community uses, sacred areas, gravesites with some level of other activities being allowed if meeting TSP stewardship principles and land use priorities with Tahltan approval of the activities. The Edoxtotene Management Area covers the upper elevation areas outside of the river corridors on the west side of Highway 37.

Detailed management directions are reported in the below AOIs.

9.1.3. **ISKUT RIVER**

Tahltan values and land uses in the area relate to the seasonal, climatic, and ecological differences in the valleys. Lower Iskut River has village sites, cabins and camps related to dēk'āne (salmon), medicinal, plants, is̲bā (mountain goat), and furbearers. Mid Iskut River has similar features but more focus on accessing ebaldzē (mushrooms), kedā (moose), and furbearers with the different forest habitats and with lower snow depths than coastal sections, and upper sections with villages, cabins, camps across all seasons. All areas included trapping, harvesting, and gathering and with better access to broader plateaus where seasonal gathering of wildlife, dediye (marmot), and subalpine and alpine plants in the mid and upper river areas. Trade and travel along the river valleys is a core value with the river corridor providing access to upper elevation obsidian mining and other sites.

The Iskut River Valley has its headwaters at Kluachon Lake and flows south through boreal, transitional coastal, and coastal rainforest ecosystems where it meets with the Tūdes̲e chō (Stikine) River just before leaving the Nation and flowing southwest to the ocean. These transitions also have influence on the climate and distribution of flora and fauna with the lower reaches with coastal species until reaching the Forrest Kerr Canyon area where the shift from Coastal Western Hemlock forests to Interior Gatēle (Cedar) Hemlock forests occurs, and finally shifts to a boreal ecosystems and forests in the Burrage Creek area. Kedā (moose), khoh (grizzly bear), sas (black bear), ch'iyōne (wolf), furbearers, dediye (marmot) (groundhogs/gophers) dih (grouse), and ts̲abā'e (trout) are found throughout the area, with dēk'āne (salmon), āseda (steelhead), is̲bā (mountain goat) found more in coastal sections, and debēhe (Stone's sheep), ts̲abā'e (rainbow trout), and hodzih (caribou) found in the northern boreal ecosystems of the valleys.

Volcanic activity is widespread throughout the Stikine Volcanic Belt, the most notable areas being the Edīzā'e (Mount Edziza), Spectrum, and Hoodoo mountain complexes. To the south of these areas, and in close proximity to the study area for this project, are the Iskut-Unuk River Cones. A total of 12 flows have been identified, dating between 70,000 and 150 years BP (Stasiuk and Russell 1990; Hauksdottir et al. 1994). Holocene lava flows have dammed Iskut River and Forest Kerr Creek; one was dated to around 7500-8200 cal years BP, and another to around 4000 to 5000 cal years BP (Fisher et al. 1998).

Tom Mackay Creek, adjacent to the Eskay Mine Site, was also dammed (Hauksdottir et al. 1994). Many of these volcanic eruptions have blocked Tūdes̲e chō (Stikine) River tributaries, preventing anadromous fish from reaching their spawning grounds upriver from these blockages (Albright 1984; Friesen 1985). This has occurred at the Forrest Kerr Canyon where several barriers have limited dēk'āne (salmon) and āseda (steelhead) distribution to the lower Iskut River reaches.

Lower Iskut

The wide braided coastal river valley of the lower Iskut River valley is rich in fur-bearing animals. Tahltan describes trapping nust'ihe (marten), tehjishe (mink) and beaver in the lower Iskut and up the Jekill River. The valley of the Jekill was particularly good tehjishe (mink) country. Tahltan had a number of cabins along the Iskut, built in the

1920s and 30s, where families would spend the winter months. The mountain ranges south and east of the Iskut (presumably including the mountains around the Unuk River headwaters as well) were prime isb̲ā (mountain goat) country. In addition, khoh (grizzlies) were plentiful in the area.

Tahltan maintained a year-round fishing village called Saksina on the lower Iskut, near the mouth of Verrett Creek. The Tahltan who inhabited this village were part of the Nāskotena Wolf clan of the Tahltan, whose main village was at Uwize' on the Bell-Irving River (called Oweegee on maps today—the name means "whistling").

Today this area has great archaeological potential for learning about our past. Climate change is causing alpine ice patches to melt and glaciers to retreat. This process exposes organic artifacts that have been preserved in the ice. Ice patch archaeology in the Spectrum Range has discovered artifacts like stitched birch bark containers and wooden walking sticks over seven thousand years old.

Middle Iskut and Ningunsaw River

The upper and middle portions of the Iskut River Valley were primary hunting, trapping and fishing grounds for Tahltan in the area. The area around Bob Quinn Lake, near where the access road to the mine site joins Highway 37, was used intensively, partly because it formed a kind of crossroads for a number of important trails. Northwards, the trails followed the Iskut upstream, leading to the numerous fish-bearing lakes of the Iskut headwaters, the obsidian quarries around Edīzā'e (Mount Edziza), the high plateau hunting grounds across the Spectrum Ranges, and eventually the heart of Tahltan country on the Tūdes̲e chō (Stikine). Southwest took one down the Iskut to the trapping grounds on the lower river flats and the summer dēk'āne (salmon) fishery, as well as the trade trails which turned south over the pass to the Unuk River. The trails up Ningunsaw River led to the west branch of the Nass River and the upper Nass country.

Members of Tahltan clans spread across a vast territory, made regular if not frequent journeys to the ancient tribal area at the confluence of the Tūdes̲e chō (Stikine) and Tāłtān (Tahltan) Rivers. Tahltan called this place Titcaxhan ("fish jumping up little water"), a name which emphasizes the importance of the annual dēk'āne (salmon) run up the Tāłtān (Tahltan) River for the life of Tahltan. For Tahltan in the Middle Iskut River area, the trail from the upper Nass country to the Tūdes̲e chō (Stikine) and Tāłtān (Tahltan) confluence was the highway home and as such it was well travelled. The southern portion of this trail, running from the Iskut River to the upper Nass by way of Ningunsaw River (the route eventually followed by Highway 37), an Elder described that it would take him and his father nine days using a dog team to get from Łuwechōn (Iskut) on Kluachon Lake to their trap line on the upper Nass.

The importance of the area around Bob Quinn Lake with the archaeological record suggests that use of this area stretches back thousands of years with knowledge there used to be a village on the lake. More recently, it has been home to a number of trapping cabins. Trapping in the valleys of the Iskut and Ningunsaw rivers is important with cabins and trails that connect from Iskut River to Devil Creek, just upstream from where it flows into the Iskut and from there a trail led over to Bob Quinn Lake, then south to the Ningunsaw River. Trapping for nust'ihe (marten), nasdā (lynx), ts̲e'des̲ (fisher), naghā (wolverine) and tehjishe (mink). Kedā (moose), was noted, could only be hunted at Echo Lake in the winter. The snow there was shallow enough for them. Khoh (grizzly bear) and ch'iyōne (wolf) were also plentiful in the valley.

Another example of trails and traplines began at the mouth of the Ningunsaw, where trails and traplines followed the Iskut south to the mouth of Forrest Kerr Creek. The trapline went up the creek, and then over the divide to More Creek, and back finally to the Iskut trapping mostly nust'ihe (marten) and ts̲e'des̲ (fisher). This area, from the mouth of Burrage Creek south to Thomas Creek, and around Bob Quinn Lake, was and still is, good berry country. There have been and still are traplines in the country and includes the area where the Eskay Creek Mine road leaves the Iskut River towards the mine site area.

This area encompasses areas of the Iskut River watershed, extending across Ningunsaw Pass to take in the upper Bell-Irving River as well. These two rivers were the major arteries through the traditional territory of the Nāskotena, one of the Tahltan Wolf clans. The Nāskotena maintained salmon fishing villages at Oweegee on the upper Bell-Irving and at Sakse'na on the lower Iskut. The major trail connecting these two villages crossed Ningunsaw Pass, with a branch that headed north to the headwater lakes of the Iskut and across Mount Edziza to Tahltan.

The Iskut valley was and is not only a major travel corridor (parts of Highway 37 follow the old Tahltan trail) but an important area for hunting, trapping, fishing and plant harvesting. All of the headwater lakes of the Iskut provide

excellent fishing in the late spring and fall. Blueberries and huckleberries are plentiful in the valley from Burrage Creek south to Thomas Creek, and around Bob Quinn Lake. South of Ningunsaw River there is excellent trapping country. For example, we call the swampy country on the left bank of the Iskut upstream from the canyon Tsa'keyeh, meaning "beaver village." Ningunsaw Pass has good moose habitat, and bears and wolves are abundant in the mountains south of the pass. In the past, we used to trap martin, lynx, fisher, wolverine and mink all through this area.

Tahltan Stewardship Plan Management Directions

The following are the management directions applicable to these lower elevation AOIs:

Lower Iskut River Large River Corridor Management Directions

- Maintain healthy salmon ecosystems and all ground and surface water sources that drain into the Lower Stikine and Iskut Rivers
- Maintain intact and undisturbed rivers and coastal old growth rainforests
- Maintain river corridor valleys and connections to high elevation areas
- Ensure Tahltan trails and cultural heritage is protected for any disturbance
- Reclaim and disturbance from roads or industry impacts on the Lower Stikine and Iskut River
- Maintain and protect Tahltan fish camps and enforce Tahltan quiet enjoyment of the land and seasonality of cultural activities (e.g. helicopter flights paths during fish camps)
- Restrict aerial flight paths and create exclusion and avoidance areas around Tahltan communities, cultural sites and fish camps
- Track fishing going into tributaries and rivers off Lower Stikine and Iskut Rivers e.g. Scud, Chutine, Porcupine
- Increase Tahltan education and youth and elder trips along the rivers and story telling about Tahltan culture
- Protect all groundwater and surface water sources and ensure clean pristine water for all living beings and communities
- No road building or development along the Lower Stikine and Iskut Rivers
- Increase fishery database and studies to go beyond Salmon stocks
- Implement fire protection measures around cultural areas, fish camps and Telegraph Creek and Glenora

Middle Iskut and Ningunsaw River Management Directions

- Maintain intact landscape from along Iskut River Large River Corridor from Iskut Lakes to Lower Iskut River
- Recovery and restoring surface and groundwater, riparian habitats, valleys and industrial roads
- Maintain healthy aquatic ecosystems and waterways
- Maintain connection to high elevations from low valley bottoms
- Support wildlife and fish habitat reclamation and enhancement
- Protect Tahltan trails and archaeological sites and cultural areas
- Protect Tahltan's right to quiet enjoyment of the land and waters in these areas from industrial development

9.1.4. **UNUK RIVER**

The Unuk River is important as an area of Tahltan trade, travel, and harvesting/gathering/trapping for plants, medicinal plants, dēk'āne (salmon), łuwe (fish), furbearers, isb̲ā (mountain goat), kedā (moose), bears, and ch'iyōne (wolf). Archaeological sites are found in the area that are dated precontact. The Prout Plateau is a key connection between the Unuk, Lower Iskut, and Ningunsaw/Oweegee Lake areas for Tahltan travel and trading.

There was a winter trade route from the coast that came up the Unuk River and crossed over to the Iskut below the mouth of the lower canyon (passing right through the Eskay Creek mine site area). An Elder's description of the

trade goods – muskets, shot, powder and knives – places the use of this route in the post-contact period. The goods were brought by most likely Tlingit, using dog-sleds. Tahltan met them somewhere on the Prout Plateau, and from there they hauled the goods up the frozen Iskut to Devil Creek, near Bob Quinn Lake. At Devil Creek Tahltan cached the goods until summer. In the summer, using horses, transported the goods up into the high country of the Tla'bane (Klappan) River and beyond, using the trails that followed the upper Nass. Some of these goods ended up at McDames Creek on the Dease River, to be traded with Kaska.

A Tahltan Elder describes a trail that connected Oweegee with the lower Iskut by way of Treaty Creek and the Unuk River. This trail would have passed over Prout Plateau. The high country around the headwaters of Treaty Creek and the Unuk River provided good habitat for hunting khoh (grizzly bear), in the early fall. Tahltan called Treaty Creek Kas Xoo, which means "grizzly bear creek".

The Unuk River is situated in the Coast Mountains of the Boundary Ranges Ecoregion with a similar climate and coastal rainforest ecosystems of the lower Iskut River. From its headwaters in a heavily glaciated area in British Columbia, south of the lower Iskut River, the Unuk flows west and south for 129 kilometres, crossing into Alaska and emptying into Burroughs Bay, an inlet of Behm Canal.

Forests of mountain hemlock, amabilis ts'ōsts'iye (fir), yellow gatēle (cedar), and Sitka ts'ū (spruce) dominate the area, with an understory populated by shrubs, including echish (blueberry), false azalea, echish chō (huckleberry) and white-flowered rhododendron. Mosses flourish in these forests. At higher elevations heaths dominated by heather and dwarf conifers are present. Sas (black bear) and khoh (grizzly bear), Roosevelt elk, kuwegānh (deer), and isb̲ā (mountain goat) are the most common large mammals in this zone. The forests also provide a home for a variety of dzime (birds), including dechīh yekhidlī (woodpeckers), red-breasted nuthatches, mesdzī (owls), golden-crowned kinglets and estoste (chestnut-backed chickadees). At higher elevations, kasbā'e (ptarmigan) and dih chō (blue grouse) are present. Łuwe (fish) present in this area include ts̲abā'e (trout) and dēk'āne (salmon) species, and dēk'āne (salmon) runs are recorded on the Unuk River in Alaska; however, closer to the study area it is unclear if lava flows or other obstructions have blocked dēk'āne (salmon) from proceeding up river, as is the case for the Iskut River and Mackay Creek.

As found in REAA Chapter 11.2.1.2, Skeena Resources reports *"Several species of salmonids are known to inhabit the Unuk River, with the majority of spawning and rearing occurring in the lower 39 km of the Alaska section (Mecum and Kissner 1989) and in Border Lake, approximately 2 km upstream of the BC Alaska border. Border Lake, which is known for its recruitment of chinook, sockeye (dēk'āne), pink, coho (tl'ūga), and chum salmon (Tripp 1987; Fisheries and Oceans Canada 1987), discharges into the Unuk River. The canyons located upstream of Border Lake restrict upstream migration of pink and chum salmon, but spawning and rearing of sockeye, chinook, and coho salmon is known to extend as far upstream as Storie Creek, approximately 5 km downstream of the confluence of Ketchum Creek and the Unuk River (Hallam Knight Piesold Ltd. and Homestake Canada Inc. 1993). Dolly Varden trout (ts̲abā'e) are also known to inhabit locations upstream of Eskay Creek along the Unuk River, as well as Unuk Lake, located approximately 14 km upstream of the confluence of Ketchum Creek and the Unuk River).*

Tahltan Stewardship Plan Management Directions

The following are the management directions applicable to the lower elevation AOI:

Unuk Large River Corridor

- Maintain healthy salmon ecosystems and all ground and surface water sources that drain into the river
- Maintain intact and undisturbed rivers and coastal old growth rainforests
- Maintain river corridor valleys and connections to high elevation areas
- Ensure Tahltan trails and cultural heritage is protected for any disturbance
- Reclaim and disturbance from roads or industry impacts on the Unuk River
- Maintain and protect Tahltan fish camps and enforce Tahltan quiet enjoyment of the land and seasonality of cultural activities (e.g. helicopter flights paths during fish camps)
- Increase Tahltan education and youth and elder trips along the rivers and story telling about Tahltan culture

- Protect all groundwater and surface water sources and ensure clean pristine water for all living beings and communities
- No road building or development along the Unuk Rivers
- Increase fishery database and studies to go beyond Salmon stocks
- Implement fire protection measures around cultural areas, or site specific areas such as fish camps

9.1.5. **OWEEGEE**

It is an area where Tahltan villages, burials, cabins, and camps are located to access the dēk'āne (salmon), łuwe (fish), wildlife, plants and medicinal plants. It supported trails and travel within the area and to the tribal headquarters at the confluence of the Tūdese chō (Stikine) and Tāłtān (Tahltan) rivers, as well trails and travel to Unuk, Tla'bane (Klappan), Upper Nass, and Iskut River valleys.

An Elder describes life at Oweegee on the Nass (Bell-Irving), approximately 50 km east of Eskay Creek where families worked and dried dēk'āne (salmon). In the spring they would catch small dēk'āne (salmon) or tsabā'e (trout) to consume and also put up in the fall for the winter. Łuwe (fish) were caught using traps and place marked trees in the water. The traps were covered and łuwe (fish) would jump into them.

Trapping for beaver was important and at times numbers were low due to the demands of the fur trade. Bears were hunted for meat and grease, and specific areas such as Treaty Creek and Ningunsaw River areas were good places for hunting khoh (grizzly bear). In the fall, dediye (marmot/groundhogs/ground squirrel) were snared. To keep the meat, bags were made from dry dēk'āne (salmon) skin, and kept it dry for use in the winter as well fats of animals like bear, moose and goat was stored in the hide or in containers made of birch bark (Edzerza 2005). In early winter, tl'ūga (coho) were caught using gaffs and to store the dried łuwe (fish), Tahltan dug cold storage pits . This storage approach was described in detail by Thorman (n.d.). The depressions left by these storage pits can be seen today throughout Tahltan Territory, mostly on the benches above rivers. According to Thorman, it was the storage pit or *duwe'ged* (meaning "a safe place dug") that gave the Tahltan a measure of security in their winter food supplies.

Elders describe hunting and trapping trails that run from Oweegee up the Bell-Irving River to its headwaters, and then over a number of passes into the Tla'bane (Klappan) watershed, or down Konigus Creek (*konigus tua*, meaning "all broken up creek," which refers to the trees and bushes damaged by the flooding waters) to the east branch of the upper Nass. In the fall, Tahltan hunted dediye "groundhog" or ground squirrel or marmots in this high country. Other trails connected to the Iskut valley by way of the Ningunsaw River or Treaty Creek and the Unuk River.

The area is identified as the Ningunsaw River, Upper Nass River, and Bell-Irving River lower forested river valleys situated in the Regional AOI. Oweegee is identified as the name for the area as it is an area (Oweegee Lake and Creek) of importance to Tahltan. The forested ecosystems are similar to the mid-Iskut with westward flowing moist Pacific air can bring heavy precipitation either as rain or deep snow. Cold Arctic air is often stalled, but it can often push westward over these mountains and bring intense cold conditions. Interior Gatēle(Cedar) – Hemlock forests occur in the valley bottoms and Engelmann Ts'ū (Spruce)– Subalpine Ts'ōsts'iye (Fir) forests occur on all the middle slopes and alpine vegetation or bare rock occur on the upper slopes and ridges; small glaciers occur on the upper slopes in the northwest nearest the Boundary Ranges.

Tahltan Stewardship Plan Management Directions

The following are the management directions applicable to the two AOIs:

Middle Iskut and Ningunsaw River

- Maintain intact landscape from along Iskut River Large River Corridor from Iskut Lakes to Lower Iskut River
- Recovery and restoring surface and groundwater, riparian habitats, valleys and industrial roads
- Maintain healthy aquatic ecosystems and waterways
- Maintain connection to high elevations from low valley bottoms
- Support wildlife and fish habitat reclamation and enhancement
- Protect Tahltan trails and archaeological sites and cultural areas

- Protect Tahltan's right to quiet enjoyment of the land and waters in these areas from industrial development

Edoxtotene Management Area

- Maintain healthy rivers, lakes and waterways
- Manage the pace and scale of development and ensure all Tahltan values are protected
- Protect Tahltan archaeological sites and cultural resources
- Maintain healthy and intact wildlife habitat ranges
- Ensure pristine and clean groundwater and surface water sources
- Require Tahltan consent before any industrial development activities to move forward
- Implement Tahltan Standards, conditions and objectives for any potential industrial activities proposed
- Tahltan access and cultural activities on the land
- Ensure Tahltan quiet enjoyment of the land and waters
- Ensure that mining or energy-related project activities achieve the highest standards and conditions and provide economic and social benefit to Tahltans.
- Implement flight path restrictions around Tahltan harvesting and cultural activities on the land.

Klappan Range and Burrage Management Area

- Maintain intactness of forests and watersheds by limiting new road development
- Community desire to create a buffer management area around the Klappan Sacred Headwaters
- Community food security and traditional gathering activities should be protected
- Implement measures to protect Tahltan quiet enjoyment of the land and waters
- Maintain healthy wildlife ecosystems and ranges
- Focus on cultural practices and Tahltan harvesting and land use
- Protect groundwater and surface water sources
- Limit industrial activities managing pace and scale in this area

9.1.6. **MORE CREEK**

The More Creek area is important as an area of Tahltan trade, travel, and harvesting/gathering/trapping for plants, medicinal plants, łuwe (fish), furbearers, isbā (mountain goat), kedā (moose), sas and khoh (bears), and ch'iyōne (wolf). Archaeological sites are found in the area that are dated precontact. It is an area identified from past Tahltan Land Use and Occupancy Studies as including highly sensitive areas and with extremely sensitive travel corridors within the area. Specific values include traplines, hunting/gathering during snow free periods, camps, cabins, obsidian sites, and travel routes through the area as a mountain pass to Lower Iskut, Oweegee area, Tāłtān (Tahltan) / Tūdese chō (Stikine) River confluence, and other routes. It has high number of archaeology sites identifying Tahltan use precontact in the area.

The area is identified as the More Creek situated in the Regional AOI. More Creek is a tributary of the Iskut River with the headwaters located in the Arctic Lake and Hankin Peak upper elevation area to the west of the river. The forested ecosystems are similar to the mid-Iskut with westward flowing moist Pacific air can bring heavy precipitation either as rain or deep snow. Cold Arctic air is often stalled, but it can often push westward over these mountains bring intense cold conditions. Interior Gatēle (Cedar) – Hemlock forests occur in the valley bottoms and Engelmann Ts'ū (Spruce)– Subalpine Ts'ōsts'iye (Fir) forests occur on all the middle slopes and alpine vegetation or bare rock occur on the upper slopes and ridges; small glaciers occur on the upper slopes in the northwest nearest the Boundary Ranges.

Annual precipitation across the Coastal Mountains equals if not exceeds that of the coast. The summers are wet and cool, and in the winter, the heavy snow is deep (making travel on snowshoes difficult), with frequent snowslides at higher elevations. Because of the excessive snowfall, the lower river flats remain covered in snow and ice long after spring has arrived in the colder interior. It is not country that welcomes human habitation. As one of our elders

put it, “it was such a hard country to live in.” This explains our name for those Tahltans that did live in this country: Edoxtotene or “rough country people.”

Despite the difficult of travelling through the region, and the constant risk of snowslides throughout the winter, the area was rich in fur-bearing animals: mink, martin, beaver, wolverine, fishers and bears. We trapped the length of the Stikine valley as far south as the mouth of the Porcupine River. Porcupine River, Scud River and Galore Creek were all excellent trapping grounds. At the height of the fur trade, a small number of Tahltans lived year round at the mouth of Scud River. A well-established trail called the Scud Cutoff linked the Scud and the Stikine, eliminating the need to follow a large westward bend of the Stikine River north of the mouth of the Scud. The Iskut valley was also good habitat for fur-bearing animals. The valley of Jekill River south of the Iskut was highly valued for its mink. Goats were hard to hunt in the winter, but sometimes we would find goats that had been killed by snowslides.

The country lying on the northern and drier slopes of the Boundary Ranges offered better hunting grounds in summer. Tahltan lived in camps at Arctic Lake and Ball Lake, fishing in the lakes, hunting for sheep and goats and trapping marmots and gophers. Yehiniko Lake, which we called Łu’tenh Menh (“Glacier Lake”), was an important fishing site, as it contained landlocked salmon. A trail connected Scud River and Arctic Lake, crossing the glaciers at the head of Scud River. Another trail ran the length of Mess Creek (the English name comes from the Tahltan Mesdzī Tū, which means “Owl Creek”).

Today this area has great archaeological potential for learning about our past. Climate change is causing alpine ice patches to melt and glaciers to retreat. This process exposes organic artifacts that have been preserved in the ice. Ice patch archaeology in the Spectrum Range has discovered artifacts like stitched birch bark containers and wooden walking sticks over seven thousand years old.

Tahltan Stewardship Plan Management Directions

The following are the management directions applicable to the AOI:

Middle Iskut and Ningunsaw River

- Maintain intact landscape from along Iskut River Large River Corridor from Iskut Lakes to Lower Iskut River
- Recovery and restoring surface and groundwater, riparian habitats, valleys and industrial roads
- Maintain healthy aquatic ecosystems and waterways
- Maintain connection to high elevations from low valley bottoms
- Support wildlife and fish habitat reclamation and enhancement
- Protect Tahltan trails and archaeological sites and cultural areas
- Protect Tahltans right to quiet enjoyment of the land and waters in these areas from industrial development

Edoxtotene Management Area

- Maintain healthy rivers, lakes and waterways
- Manage the pace and scale of development and ensure all Tahltan values are protected
- Protect Tahltan archaeological sites and cultural resources
- Maintain healthy and intact wildlife habitat ranges
- Ensure pristine and clean groundwater and surface water sources
- Require Tahltan consent before any industrial development activities to move forward
- Implement Tahltan Standards, conditions and objectives for any potential industrial activities proposed
- Tahltan access and cultural activities on the land
- Ensure Tahltan quiet enjoyment of the land and waters
- Ensure that mining or energy-related project activities achieve the highest standards and conditions and provide economic and social benefit to Tahltans.
- Implement flight path restrictions around Tahltan harvesting and cultural activities on the land.

9.1.7. **ZIPPA MOUNTAIN, UPPER BELL-IRVING RIVER, RN MOUNTAIN**

These are subalpine and alpine areas in the Lower Iskut River (Zippa Mountain), and Middle Iskut River (Upper Bell-Irving River and RN Mountain) identified by Tahltan as important for travel routes, isb̲ā (mountain goat), dediye (marmot), or access to wildlife, and plants in snow free periods for harvesting and gathering. Boreal mountains and plateaus bring multiple big game species together on these features, plateaus, and mountain passes.

Zippa Mountain

Zippa Mountain area is the southwest mountain block of the Craig and Iskut Rivers. It is an area identified as important area for isb̲ā (mountain goat) and Tahltan. It is an area where Tahltan could access isb̲ā (mountain goat) even during winter, due to the use of lower elevation slopes by the isb̲ā (mountain goat).

Upper Bell-Irving River

It is the subalpine and alpine areas of the headwaters of the river, and is a travel route to Tumeka Lake and the Tla'bane (Klappan) River valley to north east and east. It also provides access to upper elevation or high country to dediye (marmot), khoh (grizzly bear), kedā (moose), debēhe (Stone's sheep), isb̲ā (mountain goat), and plant and medicinal plant communities.

RN Mountain

It is the subalpine and alpine areas provides access to upper elevation or high country to dediye (marmot), khoh (grizzly bear), kedā(moose), debēhe (Stone's sheep), isb̲ā (mountain goat), and plant and medicinal plant communities. It is the mountain block to the east of Devil's Lake and includes a number of Tahltan sites. It is part of the travel, trapping, harvesting, and land uses in the Middle Iskut River area including camps, cabins, and sites.

Tahltan Stewardship Plan Management Directions

The following are the management directions applicable to the upper elevation AOI's:

Edoxtotene Management Area

- Maintain healthy rivers, lakes and waterways
- Manage the pace and scale of development and ensure all Tahltan values are protected
- Protect Tahltan archaeological sites and cultural resources
- Maintain healthy and intact wildlife habitat ranges
- Ensure pristine and clean groundwater and surface water sources
- Require Tahltan consent before any industrial development activities to move forward
- Implement Tahltan Standards, conditions and objectives for any potential industrial activities proposed
- Tahltan access and cultural activities on the land
- Ensure Tahltan quiet enjoyment of the land and waters
- Ensure that mining or energy-related project activities achieve the highest standards and conditions and provide economic and social benefit to Tahltans.
- Implement flight path restrictions around Tahltan harvesting and cultural activities on the land.

Klappan Range and Burrage Management Area

- Maintain intactness of forests and watersheds by limiting new road development
- Community desire to create a buffer management area around the Klappan Sacred Headwaters
- Community food security and traditional gathering activities should be protected

- Implement measures to protect Tahltan quiet enjoyment of the land and waters
- Maintain healthy wildlife ecosystems and ranges
- Focus on cultural practices and Tahltan harvesting and land use
- Protect groundwater and surface water sources
- Limit industrial activities managing pace and scale in this area

9.1.8. **CONSENT AREA AND MOUNTAIN PASS-PROUT PLATEAU**

The Consent Area AOI is the legally defined area where Tahltan consent applies under the Declaration Act Agreement, it is an area defined on approximately 10km distance on either side from the project footprint which includes the MAR, to where it meets Highway 37, and the existing mine footprint to the closest height of land and/or Tahltan Nation border. It includes the Forrest Kerr Hydroelectric Project including right of ways, and access.

Biophysical information includes similar climatic and ecological information for the Lower and Middle Iskut River AOI, and includes the Prout Plateau where the mine footprint sits. The Prout Plateau is a mountain pass from the Unuk River to the Iskut River. It is a rolling subalpine upland on the eastern flank of the Boundary Ranges of the Coast Mountains, between the Unuk River to the south and Iskut River to the north. Mountain Hemlock and Engelmann Ts'ū (Spruce)– Subalpine Ts'ōsts'iye (Fir) are the forested ecosystems which includes mountain slopes that are heavily forested, while other areas of the plateau terrain reflects sparser forest cover and parkland forest type. It has numerous lakes interspersed among the rolling meadows and narrow ridges of this highland area drained by tributaries of the Unuk and Iskut Rivers. Creeks flowing through the mine property – Tom MacKay, Ketchum and Eskay – all drain into the Unuk. The 54.5 km access road to the mine begins at Highway 37 just south of Bob Quinn Lake, and follows the Iskut River Valley south for most of its length, before turning east and ascending a valley to the plateau. The high country of the upper Unuk River lies along the southernmost boundary of Tahltan Territory, which stretches from the confluence of the Iskut and Tūdes̲e chō (Stikine) Rivers 80 km to the west, across the Unuk River, and east to "Groundhog Country" around the upper Nass, Tūdes̲e chō (Stikine) and Skeena Rivers.

Despite the difficult of travelling through the region, and the constant risk of snowslides throughout the winter, the area was rich in fur-bearing animals: mink, martin, beaver, wolverine, fishers and bears. The Iskut valley is good habitat for fur-bearing animals. The valley of Jekill River south of the Iskut was highly valued for its mink. Goats were hard to hunt in the winter, but sometimes we would find goats that had been killed by snowslides.

Tahltan maintained a year-round fishing village called Saksina on the lower Iskut, near the mouth of Verrett Creek. The Tahltan who inhabited this village were part of the Nāskotena Wolf clan of the Tahltan, whose main village was at Uwize' on the Bell-Irving River (called Oweegee on maps today—the name means "whistling"). The trail connecting these villages followed Treaty Creek upstream from the Bell-Irving, crossed the headwaters of the Unuk River, and descended Volcano Creek to the Iskut valley (this final section of trail is roughly the same route taken today by the access road to the Eskay Creek Mine). We used to maintain a trading place at Prout Plateau, on the pass between Iskut and Unuk rivers. From here Tahltan would transport coastal goods to the interior to trade. Another, more important trade route cut through this management area, following the Stikine River from the coast to the stretch of river between Tahltan and Glenora.

Today this area has great archaeological potential for learning about our past. Climate change is causing alpine ice patches to melt and glaciers to retreat. This process exposes organic artifacts that have been preserved in the ice. Ice patch archaeology in the Spectrum Range has discovered artifacts like stitched birch bark containers and wooden walking sticks over seven thousand years old.

Iskut River

Tahltan values and land uses in the area relate to the seasonal, climatic, and ecological differences in the valleys. Lower Iskut River has village sites, cabins and camps related to dēk'āne (salmon), medicinal, plants, is̲bā (mountain goat), and furbearers. Mid Iskut River has similar features but more focus on accessing ebaldzē (mushrooms), kedā (moose), and furbearers with the different forest habitats and with lower snow depths than coastal river reaches, and upper river reaches with villages, cabins, camps across all seasons for trapping, harvesting, and gathering. The

Upper Iskut River provides access to broader plateaus for seasonal gathering of wildlife, dediye (marmot), and subalpine/alpine plants.

Trade and travel along the river valleys are a core value with the river corridor providing access to upper elevation obsidian mining and other sites. The lava flats area and Bob Quinn/Ningunsaw area is known for ebaldzē (mushrooms), kedā (moose), khoh (grizzly bear), ch'iyōne (wolf) and good trapping for furbearers.

The trail connecting these villages followed Treaty Creek upstream from the Bell-Irving, crossed the headwaters of the Unuk River, and descended Volcano Creek to the Iskut valley (this final section of trail is roughly the same route taken today by the access road to the Eskay Creek Mine). Tahltan used to maintain a trading place at Prout Plateau, on the pass between Iskut and Unuk rivers. From here we would transport coastal goods to the interior to trade. Another, more important trade route cut through this management area, following the Stikine River from the coast to the stretch of river between Tahltan and Glenora.

Prout Plateau

It is a mountain pass that provides for access in snow free periods to subalpine and alpine animals such as isbā (mountain goat), kedā (moose), dediye (marmot), khoh (grizzly bear), dih (grouse) and kasbā'e (ptarmigan), plants, and medicinal plants.

The Prout Plateau is important as an area of Tahltan trade, travel, and harvesting/gathering/trapping for plants, medicinal plants, furbearers, isbā (mountain goat), kedā (moose), dzime (birds), and sas and khoh (bears). Archaeological sites are found in the area that are dated precontact. The Prout Plateau is a key connection between the Unuk, Lower Iskut, and Ningunsaw/Oweegee Lake areas for travel and trading. It is an area identified as having high archaeological potential and Tahltan uses.

There was a winter trade route from the coast that came up the Unuk River and crossed over to the Iskut below the mouth of the lower canyon (passing right through the Eskay Creek mine site area). An Elder's description of the trade goods – muskets, shot, powder and knives – places the use of this route in the post-contact period. The goods were brought by most likely Tlingit, using dog-sleds. Tahltan met them somewhere on the Prout Plateau, and from there Tahltan hauled the goods up the frozen Iskut to Devil Creek, near Bob Quinn Lake. At Devil Creek they cached the goods until summer. In the summer, using horses, Tahltan transported the goods up into the high country of the Tla'bane (Klappan) River and beyond, using the trails that followed the upper Nass. Some of these goods ended up at McDames Creek on the Dease River, to be traded with Kaska.

Another Elder describes trails that connected Oweegee with the lower Iskut by way of Treaty Creek and the Unuk River. The trails would have passed over Prout Plateau. The high country around the headwaters of Treaty Creek and the Unuk River provided good habitat for hunting khoh (grizzly bear), in the early fall. Tahltan called Treaty Creek Kas Xoo, which means "grizzly bear creek".

As identified for the Iskut River valley, Tahltan maintained a year-round fishing village called Saksina on the lower Iskut, near the mouth of Verrett Creek. The Tahltan who inhabited this village were part of the Nāskotena Wolf clan of the Tahltan, whose main village was at Uwize' on the Bell-Irving River (called Oweegee on maps today—the name means "whistling"). The trail connecting these villages followed Treaty Creek upstream from the Bell-Irving, crossed the headwaters of the Unuk River, and descended Volcano Creek to the Iskut valley (this final section of trail is roughly the same route taken today by the access road to the Eskay Creek Mine). Tahltan used to maintain a trading place at Prout Plateau, on the pass between Iskut and Unuk rivers. From here Tahltan would transport coastal goods to the interior to trade.

Tahltan Stewardship Plan Management Directions

The following are the management directions applicable to the AOI:

Middle Iskut and Ningunsaw River

- Maintain intact landscape from along Iskut River Large River Corridor from Iskut Lakes to Lower Iskut River
- Recovery and restoring surface and groundwater, riparian habitats, valleys and industrial roads

- Maintain healthy aquatic ecosystems and waterways
- Maintain connection to high elevations from low valley bottoms
- Support wildlife and fish habitat reclamation and enhancement
- Protect Tahltan trails and archaeological sites and cultural areas
- Protect Tahltans right to quiet enjoyment of the land and waters in these areas from industrial development

Edoxtotene Management Area

- Maintain healthy rivers, lakes and waterways
- Manage the pace and scale of development and ensure all Tahltan values are protected
- Protect Tahltan archaeological sites and cultural resources
- Maintain healthy and intact wildlife habitat ranges
- Ensure pristine and clean groundwater and surface water sources
- Require Tahltan consent before any industrial development activities to move forward
- Implement Tahltan Standards, conditions and objectives for any potential industrial activities proposed
- Tahltan access and cultural activities on the land
- Ensure Tahltan quiet enjoyment of the land and waters
- Ensure that mining or energy-related project activities achieve the highest standards and conditions and provide economic and social benefit to Tahltans.
- Implement flight path restrictions around Tahltan harvesting and cultural activities on the land.

Klappan Range and Burrage Management Area

- Maintain intactness of forests and watersheds by limiting new road development
- Community desire to create a buffer management area around the Klappan Sacred Headwaters
- Community food security and traditional gathering activities should be protected
- Implement measures to protect Tahltan quiet enjoyment of the land and waters
- Maintain healthy wildlife ecosystems and ranges
- Focus on cultural practices and Tahltan harvesting and land use
- Protect groundwater and surface water sources
- Limit industrial activities managing pace and scale in this area

9.1.9. **PROJECT FOOTPRINT**

Similar to 9.1.8, Tahltan values are known in the area for Tahltan land uses, seasonal snow free access to harvest isb̲ā (mountain goat), khoh (grizzly bear), kedā (moose), dzime (birds), and dediye (marmot). Gather important plants such as ts'ōsts'iye (fir) and jije (berries), and medicinal plants, as well harvest ebaldzē (mushrooms) at lower elevations in the project area.

Similarly at lower elevations, past and current land uses include camps, cabins, trails and harvesting/trapping in the area. The Project Area is identified as having high archaeological potential. The plateau and the importance for travel, trade, and land uses in the past and currently indicates the sensitivity of the area.

As the Project Footprint is situated on the Prout Plateau and the Consent Area, the biophysical description applies to this area as well. The following is Skeena Resources REAA description (Chapter 11) of the project area:

> *The Project is at an elevation of approximately 800 m in the Tom MacKay Creek watershed. Mountain slopes are heavily forested, while the subalpine terrain around the Project reflects sparser forest cover and parkland forest type. The varying elevations contain numerous different ecosystem and terrain characteristics, including bedrock-controlled terrain, bedrock outcrops, and a variety of Holocene deposited sediments. The bedrock-controlled terrain dominates the landscape and, although bedrock outcrops are extensive throughout the area, a variety of surficial materials are present. Soil formation is limited by the cold regional climate, with long winters that result in slow decomposition and high organic content in many soils.*

Seasonal peak groundwater levels occur in late spring and early summer following freshet, and mid-to late fall during the typical high precipitation season. Groundwater elevation tends be lowest during the dry months in late summer and in winter before the spring melt. Groundwater in the Project area receives recharge from precipitation and infiltration of surface runoff, as well as groundwater flow from upper slopes. Groundwater discharges through evapotranspiration and into creeks.

Annual precipitation at the Project's location mostly falls as snow between September and May. The total annual precipitation (as rainfall-equivalent) measured was 1,930 millimetres (mm) in 2022 and 2,128 mm in 2023. The annual average air temperature measured by the Eskay KM meteorological station from November 2020 to October 2022 was 0.7 degrees Celsius (°C), and the monthly mean air temperature ranged from -12.5 °C in December 2021 to 12.6 °C in August 2022. Wind speeds are generally higher in the winter and lower in the summer and tend to blow to the northeast in the fall and winter and to the southwest in the spring and summer.

As elsewhere in northwestern British Columbia (BC) (outside of populated communities), air quality in the area of the Project reflects the location's remoteness and lack of anthropogenic air emission sources. Development activities have historically occurred or continue to occur in the broader region around the Project, such as mining exploration and production (including the Eskay Creek Mine), hydroelectric power generation, forestry, and road construction and use.

The most prevalent culturally valued plants were subalpine fir (ts'ōstsiye), Alaskan blueberry (echishchō), and oval-leaved blueberry (echishchō).

Large wildlife species recorded near the Iskut and Unuk rivers include black bear (sas), moose (kedā), and mountain goat (is̲bā). Small mammals recorded include American marten (nust'ihe), wolverine (naghā), vole, and hoary marmot (dediye). Fur-bearing mammals with suitable habitat in the area include grizzly bear (khoh), wolf (ch'iyōne), lynx (nasdā), ermine, mink (tehjishe), fisher (ts̲e'des̲), least weasel, and snowshoe hare (Hallam Knight Piesold Ltd. and Homestake Canada Inc. 1993). Mid and lower elevation areas provide habitat for porcupine (dech'uwe), northern flying squirrel and red squirrel (des̲ts̲ed̲ze). Plovers, Canada goose (ghanje), harlequin duck (tūdi), and numerous passerine species have been recorded in the area. Raptors recorded in the area include bald eagle, sharp-shinned hawk (ūzē), and owls (mes̲d̲z̲ī). Upland breeding birds (migratory birds) include varied thrush, pine siskin, fox sparrow, hermit thrush, Wilson's warbler (kābalū), dark-eyed junco, Townsend's warbler (kābalū), yellow-rumped warbler (kābalū), ruby-crowned kinglet, sooty grouse (dih), golden-crowned sparrow, and Pacific wren.

Biophysical inventory mapping identified the Project area as potentially suitable for woodland caribou (hodzih) and moose (kedā; Ministry of Environment 1982). While there have been incidental observations of caribou in the region, there are no known herds in the region, as caribou do not use ICH and ESSF Biogeoclimatic Ecosystem Classification zones for habitat. The mine site is not overlapped by any caribou herd ranges shown on provincial range mapping (Government of BC 2019).

Tahltan Stewardship Plan Management Directions

The following are the management directions applicable to the AOI:

Edoxtotene Management Area

- Maintain healthy rivers, lakes and waterways
- Manage the pace and scale of development and ensure all Tahltan values are protected
- Protect Tahltan archaeological sites and cultural resources
- Maintain healthy and intact wildlife habitat ranges
- Ensure pristine and clean groundwater and surface water sources
- Require Tahltan consent before any industrial development activities to move forward
- Implement Tahltan Standards, conditions and objectives for any potential industrial activities proposed

- Tahltan access and cultural activities on the land
- Ensure Tahltan quiet enjoyment of the land and waters
- Ensure that mining or energy-related project activities achieve the highest standards and conditions and provide economic and social benefit to Tahltans.
- Implement flight path restrictions around Tahltan harvesting and cultural activities on the land.

9.1.10. **CUMULATIVE EFFECTS**

Netce'nsta or Earth-Mother

> *The Earth-Mother lives under the earth, and holds it up. The earth is like a crust or blanket spread out flat, and she is like a post that holds it up. Sometimes she gets tired and shifts her position; or sometimes the earth sags in some place where the weight is on it, and then she moves her arm to put it up. Then we have an earthquake. Earth-Mother is becoming older and weaker all the time, and by and by she will not be able to hold up the earth any longer.*
>
> *Then it will fall into the water which is below the earth, and disappear. Once Earth-Mother told the people, "When you feel an earthquake, you must not be alarmed. It is only because I am a little tired, and am shifting my position. It is no sign that I am going to fall down, and that the earth will come to an end." Therefore people are not afraid of earthquakes.*

Our ancestors respected the land and passed it down to their children in much the same condition as they had found it. We must continue to protect and conserve the interconnected whole that is Keyeh. This means caring for the land as a whole and all of its interdependent parts, respecting the relationships that exist between different features of the land and the animals, plants, and spirits that inhabit it (ecosystems), including ourselves. It is thinking of the land in terms of cycles, shorter seasonal cycles and longer ecological cycles, and Tahltan have always understood that we need to live within those cycles by making our activities align with them as much as possible. On the other hand, we accept that we will never fully understand the land—the larger community of which Tahltan are only a small part. This means that we need to be humble and careful and never forget that there is always have more to learn. This can happen, for instance, by focusing too much on one part of the land, forgetting that we need to view the land as a whole of interdependent parts that are in dynamic and constantly shifting relationships with one another. By disrupting the relationships between parts, in ways that we do not understand, we can upset the land's balance and bring about unanticipated consequences.

Climate change adds another dimension to existing cycles with reduced winter snowpack will lower water levels in our salmon-bearing rivers while raising water temperatures, with impacts on fish populations. Changes in precipitation patterns, along with warmer winters, mean that our forests are now subject to multiple stressors, including drought, pests, disease and wildfires, all of which reduce forest resilience. The gradual loss of glaciers will also mean less available water in summer months. It is unclear exactly how these changes will fully effect fish and wildlife populations but climate change is included when considering the health of the land and Tahltan Values in a cumulative and holistic manner.

The importance of this mountainous southwestern corner of the territory has, in part, to do with the resources provided by the rivers and forests: nust'ihe (marten), tsa' (beaver), tehjishe (mink), naghā (wolverine), sas and khoh (bear), isb̲ā (mountain goat), ch'iyōne (wolf), ts̲e'des̲ (fisher), ts̲abā'e (trout) and dēk'āne (salmon). It was also the trade that travelled up the rivers and trails (coast-interior trade network which stretched from the Pacific coast to the boreal forests east of the Rocky Mountains).

Tahltan land uses and practices includes villages, obsidian mining, trapping, gathering, harvesting, fishing, travel, placenames, and trails throughout the region. Infrastructure includes bridges, stream and river trails, villages, cabins, campsites, and hunting/fishing/trapping/gathering camp sites.

Tahltan frequently travelled back and forth between their villages on the Iskut and upper Nass and the tribal headquarters at the confluence of the Tūdes̲e chō (Stikine) and Tāłtān (Tahltan) rivers, using ancient trails that followed the course of rivers, including Treaty Creek, Ningunsaw River, Unuk River and the Iskut.

The information provided for this AOI is in addition to the Tahltan Values being updated as reported in the above sections, will add context for the area overall, and provide additional information to the areas north and west of the Regional AOI (Map 1).

Tahltan use and occupation in and around northern areas of this AOI, include Tahltan place names, trails, hunting areas, trapping areas, fishing locations, camps, villages, trading sites and knowledge of river courses. Existing archaeological sites in the region reveal a preponderance of obsidian. Obsidian from Edīzā'e (Mount Edziza) has been mined by Tahltan since ancient times. The volcanic glass was critical in the manufacturing of sharp tools and weapons, and was traded widely throughout the north. The study area is bordered to the west and east by two major trade and transportation corridors.

Tahltan use and occupancy of the Edīzā'e (Mount Edziza), Klastline Plateau, Todagin Plateau, and Łuwechōn community area going back to ancient times, is well-documented, and continues to be shared by Tahltan today. There are year-round village sites in the region, outside of Łuwechōn area that continued to be occupied in the early twentieth century. There are records with dozens of villages, traditional cabins, and campsites in the valleys and alongside creeks, and Tahltan trails crisscrossing the entire region. Most of the rivers, creeks, lakes and mountains in the area have Tahltan names. Archaeological sites recorded in the course of investigations carried out over the years, confirm the ancient use and occupancy of this area by Tahltan.

The Tahltan Cumulative Effects AOI is situated within the Boundary Ranges, Skeena Mountains, Yukon-Stikine Highlands, and Boreal Mountains and Plateaus Ecoregions .The Boundary Ranges area is a rugged, largely ice-capped, granitic and metamorphic-based mountain range that rises abruptly from the coast. It has a large alpine area (Boreal Altai Fescue Alpine) mainly of large icefields, glaciers and barren rock dominating the region with the coastal forested valley bottoms being found at constrained lower elevations. Forested vegetation consists of the subalpine or Mountain Hemlock zone on the lower valley slopes; and Coastal Western Hemlock zone on the valley bottoms where Sitka ts'ū (spruce) mixes with western hemlock as the dominant tree species. The Boundary Range is a coastal rainforest ecosystem and is heavily affected by moist Pacific air lying in the Gulf of Alaska and by cold Arctic air that passes over these mountains and river valleys from the northeast.

The Skeena Mountains Ecoregion is an area of high rugged mountains and a moist, coast/interior transition climate. They are composed of folded sedimentary rocks with complex folds and recumbent outlines. Typically, the valleys and saddles are characterized by tight complex folding, whereas the broader massifs are commonly gently contorted or even flat lying. The peaks and ridges present a serrate and jagged profile that has developed under intense glaciation. Glaciation was heavy with much ice originating here then flowing northward or southward to coalesce with other moving ice. Many glaciers persist in the regional area. Interior Gatēle (Cedar) – Hemlock forests occur in the lower western slopes and valleys; while Sub-Boreal Ts'ū (Spruce) forests occur in some of the northeastern valleys. Engelmann Ts'ū (Spruce)– Subalpine Ts'ōsts'iye (Fir) forests occur on all the middle slopes and alpine vegetation or bare rock occur on the upper slopes and ridges; small glaciers occur on the upper slopes in the northwest nearest the Boundary Range. The area is a transitional ecosystem from the coastal rainforest to the northern boreal ecosystems to the east and north. Westward flowing moist Pacific air can bring heavy cloud cover and precipitation either as rain in the summer or deep snow in the winter. Cold Arctic air is often stalled outside this ecosection, but it can often push westward and bring intense cold conditions.

The Yukon-Stikine Highlands Ecoregion is an area of transitioning from the rugged Coastal Mountains in the west to the subdued plateaus to the east. This area was heavily glaciated by glaciers moving off the Boundary Ranges onto the plateaus and lowlands of the northern interior of BC. Boreal Altai Fescue Alpine occurs on the summits and is very extensive in the ecoregion with the subalpine mainly dominated by the Ts'ū (Spruce) – K'aye (Willow) – kī' (Birch) with Engelmann Ts'ū (Spruce)– Subalpine Ts'ōsts'iye (Fir) present in the western area of the ecoregion. Sub-Boreal Ts'ū (Spruce) occur in the lower valleys. It is an ecoregion comprised of extensive volcanic deposits with deep erosion in the Mess Creek and Tūdeṣe chō (Stikine) River valley as it enters the Coast Mountains. Glaciation was heavy in the ecoregion from west to east as they entered into the northern interior plateaus, resulting in rounded summits and ridges and cirque erosion of the higher summits. The area is drained by the Tūdeṣe chō (Stikine) River and its tributaries the Tāłtān (Tahltan) River and by Mess Creek flowing into the Tūdeṣe chō (Stikine) River.

The Boreal Mountains and Plateaus Ecoregion is largely an area of mountains, intervening lowlands, and rolling, high plateaus that are strongly influenced by arctic air. It has a cold, dry boreal mountain climate. The Boreal White

and Black ts'ū (spruce) zone occurs in the lower, wider valleys and lowlands; while the Ts'ū (Spruce) – K'aye (Willow) – Kʔ (Birch) zone occupies most of this area on the mid-slopes, with Boreal Altai Fescue Alpine on the summits and is very extensive in the ecoregion. The ecosection is influenced by uneven intensity from glaciation. Drainage of this area radiates outward in all directions; through the coastal mountains by the Tūdeṣe chō (Stikine) and Iskut rivers; northwest across the Yukon and Alaska by from the headwaters of the Yukon river; and northeast to the Mackenzie River via the Dease and Liard Rivers. The only Tahltan community situated within this AOI is Łuwechōn (Iskut) on Highway 37.

Tahltan Stewardship Plan Management Directions

The following are the management directions applicable to the AOI:

Edoxtotene Management Area

- Maintain healthy rivers, lakes and waterways
- Manage the pace and scale of development and ensure all Tahltan values are protected
- Protect Tahltan archaeological sites and cultural resources
- Maintain healthy and intact wildlife habitat ranges
- Ensure pristine and clean groundwater and surface water sources
- Require Tahltan consent before any industrial development activities to move forward
- Implement Tahltan Standards, conditions and objectives for any potential industrial activities proposed
- Tahltan access and cultural activities on the land
- Ensure Tahltan quiet enjoyment of the land and waters
- Ensure that mining or energy-related project activities achieve the highest standards and conditions and provide economic and social benefit to Tahltans.
- Implement flight path restrictions around Tahltan harvesting and cultural activities on the land.

Klappan Range and Burrage Management Area

- Maintain intactness of forests and watersheds by limiting new road development
- Community desire to create a buffer management area around the Klappan Sacred Headwaters
- Community food security and traditional gathering activities should be protected
- Implement measures to protect Tahltan quiet enjoyment of the land and waters
- Maintain healthy wildlife ecosystems and ranges
- Focus on cultural practices and Tahltan harvesting and land use
- Protect groundwater and surface water sources
- Limit industrial activities managing pace and scale in this area

Middle Iskut and Ningunsaw River Management Directions

- Maintain intact landscape from along Iskut River Large River Corridor from Iskut Lakes to Lower Iskut River
- Recovery and restoring surface and groundwater, riparian habitats, valleys and industrial roads
- Maintain healthy aquatic ecosystems and waterways
- Maintain connection to high elevations from low valley bottoms
- Support wildlife and fish habitat reclamation and enhancement
- Protect Tahltan trails and archaeological sites and cultural areas
- Protect Tahltans right to quiet enjoyment of the land and waters in these areas from industrial development

Lower Stikine and Iskut River Large River Corridor Management Directions

- Maintain healthy salmon ecosystems and all ground and surface water sources that drain into the Lower Stikine and Iskut Rivers

- Maintain intact and undisturbed rivers and coastal old growth rainforests
- Maintain river corridor valleys and connections to high elevation areas
- Ensure Tahltan trails and cultural heritage is protected for any disturbance
- Reclaim and disturbance from roads or industry impacts on the Lower Stikine and Iskut River
- Maintain and protect Tahltan fish camps and enforce Tahltan quiet enjoyment of the land and seasonality of cultural activities (e.g. helicopter flights paths during fish camps)
- Restrict aerial flight paths and create exclusion and avoidance areas around Tahltan communities, cultural sites and fish camps
- Track fishing going into tributaries and rivers off Lower Stikine and Iskut Rivers e.g. Scud, Chutine, Porcupine
- Increase Tahltan education and youth and elder trips along the rivers and story telling about Tahltan culture
- Protect all groundwater and surface water sources and ensure clean pristine water for all living beings and communities
- No road building or development along the Lower Stikine and Iskut Rivers
- Increase fishery database and studies to go beyond Salmon stocks
- Implement fire protection measures around cultural areas, fish camps and Telegraph Creek and Glenora

Łuwechōn Deferral Area

- Protect medicinal and traditional plants of importance (e.g. blueberries).
- Maintain a 25–50 km protection buffer around community of Iskut; inside this area no new industrial development projects are permitted.
- Establish community gun ranges and archery in Iskut area. Clear out traditional trails and keep them open for Tahltan use.
- Restrict float planes on Kluachon Lake; plane traffic is a major disturbance for the community of Iskut.
- Focus on resource and food security for current and future generations. Explore Tahltan-led recreation and tourism.
- Protect culture camps, burial sites and traplines.
- Support and protect ceremonial grounds for elders and places to practice medicine. Protect water sources and Iskut community watersheds.
- Ensure quiet enjoyment of land and protect against overcrowding.

9.2. THE CONDITION OF TAHLTAN LANDS, CULTURE, AND COMMUNITIES

The Scales of Assessment are detailed in section 9.1, in the Hybrid AIR, and the REAA in section 4 where there is greater detail with the understandings of the relationship of regional, landscape, and site scales for the ECRP. There are 2 Regional AOIs (Regional and Cumulative Effects), 4 lower elevation Landscape AOIs (Lower Iskut, Mid – Iskut and Ningunsaw, Oweegee, and Unuk Large River Corridors) 5 upper elevation Landscape AOIs (More Creek, Zippa Mountain, Upper Bell Irving, Mountain Pass-Prout Plateau, Oweegee) and the Consent Landscape AOI. For all the landscape AOIs, site specific values are included but due to the confidential and sensitive nature of the values and knowledge they are not spatially shown but incorporated in each respective AOI assessment.

For each AOI, a summary of the biophysical description, Tahltan Values, and TSP Plan directions are reported in Section 9.1 which includes information on Tahltan Values and the interconnections of Tahltan use and occupancy of the AOIs and management directions related to each AOI from the Tahltan Stewardship Plan.

Section 9.2 provides additional information on Tahltan Values and provides information on past and existing conditions followed by a summary of the conditions and barriers of Tahltan lands, culture, and where applicable, Tahltan communities.

9.2.1. **REGIONAL**

The common values identified in REAA section 4.2.11 are found in the Regional AOI, with information in the Application found in REAA chapters 12-20-27 primarily with information compiled by Skeena Resources associated with the Tahltan Consent, Project Footprint and partially with the Lower Iskut, Mid Iskut and Ningunsaw, Unuk River Large River Corridors, and Regional AOIs. The project-specific technical information, where applicable, will be included for those specific AOI Sections. The areas of the AOIs outside of the above list, have reported technical information related to past regulatory reviews, studies, or relevant literature reviews to provide information to aid in determining effects.

Ancient or Past Conditions

Ancient - Long Term Conditions (7-15 Generations 140 to 300 years or 1955 to 1724)

For thousands of years, Tahltan were living traditionally in the region following the harvesting, gathering, and social seasonal patterns with the movement of wildlife, availability of plant communities, and the salmon and fish cycles influencing traditional ways. Tahltan were also mining, primarily obsidian, and trading with Indigenous neighbours. The landscapes were intact and only affected from natural disturbances and events.

Placer mining has been identified occurring in the region by the early 1860's and in the 1870's the first mineral tenure systems was brought into force for the region. Some of the first claims in the region include Johnny Mountain in 1907 with claims continuing to increase over time as access and exploration techniques advanced (Scannell 2012). Cominco staked the Red Bluffs claims in 1929 from where the Snip Mine originated in the 1980's.

Scannell (2012) also reports there is a history of speculative mining in the region which was non-documented …*"Since the gold rush 150 years ago, thousands of mines have been developed in the Stikine River and adjacent drainages (Baker 2002). Many of these mines were abandoned when few minerals were found or when mining became unprofitable. There remain many historic mine sites that have not been documented."*

Some of the relevant events occurring in the Region identified by Tahltan include (Tahltan First Nation and IISD 2003):

- *1901 - Yukon Telegraph Line completed to Dawson City using route of the 1865–66 Collins initiative.*
- *1910 - 1910 Tahltan Declaration of the Tahltan Tribe asks for resolution of land and rights issue through the development of a treaty among the Tahltan, the Government of Canada and the Government of British Columbia.*
- *1928 - The pack trail from Telegraph Creek to Dease Lake is upgraded to a road. The Stikine, Telegraph Creek and Dease Lake become essential transportation links between southern B.C. and the northern interior.*
- *1930s - Bush planes provide new means of access to remote areas.*
- *1941–1942 - Stikine River used to transport heavy equipment and supplies for construction of the Alaska Highway.*
- *1952 - Production at the Cassiar Asbestos Mine begins; continues until 1992.*
- *1950s and 1960s - A number of Tahltan worked in mineral exploration industry.*
- *1960s - Increasingly common use of fixed wing aircraft and the helicopter (which started in the 1950s) leads to the reduction in the use of Telegraph Creek as a staging point for exploration in Tahltan Country in favour of Smithers. Tahltan involvement in exploration activities declines as a result.*

Forestry, guide outfitting, trapping and other natural resource activities were occurring during the late 1870's to the mid 1950's but on a site specific scale or at minor levels than occurring during the Past -Short Term conditions period. The regions was predominately without roads and transportation was on foot or by river until fixed wing aircraft came into greater use in the 1950's.

The environment for this period is assumed to be self regulating based on the regional ecosystems and geomorphology driving the surface and ground hydrology, aquatic ecosystems functioning and fluctuating within the natural variation of the time, and terrestrial ecosystems being driven by their respective natural disturbances. Fish and wildlife populations important to Tahltan having naturally driven cycles of population ebb and flow not

overtly influenced at regional scales from human effects. Tahltan way of life has been documented to live and move with these conditions until European presence in the mid to late 1800's began its effects.

Technical documentation of the natural environment on water, wildlife/fish, and ecosystems is limited to explorer's and other European sources with the wealth of information tied to Tahltan Knowledge for the area. What can be shared has been identified in the Tahltan Values Sections in this chapter and other cross referenced chapters in the Application. Further information may be available as part of the Tahltan Risk Assessment where confidential or sensitive Tahltan Knowledge may become available for public documents.

Past - Short Term Conditions (1-3 generations 0 – 60 years or 2024 to 1965)

1960's to 2024

Road access has created significant effects in the Tahltan Nation and the region. Highway 37 initially began from the Alaska Highway where the road was constructed south (1959) to support the Cassiar Asbestos Mine. Over time the highway was constructed to Dease Lake where it connected to the Telegraph Creek Road (Highway 51) by the early 1970's. The southern section was a series of logging roads to Meziadin Junction until the highway construction continued north to Dease Lake in the mid 1970's. This was completed to support asbestos from the Cassiar Mine to shipped to the port of Stewart and as logistical support for the Dease Lake Railgrade extension. With the completion of the bridge near Kitwanga, the highway southern endpoint moved from New Hazelton to Kitwanga in the 1970's. With the advancement of the highway and the continued mineral exploration pressures, non-status roads (roads without legal designations) occurred where proponents created resource roads or "trails" to access mineral or placer tenures.

Commercial forestry is relatively recent to the area with forestry initially tied to Cassiar Forest District which operated as a forest district until the early 2000's where it was amalgamated with the Bulkley Forest District and became the Skeena Stikine Natural Resource District with the district operated from the Smithers office and the Coast Mountains Natural Resource District (office based in Terrace) (REAA Table 10.10-4). Skeena Resources reports "*The largest TSAs in northwestern BC include the Cassiar TSA (BC largest and least populated TSA, covering 13.1 million ha), Nass TSA, MacKenzie TSA, Kispiox TSA, Prince George TSA and North Coast TSA (Government of BC 2023c; 2024b). The Cassiar TSA includes a First Nations Woodlands Licence1 held by the Tahltan Nation. As defined by the Cassiar Iskut-Stikine LRMP, the timber harvesting land base represents approximately 1% of the total area covered by the LRMP (ILMB 2000)*."

Timber harvesting has been limited to low elevation forests in the Regional AOI with an average harvest of 265 ha and 6 openings from 1978 to 2003[5]. Cumulatively, there has been 5,580 ha of timber harvested in the Regional AOI. With each of the openings has associated roads and increased access in the low elevation areas. Since 2004 there has been an increase in the rate of timber harvesting with annual harvest averages of 23 opening and 320 ha, with 6,080 ha timber harvested from 2004 to 2024. With each of the openings having associated roads and resulting increased access in the low elevation areas. The majority of the blocks harvested since 1978 (566 openings) are considered in the early seral stage in the low elevation forests in the area.

Mineral exploration has been occurring since ancient times by Tahltan and the mining of obsidian, and since 1861 with the Stikine Gold Rush. The Regional AOI is situated within the "Golden Triangle" is one of the richest and most active areas for mineral exploration and development in BC. There are numerous known mineral deposits, widespread mineral claim staking in the area, and a number of mineral mines in the area (Table 10.10-4). Currently, there are 1,460 active mineral tenures of 598,208 ha of the area, with 34 approved Notice of Work permits (placer and mineral) in 2024, 2 major mine permits (Eskay and KSM), and 2 past producer mine sites (closed or under care and maintenance Snip and Johnny Mountain). It includes existing airstrips at Bob Quinn, Snip Mine, and Johnny Mountain Mine, aircraft infrastructure at Bronson Slope, and helicopter activities tied to mineral exploration. In addition, the Bronson Slope Connector is situated in the region.

[5] https://catalogue.data.gov.bc.ca/dataset/harvested-areas-of-bc-consolidated-cutblocks-

Chapter 21 in the REAA, provides information on infrastructure and services for the project, and Skeena Resources reports:

The development of infrastructure and services in the region has been largely influenced by the evolution of mining activities in the region, with the development of roads, a telegraph line, mail service, and steamboat service in response to demand related to gold rushes in northern BC starting in the mid-nineteenth century and furthered by the large surge of gold seekers who passed through the region on their way to the Yukon during the 1898 Klondike gold rush (Sheppard 1983). While mining development in the region has historically increased services available to local residents, mine closures and associated cessation of supporting activities at other times has resulted in the reduction of services as well. For example, Sheppard (1983, 240) notes that during the 1920s to 1940s, there were four competing general stores operating in Telegraph Creek in response to demand from "hunters, adventurers, miners, and airport construction". However, by the late 1950s, mining, big-game hunting, and construction activities had declined, and only one general store remained in Telegraph Creek. As well, the local office for the Indian agent responsible for fulfilling governmental obligations under the Indian Act (RSC 1985, c I-5; including management of housing and other infrastructure) closed around this time (Sheppard 1983).

Since then, notable infrastructure developments of geographic significance to the LAA include the opening of the Cassiar Asbestos Mine in the 1950s (Albright 1982), the completion of the Stewart-Cassiar Highway in the 1970s (McIlwraith 2007), and the construction of the BC Rail grade in the mid-1970s (McIlwraith 2007). This last development did not see installation of the planned track and therefore never supported a functional railway; however, its creation facilitated off-road and pedestrian access to the areas it crosses and continues to be used today.

Chapter 22 in the REAA, provides information on the non-traditional land uses and tenures within the Tahltan Consent, Project Footprint and partially with the Lower Iskut, Mid Iskut and Ningunsaw, Unuk River Large River Corridors, and partially within the Regional AOI's 9 (Section 22.4.3). In addition, recent information compiled for the *Red Chris Block Cave Project - Production Phase Application for an Amendment to Environmental Assessment Certificate #M05-02* (Newmont 2024) provides additional current information on the topic. Guide outfitting concessions, range tenures, and trapping concessions are the largest area based tenures in the AOI, but they are predominantly site specific activities occurring infrequently across the tenure (Table 4-7, Newmont 2024). They are predominantly consumptive based on wildlife or are focused on supporting horses for guide outfitting as range tenures. The predominant tenures and activities are tied to forestry and associated road, cutting, and other related permits and tenures; mineral exploration tenures and permits; and major mine permits (Section 22.4.3 and Newmont 2024). Associated with these activities are 1,138 km of roads with highway (141 km) and industrial roads (623 km) in place. Additional historical information relevant to the AOI is reported in Section 22.4.2.1.

Historical information on water is based a summary from Scannell (2012) using past water sampling by Environment Canada of the Stikine River upstream of the confluence with the Iskut River between 1981 and 1994 (Jang and Webber 1996, Table 3). During the same time period, flow data was collected at a Water Survey of Canada flow gauge located 58 km southwest of Telegraph Creek and about 70 km upstream from the water quality station.

Environment Canada (2005) reported that there were "no environmentally significant trends in water quality" and that elevated metals likely were in particulate form. Environment Canada (2005) reported: "Total aluminum, cadmium, chromium, copper, iron, lead, manganese, nickel and zinc, organic carbon, apparent color, non-filterable residue and turbidity values did not meet various water quality criteria at times due to high levels of suspended sediment carried by high river flow. Copper levels exceeded the aquatic life criteria most of the time, suggesting a naturally high copper mineralization in the watershed."

The US Geological Survey sampled water quality in the Stikine River near Wrangell, Alaska from 1975 through 1993 (Alexander et al. 2001). Stream flow also was sampled at the same location from 1976 through 1993.

According to data from the US Geological Survey, water quality in the Stikine River near Wrangell was generally good (Table 4), although 13% of the samples exceeded the chronic criterion for Cu, 20% exceeded the chronic criterion for Cd and 38% exceeded the chronic criterion for Pb (US EPA 2009; Canadian Water Quality Guidelines for the Protection of Aquatic Life 2007; Nagpal et al. 2006). Al was sampled as total Al and the higher values are likely a result of suspended sediments. Only one sample was analyzed for dissolved Al; the concentration was lower than both the acute and

chronic criteria. There was no apparent correlation with exceedances in water quality and stream flow (Alexander et al. 2001).

The author also summarizes information on the Iskut River where:

Environment Canada sampled water quality in the Iskut River below the Johnson River between 1980 and 2002 (BWP Consulting 2003, Table 5). Stream flow was sampled at a Water Survey of Canada flow gauge at the same location. BWP Consulting (who conducted the data analysis) concluded that "There were no obvious environmentally significant trends in water quality that could be identified through visual examination of the data.". . . maximum nonfilterable residue and turbidity values occurred during peak flows, and were probably a natural occurrence. BWP further reported: "Total aluminum, arsenic, cadmium, chromium, copper, iron, lead, manganese and zinc, organic carbon, apparent color, non-filterable residue and turbidity values did not meet various water quality guidelines due to the high levels of suspended sediment in the water during freshet." The report states that elevated metals occurred with elevated suspended sediments, indicating that metals were in particulate form. The authors do not speculate about the bioavailability of the elevated metals.

Scannell (2012) provides summary information on the Iskut River fish distribution with the lower portions of the Iskut River, below the Iskut Canyon near Forrest Kerr Creek, supports Chinook, coho, pink and sockeye salmon; Dolly Varden char; Rainbow, steelhead, bull, and cutthroat trout; mountain whitefish; arctic grayling; burbot; lake chub; lamprey; longnose sucker; three-spine stickleback; dace and sculpin species.

The upper portion of the Iskut River, upstream of the canyon, has a more limited fish population. Dolly Varden char, bull trout, rainbow trout, mountain whitefish and sculpin were reported from this region of the Iskut River. This is consistent with information provided in the Application and the Forrest Kerr Hydroelectric Project (Forrest Kerr EA Application 2003).

Similar information on wildlife values for the Iskut River are tabled for moose and mountain goats, primarily based on the Galore Creek Environmental Assessment (Scannell 2012).

The information provided is consistent with the historical information reported by Newmont (2024), Skeena Resources Chapters, 12-20 for the regional assessment areas. Project-specific information will be identified for the Tahltan AOI's within these areas.

Existing Conditions and Barriers to Tahltan

Existing Conditions and Barriers

The existing conditions and barriers for the AOI are the reported for each AOI in the below sections, and with the information reported in REAA Section 4.4.3.4.

The information provided in the *Past - Short Term Conditions (1-3 generations 0 – 60 years or 2024 to 1965)* provide details on components which have been both positive and negative effects on Tahltan Values with:

- the development of Highway 37 and its effects over time with increased traffic volumes, increased road densities with increasing ground based access for resource development; increased density and distribution of mineral exploration, mine development, and reclamation, forestry, guide outfitting, licenced harvesting and gathering (e.g. mushrooms),

- Forestry with an average harvest of 265 ha and 6 openings from 1978 to 2003 . Cumulatively, there has been 5,580 ha of timber harvested in the Regional AOI. With each of the openings has associated roads and increased access in the low elevation areas. Since 2004 there has been an increase in the rate of timber harvesting with annual harvest averages of 23 opening and 320 ha, with 6,080 ha timber harvested from 2004 to 2024. With each of the openings having associated roads and resulting increased access in the low elevation areas. The majority of the blocks harvested since 1978 (566 openings) are considered in the early seral stage in the low elevation forests in the area.

- Currently, there are 1,460 active mineral tenures of 598,208 ha of the area, with 34 approved Notice of Work permits (placer and mineral) in 2024, 2 major mine permits (Eskay and KSM), and 2 past producer mine sites (closed or under care and maintenance Snip and Johnny Mountain). It includes existing

airstrips at Bob Quinn, Snip Mine, and Johnny Mountain Mine, aircraft infrastructure at Bronson Slope, and helicopter activities tied to mineral exploration. In addition, the Bronson Slope Connector is situated in the region.

- Associated with these activities are 1,138 km of roads with highway (141 km) and industrial roads (623 km) in place. Additional historical information relevant to the AOI is reported in REAA Section 22.4.2.1.
- Tahltan have identified concerns on the wildlife mortalities tied to access from both licenced harvesting and with motor vehicle events where based on Tahltan monitoring is occurring at 2-4 times higher than what is being reported on provincial systems. In addition, loss of culturally important gathering areas from infrastructure development such as pine mushroom and Burrage berries communities has been a barrier to Tahltan Core Priorities.
- The inconsistent and at times restricted access to Tahltan accessing lands and water with resource roads has been a barrier since the 1990's and continues to date.
- Mineral exploration, with associated air logistics have been increasing over time and has had effects on Tahltan Quiet Enjoyment of Land with major project development, forestry, and other tenured/licenced activities in the AOI.
- As part of the TSP and this environmental assessment, Tahltan communities and members have expressed concerns on the socio-cultural effects of revenues, benefits, services, housing, and infrastructure leaving Tahltan Territory with communities shrinking (out-migration) and social-cultural negative effects increasing (addictions, mental health, housing) in the territory over the past and current time periods. Finally Tahltan have identified having more ability to direct the pace and scale of resource development so positive legacies can be in place for current and future generations and move away from boom and bust cycles.
- There are 100 archaeological known sites with the provincial system and the potential for higher densities of finds.
- There are concerns on the current conditions related to salmon and fish populations, effects from a changing climate, and unregulated activities and harvesting on Tahltan Values which have influences on existing conditions but are acknowledged these items are occurring from external forces outside of this assessment.

9.2.2. **ISKUT RIVER**

Lower Iskut

Tahltan Values identified in REAA section 4.2.11 are considered for AOI and in the context described in 4.2.11 while recognizing the confidentiality and sensitivity of Tahltan Knowledge within a public document. The area has been used for thousands of years, with Tahltan Values found in the area including Tahltan archaeological sites ,traditional food and gathering areas, burial grounds, village sites, cache pits, fish camps, food security areas, trapping, trails and travel routes, placenames, sources of Tahltan Stories, coastal moose habitat range, fresh water and aquatic resources, salmon habitat and ecosystems, ground and surface water sources, riparian habitat, intact watersheds, mountain goat habitat range, glacier trails, and importance of Craig, Lower Iskut, and Lower Stikine Rivers.

Technical information for the AOI(s), unless reported by Skeena Resources, or tied to specific projects are supported by information identified regionally.

Ancient - Long Term Conditions (7-15 Generations 140 to 300 years or 1955 to 1724)

In addition to the above, similar conditions as reported in Section 9.1.2 and 9.1.10 occurred for the two low elevation areas with additional activities reported occurring on the lower Iskut River where prospectors in the late 1800's identified mineral occurrences in the area; this was followed by more systematic bedrock mapping, geochemical sampling, and geophysical surveying (Baker 2002). During the Klondike Gold Rush a number of prominent mineral outcroppings, including Johnny Mountain were identified by a variety of expeditions including

during the international boundary surveys (Martin 1996). The first claims in the Johnny Mountain area were staked by the Iskut Mining Company of Wrangell Alaska in 1907 (Scannell 2012). This was followed my other prospectors, such as the Red Bluff claim group, 5 km northeast of the Johnny Mountain property (which is located outside of the area), was staked in 1909. Cominco staked 42 claims in 1929 in the Iskut River area; these claims were never developed (Scannell 2012).

Past - Short Term Conditions (1-3 generations 20 – 60 years or 2024 to 1965)

1960's to 2024

Since the 1980's there has been 24 mineral claims with the companies associated with Snip, Bronson Slope, and Rock and Roll properties. The companies holding the claims have changed over the years with the current owners and property descriptions detailed in the next section. The BC Minfile[6] information reports 1 anomaly, 44 showings, 2 developed prospects (Bronson Slope and Rock and Roll), 8 prospects, and 1 past producer (Snip Mine). While these features were explored and prospected earlier than 1965, the majority of the work has occurred in the recent past and current times.

Access has been limited to water and aircraft with trails and mining roads being limited to mineral exploration and on mineral claims. There is an airstrip which is still used to date, it was built to service the Snip Mine and is located on the river floodplain in the mine site area. When Prime Resources/Cominco operated Snip Mine, it used a hovercraft from Wrangell to bring goods and haul concentrate from the mine. The hovercraft was contentious with concerns on the effects created on the coastal rivers, with Department of Fisheries and Oceans reporting direct and indirect effects to salmon redds, juvenile salmon in shallow areas, and stream bank erosion (Brown and Lidster 1995). The hovercraft ceased operations before the mine closed.

The limited road access in this area was developed to support three run-of-river hydroelectric facilities — Forrest Kerr (195 MW), McLymont (66 MW), and Volcano (17 MW) Hydro Projects owned and operated by Coast Mountain Hydro Services. The project was approved in 2003 with an Environmental Assessment Certificate awarded. The project obtained commercial authorization in 2014 to begin selling power to BC Hydro. The majority of the road access is related to resource roads developed in the Mid Iskut River area which is detailed in Section 10.10.2 with 8 km of main road with additional road access to support the project being developed. Currently the road access terminates at this project.

Additional Information on Forrest Kerr from REAA Chapter 10 (Page 10-43) include:

- *Production: a 195 MW run-of-river hydroelectric power project with a transmission line capacity of 287 kilovolt (kV) (Cambria Gordon Ltd. 2009).*
- *Project Lifespan: operations began in late 2014, with an anticipated project life of 60 years.*
- *Footprint: approximately 29 ha of land was cleared for the Forrest Kerr Hydroelectric project. The project infrastructure includes the following: Weir on the Iskut River below Forrest Kerr Creek, intake structure, power tunnel, surge / access tunnel, in-tunnel de-sanding system, underground powerhouse with three turbines, powerhouse access shaft and hoist, and tailrace (tunnel discharge (Cambria Gordon Ltd. 2009).*
- *Access: access to the project is from Highway 37 and the Eskay Creek MAR. A new 8 km gravel road was constructed in 2005 (Cambria Gordon Ltd. 2009) and the airstrip at Bob Quinn Lake will also be used to transport personnel and materials.*
- *Traffic volume: it is assumed that there will be limited traffic along Highway 37 and the Eskay Creek MAR during operations. The primary traffic will comprise employees heading to and from the Forrest Kerr camp at approximately one trip per day.*
- *Water (inputs/outputs): water will be diverted from the Iskut River through a 3.1 km tunnel, resulting in approximately 252 cubic metres per second (m3/s) diversion flow, and returned to the Iskut River at the tailrace (Glassman 2003).*
- *Employment: the hydroelectric power project created 400 jobs during peak construction.*

[6] https://minfile.gov.bc.ca/

There are 3 registered archaeology sites in the AOI, and includes multiple site specific and landscape Tahltan Knowledge features in the AOI.

In 2024, there are 8 authorized Notice of Works permits for claims in the area, with Snip, Bronson Creek, Rock and Roll, Iskut Project – Bronson Connector, KSP, Hoodoo, and Golden Triangle North. There 120 claims issued or renewed since 2004 with the 10 companies owning the claims. Johnny Mountain is a closed mine site and it is located at higher elevations outside of this area.

Currently the forest clearings are tied to openings for mineral exploration permits, such as drill pads or camps; outside of the land cleared for the Coast Mountain Hydro Services hydroelectric projects and the Snip Mine infrastructure. Outside of existing disturbances related to past mine infrastructure, airstrips, developed prospects, and mineral exploration, there is intact forested river corridor in the area.

However, the Iskut Property (see below description) includes the Bronson Connector, a proposed mineral exploration road from the McLymont hydroelectric project and traversing approximately 20 km to Snip Mine/Craig River area. Access into the area has been proposed since 1990's where the provincial government proposed a 72 km road from Bob Quinn Lake through to Bronson Creek, Prime Resources constructed the first 40 km to near Volcano Creek before extending the road south to the Eskay Creek Mine Area (Forrest Kerr EA Application 2003). Access corridors in the area are tied to Special Use Permits or mineral exploration authorizations and are restricted and not public access. This includes access for Tahltan being restricted or limited over this time fir traditional uses. Water access from the Stikine to the Lower Iskut continues to be accessible by Tahltan and public.

Snip Mine

Snip Mine is an underground mine located in the Craig and Lower Iskut River area, it operated from 1991 to 1999. It produced 32.093 million grams of gold, 12.183 million grams of silver and 249,276 kilograms of copper from about 1.2 million tonnes (BC Minfile). It was operated by Prime Resources Corporation (a venture of companies including Cominco, and Homestake Canada Inc). It was closed in 1999 with an approved reclamation and closure plan. In 2001, Barrick Gold Ltd purchased the property by acquiring Homestake Canada Inc. and was responsible for the closure management of the site. In 2017, Skeena Resources obtained full ownership of the project from Barrick Gold Ltd. Skeena has indicated interest in making the project a satellite operation if the Eskay Creek Revitalization Project is approved, with ore being possibly trucked to the mill at Eskay Creek and processed. This could occur during the later stages of the Eskay Creek Life of Mine[7]. This is not included as a component of the environmental assessment application currently being reviewed.

Highlights about the project provided by Skeena Resources in REAA Chapter 10 (Page 10-39) include the following:

- *Production: from 1991 to 1999, the mine produced 32,093 t of gold, 12,182 t of silver, and 249,276 kg of copper from 1.2 Mt of ore (MEMPR 2007).*
- *Project Lifespan: the Snip Mine lifespan was 8 years (1991 to 1999).*
- *Footprint: the mine infrastructure consisted of an underground mining operation, mill, tailings impoundment, and ancillary facilities.*
- *Access: the mine was a fly-in/fly-out operation accessible by helicopter (Sibbick and MacGillivray 2006). The site could also be accessed by boat (Price 2003), or hovercraft along the Iskut and Stikine rivers.*
- *Traffic volume: the mine relied mostly on air transportation (Wojdak 2010).*
- *Tailings storage: the tailings impoundment was constructed in the saddle of a narrow valley forming the headwaters to both Monsoon and Sky creeks. Dams were constructed at each end to form a tailings impoundment approximately 150 m wide and 800 m long. Discharge from the impoundment was directed toward Sky Creek (Sibbick and MacGillivray 2006).*
- *Water (inputs/outputs): the mine site is drained by the Bronson, Monsoon, and Sky Creek drainages. Both Bronson and Monsoon creeks flow directly into the Iskut River, whereas Sky Creek flows into the Craig River and then into the Iskut River (Sibbick and MacGillivray 2006).*
- *Employment: on average, 122 people were employed by the mine (MEMPR 1993).*

[7] https://skeenagoldsilver.com/eskay-creek/snip-deposit/

Iskut Property

The Iskut Property is a combination of claims including the Bronson Slope developed prospect, Golden Triangle North, and the Johnny Mountain Mine all held by Snipgold[8] Inc. a subsidiary of Seabridge Gold who also owns KSM mine project south of the Eskay Creek Mine.

Bronson Slope has history of advanced exploration and developed prospect primarily during the 1980's and 1990's through a number of companies. Skyline Gold Corporation became Snipgold Corp was the last company owning the properties prior to Seabridge Gold acquisition in 2016. It is neighbouring the Snip Mine site and in the 1990's and 2000's worked with previous owners on exploration activities. The Bronson Slope property also includes the Bronson Connector which to date, has not been advanced by Snipgold to further the development of the properties; however this is a concern with Tahltan by opening the area to more ground based resource development access in the Lower Iskut River.

Johnny Mountain

Johnny Mountain has history of exploration from the early 1900's with a number of companies involved in exploring the deposit. It was an underground mine that operated from 1988 to 1993. It closed in 1993, with the mine site and property being held over a dozen companies resulting in the lack of a consolidated and focused environmentally sustainable development plan[8]. In 2005, Skyline Gold (later renamed Snipgold) purchased the property with Seabridge Gold obtained the entire Iskut Property including Johnny Mountain mine site in 2016.

Rock and Roll Property

Originally claimed in 1988, it has a history of exploration including drilling, it is currently owned by Etruscus Resources Corporation (2018), with plans to continue drilling and other exploration activities under its current authorization. It is a developed prospect (BC Minfile).

Lower Iskut River Current Conditions

The key TSP management directions for the AOI focus on maintaining and reclaiming intact coastal river aquatic and terrestrial ecosystems; restrict ground access; protecting and maintaining salmon and fish values; protecting water sources; protecting and maintaining Tahltan sites, uses, and way of life; maintaining or recovering salmon populations; and reducing cumulative effects to Tahltan and interconnected values.

Currently the AOI, is meeting many of the directions, with mineral exploration and closed mine reclamation/ maintenance being the main resource activities. There is air traffic related to mineral exploration, licensed harvesting and gathering, and advancing mineral projects are existing pressures on fish, wildlife, water, river corridors, Tahltan way of life, Tahltan Core Priorities, and Quiet Enjoyment of the Land values in the AOI. However, most of the AOI is intact contiguous landscape, without ground access, and still relatively remote which is supporting meeting TSP management directions at this time.

Middle Iskut and Ningunsaw River

Tahltan Values identified in REAA section 4.2.11 are considered for AOI and in the context described in 4.2.11 while recognizing the confidentiality and sensitivity of Tahltan Knowledge within a public document. The area has been used for thousands of years, with Tahltan Values found in the area including medicinal plants, access to Klappan Sacred Headwaters, cabins and cultural sites, harvesting and gathering areas, trails and archeological sites, fishing and hunting areas, family and gathering areas, Iskut River Hot Spring, Iskut River, Bell-Irving River, interior moose habitat range, trout and freshwater aquatic resources, ground and surface water sources, Stone's Sheep and mountain goat habitat range, groundwater sources, and riparian habitats. The Iskut valley was and is not only a major travel corridor (parts of Highway 37 follow the old Tahltan trail) but an important area for hunting, trapping, fishing and plant harvesting. All of the headwater lakes of the Iskut provide excellent fishing in the late spring and fall. Blueberries and huckleberries are plentiful in the valley from Burrage Creek south to Thomas Creek, and around Bob Quinn Lake. South of Ningunsaw River there is excellent trapping country. For example, we call the swampy country on the left bank of the Iskut upstream

[8] https://iskutproject.com/

from the canyon Tsa'keyeh, meaning "beaver village." Ningunsaw Pass has good moose habitat, and bears and wolves are abundant in the mountains south of the pass. In the past, we used to trap martin, lynx, fisher, wolverine and mink all through this area.

Ancient - Long Term Conditions (7-15 Generations 140 to 300 years or 1955 to 1724)

Similar conditions as reported in Section 9.1 occurred for the low elevation areas with additional activities reported occurring similar to the Lower Iskut.

Past - Short Term Conditions (1-3 generations 0 – 60 years or 2024 to 1965)

1960's to 2024

The AOI is represents the low elevation valley landscape with mid Iskut River and Ningunsaw River as the Large River Corridor identified in the TSP. It is also the where the main access, transmission line, a focal area for commercial forestry, and access to the Forrest Kerr and Eskay Creek projects are situated.

There are 235 mineral tenures with 23 owners in the AOI, with 9 approved Notice of Work permits, primarily for quarries, and as access control for upper elevation permits (e.g., Galore Creek, Ball Creek, and Iskut Property), or the permit boundaries extend into the AOI with the majority of the permit existing in upper elevation areas outside of the AOI.

Access

Highway 37 access has created significant effects in the Tahltan Nation and the region. Highway 37 initially began from the Alaska Highway where the road was constructed south (1959) to support the Cassiar Asbestos Mine. Over time the highway was constructed to Dease Lake where it connected to the Telegraph Creek Road (Highway 51) by the early 1970's.

Access into the AOI for resource development has been proposed since at the least the 1990's where the provincial government proposed a 72 km road from Bob Quinn Lake through to Bronson Creek, Prime Resources constructed the first 40 km to near Volcano Creek before extending the road south to the Eskay Creek Mine Area (Forrest Kerr EA Application 2003). Access corridors in the area for resource development (does not include forestry where generally the roads are considered public) are tied to Special Use Permits or mineral exploration authorizations and are restricted and not public access. This includes access for Tahltan being restricted or limited intermittently over this time for traditional uses.

REAA Section 21.4 provides information on the Eskay Creek Mine Access Road as:

The Eskay Creek MAR: *located near the Bob Quinn Lake Aerodrome, this road is approximately 138 km north of Meziadin Junction. The Eskay Creek MAR is about 59 km long and is a private industrial road that was built by Barrick Gold Corporation in the early 1990s. Some respondents to the Tahltan Survey noted that this road, as well as other access roads, have been both beneficial and problematic for traditional land use, as it opens up access to areas that were previously more difficult to access for both Indigenous and non-Indigenous land users. Land use activities are described in Chapter 22, Non-traditional Land and Resource Use, and Chapter 26, Current and Future Use of Land and Resources for Traditional Purposes Effects Assessment.*

There are 610 km of access in the AOI, with the following breakdown:

- 89 km Highway 37
- 3 km local or recreation
- 520 km resource related roads and trails (includes roads within cutblocks and right of ways)
- Of the 520 km, there is 71 km related to the Eskay Creek Mine Access Road (MAR) and Forest Kerr Project. The MAR continues to south towards the mine site but is outside of the AOI. It will be discussed further in Section 4.4.9 and 10

NTL

The Northwest Transmission Line is situated in the AOI, and includes the transmission line extension to Iskut and Red Chris Mine. The transmission line has a Right of Way (ROW varies from 25 m to 40 m) with associated access roads and clearings adjacent to the ROW (both cutblock and openings to support the transmission line) remaining in permanent early seral stage. The total disturbance is approximately 91 km and 225 ha, and approximately 40 km and 229 ha with the connection to the line from the Forrest Kerr Project.

Forestry

In 2024, there were 283 cutblocks, primarily situated in the Bob Quinn and Devils Lake Forest Service Roads area, with harvesting occurring as

- 8 openings - 1980-1990, 472 ha
- 33 openings - 1991-2000, 741 ha
- 24 openings – 2001-2010, 171 ha
- 182 openings - 2011 – 2020, 2,727 ha
- 36 openings -2021-2024, 36 blocks, 756 ha

Given the duration of timber harvesting, the openings are early seral but silviculture has been occurring on blocks to meet provincial standards and obligations. Overall, the seral stage for the AOI, has 6% early, 23% mid-mature, 51% mature, and 18% old forests in the Interior Cedar Hemlock (ICH) ecosystem, with large areas of mature and old forests situated in the more remote areas of the AOI.

Within the AOI, 56 archaeological sites are situated in the AOI, and includes multiple site specific and landscape Tahltan Knowledge features in the AOI.

The current conditions and barriers identified in the Past Short Term conditions section are still in place today. The industrial access developed in the past for the Eskay Mine Project and then the Forrest Kerr Hydroelectric Project has restrictions and barriers to Tahltan use of the area.

Additional information for the AOI are reported in REAA Sections 4.4.9 and 10, with additional project-specific conditions and barriers identified to the Consent and Project Footprint AOIs in this report.

Middle Iskut and Ningunsaw River Current Conditions

The key TSP management directions for the AOI focus on maintaining intact landscape and healthy aquatic ecosystems and waterways from along Iskut River Large River Corridor from Iskut Lakes to Lower Iskut River; recovery and restoring surface and groundwater, riparian habitats, valleys and industrial roads; maintain healthy aquatic ecosystems and waterways; support wildlife and fish habitat reclamation and enhancement; protect Tahltan cultural, archaeological sites, traditional practices, and quiet enjoyment of the land and waters in these areas from industrial development

Currently the AOI, is meeting many of the directions, with mine access, forestry development, and hydroelectric being the main resource activities. There are existing barriers to Tahltan with a high density of access, much of it with restricted or inconsistent access to Tahltan for several decades. Forestry has removed a sizable area of mature and old forests in the valleys accessible to Highway 37 and resource roads, given the large size of the AOI, with many areas still remote, is where much of the mature and older forests are located, resulting in acceptable seral stage targets. In addition, commercial forestry has legal obligations for silviculture to plant trees in cutblocks which will reduce the effects over time. Also with Tahltan owning the commercial forest tenure is allowing for shifts in the density, distribution, and location of future blocks. However, the existing access and early seral openings does result in increased licenced harvesting and gathering of plants and wildlife with the network of forestry roads and access related to infrastructure like the NTL right-of- way. Mineral exploration with air traffic is also in the area which has effects on wildlife and quiet enjoyment of the land. Finally, Highway 37 has being identified as both a positive and negative barrier/condition with increased traffic from resource development, travel routes, transportation of goods, and community uses. The existing barriers and conditions are indirect/mixed effects with

from other sources including Red Chris, Forestry, mineral exploration, Forrest Kerr Hydroelectric, and others with the recent development of the ECRP.

9.2.3. **UNUK RIVER**

Tahltan Values identified in Section 4.2.11 are considered for AOI's and in the context described in 4.2.11 while recognizing the confidentiality and sensitivity of Tahltan Knowledge within a public document. The area has been used for thousands of years, with Tahltan Values found in the area including Tahltan archaeological sites ,traditional food and gathering areas, burial grounds, cache pits, fish camps, , trapping, trails and travel routes, placenames, sources of Tahltan Stories, coastal moose habitat range, fresh water and aquatic resources, salmon habitat and ecosystems, ground and surface water sources, riparian habitat, intact watersheds, and mountain goat habitat range. Tahltan used to maintain a trading place at Prout Plateau, on the pass between Iskut and Unuk rivers. From here we would transport coastal goods to the interior to trade.

Salmon are central to our cultural identity as Tahltan. We sometimes refer to ourselves as "Salmon People." Salmon have accompanied Tahltans from the beginning. When the two matriarchs of the Tahltan people first encountered one another across the Stikine River at the mouth of the Tahltan River, the woman on the south bank asked what it was she saw flashing white in the shallow waters of the Tahltan. "Salmon ascending the small stream," was the answer. And this became the name of the Tahltan River: Titcaxhan. The large annual salmon runs up the Stikine River (and also the Taku, Skeena, Nass and Unuk rivers) have always been the basis of our wealth and strength as a Nation. We developed a pit storage system to store and preserve salmon for the winter months. Having access to dried salmon meant that we were less vulnerable to the vagaries of the hunt.

Ancient - Long Term Conditions (7-15 Generations 140 to 300 years or 1955 to 1724)

In addition to the above, similar conditions as reported in Section 9.1.2, 9.1.4 and 9.1.10 are applicable for ancient conditions.

Past - Short Term Conditions (1-3 generations 20 – 60 years or 2024 to 1965)

1960's to 2024

The information reported for the history of the Eskay Creek Mine Project, KSM Mine Project, and Brucejack Mine Project identified in REAA Sections 21.4.2 and 22.4.2 are applicable to the AOI.

The Unuk Large River Corridor is an intact forested AOI without ground access, commercial forestry, or other large human openings/clearings. It is a coastal salmon river ecosystem as reported by Skeena Resources in chapters 14-20,22, 25-27 detailing the relevant water, fish, wildlife, non-traditional, and traditional uses in the AOI.

It is within a landscape of high mineral values overlain with Notice of Work permits covering the length of the AOI, with interests tied to the upper elevation mineral deposits. Within the AOI, there is 1 developed prospect, several prospects, and numerous showings in the coastal forest landscape. Eskay Creek, KSM, and Brucejack Mines and Nugget Trap have drainage into the AOI. There are 60 mineral claims covering the majority of the AOI, with the claims owned by 4 companies with 40 of claims owned by Eskay Mining Corp.

Additional information on non-traditional land uses and tenures are reported in Section 22.4.3 and traditional land uses in Section 25.4.3.

Unuk River Current Conditions

The key TSP management directions for the AOI focus on maintaining and reclaiming intact coastal river aquatic and terrestrial ecosystems; restrict ground access; protecting and maintaining salmon and fish values; protecting water sources; protecting and maintaining Tahltan sites, uses, and way of life; maintaining or recovering salmon populations; and reducing cumulative effects to Tahltan and interconnected values.

Currently the AOI, is meeting many of the directions, with mineral exploration having tenures within the AOI, being the main resource activities. There is air traffic related to mineral exploration, licensed harvesting and gathering, and advancing mineral projects are existing pressures on fish, wildlife, water, river corridors, Tahltan way of life, Tahltan

Core Priorities, and Quiet Enjoyment of the Land values in the AOI. However, most of the AOI is intact contiguous landscape, without ground access, and still relatively remote which is supporting meeting TSP management directions at this time. There is the potential effects from major projects and mineral exploration currently authorized outside of the AOI but with downstream effects on the AOI.

9.2.4. **OWEEGEE**

Tahltan Values identified in Section 9.1.2 and 4 are considered for AOI's and in the context described while recognizing the confidentiality and sensitivity of Tahltan Knowledge within a public document. Tahltan Values identified for the AOI include medicinal plants, access to Klappan; cabins and cultural sites; harvesting and gathering areas; Tahltan trails and archeological sites; fishing and hunting areas; family and community gathering areas; moose habitat range; trout and freshwater aquatic resources; ground and surface water sources; sheep and goat habitat range; groundwater sources and riparian habitat.

Technical information for the AOI(s), unless reported by Skeena Resources, or tied to specific projects are supported by information identified regionally.

Ancient or Past Conditions

Ancient - Long Term Conditions (7-15 Generations 140 to 300 years or 1955 to 1724)

In addition to the above, similar conditions as reported in Section 9.1.2 and 9.1.10 are applicable for ancient conditions.

Past - Short Term Conditions (1-3 generations 20 – 60 years or 2024 to 1965)

1960's to 2024

Large River Corridor

The AOI is represents the low elevation valley landscape with mid Iskut River and Ningunsaw River as the Large River Corridor identified in the TSP. It is also the includes Highway 37 (Transportation Corridor), access, transmission line, and another focal area for commercial forestry.

There are 42 mineral tenures with 4 owners in the AOI, as access control for upper elevation permits (e.g., Pretium Resources, KSM Mining ULC). There are 2 approved Notice of Work permits, one for gravel/ quarries, one for mineral exploration (Arcwest Exploration). The exploration permit is a large area that straddles lower and upper elevations to the east of Highway 37. The gravel permit is entirely within the AOI.

Access

There are 434 km of access in the AOI, with the following breakdown:

- 51 km Highway 37
- 1 km local or recreation
- 382 km resource related roads and trails (includes roads within cutblocks and right of ways)

NTL

The Northwest Transmission Line is situated in the AOI and has a Right of Way (ROW varies from 25 m to 40 m) with associated access roads and clearings adjacent to the ROW (both cutblock and openings to support the transmission line) remaining in permanent early seral stage. The total disturbance is approximately 51 km and 125 ha, and approximately 51 km and 96 ha.

Forestry

At this time, there are 283 cutblocks, primarily situated in the Bob Quinn and Devils Lake Forest Service Roads area, with harvesting occurring as

- 43 openings - 1980-1990, 3,059 ha
- 19 openings - 1991-2000, 888 ha
- 16 openings – 2001-2010, 347 ha
- 82 openings - 2011 – 2020, 1,403 ha
- 86 openings -2021-2024, 549 ha

Given the duration of timber harvesting, the openings are early seral, but silviculture has been occurring on blocks to meet provincial standards and obligations. Overall, the seral stage for the AOI, has 23% early, 6 % mid-mature, 23% mature, and 47% old forests in the ICH ecosystem. However, the old forests are located in the side drainages currently unroaded and where no timber harvesting has occurred. The lower river corridor is predominantly early seral due to the focused lower elevation timber harvesting.

Tahltan values and arc sites

11 archaeological sites are situated in the AOI, and includes multiple Tahltan sites and features

Oweegee Upper Elevation

It is the upper elevation areas located adjacent to the Oweegee Large River Corridor. There are 54 mineral tenures held by 5 companies. There are two approved Notice of Work permit for mineral exploration Santana Resources Oweegee Project and Arcwest Exploration. There is a major mine permit or permitted mine area to west of Highway 37 held by KSM Mining ULC, it also includes a lower elevation area at Treaty Creek. The area has 2 prospects, and a few showings, and no past producers (BC Minfile). It has no roads, and is accessible only by aircraft.

Large River Corridor

The past conditions detailed above are also the current conditions for the AOI.

Oweegee Upper Elevation

It is the upper elevation areas located adjacent to the Oweegee Large River Corridor. There are 54 mineral tenures held by 5 companies. There is one approved Notice of Work permit for mineral exploration (Arcwest Exploration). There is a major mine permit or permitted mine area west of Highway 37 held by KSM Mining ULC, it also includes a lower elevation area at Treaty Creek. The area has 2 prospects, and a few showings, and no past producers (BC Minfile). It has no roads, and is accessible only by aircraft.

Oweegee AOI Current Conditions

Large River Corridor

The key TSP management directions for the AOI focus on maintaining intact landscape and healthy aquatic ecosystems and waterways; recovery and restoring surface and groundwater, riparian habitats, valleys and industrial roads; Maintain healthy aquatic ecosystems and waterways; support wildlife and fish habitat reclamation and enhancement; protect Tahltan cultural, archaeological sites, traditional practices, and quiet enjoyment of the land and waters in these areas from industrial development

Currently the AOI, is meeting many of the directions, with mine access, and forestry development being the main resource activities. There are existing barriers to Tahltan with a high density of access, much of it with restricted or inconsistent access to Tahltan for several decades. Forestry has removed a sizable area of mature and old forests in the valleys accessible to Highway 37 and resource roads. Overall, the seral stage for the AOI, has 23% early, 6 % mid-mature, 23% mature, and 47% old forests in the ICH ecosystem. However, the old forests are located in the side drainages currently unroaded and where no timber harvesting has occurred. The lower river corridor is

predominantly early seral due to the focused lower elevation timber harvesting. The existing access and early seral openings does result in increased licences harvesting and gathering of plants and wildlife with the network of forestry roads and access related to infrastructure like the NTL right-of- way. Mineral exploration with air traffic is also in the area which has effects on wildlife and quiet enjoyment of the land. Finally, Highway 37 has being identified as both a positive and negative barrier/condition with increased traffic from resource development, travel routes, transportation of goods, and community uses. The existing barriers and conditions are indirect/mixed effects with from other sources including Red Chris, Forestry, mineral exploration, Forrest Kerr Hydroelectric, and others with the recent development of the ECRP.

The effects from current conditions are primarily other projects/proponents outside access barriers with transportation effects directly tied to the Application. There are indirect/mixed effects contributing with other projects, such as mineral exploration, forestry tenures and harvesting, existing traffic with the Red Chris Mine. The existing access contributing to increased licensed harvesting and gathering in the AOI. Air traffic related to support of mineral exploration, licensed harvesting and gathering, and advancing mineral projects have additional effects on wildlife, way of life, and quiet enjoyment of the land values.

Upper Elevation AOI

Similar to the above conditions, most the current conditions are tied to mineral exploration and development and the air support having effects on wildlife, way of life, and quiet enjoyment of the land values.

9.2.5. **MORE CREEK**

Tahltan Values identified in Section 9.1.2 and 6 are considered for this AOI and in the context described while recognizing the confidentiality and sensitivity of Tahltan Knowledge within a public document. The area has been used for thousands of years, with Tahltan Values found in the area including Tahltan archaeological sites ,traditional food and gathering areas, burial grounds, village sites, cache pits, fish camps, food security areas, trapping, trails and travel routes, placenames, sources of Tahltan Stories, intact watersheds, mountain goat habitat range, glacier trails, and importance of high elevation lakes and waterways.

Technical information for the AOI(s), unless reported by Skeena Resources, or tied to specific projects are supported by information identified regionally.

Ancient - Long Term Conditions (7-15 Generations 140 to 300 years or 1955 to 1724)

In addition to the above, similar conditions as reported in Section 9.1.2, 9.1.4 and 9.1.10 are applicable for ancient conditions.

Past - Short Term Conditions (1-3 generations 20 – 60 years or 2024 to 1965)

1960's to 2024

More Creek area is the main access corridor for the Galore Creek Mine Project, and contains key infrastructure components for the revised project. The area has been explored since 1950's. when mineralization was discovered at Galore Creek by geologists exploring in the region. From the 1950's through to the 90's extensive exploration work was carried out by a number of exploration and major mining companies. In 2003 NovaGold acquired the property from Stikine Copper, completed a Feasibility Study, and received an Environmental Assessment Certificate in 2007. Construction was initiated on the road and tunnel at several headings prior to the Project being put on care and maintenance in late 2007[9].

[9] https://www.gcmc.ca/galore-creek-project/#history

Galore Creek Mine Project is proposed as an open pit copper, gold and silver mine with an anticipated production capacity of approximately 60,000 tonnes per day of ore over the anticipated 25-year lifespan of the mine. It would include open pits, a processing plant, a tailings storage facility, and an access road that is approximately 140 kilometres long.

Skeena Resources summarizes the project in REAA Section 10.10.3 including project highlights. The current approved design of the project has most of the project situated outside of the AOI, including the open pit, tailings impoundment, and other facilities in the Galore Creek Valley with drainage primarily to the Lower Stikine River. An EAC amendment was issued in December 2024 which included adjusting camp occupancy flexibility to cycle up to the maximum 1640 workers allowed across any of the approved camp locations under the project, realigning the South West More Bypass road to avoid the Upper More Creek Crossing and improve road safety within the AOI, other aspects of the approved amendment are outside of the AOI[10]. All of which can have effects on the environmental and on the social economic conditions to Tahltan Values.

Within the AOI, there are 25 km of resource road with approximately 17 km at lower elevation along More Creek. In addition, 6 approved Notice of Work authorizations are partially situated in the AOI, held by 6 companies, with the existing access captured in the Galore Creek authorizations and tenures.

As reported in Section 10.10.3 and by Galore Creek Mining Corporation (GCMC) there is an access corridor and some project components located in the AOI. The access is under Special Use Permits and other associated permits that restrict access to the area through means such as gated structures. Section 4.4.7.2 identifies the scope of Tahltan Values, traditional practices, sites and landscape features for the area.

Mineral exploration is occurring in the area, predominantly through aircraft based support, with multiple additional permits adjacent to the AOI. Potential disturbance from mineral exploration to wildlife is a concern.

The area has high fish, wildlife, traditional land uses, and quiet enjoyment of the land values to Tahltan which currently are affected with the project. Tahltan, BCEAO, and GCMC identified through the recent EAC amendment additional conditions to mitigate effects and uncertainties related to:

- Condition 9: Access Development Environmental Management Plan;
- Condition 10: Terrestrial Ecosystems and Wildlife Management Plan;
- Condition 11: Fish and Fish Habitat Management Plan;
- Condition 12: Archaeological and Heritage Resources Management Plan;
- Condition 13: Wetlands Management Plan;
- Condition 14: Socio-economic Effects Management Plan
- Condition 16: Indigenous Monitor;
- Condition 17: No Hunting, Fishing or Trapping; and,
- Condition 18: Peaceful Enjoyment Management Plan.

More Creek AOI Current Conditions

As reported above, it is an area of high Tahltan Values with significant archaeological finds and potential, with existing disturbance, access, and mine project development. It is an high elevation valley with high value mountain goat range, Stone's Sheep range, groundhogs (marmots), furbearers, with grizzly bear, moose, and seasonal wildlife use during snow free periods. There are existing barriers to Tahltan with restricted and inconsistent access to Tahltan lands and values, disturbance from aircraft and mineral exploration, and other aspects related to the major project activities and plans. As noted there are a number of conditions developed with the GCMC EAC amendment which are being considered and modified to support similar concerns with this assessment.

[10] https://www.projects.eao.gov.bc.ca/p/588510c6aaecd9001b8157d0/project-details

9.2.6. **ZIPPA MOUNTAIN, UPPER BELL-IRVING RIVER, RN MOUNTAIN**

Tahltan Values identified in Section 9.1.2 and 7 are considered for this AOI and in the context described while recognizing the confidentiality and sensitivity of Tahltan Knowledge within a public document. Tahltan Knowledge for each value will be included in each value's section after determining its confidentiality and sensitivity for the public EAC Application.

Technical information for the AOI(s), unless reported by Skeena Resources, or tied to specific projects are supported by information identified regionally.

Ancient - Long Term Conditions (7-15 Generations 140 to 300 years or 1955 to 1724)

In addition to the above, similar conditions as reported in Section 9.1.2, 9.1.3, 9.1.4 and 9.1.10 are applicable for ancient conditions.

Past - Short Term Conditions (1-3 generations 20 – 60 years or 2024 to 1965)

1960's to 2024

Upper Bell-Irving

The AOI is located withing the Klappan Range and Burrage Management Area designation of the TSP. It is unroaded, intact old growth high elevation forests, and intact headwaters of the Bell-Irving River. There are no mineral tenures or authorizations/leases, commercial forestry, or existing ground access.

There are consumptive activities that can occur in the area from guide outfitting, trapping, and licensed harvesting. Compulsory Inspection harvest data is available for the area, but the public information is grouped by Wildlife Management Unit which are large areas (e.g., AOI is situated in WMU 6-17 10,372 km^2) but the location information with the harvests are not spatial, so determining the harvest rates for each specific AOI is challenging. In addition, the hunting is a combination of general open season, limited entry hunting season, and quotas, with various reporting requirements which make specific AOI harvesting limited. Commercial trapping has decreased over time, with limited reporting occurring due to the low prices for fur.

RN Mountain

The AOI is located withing the Klappan Range and Burrage Management Area designation of the TSP. It is unroaded, intact old growth high elevation forests, and intact headwaters of the Bell-Irving River. There are no mineral tenures or authorizations/leases, commercial forestry, or existing ground access.

Effects from other projects are also limiting given the remote location and lack of authorizations/tenures in the AOI. There are consumptive activities that can occur in the area from guide outfitting, trapping, and licensed hunting. Compulsory Inspection harvest data is available for the area, but the public information is grouped by Wildlife Management Unit which are large areas (e.g., AOI is situated in WMU 6-17 10,372 km^2) but the location information with the harvests are not spatial, so determining the harvest rates for each specific AOI is challenging. In addition, the hunting is a combination of general open season, limited entry hunting season, and quotas, with various reporting requirements which make specific AOI harvesting limited. Commercial trapping has decreased over time, with limited reporting occurring due to the low prices for fur.

Tahltan use of the area, the current activities, gathering, and harvesting have used this area since ancient times and is ongoing, but due to the confidential nature of the information is not included in the reporting.

Finally, the AOI is situated in the Klappan Range and Burrage Management Area designation of the TSP, and at this time the management directions are being met with limited barriers and effects to Tahltan.

Zippa Creek

Zippa Creek is located adjacent to the Lower Iskut Large River Corridor and has the Edoxtotene Management Area designation. The area has 1 developed prospect, over 10 showings, and no past or current mines/producers (BC Minfile). It has no roads, and is accessible by aircraft. There are 10 mineral tenures, owned by 3 companies. There are no approved Notice of Work permits so current levels of mineral exploration are low. There are historical mineral claims and has been an area of periods of mineral exploration.

Mountain goats and other coastal ecosystem wildlife and plant communities, important to Tahltan, are found in the AOI, with population information limited to past environmental assessments, such as Galore Creek; however the results are dated may not reflect current trends (Scannell 2012). The landscape appears to be intact upper elevation coastal mountain block with no ground access.

Zippa, RN, and Upper Bell-Irving AOIs Current Conditions

The TSP Management directions for these AOIs are focused intact forests and watersheds, community food security and traditional gathering activities, measures to protect Tahltan quiet enjoyment of the land and waters, healthy wildlife ecosystems and ranges, and focus on cultural practices and Tahltan harvesting and land use. At this time, the areas are intact, without ground access, with mineral exploration only occurring in the Zippa Mountain AOI to any extent. The current effects are low as there are primarily intact landscapes without ground access. Effects from other projects are also limiting given the remote location and lack of authorizations/tenures in the AOI. There are consumptive activities that can occur in the area from guide outfitting, trapping, and licensed hunting.

9.2.7. CONSENT AREA AND MOUNTAIN PASS-PROUT PLATEAU

The information reported in 9.1.8 on Tahltan use and occupancy applies here, with additional information with the Lower Iskut River has village sites, cabins and camps related to dēk'āne (salmon), medicinal, plants, isb̲ā (mountain goat), and furbearers. Mid Iskut River has similar features but more focus on accessing ebaldzē (mushrooms), kedā (moose), and furbearers with the different forest habitats and with lower snow depths than coastal river reaches, and upper river reaches with villages, cabins, camps across all seasons for trapping, harvesting, and gathering. The Upper Iskut River provides access to broader plateaus for seasonal gathering of wildlife, dediye (marmot), and subalpine/alpine plants.

Trade and travel along the river valleys are a core value with the river corridor providing access to upper elevation obsidian mining and other sites. The lava flats area and Bob Quinn/Ningunsaw area is known for ebaldzē (mushrooms), kedā (moose), khoh (grizzly bear), ch'iyōne (wolf) and good trapping for furbearers.

The Prout Plateau is important as an area of Tahltan trade, travel, and harvesting/gathering/trapping for plants, medicinal plants, furbearers, isb̲ā (mountain goat), kedā (moose), dzime (birds), and sas and khoh (bears). Archaeological sites are found in the area that are dated precontact. The Prout Plateau is a key connection between the Unuk, Lower Iskut, and Ningunsaw/Oweegee Lake areas for travel and trading. It is an area identified as having high archaeological potential and Tahltan uses.

There was a winter trade route from the coast that came up the Unuk River and crossed over to the Iskut below the mouth of the lower canyon (passing right through the Eskay Creek mine site area). An Elder's description of the trade goods – muskets, shot, powder and knives – places the use of this route in the post-contact period. The goods were brought by most likely Tlingit, using dog-sleds. Tahltan met them somewhere on the Prout Plateau, and from there they hauled the goods up the frozen Iskut to Devil Creek, near Bob Quinn Lake. At Devil Creek they cached the goods until summer. In the summer, using horses, they transported the goods up into the high country of the Tla'bane (Klappan) River and beyond, using the trails that followed the upper Nass. Some of these goods ended up at McDames Creek on the Dease River, to be traded with Kaska.

Another Elder describes trails that connected Oweegee with the lower Iskut by way of Treaty Creek and the Unuk River. The trails would have passed over Prout Plateau. The high country around the headwaters of Treaty Creek and the Unuk River provided good habitat for hunting khoh (grizzly bear), in the early fall. Tahltan called Treaty Creek Kas Xoo, which means “grizzly bear creek”.

The Tahltan Values are reported by Skeena Resources and their acknowledgement and importance in the REAA. Generally the Regional Assessment Areas and Local Assessment Areas identified by Skeena Resources in REAA chapters 10,12-20,22, 25-27 align with the AOI. The information reported for these values are applicable for this AOI.

Ancient - Long Term Conditions (7-15 Generations 140 to 300 years or 1955 to 1724)

In addition to the above, similar conditions as reported in Section 9.1.2, 3,4,8, and 10 are applicable for ancient conditions.

Past - Short Term Conditions (1-3 generations 20 – 60 years or 2024 to 1965)

1960’s to 2024

The history of the project reported in Sections 1.1.4 and 5, and REAA Section 21.4.2, provide information on the past conditions related to the AOI for the project and access components. It includes the mineral exploration history and the development history for the mine site. It also includes the MAR developed in the 1990’s and further advanced to the west with the Forrest Kerr Hydroelectric Project. In addition, Section 22.4.2 provides additional historical and regional information for the AOI.

The information reported in Section 22.4.3 for Non-traditional Land and Resource Use represents the current information and summaries for resource exploration and development; provincial land use plans; provincial land designations, fee simple lands, and tenures; licenced harvesting (guide outfitting, trapping, fishing, vegetation, and hunting) ; forestry; transportation and linear features; and recreation and tourism.

Consent and Mountain Pass- Prout Plateau AOIs Current Conditions

The history of the mine detailed in Section 4 and in the REAA speak to the past and current conditions. Tahltan have identified by having a project with existing access and infrastructure is more beneficial than considering developing an intact pristine watershed. The information reported in Section 22.4.3 for Non-traditional Land and Resource Use represents the current information and summaries for resource exploration and development; provincial land use plans; provincial land designations, fee simple lands, and tenures; licenced harvesting (guide outfitting, trapping, fishing, vegetation, and hunting) ; forestry; transportation and linear features; and recreation and tourism.

TCG has identified current barriers to Tahltan relating to the existing human footprint (including resource development), and the restricted access to the area currently limits Tahltan ability to practice traditional ways and affects Tahltan way of life.

9.2.8. **PROJECT FOOTPRINT**

The information reported in 9.1.9 and 9.2.8 on Tahltan use and occupancy applies here, with additional information with the Lower Iskut River has village sites, cabins and camps related to dēk’āne (salmon), medicinal, plants, isb̲ā (mountain goat), and furbearers. Mid Iskut River has similar features but more focus on accessing ebaldzē (mushrooms), kedā (moose), and furbearers with the different forest habitats and with lower snow depths than coastal river reaches, and upper river reaches with villages, cabins, camps across all seasons for trapping, harvesting, and gathering. The Upper Iskut River provides access to broader plateaus for seasonal gathering of wildlife, dediye (marmot), and subalpine/alpine plants.

Trade and travel along the river valleys are a core value with the river corridor providing access to upper elevation obsidian mining and other sites. The lava flats area and Bob Quinn/Ningunsaw area is known for ebaldzē (mushrooms), kedā (moose), khoh (grizzly bear), ch'iyōne (wolf) and good trapping for furbearers.

The Prout Plateau is important as an area of Tahltan trade, travel, and harvesting/gathering/trapping for plants, medicinal plants, furbearers, isb̲ā (mountain goat), kedā (moose), dzime (birds), and sas and khoh (bears). Archaeological sites are found in the area that are dated precontact. The Prout Plateau is a key connection between the Unuk, Lower Iskut, and Ningunsaw/Oweegee Lake areas for travel and trading. It is an area identified as having high archaeological potential and Tahltan uses.

There was a winter trade route from the coast that came up the Unuk River and crossed over to the Iskut below the mouth of the lower canyon (passing right through the Eskay Creek mine site area). An Elder's description of the trade goods – muskets, shot, powder and knives – places the use of this route in the post-contact period. The goods were brought by most likely Tlingit, using dog-sleds. Tahltan met them somewhere on the Prout Plateau, and from there they hauled the goods up the frozen Iskut to Devil Creek, near Bob Quinn Lake. At Devil Creek they cached the goods until summer. In the summer, using horses, they transported the goods up into the high country of the Tla'bane (Klappan) River and beyond, using the trails that followed the upper Nass. Some of these goods ended up at McDames Creek on the Dease River, to be traded with Kaska.

Another Elder describes trails that connected Oweegee with the lower Iskut by way of Treaty Creek and the Unuk River. The trails would have passed over Prout Plateau. The high country around the headwaters of Treaty Creek and the Unuk River provided good habitat for hunting khoh (grizzly bear), in the early fall. Tahltan called Treaty Creek Kas Xoo, which means "grizzly bear creek".

The Tahltan Values are reported by Skeena Resources and their acknowledgement and importance in the REAA. Generally the Regional Assessment Areas and Local Assessment Areas identified by Skeena Resources in REAA chapters 10,12-20,22, 25-27 align with the AOI. The information reported for these values are applicable for this AOI.

Ancient - Long Term Conditions (7-15 Generations 140 to 300 years or 1955 to 1724)

In addition to the above, similar conditions as reported in Section 9.1.2, 3,4,8,9 and 10 are applicable for ancient conditions.

Past - Short Term Conditions (1-3 generations 20 – 60 years or 2024 to 1965)

1960's to 2024

The information in REAA Section 4.4.9.4 is applicable for the AOI, and includes the project components and aspects of the transportation corridor located in the AOI. The history of the project and the non-traditional land uses reported in Sections 21.4.2, and 22.4.2 and 3 are relevant to the Project Footprint AOI.

The information reported in Section 22.4.3 for Non-traditional Land and Resource Use represents the current information and summaries for resource exploration and development; provincial land use plans; provincial land designations, fee simple lands, and tenures; licenced harvesting (guide outfitting, trapping, fishing, vegetation, and hunting); forestry; transportation and linear features; and recreation and tourism.

The information provided is applicable for this AOI and Section 4.4.3.5 (Regional AOI) for existing conditions.

Project Footprint Current Conditions

The history of the mine detailed in Section 4 and in the REAA speak to the past and current conditions. Tahltan have identified by having a project with existing access and infrastructure is more beneficial than considering developing an intact pristine watershed. The information reported in Section 22.4.3 for Non-traditional Land and Resource Use represents the current information and summaries for resource exploration and development;

provincial land use plans; provincial land designations, fee simple lands, and tenures; licenced harvesting (guide outfitting, trapping, fishing, vegetation, and hunting) ; forestry; transportation and linear features; and recreation and tourism.

TCG has identified current barriers to Tahltan relating to the existing human footprint (including resource development), and the restricted access to the area currently limits Tahltan ability to practice traditional ways and affects Tahltan way of life.

9.2.9. **CUMULATIVE EFFECTS**

The Tahltan Values and information provided in Sections 9.1.2, 9.1.10, 9.2.1 apply here, and REAA Section 4.4.11.2 can be considered when determining the range of values and conditions for this AOI.

Ancient - Long Term Conditions (7-15 Generations 140 to 300 years or 1955 to 1724)

The information reported in Sections 9.1.2, 9.1.10, 9.2.1 are applicable for ancient conditions.

Past - Short Term Conditions (1-3 generations 20 – 60 years or 2024 to 1965)

1960's to 2024

REAA Chapter 21 and 22 provides information on the infrastructure and services and non-traditional land uses and tenures (Sections 21.4.2 and 3; 22.4.2 and 3) for the AOI. In addition, recent information compiled for the *Red Chris Block Cave Project - Production Phase Application for an Amendment to Environmental Assessment Certificate #M05-02* (Newmont 2024) provides additional current information on the historical conditions.

Guide outfitting concessions, range tenures, and trapping concessions are the largest area based tenures in the AOI, but they are predominantly site specific activities occurring infrequently across the tenure (Table 4-7; Newmont 2024). They are predominantly consumptive based on wildlife or are focused on supporting horses for guide outfitting as range tenures. The predominant tenures and activities are tied to forestry and associated road, cutting, and other related permits and tenures; mineral exploration tenures and permits; and major mine permits (Section 22.4.3 and Newmont 2024). Associated with these activities are 2,671 km of roads with highway (235 km) and industrial roads (1,813 km) in place. Additional historical information relevant to the AOI is reported in Section 22.4.2.1.

There are 3,372 active mineral tenures with 79 owners in the AOI, with 37 approved Notice of Work permits, for exploration and major projects (such as Eskay Creek, Galore Creek, Ball Creek, Snip Mine, and Iskut Property). There are 5 Permitted Mine Areas with KSM, Brucejack, Premier, Red Chris, and Eskay Creek situated within the AOI.

Access

Highway 37 access has created significant effects in the Tahltan Nation and the region. Highway 37 initially began from the Alaska Highway where the road was constructed south (1959) to support the Cassiar Asbestos Mine. Over time the highway was constructed to Dease Lake where it connected to the Telegraph Creek Road (Highway 51) by the early 1970's.

There are 2,671 km of access in the AOI, with the following breakdown:

- 235 km Highway 37
- 4 km local or recreation
- 1,813 km resource related roads and trails (includes roads within cutblocks and right of ways)
- Of the 1,813 km, there is 71 km related to the Eskay Creek MAR and Forest Kerr Project. The MAR continues to south towards the mine site but is outside of the AOI. It will be discussed further in Sections 4.4.9 and 10

NTL

The Northwest Transmission Line is situated in the AOI, and includes the transmission line extension to Iskut and Red Chris Mine. The transmission line has a Right of Way (ROW varies from 25 m to 40 m) with associated access roads and clearings adjacent to the ROW (both cutblock and openings to support the transmission line) remaining in permanent early seral stage. The total disturbance is approximately 311 km and 388 ha.

Forestry

At this time, there are 1,146 blocks, situated in Skeena Stikine Natural Resource District with the district operated from the Smithers office and the Coast Mountains Natural Resource District (office based in Terrace), the with harvesting occurring as:

- 157 openings - 1980-1990, 9,673 ha
- 236 openings - 1991-2000, 6,310 ha
- 84 openings – 2001-2010, 1,44 ha
- 332 openings - 2011 – 2020, 4,996 ha
- 337 openings -2021-2024, 36 blocks, 2,365 ha

Given the duration of timber harvesting, the openings are early seral but silviculture has been occurring on blocks to meet provincial standards and obligations.

Within the AOI, 384 archaeological sites are situated in the Tahltan Nation with additional sites located outside of the Nation in the AOI, and includes multiple site specific and landscape Tahltan Knowledge features in the AOI.

The information reported in Section 22.4.3 for Non-traditional Land and Resource Use represents the current information and summaries for resource exploration and development; provincial land use plans; provincial land designations, fee simple lands, and tenures; licenced harvesting (guide outfitting, trapping, fishing, vegetation, and hunting) ; forestry; transportation and linear features; and recreation and tourism.

The information provided is applicable for this AOI and Section 4.4.3.5 (Regional AOI) for existing conditions.

As identified through this section, a number of past, current, and near future projects can have effects to Tahltan and determining how effects can occur that are occurring from projects or activities not including the Eskay Creek Mine Project; indirect effects or mixed effects being contributed from the Eskay Creek Mine Project; and effects contributing directly from the Eskay Creek Mine Project.

The Cumulative Effects AOI and effects assessment is being based on the following specific projects:

- Brucejack Mine (Section 10.10.2 Present Projects for details)
- KSM Mine (Section 10.10.3 Reasonably Foreseeable Future Projects)
- Snip Mine (Section 10.10.1 Past Projects)
- Johnny Mountain (Newmont 2024)
- Galore Creek Mine (Section 10.10.3 Reasonably Foreseeable Future Projects)
- Red Chris Mine (Section 10.10.2 Present Projects)
- Forrest Kerr Hydroelectric Project (including McLymont and Volcano Creek) (Section 10.10.2 Present Projects)
- Forestry
- Northwest Transmission Line (Section 10.10.2 Present Projects)
- Advanced Exploration Projects
    - Iskut Property and Bronson Connector
    - Schaft Creek
    - There are also over 30 currently authorized exploration projects

Other activities such as guide outfitting, trapping, and licensed hunting is considered as components of the AOI's where they are indicated as possible effects or barriers (Section 10.10.4; Newmont 2024).

Cumulative Effects Current Conditions

Of all the existing and potential threats Tahltan face today, probably the greatest is the cumulative effects of the many pressures on the land and people. At present, there are three operational mines in Tahltan Territory. Mineral exploration is territory-wide, has being increasing for several decades, and is expected to continue increasing for the near future with a number of potential mines in different stages of planning and permitting. The commercial salmon fishery in Alaska continues to effect salmon stocks and the potential conditions on game populations with increasing access are cumulative effect concerns.

Climate change adds another dimension to existing threats. Reduced winter snowpack will lower water levels in our salmon-bearing rivers while raising water temperatures, with impacts on fish populations. Changes in precipitation patterns, along with warmer winters, mean that our forests are now subject to multiple stressors, including drought, pests, disease and wildfires, all of which reduce forest resilience. The gradual loss of glaciers is expected with less available water in summer months. It is unclear exactly how these changes will impact fish and game populations, but it seems safe to assume they will add to the pressures on these populations already occurring from human disturbance and resource activities.

The Pace and Scale of Development under the current conditions has been identified by Tahltan and a driver in the Tahltan Stewardship Plan. There are current conditions which are effecting Tahltan Core Priorities in a number of the AOIs but appear to not be violating all of the management directions only partially. Current impacts to Quiet Enjoyment of the Land, traditional land uses and practices, and effects from development occurring in community food security areas and culturally important areas are current conditions at this time. Food sovereignty, clean surface and groundwater sources, reducing development pressures in and around community areas, restoring the health of communities, reversing the out migration of benefits, services, and infrastructure are all current conditions being faced at this time. This is at a time where Tahltan employment is high, economic benefits are high, and economic opportunities and benefits have been established through existing resource development agreements and arrangements with provincial and federal governments.

Loss of access or inconsistent access to lands and way of life activities are also part of the current conditions.

9.3. THE EXPECTED PROJECT EFFECTS ON TAHLTAN LANDS, CULTURE, AND COMMUNITIES

The approach to summarize the potential effects are to consider the effects in the following manner using similar considerations as identified in Section 3.4.8 and the Hybrid AIR (Sections 4.5.3 and 4). As the Tahltan Assessment has multiple AOIs, the first step is determine the severity or indicator of effects, and the source. The source of the effects are currently identified by:

- Indirect Effects where effects are identified by the current and future potential effects tied with resource development and/or the TSP management direction violations but the effects are not tied to the Eskay Creek Mine Project. This allows to aid when determining cumulative effects at the regional or cumulative effects scale;

- Mixed Effects where the current or future potential effects are partially contributable to the Project, and where possible, the components or features linked to these effects are identified;
- Direct Effects where the effects are estimated to be with the Project, with the project-specific effects being explored through each AOI and suite of Tahltan Values; and
- Nil to limited potential future effects are occurring from the project and possibly other land use activities in the AOI.

This will assist in determining which AOIs are contributing towards determining the effects from the Project and the severity of effects.

9.3.1. **REGIONAL**

The potential effects from the ECRP in Regional AOI are currently determined as follows:

- Lower Iskut Large River Corridor
    - Where mixed effects are estimated due to the potential effects of Skeena Resources considering the potential transport of ore from the Snip Mine, if ground access were to be established, to the ECRP for processing and then transport. The potential effects are tied to Snip Mine becoming active and the Bronson Connector being built.
- Mid Iskut and Ningunsaw Large River Corridor
    - Where mixed and direct effects are estimated due to the potential effects related to the Transportation Corridor and the Project
- Unuk River
    - Where direct effects are estimated due to the potential effects related to the Transportation Corridor and the Project
- Oweegee
    - Where mixed and direct effects are estimated due to the potential effects related to the Transportation Corridor and the Project
- Upper Elevation Zippa Mountain, Upper Bell-Irving, and RN Mountain
    - Potential effects from the Project are not identified and the effects from proponents are limited to Zippa Mountain related to mineral exploration. The other AOIs have nil to limited effects.
- Upper Elevation More Creek
    - The effects related to More Creek AOI are due to other proponents, and authorized activities without any identified mixed or direct effects from the Project.
- Upper Elevation Consent Area, Mountain Pass-Prout Plateau, and Project Footprint AOIs
    - Where direct effects are estimated due to the potential effects related to the Transportation Corridor and the Project.

Based on the summary of potential effects mixed or directly associated with the Project are applicable at the regional (predominately socio-cultural in nature), landscape (Lower Iskut, Iskut and Ningunsaw, Unuk, Oweegee, Consent AOI, Mountain Pass-Prout Plateau, and Project Footprint), with the other AOIs being considered as part of the Cumulative Effects AOI assessment.

- Source – mixed effects
- Magnitude – low to moderate
- Extent – landscape to regional
- Duration 1 to 3 generations reversible long-term
- Frequency – continuous
- Confidence moderate to high
- Risk and uncertainty – medium/moderate

9.3.2. **ISKUT RIVER**

Lower Iskut

The key TSP management directions for the AOI focus on maintaining and reclaiming intact coastal river aquatic and terrestrial ecosystems; restrict ground access; protecting and maintaining salmon and fish values; protecting water sources; protecting and maintaining Tahltan sites, uses, and way of life; maintaining or recovering salmon populations; and reducing cumulative effects to Tahltan and interconnected values.

Currently the AOI, is meeting many of the directions, with mineral exploration and closed mine reclamation/ maintenance being the main resource activities. However the potential for increased resource development with ground access in the near future related to the Iskut Property, Bronson Connector, and Snip Mine can result in not meeting key management directions for the AOI and result in singular effects and cumulative effects to Tahltan values.

The effects will be from primarily other projects/proponents and is not directly tied to the Application. There are indirect/mixed effects contributing with the potential interest in using Snip Mine as a satellite operation to truck ore to the mine site for processing. However the potential for increased resource development with ground access in the near future related to the Iskut Property, Bronson Connector, and Snip Mine can result in violating key management directions for the AOI and result in singular effects and cumulative effects to Tahltan Values. Ground based access will increase the effects and will added by air traffic also increasing to support increased in mineral exploration, licensed harvesting and gathering, and advancing mineral projects which will result in additional effects to existing pressures on fish, wildlife, water, river corridors, Tahltan way of life, Tahltan Core Priorities, and Quiet Enjoyment of the Land values.

The effects will be from primarily other projects/proponents and is not directly tied to the Application. There are indirect/mixed effects contributing with the potential interest in using Snip Mine as a satellite operation to truck ore to the ECRP mine site for processing.

Middle Iskut and Ningunsaw River

The key TSP management directions for the AOI focus on maintaining intact landscape and healthy aquatic ecosystems and waterways from along Iskut River Large River Corridor from Iskut Lakes to Lower Iskut River; recovery and restoring surface and groundwater, riparian habitats, valleys and industrial roads; Maintain healthy aquatic ecosystems and waterways; support wildlife and fish habitat reclamation and enhancement; protect Tahltan cultural, archaeological sites, traditional practices, and quiet enjoyment of the land and waters in these areas from industrial development

Currently the AOI, is meeting many of the directions, with mine access, forestry development, and hydroelectric being the main resource activities. However the potential for increased resource development, access development, increased traffic volumes directly from resource development in the AOI and adjacent to the AOI, such as Red Chris, Galore Creek, Eskay Creek, the Iskut Property, Bronson Connector, Snip Mine, and forestry can result in not meeting key management directions for the AOI and result in further singular effects and cumulative effects to Tahltan values.

The effects will be from primarily other projects/proponents outside of the effects related access barriers and transportation effects directly tied to the Application. There are indirect/mixed effects contributing with other projects, such as the potential interest in using Snip Mine as a satellite operation to truck ore to the mine site for processing, further development of the Galore Creek Mine Project, forestry, and existing access contributing to licensed harvesting and gathering in the AOI. Air traffic could also increase to support increased in mineral exploration, licensed harvesting and gathering, and advancing mineral projects which can result in additional effects on wildlife, way of life, and quiet enjoyment of the land values.

However the potential for increased resource development, access development, increased traffic volumes directly from resource development in the AOI and adjacent to the AOI, such as Red Chris, Galore Creek, Eskay Creek, the Iskut Property, Bronson Connector, Snip Mine, and forestry can result in violating key management directions for the AOI and result in further singular effects and cumulative effects to Tahltan Values.

The effects will be from primarily other projects/proponents outside of the effects related access barriers and transportation effects directly tied to the Application. There are indirect/mixed effects contributing with other projects, such as the potential interest in using Snip Mine as a satellite operation to truck ore to the mine site for processing, further development of the Galore Creek Mine Project, forestry, and existing access contributing to licensed harvesting and gathering in the AOI. Air traffic could also increase to support increased in mineral exploration, licensed harvesting and gathering, and advancing mineral projects which can result in additional effects to existing pressures on wildlife, Tahltan way of life, Tahltan Core Priorities, and Quiet Enjoyment of the Land values.

9.3.3. **UNUK RIVER**

The potential effects identified for the Unuk River are related to water, fish and fish habitat, traditional land uses, quiet enjoyment of the land tied to the Eskay Creek Mine Project and cumulative effects from KSM Mine Project, Brucejack Mine Project and Nugget Trap Mine Project detailed by both Skeena Resources and Tahltan (chapters 12-20,24-27 with sections 5-7 in each chapter detailing the potential effects and estimated outcomes; Sections 4.4.9 and 10).

However the potential for increased resource development with downstream effects on aquatic ecosystems from projects outside of the AOI, including ECRP, KSM, Brucejack, Nugget Trap Mine Projects can result in violating key management directions for the AOI and result in singular effects and cumulative effects to Tahltan Values. The potential effects identified for the Unuk River are related to water, fish and fish habitat, traditional land uses, quiet enjoyment of the land tied to the Eskay Creek Mine Project and cumulative effects from KSM Mine Project, Brucejack Mine Project and Nugget Trap Mine Project detailed by both Skeena Resources and Tahltan (REAA chapters 12-20,24-27 with sections 5-7 in each chapter detailing the potential effects and estimated outcomes; Sections 4.4.9 and 10).

9.3.4. **OWEEGEE**

Large River Corridor

The key TSP management directions for the AOI focus on maintaining intact landscape and healthy aquatic ecosystems and waterways; recovery and restoring surface and groundwater, riparian habitats, valleys and industrial roads; Maintain healthy aquatic ecosystems and waterways; support wildlife and fish habitat reclamation and enhancement; protect Tahltan cultural, archaeological sites, traditional practices, and quiet enjoyment of the land and waters in these areas from industrial development

Currently the AOI, is meeting many of the directions, with mine access, and forestry development being the main resource activities. However the potential for increased resource development, access development, increased traffic volumes directly from resource development in the AOI and adjacent to the AOI, such as Red Chris, Galore Creek, Eskay Creek, the Iskut Property, Bronson Connector, Snip Mine, and forestry can result in not meeting key management directions for the AOI and result in further negative effects and negative cumulative effects to Tahltan Values.

The effects will be from primarily other projects/proponents outside of the effects related access barriers transportation effects directly tied to the Application. There are indirect/mixed effects contributing with other projects, such as mineral exploration, forestry tenures and harvesting, existing traffic with the Red Chris Mine and potential changes with the Red Chris Mine Project Block Cave Amendment, potential interest in using Snip Mine as a satellite operation to truck ore to the mine site for processing resulting in longer life of mine and traffic transporting concentrate, further development of the Galore Creek Mine Project, and the existing and new access contributing to increased licensed harvesting and gathering in the AOI. Air traffic could also increase to support increased in mineral exploration, licensed harvesting and gathering, and advancing mineral projects which can result in additional effects on wildlife, way of life, and quiet enjoyment of the land values.

Upper Elevation AOI

The potential effects are related to the current potential development of the KSM project. There are also effects related to mineral exploration in and adjacent to the AOI. The effects are indirect from other sources outside of the Eskay Creek Mine Project.

9.3.5. **MORE CREEK**

The potential effects are related to the development of the GCMC project, including the proposed activities with the recent EAC amendment. There are also effects related to mineral exploration in and adjacent to the AOI. The effects are indirect from other sources outside of the Eskay Creek Mine Project.

9.3.6. **ZIPPA MOUNTAIN, UPPER BELL-IRVING RIVER, RN MOUNTAIN**

Upper Bell-Irving

At this time the potential effects are very limited to nil from the project as the AOI has primarily intact landscapes without ground access. The upper elevation forests are old growth and are captured as part of the provincial old growth strategy as a priority deferral area[11]. In addition, the area currently does not have existing mineral authorizations, commercial forestry, existing ground access, and no mineral tenures. Without notice of work authorizations or mineral tenures in the AOI results in limited ground disturbance or barriers occurring to Tahltan and Tahltan values.

Effects from other projects are also limiting given the remote location and lack of authorizations/tenures in the AOI.

Tahltan use of the area, the current activities, gathering, and harvesting have used this area since ancient times and is ongoing, but due to the confidential nature of the information is not included in the reporting.

Finally, the AOI is situated in the Klappan Range and Burrage Management Area designation of the TSP, and at this time the management directions are being met with the limited to nil barriers and effects to Tahltan.

RN Mountain

At this time the potential effects are very limited to nil from the project as the AOI has primarily intact landscapes without ground access. The upper elevation forests are old growth and are captured as part of the provincial old growth strategy as a priority deferral area[12]. In addition the area currently does not have existing mineral authorizations, commercial forestry, existing ground access, and no mineral tenures. Without notice of work authorizations or mineral tenures in the AOI results in limited ground disturbance or barriers occurring to Tahltan and Tahltan values.

Effects from other projects are also limiting given the remote location and lack of authorizations/tenures in the AOI. There are consumptive activities that can occur in the area from guide outfitting, trapping, and licensed hunting. Compulsory Inspection harvest data is available for the area, but the public information is grouped by Wildlife Management Unit which are large areas (e.g., AOI is situated in WMU 6-17 10,372 km^2) but the location information with the harvests are not spatial, so determining the harvest rates for each specific AOI is challenging. In addition, the hunting is a combination of general open season, limited entry hunting season, and quotas, with various reporting requirements which make specific AOI harvesting limited. Commercial trapping has decreased over time, with limited reporting occurring due to the low prices for fur.

[11] https://www2.gov.bc.ca/gov/content/industry/forestry/managing-our-forest-resources/old-growth-forests
[12] https://www2.gov.bc.ca/gov/content/industry/forestry/managing-our-forest-resources/old-growth-forests

Tahltan use of the area, the current activities, gathering, and harvesting have used this area since ancient times and is ongoing, but due to the confidential nature of the information is not included in the reporting.

Finally, the AOI is situated in the Klappan Range and Burrage Management Area designation of the TSP, and at this time the management directions are being met with limited barriers and effects to Tahltan.

Zippa Creek

Zippa Creek is located adjacent to the Lower Iskut Large River Corridor and has the Edoxtotene Management Area designation.

At this time the potential effects are very limited to nil from the project as the AOI has primarily intact landscapes without ground access. Effects from other projects are also limiting given the remote location and lack of authorizations/tenures in the AOI. There are consumptive activities that can occur in the area from guide outfitting, trapping, and licensed hunting.

The AOI is located in the Golden Triangle, close proximity to Snip Mine, and Iskut Property where mineral exploration activities are occurring under current authorizations. It is expected if ground access were to occur, further development of the Iskut Property, and Snip Mine becomes a satellite operation to Eskay Creek Mine, can result in not meeting the management directions for the AOI, and can result in effects and cumulative effects to the AOI from other projects.

9.3.7. **CONSENT AREA AND MOUNTAIN PASS-PROUT PLATEAU**

Sections 4.4.9.6 in the REAA report on the potential effects on Tahltan Values, including both Skeena Resources and TCG effects estimations in detail. The following are the potential effects summarized by Tahltan Value:

Air Quality – Skeena Resources has identified potential effects (singular and cumulative) at the landscape scale for both these AOIs and the AOIs intersected by the Transportation Corridor; far-future duration; nil to high magnitude; continuous; and high importance to Tahltan. The Tahltan Assessment of potential effects identify:

- Extent: landscape
- Magnitude: low to moderate with the dispersion effects seasonally during Construction and Operations and low during Reclamation and Closure
- Duration and Reversibility: 1 generation and reversible
- Frequency: continuous during Construction and Operations and irregular during Reclamation and Closure
- Confidence: high
- Risk and Uncertainties: high risk with low uncertainties

Noise and Vibration - Skeena Resources has identified potential effects (singular and cumulative) at the regional - landscape scales; short-term duration and continuous; low to moderate magnitude and moderate importance to Tahltan. The Tahltan Assessment of potential effects identify:

- Extent: landscape
- Magnitude: low to moderate, with seasonal dispersion effects during Construction and Operations; low during Reclamation and Closure.
- Duration and Reversibility: effects expected to last one generation and considered reversible.
- Frequency: continuous during Construction and Operations; irregular during Reclamation and Closure.
- Confidence: high
- Risk and Uncertainties: high risk, but low uncertainty

Groundwater - Skeena Resources has identified potential effects (singular and cumulative) as high magnitude; local extent; irreversible and far-future duration; continuous; and moderate importance. The Tahltan Assessment of potential effects identify:

- Extent: site specific to landscape
- Magnitude: moderate to high
- Duration and Reversibility: 3 or more generations and irreversible.
- Frequency: continuous
- Confidence: high
- Risk and Uncertainties: high risk, moderate to high uncertainty

Surface Water – Skeena Resource has identified potential effects (singular) of irreversible potential effects to surface water are expected for watersheds draining into the Unuk River within the Consent and Project Footprint AOIs. Water treatment will be required in perpetuity. These effects are categorized as low to high magnitude, irreversible, far-future, continuous, with high resiliency, neutral context, and high importance to Tahltan. Cumulative effects for water quality are moderate in magnitude, regional extent, far-future and irreversible, and high importance.

The Tahltan Assessment of potential effects identify:

- Extent: site specific to landscape
- Magnitude: high
- Duration and Reversibility: 3 or more generations and irreversible.
- Frequency: continuous
- Confidence: high
- Risk and Uncertainties: high risk, high uncertainty

Fish and Fish Habitat - Skeena Resource has identified potential effects as landscape to regional, low to moderate magnitude, irreversible, far-future, and regular, with low resiliency and low contextual sensitivity, but moderate importance to Tahltan.

The Tahltan Assessment of potential effects identify:

- Extent: site specific to landscape
- Magnitude: low to moderate
- Duration and Reversibility: 3 or more generations and irreversible.
- Frequency: continuous
- Confidence: high
- Risk and Uncertainties: moderate to high risk with moderate uncertainties

Terrain and Soils – Skeena Resources estimated no potential effects after implementing mitigation measures. The Tahltan Assessment included this topic with Heritage Resources, Vegetation, and Wildlife and Wildlife Habitat where the effects identified are interconnected to this value.

Vegetation and Ecosystems – Skeena Resources potential effects include on the loss of ecosystems and culturally important plant species within the Consent and Project Footprint AOIs are characterized as having:

    - Local extent, moderate magnitude, and far-future duration;
    - Continuous effect, low resiliency, and long-term reversibility;
    - Moderate importance to Tahltan;
    - High confidence in available information, high probability of occurrence, and medium risk with minor consequences.
- Cumulative effects of

    - Local extent, low magnitude, and far-future duration;
    - Continuous effect, low resiliency, and long-term reversibility;
    - Moderate importance to Tahltan;
    - High confidence in available information, high probability of occurrence, and medium risk with minor consequences.

Tahltan technical concerns relate to the uncertainties surrounding reclamation success in restoring culturally important plants and mature/old-growth ecosystems in high-elevation mountain pass environments, which parallels concerns noted in the Wildlife and Wildlife Habitat chapter with the limited history of successfully restoring these vegetation types, and the time required to achieve success. These effects are interdependent to Tahltan Core Priorities and way of life practices. In addition the continued loss of access to culturally important plant communities has been an existing barrier for several generations and this is additive to these barriers for future generations. The Tahltan Assessment included this topic with Heritage Resources, Vegetation, and Wildlife and Wildlife Habitat where the effects identified are interconnected to this value.

Wildlife and Wildlife Habitat – Skeena Resources reporting on potential effects include

- Direct habitat loss during Construction is characterized as having:
    - Local extent, low to moderate magnitude, far-future duration, and a continuous effect;
    - Moderate resiliency to disturbance, irreversible, and of high importance to Tahltan;
    - High confidence in information, high probability of occurring, and medium risk with minor consequences.
- Indirect habitat loss during Construction and Operations is assessed with:
    - Landscape to regional extent, low magnitude, medium-term duration, and continuous effect;
    - Moderate resiliency, long-term reversibility, and high importance to Tahltan;
    - Medium confidence, high probability, and medium risk with minor consequences.
- Wildlife movement effects during Construction and Operations include:
    - Landscape extent, low magnitude, medium-term duration, and continuous effect;
    - Moderate resiliency, long-term reversibility, and high importance to Tahltan;
    - Medium confidence, medium probability, and medium risk with moderate consequences.
- Wildlife mortality risks during Construction and Operations are evaluated as:
    - Landscape extent, low magnitude, medium-term duration, and continuous effect;
    - Moderate resiliency, long-term reversibility, and high importance to Tahltan;
    - High confidence, low probability, and low risk with minor consequences.

The Tahltan Assessment of potential effects identify:

- Extent: landscape
- Magnitude: moderate to high
- Duration and Reversibility: 1 to 3 generations and reversible.
- Frequency: continuous
- Confidence: moderate to high
- Risk and Uncertainties: moderate to high risk with moderate uncertainties

Human Health – Human Health is a complex chapter and the following are potential effects reported by Skeena Resource:

- The current estimated effects on the changes in community cohesion due to migration during Operations identify a household to community extent, low magnitude, medium-term duration and continuous effect, moderate resiliency to disturbance, and low importance to Tahltan. The effects have a medium confidence of information, low probability of occurring, with low risk and minor consequences.
- The current estimated effects on the changes in community cohesion due rotation work schedule during Construction and Operations identify a local to regional extent, low magnitude, medium-term duration and continuous effect, moderate to high resiliency to disturbance, and moderate to high importance to

Tahltan. The effects have a medium confidence of information, medium probability of occurring, with low risk and minor consequences.

- The current estimated effects on the changes in Indigenous people mental health or quality of life due to landscape/environmental changes during Construction and Operations identify a regional extent, low magnitude, long-term duration and continuous effect, low resiliency to disturbance, and high importance to Tahltan. The effects have a medium confidence of information, high probability of occurring, with medium risk and minor consequences.
- The current estimated effects on the changes in the incidence of diseases during Construction and Operations identify a household extent, low magnitude, medium-term duration and sporadic effect, moderate resiliency to disturbance, and low importance to Tahltan. The effects have a medium confidence of information, low probability of occurring, with low risk and minor consequences.
- The current estimated effects on the changes in the incidence of chronic diseases from exposure of metal POCs during Construction and Operations identify a household extent, high magnitude, far-future duration and sporadic effect, high resiliency to disturbance, and high importance to Tahltan. The effects have a medium confidence of information, low probability of occurring, with low risk and moderate consequences.
- The current estimated effects on the changes in the incidence of chronic diseases from exposure of CACs during Construction and Operations identify a household extent, high magnitude, medium-term duration and sporadic effect, moderate resiliency to disturbance, and high importance to Tahltan. The effects have a medium confidence of information, low probability of occurring, with low risk and moderate consequences.
- The current estimated effects on the changes in the incidence of chronic diseases from exposure of PM_{10} for off-duty workers during Construction and Operations identify a regional extent, low magnitude, medium-term duration and continuous effect, moderate resiliency to disturbance, and moderate importance to Tahltan. The effects have a medium confidence of information, medium probability of occurring, with low risk and minor consequences.
- The current estimated effects on the changes in nutrition due to increased food costs during Construction and Operations identify a regional extent, low magnitude, medium-term duration and continuous effect, moderate resiliency to disturbance, and moderate importance to Tahltan. The effects have a medium confidence of information, low probability of occurring, with low risk and minor consequences.
- The current estimated effects on the changes in nutrition to Indigenous peoples due to reduced quality/quantity of subsistence foods during Construction, Operations, Reclamation and Closure, and Post-closure identify a local/household extent, low magnitude, far-future duration and sporadic effect, high resiliency to disturbance, and high importance to Tahltan. The effects have a medium confidence of information, low probability of occurring, with low risk and minor consequences.

Tahltan Assessment of potential effects include:

- Extent: landscape to regional
- Magnitude: low to moderate
- Duration and Reversibility: 1 to 3 generations and reversible.
- Frequency: continuous
- Confidence: moderate to high
- Risk and Uncertainties: moderate to high risk with moderate uncertainties

Infrastructure and Services – where Skeena Resources reported potential effects of

- The projected effects on health care services and facilities during Operations indicate a regional/Indigenous Peoples extent, with moderate magnitude, medium-term duration, and continuous effect. These impacts are expected to have low resiliency to disturbance, are reversible in the long term, and are of high importance to the Tahltan. The assessment carries a medium level of confidence, with a medium probability of occurrence, resulting in a medium risk and moderate consequences.

- The projected effects on housing affordability and availability during Operations are identified at the community level. These effects are of moderate magnitude and medium-term duration, continuous in nature, and characterized by low resiliency to disturbance. They are considered reversible over the long term and are highly important to the Tahltan. The confidence level in the data is medium, the probability of occurrence is medium, and the overall risk and consequences are moderate.

- Cumulative effects on health care services and facilities during Operations are considered more substantial. These effects span a regional/Indigenous Peoples extent, are of high magnitude, medium-term duration, and continuous. They exhibit low resiliency to disturbance and are deemed reversible in the long term. The assessment has medium confidence, a medium likelihood of occurring, and represents a high risk with major consequences.

- Cumulative effects on housing affordability and availability during Operations are also assessed as high magnitude at the community level. These impacts are continuous, medium-term, and marked by low resiliency to disturbance. They are reversible in the long term and of high significance to the Tahltan. The confidence in this information is medium, as is the probability of occurrence, while the associated risk is high with major consequences.

- Potential positive outcomes during Construction and Operations phases include improvements in employment, income, contracting, partnerships, business opportunities, and tax revenue for the Tahltan. However, it is important to note that these opportunities may not be equally accessible to Indigenous women and workers.

- Potential negative effects during Reclamation and Closure include reductions in employment, income, contracting, partnerships, business opportunities, and tax revenue for the Tahltan.

- There are concerns about negative effects on Tahltan way of life and traditional practices due to ongoing access barriers to the project area throughout all mining stages. These effects may particularly affect members who rely on the Eskay Creek area for harvesting resources and households that use harvesting to supplement their income. These disruptions could disproportionately affect lower-income families that face food insecurity and depend more heavily on traditional subsistence activities.

- Potential changes to the cost of living due to an increased demand for housing, local goods, and pressure on local wages.

TCG technical concerns, socio-cultural concerns and Tahltan community concerns are reported in detail in REAA Section 4.4.9.6 and the Tahltan reporting of effects with this value was:

- Extent: site specific to territory/regional
- Magnitude: moderate to high
- Duration and Reversibility: 1 to 3 generations and reversible short to long term
- Frequency: continuous during Construction and Operations and irregular during Reclamation and Closure
- Confidence: high
- Risk and Uncertainties: moderate to high risk with low uncertainties

Employment and Economy – Skeena Resources reported the following for potential effects:

- The current estimated effects on pressures on health care services and facilities during Operations identify a regional/Indigenous Peoples extent, moderate magnitude, medium-term duration, continuous effect, low resiliency to disturbance, reversible in the long-term, and high importance to Tahltan. These effects have medium confidence, medium probability of occurring, with medium risk and moderate consequences.

- The current estimated effects on pressures on affordability and availability of housing during Operations identify a community extent, moderate magnitude, medium-term duration, continuous effect, low resiliency to disturbance, reversible in the long-term, and high importance to Tahltan. These effects have medium confidence, medium probability of occurring, with medium risk and moderate consequences.
- The current estimated effects on the changes in project expenditures, business opportunities, and GDP benefits has positive effects reported with increases during Construction and Operations with a regional/Indigenous Peoples extent, moderate magnitude, short-term duration and sporadic effect, moderate resiliency to disturbance, reversible in the short-term, and high importance to Tahltan. The effects have a medium confidence, medium probability of occurring, with high positive risk and major consequences.
- The estimated effects related in tax revenue during Construction and Operations are similar as the above positive effects.
- The current estimated effects on the pressures on employment and economy has negative effects reported with decreases during Reclamation and Closure with a regional/Indigenous Peoples extent, moderate magnitude, medium-term duration and continuous effect, moderate resiliency to disturbance, reversible in the short-term, and high importance to Tahltan. The effects have a medium confidence, high probability of occurring, with high risk and major consequences.
- The current estimated effects on the changes in project expenditures, business opportunities, and GDP benefits has negative effects reported with decreases during Reclamation and Closure with a regional/Indigenous Peoples extent, moderate magnitude, short-term duration and sporadic effect, moderate resiliency to disturbance, reversible in the short-term, and high importance to Tahltan. The effects have a medium confidence, medium probability of occurring, with high positive risk and major consequences.
- The estimated effects related in tax revenue during Reclamation and Closure are similar as the above negative effects.
- The current estimated cumulative effects on health care services and facilities during Operations identify a regional/Indigenous Peoples extent, high magnitude, medium-term duration, continuous effect, low resiliency to disturbance, reversible in the long-term, and high importance to Tahltan. These effects have medium confidence, medium probability of occurring, with high risk and major consequences.
- The current estimated cumulative effects on pressures on affordability and availability of housing during Operations identify a community extent, high magnitude, medium-term duration, continuous effect, low resiliency to disturbance, reversible in the long-term, and high importance to Tahltan. These effects have medium confidence, medium probability of occurring, with high risk and major consequences.
- Interest has been expressed in business, contracting, training, employment, and educational opportunities.
- The estimate of local workers (including Tahltan members) is 25% of total workers, which is lower than other similar projects in the area. Skeena Resources reports the number of available jobs to Tahltan members in mining has increased faster than the available Tahltan workforce, but will aim to have a higher percentage where possible.

TCG technical concerns, socio-cultural concerns and Tahltan community concerns are reported in detail in REAA Section 4.4.9.6 and the Tahltan reporting of effects with this value was:

- Extent: site specific to territory/regional
- Magnitude: moderate to high

- Duration and Reversibility: 1 to 3 generations and reversible short to long term
- Frequency: continuous during Construction and Operations and irregular during Reclamation and Closure
- Confidence: high
- Risk and Uncertainties: moderate to high risk with low uncertainties

Heritage Resources - Skeena Resources reported the following for potential effects:

- The current estimated effects on the disturbance of archaeological area during Construction Operations, and Closure identify a local extent, moderate magnitude, far-future duration and singular frequency, low resiliency to disturbance, irreversible, and high importance to Tahltan. The effects have a high confidence of information, low probability of occurring, with minor risk and minor consequences.

- The current estimated effects on the disturbance of historic and traditional use sites during Construction, Operations, and Closure identify local extent, moderate magnitude, far-future duration singular frequency, low resiliency to disturbance, irreversible, and high importance to Tahltan. The effects have a high confidence of information, low probability of occurring, with low risk and minor consequences.

TCG technical concerns, socio-cultural concerns and Tahltan community concerns are reported in detail in REAA Section 4.4.9.6 and the Tahltan reporting of effects with this value was:

- Extent: site specific to landscape
- Magnitude: moderate
- Duration and Reversibility: 3 generations or more and irreversible
- Frequency: sporadic
- Confidence: high
- Risk and Uncertainties: moderate risk with low uncertainties

Current and Future Use of Land and Resources for Traditional Purposes – Skeena Resources reported the following potential effects:

- The current estimated effects on opportunities for traditional practices during Construction and Operations are identified as regional/nation extent, low magnitude, medium-term duration, and continuous frequency, with moderate resiliency to disturbance, short-term reversibility, and high importance to Tahltan. These effects have medium confidence, a high probability of occurrence, medium risk, and minor consequences.

- The current estimated effects on access, hunting, trapping, fishing, gathering, and other important areas during Construction, Operations, Reclamation and Closure, and Post-closure are regional/nation in extent, low magnitude, long-term duration, and continuous frequency, with moderate resiliency, long-term reversibility, and high importance to Tahltan. These effects have medium confidence, high probability, medium risk, and minor consequences.

- The current estimated effects on the quality and abundance of resources during Construction and Operations are regional/nation extent, low magnitude, medium-term duration, continuous frequency, high resiliency, long-term reversibility, and high importance to Tahltan. These effects have medium confidence, high probability, medium risk, and minor consequences.

- The current estimated cumulative effects on access, hunting, trapping, fishing, gathering, and other important areas during all project phases are regional/nation extent, moderate magnitude, long-term duration, continuous frequency, moderate resiliency, long-term reversibility, and high importance to Tahltan. These effects have moderate confidence, high probability, medium risk, and moderate consequences.

TCG technical concerns, socio-cultural concerns and Tahltan community concerns are reported in detail in REAA Section 4.4.9.6 and the Tahltan reporting of effects with this value was:

- Extent: landscape to nation/region
- Magnitude: moderate to high
- Duration and Reversibility: 3 generations or more and reversible long-term
- Frequency: continuous
- Confidence: high
- Risk and Uncertainties: moderate risk with moderate uncertainties

Quiet Enjoyment of Land – Skeena Resources reported potential effects of:

- The estimated potential effects on the physical characteristics of the land during Construction and Operations are identified as having a regional to national extent, moderate magnitude, far-future duration, and continuous frequency. The land has moderate resiliency to disturbance, and the effects are considered irreversible with high importance to Tahltan. Confidence in the information is medium, with a medium probability of occurrence, leading to medium risk and moderate consequences.

- The estimated effects on the intangible experiential qualities of the land during Construction and Operations also show a regional to national extent, moderate magnitude, far-future duration, and continuous frequency. These impacts are irreversible, have moderate resiliency, and hold high importance to Tahltan. The assessment carries medium confidence, medium probability, medium risk, and moderate consequences.

- Cumulative effects on physical land characteristics during Construction and Operations are similarly rated as regional to national in extent, moderate in magnitude, far-future in duration, and continuous in frequency. The land has moderate resiliency, and the impacts are irreversible and of high importance to Tahltan. These effects are supported by medium information confidence and a medium probability, with medium risk and moderate consequences.

- Cumulative effects on the intangible experiential qualities of the land reflect the same criteria: regional to national extent, moderate magnitude, far-future duration, continuous frequency, moderate resiliency, irreversible outcomes, and high importance to Tahltan. Confidence is medium, as is probability, risk, and consequence.

TCG technical concerns, socio-cultural concerns and Tahltan community concerns are reported in detail in REAA Section 4.4.9.6 and the Tahltan reporting of effects with this value was:

- Extent: landscape to nation/region
- Magnitude: high
- Duration and Reversibility: 3 generations or more and reversible long-term to irreversible
- Frequency: continuous
- Confidence: high
- Risk and Uncertainties: moderate risk with moderate uncertainties

Summary of Effects for the Consent and Mountain Pass AOIs

Based on the potential effects identified for the values above, (see also REAA Section 4.4.9.8- positive, Section 4.4.9.9 – negative) against the proposed mitigations by Skeena Resources and Tahltan (Section 4.4.9.10) support the following estimated effects related directly to the ECRP:

- Effects are measured at the Consent and Mountain Pass AOI's
- Positive effects with employment and economy jobs, business, contracts, and partnerships with Tahltan; community focused social, cultural, economic and environmental legacies
- Positive effects with use of existing access and project footprint, limited new access infrastructure required
- Negative effects associated with increased transportation volumes, increased safety concerns, increased wildlife mortalities, air quality, noise, and Tahltan land uses
    - Inconsistent access for several generations to lands, traditional uses and sites, and QEL connections
    - Potential for MAR and other industrial roads in area not being reclaimed due to existing or future resource development interests
    - Potential for MAR and other industrial roads in area not being reclaimed for several generations due to long term reclamation and closure requirements
- Negative effects with irreversible effects related to groundwater, surface water, fish for only the watersheds with the project footprint and draining into the Unuk River with:
    - water quality and treatment into perpetuity
    - high uncertainties with hydraulic containment for TMSF, MRSA, open pits, ore stockpiles and other mine components
    - uncertainties with potential seepage and surface water escaping from water containment areas
    - water quality exceedances for extended stretches of creeks and waterways
    - downstream fish habitat on Ketchum creek and Unuk River with potential effects to stream flows, stability, and water quality
    - uncertainties with assumptions on geology and landscape formations containing seepage and surface water flows
    - uncertainties with the potential effects from the open pit exposed walls with MLARD, maintaining a consistent pit lake; underground mine workings and open pits
    - linkage of effects to Tahltan Core Priorities, wildlife, CFTLUP, QEL, plants, human health
    - concerns on snow creating additional water management issues due to coastal winter influences and past experiences
- Negative effects with air quality for the project area and surrounding area, links to human health, wildlife, plants, CFTLUP, and QEL
- Negative effects with wildlife related to loss of habitats, reclamation uncertainties, and mortalities from traffic linked to CFTLUP, and QEL values
- Uncertainties with the reclamation and closure for the project with the water treatment requirements, financial resources to support closure requirements, long term requirements to restore the land and water for future generations, and potential for access and other components not being reclaimed due to technical, financial, and environmental constraints with resource development interests in the area.
- Negative effects to CFTLUP and QEL with restricted access to land in and around the project area and inconsistent access to the MAR area
- Aspects of the project are not consistent with sustainability requirements for these AOIs
- Barriers related to restricted and inconsistent access to Tahltan lands and waters; community effects from resource development
- Mitigations are focused on
    - co-designing/managing access for Tahltan to access lands and waters;
    - co-designing wildlife, air quality, fugitive dust, access and other management plans to reduce uncertainties and risks;
    - establishing conditions to field verify fish, groundwater and surface water, wildlife, reclamation, and mine component design assumptions with Tahltan triggers if assumptions are not valid;
    - reclamation and closure requirements, including design changes/adjustments for mine components to reduce uncertainties and reduce risk for future generations
    - Financial bonding to support post closure requirements for land and water
    - Co-designing reclamation and closure monitoring plans and research
    - Co-designed human health, wildlife, plants, and water bioaccumulation monitoring;
    - Tahltan focused human health and socio-cultural mitigations and management plans;

- Social, cultural, environmental, and economic positive legacies; and
- Improvements to Highway 37 to reduce wildlife and safety risks with increased traffic volumes from projects and other resource development interests

Based on the information provided in above and in REAA Sections 4.4.9.6, 4.4.9.8 – 4.4.9.11 the below are the effects assessment for the Consent, Mountain Pass, and Transportation Corridor.

Extent – Site specific to Landscape
Magnitude –high
Duration –1-3 generations to over 3 generations
Frequency – Continuous
Reversibility – reversible long term to irreversible
Risk and uncertainty – moderate to high and moderate to high uncertainty

9.3.8. **PROJECT FOOTPRINT**

Given the AOI sites within the above AOIs with the focus on the Permitted Mine Area and Project Components, the Tahltan Values with the reported effects by Skeena Resources and TCG are applicable for this AOI. In addition, the effects management criteria identified above with the detailed information reported in REAA Section 4.4.9.7 are applicable here and the effects management criteria identified for the common values in REAA Sections 4.4.9.6, 4.4.9.8, and 4.4.9.10 are applicable for this AOI.

9.3.9. **CUMULATIVE EFFECTS**

Cumulative effects have been identified for all or some of Tahltan Values for this AOI, with the primary effects associated with the ECRP potential effects. There are additional cumulative effects reported for the Mid-Iskut and Ningunsaw AOI reported in REAA Section 4.4.4.10 with indirect effects related to past mining projects, projects potentially being developed in the future, and with TSP management directions not being met from other projects. The potential effects related to this AOI are moderate to high, as opening the area to ground access, and developing projects and properties can alter the nature, role, or function value or AOI and not be consistent with the TSP. The landscape will have effects from the identified projects and potentially effect half to a generation in duration.

When evaluating the potential cumulative effects of the ECRP on the Consent and Mountain Pass AOIs, in conjunction with the Mid Iskut and Ningunsaw AOIs, the anticipated effects are landscape in extent and of moderate to high magnitude. The ECRP and resource development activities has the potential to significantly alter the nature, role, and functional value of the AOIs. These changes may not align with the values or objectives set out in the TSP.

The duration of these effects is expected to span from one to three generations, with some impacts likely to persist beyond three generations. These effects are anticipated to occur in a continuous manner. While certain effects may be reversible in the long term, others are estimated to be irreversible.

The level of confidence in the assessment of these effects is considered moderate to high, as the nature of the impacts is generally understood. However, the likelihood of their occurrence is influenced by external pressures and financial market conditions, introducing a degree of risk and uncertainty. The overall risk of occurrence is assessed as moderate, with moderate levels of uncertainty.

Cumulative effects will be further refined based on additional information, mitigations, and/or reduction in uncertainties/risk to Tahltan Values and the adjustments in the Tahltan Risk Assessment through upcoming confidential engagement with Tahltan members, where further evaluation of the potential risks to rights and Core Priorities will be provided for additional knowledge, concerns, and directions on the assessment.

9.4. THE SEVERITY OF POTENTIAL EFFECTS

As reported in Section 9.3, the Project related effects are not directly or mixed with other resource development and land use activities for the More Creek, Zippa Mountain, RN Mountain, and Upper Bell Irving AOIs. This does not mean there are ongoing effects are but are not being considered at this time of the draft with direct and mixed potential effects reported for the remaining AOIs.

9.4.1. **REGIONAL**

Seven to fifteen generations ago, the land and Tahltan relationship and way of life was strong with the importance of this mountainous southwestern corner of the territory has, in part, to do with the resources provided by the rivers and forests: nust'ihe (marten), tsa' (beaver), tehjishe (mink), naghā (wolverine), sas and khoh (bear), isb̲ā (mountain goat), ch'iyōne (wolf), tse̲'des̲ (fisher), tsa̲bā'e (trout) and dēk'āne (salmon). It was also the trade that travelled up the rivers and trails (coast-interior trade network which stretched from the Pacific coast to the boreal forests east of the Rocky Mountains).

Tahltan sites, land uses, and practices includes villages, obsidian mining, trapping, gathering, harvesting, fishing, travel, placenames, and trails throughout the region. Infrastructure includes bridges, stream and river trails, villages, cabins, campsites, and hunting/fishing/trapping/gathering camp sites.

Tahltan frequently travelled back and forth between villages on the Iskut and upper Nass and the tribal headquarters at the confluence of the Tūdese̲ chō (Stikine) and Tāłtān (Tahltan) rivers, using ancient trails that followed the course of rivers, including Treaty Creek, Ningunsaw River, Oweegee River, Unuk River and Iskut River.

The discovery of gold in the Cassiar region in the 1860s radically altered the conditions and patterns of life for everyone in the northwest portion of what eventually became British Columbia. This change continued to increase in the region through historic times with increased resource development and impacts on Tahltan with some of the relevant events occurring in the Region identified by Tahltan include (Tahltan First Nation and IISD 2003):

- *1901 - Yukon Telegraph Line completed to Dawson City using route of the 1865–66 Collins initiative.*
- *1910 - 1910 Tahltan Declaration of the Tahltan Tribe asks for resolution of land and rights issue through the development of a treaty among the Tahltan, the Government of Canada and the Government of British Columbia.*
- *1928 - The pack trail from Telegraph Creek to Dease Lake is upgraded to a road. The Stikine, Telegraph Creek and Dease Lake become essential transportation links between southern B.C. and the northern interior.*
- *1930s - Bush planes provide new means of access to remote areas.*
- *1941–1942 - Stikine River used to transport heavy equipment and supplies for construction of the Alaska Highway.*
- *1952 - Production at the Cassiar Asbestos mine begins; continues until 1992.*
- *1950s and 1960s - A number of Tahltan worked in mineral exploration industry.*
- *1960s - Increasingly common use of fixed wing aircraft and the helicopter (which started in the 1950s) leads to the reduction in the use of Telegraph Creek as a staging point for exploration in Tahltan Country in favour of Smithers. Tahltan involvement in exploration activities declines as a result.*

Forestry, guide outfitting, trapping and other natural resource activities were occurring during the late 1870's to the mid 1950's but on a site specific scale or at minor levels than occurring during the Past -Short Term conditions period (REAA Section 4.4.3.4). The regions was predominately without roads and transportation was on foot or by river until fixed wing aircraft came into greater use in the 1950's.

The increase in resource development is tied to increased access and mineral activities in the region, which has created existing barriers to Tahltan. affecting Tahltan's ability to be on the land and exercise of rights. The development of the Eskay Mine Project in the 1990's and the Mine Access Road began the inconsistent and at for periods of time, restricted access to lands in the Region, which has been further affected through development of resource development (e.g., mining, forestry, hydroelectric, transmission lines, heli-skiing, guide outfitting, commercial tourism). It has resulted in loss and degradation of culturally important values such as trails, plant communities, wildlife habitats, and surface and ground water sources. The increase in access has also increased the consumptive harvest of wildlife and plants through the licensed opportunities provided to residents of the province.

With the physical barriers and loss/degradation to Tahltan Values, the socio-cultural effects from the resource development and increased access through the Past -Short Term conditions period has been detailed in Section 5.2.1 and in the REAA Section 4.3. There are barriers from mining and resource activities which are resulting in Tahltan communities shrinking; community infrastructure and services declining; mental and physical health effects, addiction and trauma from mine and resource development work; and concerns on negative legacies continuing to exist in the Nation. All of the barriers are existing, and the potential effects from the Project are considered additive to these barriers and potential effects to Tahltan Core Priorities, Sustainability Requirements, and exercise of rights.

The regional effects related to the Project have been determined by Skeena Resources to include the potential effects related to Infrastructure and Services, Human Health, Employment and Economy, Current and Future Use of Land and Resources for Traditional Purposes, and Quiet Enjoyment of Land. The potential effects include both positive and negative effects. The positive effects will be explore in more detail in Section 9.5 for all the affected AOIs from the Project. The severity of negative effects for the Regional AOI includes the regional and territory level effects related to the project with the proposed mitigations; the uncertainty, including by considering confidences, contingencies and risks, and whether the Tahltan Core Priorities are met. To aid in the determination of the Tahltan Core Priorities are being met, will include whether the TSP management directions are also being met.

The determination of significance of effects after consideration of Tahltan proposed mitigations and conditions, to Tahltan will be determined in Sections 9.5 and 9.6 followed by the conclusions to Tahltan Sustainability Requirements and potential effects to Tahltan rights and title are reported in Section 10.

The Regional AOI has regional/territory effects related to community well-being, socio-cultural, traditional/way of life practices, quiet enjoyment of land interconnection to Keyeh, and the exercise of rights from existing and potential additive barriers. These effects may be mitigated with the full range of Skeena Resources and Tahltan mitigations, terms and conditions. This will be considered when considering whether the Tahltan Core Priorities are being met when considering the potential effects by the below AOIs nested within this AOI.

When considering the potential severity of effects for the AOI, the following are being considered, in addition to the above information:

Lower Iskut – The potential mixed effects, including Snip Mine, will violate the TSP management directions if the resource development interests were to proceed; add to the cumulative effects of the region, and with uncertainties the Tahltan Core Priorities can be met with these actions.

Mid-Iskut and Ningunsaw – The current TSP management directions are being met, and with the mixed effects of the project, may, with all the proposed mitigations maintain the Tahltan Core Priorities.

Oweegee – The effects related to the Project are mixed with the effects from primarily other projects/proponents outside of the direct effects related access barriers and transportation effects directly tied to the Application. Currently these effects are not violating TSP management directions, but will add to the cumulative effects of the region. It has been noted due to the ongoing resource development activities and uncertainties with the mitigations there can be challenges in maintaining Tahltan Core Priorities but in the near term are expected to be maintained.

Unuk - Overall, it is possible to indicate the Tahltan Core Priorities may be met with these project related effects but there are uncertainties related to surface water and groundwater which can increase the potential effects to Tahltan Values. The potential effects identified for the Unuk River are related to water, fish and fish habitat, traditional land uses, quiet enjoyment of the land tied to the Eskay Creek Mine Project and cumulative effects from KSM Mine Project, Brucejack Mine Project and Nugget Trap Mine Project detailed by both Skeena Resources and Tahltan

Consent - As reported in Section 9.3.7, the severity of effects when considering the potential effects reported by Skeena Resources with the uncertainties and risks identified by Tahltan there are site specific to landscape effects of high magnitude, for 3 or more generations, reversible in the long term or not at all, with moderate to high risk and uncertainties to Tahltan Values. The TSP management directions have several which will not be met at a site and landscape scale from the Project's direct effects but with the majority still being met. There are several sustainability requirements not currently being met with others appearing to be consistent. The Tahltan Core Priorities for the Consent AOI will have areas where it will be challenging and require more than seven generations to determine the success of restoring the health of the land and other priorities. However, it is not applicable to entire AOI.

Mountain Pass – Prout Plateau and Project Footprint have similar effects as related to the Consent AOI but are more focused given the Project's direct effects and the smaller landscapes of the AOI. For these AOIs the challenges with the sustainability requirements and maintaining the Core Priorities are greater and it may not be possible for these AOIs.

Based on the summary of potential effects mixed or directly associated with the Project are applicable at the regional (predominately socio-cultural in nature), landscape (Lower Iskut, Iskut and Ningunsaw, Unuk, Oweegee, Consent AOI, Mountain Pass-Prout Plateau, and Project Footprint), with the other AOIs being considered as part of the Cumulative Effects AOI assessment. The potential severity of effects are related to the Project but with contributions from other resource development activities, moderate in magnitude, at a landscape to regional scale, occurring continuously for 3 or more generations, some effects may be reversible, with moderate to high confidence of occurring with moderate risk and uncertainties.

Across the AOI, TSP management directions are generally being met as a collective, but with several AOIs not being consistent with the TSP, and not consistent with several of the Tahltan Sustainability Requirements. At a regional scale, the Tahltan Core Priorities are being met, but with challenges for several AOIs on maintaining the health of land and water, and Tahltan way of life priorities followed with uncertainties in the ability to restore the health of the land and water for future generations from the scope of resource development.

9.4.2. **ISKUT RIVER**

Lower Iskut

As reported in Section 9.3.2, the potential effects related to the Project are mixed and are tied to future potential actions, including the development of the Bronson Connector, the re-opening of the Snip Mine, and the potential approval to allow the ore to be transported to the ECRP for processing within the LOM. These actions will violate the

TSP management directions, add to the cumulative effects of the region, and it is uncertain if the Tahltan Core Priorities can be met with these actions.

Middle Iskut and Ningunsaw River

As reported in Section 9.3.2, the potential effects related to the Project are mixed with the effects from primarily other projects/proponents outside of the direct effects related access barriers and transportation effects directly tied to the Application. Currently these effects are not violating TSP management directions, but will add to the cumulative effects of the region. The proposed conditions and mitigations can reduce the potential effects to Tahltan accessing the land, traffic related wildlife mortalities, and stronger management and monitoring of the potential traffic volumes, safety, and road/highway upgrades. The potential for not reclaiming the access corridors due to other resource development and government interests does effect the ability to restore the health of the land for future generations. Overall, it is possible with this stage of the assessment to indicate the Tahltan Core Priorities may be met with these project related effects.

9.4.3. **UNUK RIVER**

The potential effects identified for the Unuk River are related to water, fish and fish habitat, traditional land uses, quiet enjoyment of the land tied to the Eskay Creek Mine Project and cumulative effects from KSM Mine Project, Brucejack Mine Project and Nugget Trap Mine Project detailed by both Skeena Resources and Tahltan (REAA chapters 12-20,24-27 with sections 5-7 in each chapter detailing the potential effects and estimated outcomes; Sections 4.4.9 and 10).

However the potential for increased resource development with downstream effects on aquatic ecosystems from projects outside of the AOI, including ECRP, KSM, Brucejack, Nugget Trap Mine Projects can result in violating key management directions for the AOI and result in singular effects and cumulative effects to Tahltan Values. The potential effects identified for the Unuk River are related to water, fish and fish habitat, traditional land uses, quiet enjoyment of the land tied to the Eskay Creek Mine Project and cumulative effects from KSM Mine Project, Brucejack Mine Project and Nugget Trap Mine Project detailed by both Skeena Resources and Tahltan (REAA chapters 12-20,24-27 with sections 5-7 in each chapter detailing the potential effects and estimated outcomes; Sections 4.4.9 and 10).

The direct effects from the Project have uncertainties related to the predictive models and assumptions being considered with surface water and groundwater quality and quantity. Skeena Resources has reported the effects to the AOI are low, but Tahltan have identified concerns if the field results of models are not consistent. Tahltan have proposed draft mitigations and conditions . The potential effects are low to moderate with the current estimated effects from the project, existing projects, and effects from developing projects and properties can alter the nature, role, or function value or AOI and not be consistent with the TSP. The landscape will have effects from the identified projects and potentially effect half to a generation or longer in duration. The confidence and risk of the effects are moderate as the effects are known but the potential occurring has some risks and is dependent on external pressures and financial markets. The risk of occurring is low to moderate. Based on the TSP management direction and effects to Tahltan values, there are estimated moderate effects to the AOI primarily from other sources/projects. Overall, it is possible with this stage of the assessment to indicate the Tahltan Core Priorities may be met with these project related effects but there are uncertainties related to surface water and groundwater which can increase the potential effects to Tahltan Values.

9.4.4. **OWEEGEE**

As reported in Section 9.3.2, the potential effects related to the Project are mixed with the effects from primarily other projects/proponents outside of the direct effects related access barriers and transportation effects directly tied to the Application. Currently these effects are not violating TSP management directions, but will add to the

cumulative effects of the region. The proposed conditions and mitigations can reduce the potential effects to Tahltan accessing the land, traffic related wildlife mortalities, and stronger management and monitoring of the potential traffic volumes, safety, and road/highway upgrades. The potential for not reclaiming the access corridors due to other resource development and government interests does effect the ability to restore the health of the land for future generations. Overall, it is possible with this stage of the assessment to indicate the Tahltan Core Priorities may be met with these project related effects.

9.4.5. CONSENT AREA AND MOUNTAIN PASS-PROUT PLATEAU

As reported in Section 9.3.7, the severity of effects when considering the potential effects reported by Skeena Resources with the uncertainties and risks identified by Tahltan there are site specific to landscape effects of high magnitude, for 3 or more generations, reversible in the long term or not at all, with moderate to high risk and uncertainties to Tahltan Values. The TSP management directions have several which will not be met at a site and landscape scale from the Project's direct effects but with the majority still being met. There are several sustainability requirements not currently being met with others appearing to be consistent. The Tahltan Core Priorities for the Consent AOI will have areas where it will be challenging and require more than seven generations to determine the success of restoring the health of the land and other priorities. However, it is not applicable to entire Consent AOI.

Mountain Pass – Prout Plateau have similar effects as related to the Consent AOI but are more focused given the Project's direct effects and the smaller landscapes of the AOI. For these AOIs the challenges with the sustainability requirements and maintaining the Core Priorities are greater and it may not be possible for these AOIs.

9.4.6. PROJECT FOOTPRINT

Mountain Pass – Prout Plateau have similar effects as related to the Consent AOI but are more focused given the Project's direct effects and the smaller landscapes of the AOI. For these AOIs the challenges with the sustainability requirements and maintaining the Core Priorities are greater and it may not be possible for these AOIs.

9.4.7. CUMULATIVE EFFECTS

As reported in Sectio 9.3.7, there are expected cumulative effects related to the current and potential resource development projects and activities reported for each AOI. For example, Red Chris Mine is an operating mine with plans for expansion and increased Life of Mine; Galore Creek is authorized project and is planning to move to advance their project in the next year to two years; Seabridge Gold is advancing the KSM mine and properties on the lower Iskut River; Coast Mountain Hydro is an operating facility; commercial forestry is a tenured activity; mineral exploration continues to increase; and the provincial government has recently announced its intention to "fast track" projects in this AOI to increase the pace and scale of development. ECRP will be an additive project to these effects, and while have lesser effects than other projects in the AOI, are contributing to the overall cumulative effects.

The TSP speaks directly to concerns with cumulative effects, the need for pace and scale measures to development, the need to stop and hopefully reverse the serious socio-cultural effects to communities, families, and members through Tahltan governance and co-management.

When evaluating the potential cumulative effects of the ECRP on the Consent and Mountain Pass Areas of Interest (AOIs), in conjunction with the Mid Iskut and Nigunsaw AOIs, the anticipated effects are landscape in extent and of moderate to high magnitude. The ECRP and resource development activities has the potential to significantly alter the nature, role, and functional value of the AOIs. When taken in context with the other related resource development existing and potential barriers and effects, they are not aligned with the values or objectives set out in the TSP (Territorial Stewardship Plan).

The duration of these effects is expected to span from one to three generations, with some impacts likely to persist beyond three generations. These effects are anticipated to occur in a continuous manner. While certain effects may be reversible in the long term, others are estimated to be irreversible.

The level of confidence in the assessment of these effects is considered moderate to high, as the nature of the impacts is generally understood. However, the likelihood of their occurrence is influenced by external pressures and financial market conditions, introducing a degree of risk and uncertainty. The overall risk of occurrence is assessed as moderate, with moderate levels of uncertainty.

9.5. THE OVERALL PROJECT EFFECTS TO TAHLTAN LANDS, CULTURE AND COMMUNITIES, AND THE ALIGNMENT WITH TAHLTAN CORE PRIORITIES

The Tahltan Risk Assessment is reviewing what are the overall project effects to Tahltan lands, culture and communities, by making an:

- Initial determination of the overall significance of potential project effects and whether the project aligns with the Tahltan Core Priorities; and
- Determining how the Tahltan Risk Assessment Factors and Tahltan Sustainability Requirements have been considered with the mitigations proposed by Skeena Resources (Section 9.6.1), the draft Federal (Section 9.6.2) and draft BC EAO Conditions (Appendix 2), and the draft Tahltan Conditions (Section 10.2).

This will support determining if the (a) is the project likely to cause significant effects to Tahltan lands, culture, and communities, and (b) does it align with the Tahltan Core Priorities.

At this time of the Tahltan Risk Assessment, there are several ongoing processes which can affect determining the overall effects from the ECRP.

The first factor is Tahltan members' directions are required to support a determination of the overall effects of the Project to Tahltan lands, culture and communities. Tahltan need to have an opportunity for members to see and provide directions on the draft summary of effects; summary of overall effects and significance to Tahltan; Tahltan draft conditions; the estimated effects to Section 35 rights; and the draft conclusions of the Project. This is due to the sensitivities of Tahltan Knowledge and the rights-related information being tabled. This relates to Tahltan Risk Assessment Factors 1-4, 6, 12, and 15.

The second factor is a number of the Tahltan Risk Assessment Factors are tied to the understandings of the positive effects of the ECRP to Tahltan (e.g., Factors 8 and 9) , the potential benefits to Tahltan (e.g., Factors 8,9, and 16) , the socio-cultural outcomes(e.g., Factor 7 and 11) , the application of the DAA (Factor 17), and the delivery of the draft Tahltan conditions which can include a bilateral relationship with Skeena Resources, Tahltan terms and conditions, Tahltan EAO terms and conditions, and/or regulatory permit conditions with the Mines Act and Environmental Management Act permit decisions (Factor 18). All of these items are still being collaborated with Skeena Resources, EAO, and provincial government.

At this time, there has been a TCG press release on August 14, 2025, where the President announced the negotiations of a draft Impact Benefits Agreement has advanced sufficiently for it to be provided to Tahltan ratification vote in early October. The TCG Lands and Regulatory Affairs Department will be meeting with members to discuss the draft TRA and it is expected confidential information related to above items will be available to support Tahltan Knowledge and directions being provided with all this information to support addressing these items.

In addition, the collaboration by all involved will continue through the upcoming Public Comment Period on the draft terms and conditions for Tahltan, BC and Canada. With the additional directions from Tahltan members, TCG will be

able to work with all parties to make adjustments to draft conditions and determine the best delivery (EAC, IBA, permitting, bilateral commitment) for Tahltan.

All of these sensitivities and confidential requirements are provided in the DAA, where sections and the terms and conditions of the draft TRA can be included in this draft version of the TRA, to support Tahltan making a fair and transparent review of the TRA, provide additional knowledge and directions to the TRA, which can support the TCG Board making a *Notice of Decision*.

To aid in the understanding of the TRA of the ECRP and the Tahltan Risk Assessment Factors the following information is provided related to several of the factors where it is public knowledge:

- 5 - *Does the project align with Tahltan direction on the use of the project area, including in land use plans?* The TSP and the management direction for specific land use areas are a component of evaluating the potential effects within an AOI, and there are number of sections in the TRA where it is reported if the management directions are being met in relation to the ECRP.
- 10 -*What is the compliance, regulatory, and operational history of the proponent with Tahltan and other Indigenous Nations?* The relationship with Skeena Resources and the Eskay Creek Mine has been reported in the REAA, and the TRA with sources referenced to public sources such as news releases or reports. The relationship to date has been positive.
- 13 -*Has a Tahltan land use and occupancy study been completed and used in the design of the project and incorporated into the environmental assessment application?* A TLUOS was completed for the ECRP, it was used in the project design and REAA; Tahltan Knowledge is recognised as an valid information source; public domain Tahltan Knowledge is used by Skeena Resources in the development of the REAA; and TCG review of the project with the Tahltan Assessment included the application of the interdependence or relationship between Tahltan people, land, water, living and spiritual beings to support effects assessment along with other Tahltan specific measures which was included by Skeena Resources in the REAA as well as by TCG in their relevant sections.
- 14 - *Does baseline information meet the confidences of Tahltan that it accurately and precisely captures the current knowledge for the project area and study areas? If not, do the contingencies meet the confidences of Tahltan?* By TCG and EAO making the determination to accept the REAA and commence the Effects Assessment stage indicates the information was accepted but there were different understandings/perspectives of the uncertainties of the information and the contingencies required to meet or be more aligned with Tahltan Sustainability Requirements which are reflected in the risk assessment and draft Tahltan Conditions.
- 17. *Have the proponent and/or regulatory agencies applied Tahltan Sustainability Requirements and the above risk criteria? Are they following the consent and decision-making requirements for Tahltan? Are they taking actions in relation to any Tahltan risk and sustainability concerns to require changes to the proposed project, certificate conditions* – Skeena Resources, EAO, provincial regulatory ministries, and IAAC have collaborated with TCG throughout the EA process and is continuing as the process moves to a decision stage and subsequent permitting decisions post TCG *Notice of Decision*.

9.5.1. **REGIONAL**

As reported in Section 9.4.1, the increase in resource development is tied to increased access and mineral activities in the region, which has created existing barriers to Tahltan. affecting Tahltan's ability to be on the land and exercise of rights. The development of the Eskay Mine Project in the 1990's and the Mine Access Road began the inconsistent and at for periods of time, restricted access to lands in the Region, which has been further affected through development of resource development (e.g., mining, forestry, hydroelectric, transmission lines, heli-skiing,

guide outfitting, commercial tourism). It has resulted in loss and degradation of culturally important values such as trails, plant communities, wildlife habitats, and surface and ground water sources. The increase in access has also increased the consumptive harvest of wildlife and plants through the licensed opportunities provided to residents of the province.

With the physical barriers and loss/degradation to Tahltan Values, the socio-cultural effects from the resource development and increased access through the Past -Short Term conditions period has been detailed in Section 5.2.1 and in the REAA Section 4.3. There are barriers from mining and resource activities which Tahltan view are resulting in Tahltan communities shrinking; community infrastructure and services declining; mental and physical health effects, addiction and trauma; and concerns on negative legacies continuing to exist in the Nation. All of the barriers are existing, and the potential effects from the Project are considered additive to these barriers and are identified as potential effects to Tahltan Core Priorities, Sustainability Requirements, and exercise of rights.

Positive effects are associated with the project through a variety of ways with this assessment. The proposed project is a redesign of an existing closed mine in the Tahltan Nation. The access is based on an existing industrial road, and the project footprint is within a predominately disturbed area. That is not to say there are not negative effects with the project, but the potential effects from an environmental assessment for an open pit mine project, tailings storage facility, water treatment, and access road(s) in a pristine watershed have a much greater potential for negative effects and potential to not be consistent with Tahltan Stewardship Plan management directions, the Core Priorities, and Sustainability Requirements across scales.

There are potential positive effects related to Tahltan employment, careers, education, business, and contracting opportunities with the proposed project at the Nation and territory scale. There are potential positive effects related to social, cultural, economic, and environmental legacies that can come through agreements with Skeena Resources and governments. It is important the legacies reflect the socio-cultural items raised through members feedback on the concerns reported above are important when considering positive legacies associated with the project.

There can be positive effects with the application of mitigations, conditions, and management plans that address the existing barriers to Tahltan being able to manage the access of land under industrial control. These barriers have been in place for several decades with various approaches to allowing access with mixed results. It has resulted in generational loss to consistent, easy access for traditional purposes, way of life, and quiet enjoyment of land requirements. The full scope of potential positive effects will depend on the commitments for collaborating and working with Tahltan on the access for Tahltan to be on the land while still maintaining safety requirements for the project.

As Skeena Resources has identified, the project has had positive effects to Tahltan historically, currently, and in the future through employment, training, careers, social, economic, cultural, and environmental components and mitigations of the project through time and detailed in the Application.

This information is providing additional context when considering the AOIs nested within the Regional AOI, with the information reported in Section 9.1 to 9.4 to support the process in assessing the overall effects to Tahltan. In completing the steps in the assessment includes sharing confidential and sensitive information with Tahltan members for additional knowledge, review, and directions for the TRA in the final determinations of the effects of the project to Tahltan. The draft TRA will be updated for the next version of the report reflecting the outcomes of the internal Tahltan review and directions.

This section of the draft Tahltan Risk Assessment Report is currently under review by Tahltan members. It relates to potential impacts from the Project that are specific to Tahltan's Aboriginal title and rights and potential mitigation strategies being considered by TCG for seeking to address those impacts.

9.5.2. ISKUT RIVER

Lower Iskut

This section of the draft Tahltan Risk Assessment Report is currently under review by Tahltan members. It relates to potential impacts from the Project that are specific to Tahltan's Aboriginal title and rights and potential mitigation strategies being considered by TCG for seeking to address those impacts.

Middle Iskut and Ningunsaw River

This section of the draft Tahltan Risk Assessment Report is currently under review by Tahltan members. It relates to potential impacts from the Project that are specific to Tahltan's Aboriginal title and rights and potential mitigation strategies being considered by TCG for seeking to address those impacts.

9.5.3. UNUK RIVER

This section of the draft Tahltan Risk Assessment Report is currently under review by Tahltan members. It relates to potential impacts from the Project that are specific to Tahltan's Aboriginal title and rights and potential mitigation strategies being considered by TCG for seeking to address those impacts.

9.5.4. OWEEGEE

This section of the draft Tahltan Risk Assessment Report is currently under review by Tahltan members. It relates to potential impacts from the Project that are specific to Tahltan's Aboriginal title and rights and potential mitigation strategies being considered by TCG for seeking to address those impacts.

9.5.5. CONSENT AREA AND MOUNTAIN PASS-PROUT PLATEAU

This section of the draft Tahltan Risk Assessment Report is currently under review by Tahltan members. It relates to potential impacts from the Project that are specific to Tahltan's Aboriginal title and rights and potential mitigation strategies being considered by TCG for seeking to address those impacts.

9.5.6. PROJECT FOOTPRINT

This section of the draft Tahltan Risk Assessment Report is currently under review by Tahltan members. It relates to potential impacts from the Project that are specific to Tahltan's Aboriginal title and rights and potential mitigation strategies being considered by TCG for seeking to address those impacts.

9.5.7. CUMULATIVE EFFECTS

This section of the draft Tahltan Risk Assessment Report is currently under review by Tahltan members. It relates to potential impacts from the Project that are specific to Tahltan's Aboriginal title and rights and potential mitigation strategies being considered by TCG for seeking to address those impacts.

9.6. MITIGATIONS MEASURES OR TERMS AND CONDITIONS TO ADDRESS EFFECTS AND ALIGNMENT WITH TAHLTAN CORE PRIORITIES

9.6.1. SKEENA RESOURCES PROPOSED MITIGATION MEASURES

The following are a summary of mitigation measures proposed by Skeena Resources as reported by the EAO.

Air Quality

- Minimise surface disturbance for all activities to the areas strictly necessary;
- Use dust suppression or watering in drilling, stockpile management, road maintenance, and considering wind conditions when moving debris, waste or gravel;
- Use low-silt road crush to maintain roads which minimizes fugitive dust emissions;
- Establish vegetation or other ground cover or wind breaks around areas that are no longer being expanded or actively disturbed, and that have not yet been reclaimed;
- Seed topsoil stockpiles that are no longer being actively used, to reduce bare soil and to limit the establishment of invasive species;
- Implement a trigger action response plan to ensure that mitigation measures are implemented quickly after trigger thresholds are crossed; and
- Reduce criteria air contaminants from exhaust by maintaining equipment and turning it off when not in use.

Employment and Economy

- Recruitment and Selection Policy: Emphasizes inclusive hiring practices to reflect local demographics and encourages the employment of Indigenous people and other underrepresented groups. Provides training programs to enhance the skills and qualifications of the local workforce, including reimbursement for course tuition fees, paid study days, and funding for professional development activities.
- Professional Development Policy: Offers on-the-job training to help local and Indigenous populations qualify for employment opportunities.
- Hours of Work and Overtime Policy: An existing policy that includes provisions for rotational employees at remote sites.
- Annual Work Performance Evaluation Policy: An existing policy implementing annual performance evaluations tied to salary reviews to ensure fair compensation.
- Crew Rotational Travel Policy: A measure that will regulate travel expenses associated with rotations, including charter air flights and compensating travel to a designated pickup point. The inclusion that rotational employees who move from their original point of hire will be required to pay for additional travel costs associated with their new residence will disincentivize moving to other communities.
- Workplace Safety and Anti-Harassment Policies: Implement policies that include provisions for a safe working environment with specific anti-harassment, bullying, and drug and alcohol policies.
- Indigenous Cultural Sensitivity Training: Improves intercultural understanding to promote an inclusive and respectful workplace.
- Specialized Courses and Certification: Partnering with educational institutions and TCG to create courses and certification programs tailored to the specific needs of Eskay Creek to improve workforce capacity and readiness.

- Mentorship and Internship Programs: Initiatives like the Tahltan Mentorship Program aim to equip Tahltan individuals with the skills needed for leadership and technical roles, while the internship program targets youth entry into the workforce.
- Social Closure Plan: To help manage the socioeconomic impact of Eskay Creek's transition to closure, this plan considers and identifies opportunities on employee support for skills transition and employment searches, reducing negative impacts from the eventual reduction in project-related jobs.
- Procurement Plan: Supports local economic growth by increasing contracts awarded to businesses within the LAA and RAA, including Indigenous-owned businesses. Skeena plans to hold virtual sessions to help local vendors understand and participate in procurement processes.
- Tax Revenue: While there are no direct mitigation measures for tax revenue, Skeena anticipates that increased local employment and business opportunities during Construction and Operations will raise local and provincial tax revenues. This will indirectly support public services and infrastructure.
- Cost of Living: No direct mitigation measures are identified for potential increases in the cost of living, as the cost of living is influenced by many factors, including other projects and external factors. Skeena acknowledges the challenge for low-income and single-income households. Eskay Creek intends to house employees on site and offer transportation to and from the workplace to minimize increased demand on local housing stock.
- Focus on Vulnerable Groups: Women, Indigenous populations, youth, low-income households, single parents, and rural populations are considered in mitigation strategies, including for hiring, training, and workplace support policies.
- Flexible Employment Options: Crew rotational policies may have effects to employee health and well-being, which is further described in Section XX of this Report (Human Health).
- Safety and Supportive Workplace Culture: Anti-harassment and cultural sensitivity training aim to create an inclusive and secure environment for all employees, including Indigenous and gender-diverse individuals.
- Socioeconomic Monitoring Plan: To assess the effectiveness of mitigation measures, Eskay Creek includes indicators to track employment levels, income, business participation, tax contributions, and cost of living. This allows for adaptive management and refinement of mitigation efforts based on observed outcomes.

Fish and Fish Habitat

- Diversion of non-contact water (including snow management) around the disturbed footprint areas to the maximum practical extent with the aim of avoiding mixing of non-contact and contact water;
- Establish water management structures, including non-contact water diversions, conveyance ditchlines, active diversions and/or crossings to enable flow around active construction and operations areas;
- Managing contact water, including sediment-laden runoff, to reduce potential adverse effects to downstream receiving environments;
- Implementing treatment, as required, to maintain mine effluent water quality below the appropriate water quality guidelines or approved discharge limits prior to discharge of water to the receiving environment;
- Incorporating seepage mitigation measures at the TMSF and the water collection ponds;
- Implementing ML/ARD management practices, including the subaqueous management of PAG materials in the TMSF;
- Implementing progressive reclamation efforts (including covering and/or revegetating disturbed areas, where practical) to reduce contact water and promote positive drainage; and
- Develop a site-specific selenium trophic transfer model and update aquatic effects monitoring program with selenium monitoring requirements.

Groundwater

The existing mitigation measures include:

- Diversion of non-contact water (including snow management) around the disturbed footprint areas to the maximum practical extent with the aim of avoiding mixing of non-contact and contact water;
- Managing contact water, including sediment-laden runoff, to reduce potential adverse effects to downstream receiving environments;
- Implementing treatment, as required, to maintain mine effluent water quality below the appropriate water quality guidelines or approved discharge limits prior to discharge;
- Incorporating seepage mitigation measures at the TMSF and the water collection ponds;
- Implementing ML/ARD management practices, including the subaqueous management of PAG materials in the TMSF; and
- Implementing progressive reclamation efforts (including covering and/or revegetating disturbed areas, where practical) to reduce contact water and promote positive drainage.

Skeena Resources proposes the following infrastructure and equipment to enact the new mitigation measures:

- Erosion and sediment control features to mitigate and manage sediment-laden runoff from mine disturbed areas;
- Contact water collection ponds;
- Diversion channels to divert non-contact water away from Eskay Creek;
- Collection channels to gather and transport contact water to the appropriate management, treatment and discharge locations;
- Liners and other measures to reduce seepage within contact water collection ponds and contact water collection channels;
- Storage facilities (e.g., TMSF and ASF); and
- Water Treatment Plant.

Heritage Resources

- Skeena Resources is proposing to use existing mitigation hierarchy available through existing provincial and Tahltan policy and standards. Skeena Resources is also committed to work with TCG to implement approaches avoid areas, and where disturbed consider both pre and post disturbance assessments.

Human Health

- Health and Mental Support Program (HMSP): Establishes an onsite medical clinic, tracks health-related incidents, provides mental health support informed by mental health guidelines for Indigenous people, and implements a Communicable Disease Prevention Plan.
- Health and Safety Policy: Regular worker training to reinforce workplace safety procedures.
- Overdose Treatment Capabilities: Includes opioid emergency response in camp medical offices.
- Cultural Sensitivity and Bystander Training: Employees receive cultural awareness training and bystander intervention education to foster inclusivity and respect.

Environmental and Social Responsibility (New Measures)

- Environmental and Social Responsibility Policy: Ensures sustainability, environmental stewardship, and social accountability, with tracking and auditing systems in place. Mitigations for the effects on Indigenous communities' ability to harvest and access subsistence or cultural animals/plants will be mitigated through emissions control, noise control, and the prevention of non-locals from harvesting. Skeena has committed to ensuring Reclamation occurs according to the Tahltan approved plan.
- Community Feedback Process: Provides multiple ways for Indigenous Nations, stakeholders, employees, and the public to report concerns via an online portal, telephone, and physical drop boxes.

Infrastructure and Services

- Recruitment and Selection Policy: Implement policy to leverage existing recruitment initiatives and partner with training and post-graduate programs in LAA and RAA communities to notify them of recruitment efforts and employment opportunities, to help minimize in-migration due to Eskay Creek;
- Procurement Policy: Implement policy to prioritize procurement and contracting from businesses within the LAA and RAA, including involvement of Indigenous-owned businesses;
- General Occupational Health and Safety Policy: Implement policy to liaise and coordinate with community emergency services;
- Health and Medical Services Plan: Develop plan to reduce pressure on health care services and facilities, and link plan to General Occupational Health and Safety Policy;
- Personnel Policy Manual: Implement incident reporting and investigation procedures, as well as an employee assistance program;
- Drug and Alcohol Policy: Implement policy to reduce pressure on health care services and facilities;
- Community feedback process: Implement process for residents of LAA and RAA communities and employees to share input about potential effects of Eskay Creek; and
- Integrated Waste Management Plan: Develop plan as required by the RDKS to reduce pressure on utilities.

Noise and Vibration

- Changes to blasting design, such as using less explosives per delay, and deeper holes, would be implemented. Additionally, all blasting activities would be restricted to daylight hours only;
- Equipment selected based on noise rating, maintained per manufacturer specifications to minimize noise, and speed limits set on mine roads;
- Process plant design would house equipment within an enclosed building to mitigate breakout noise;
- Provide rated hearing protection (per the Code) and establish exclusion zones (typically 500-800m) during blasting; and,
- Building mitigations would include being constructed away from the open pit, and onsite camps would have facades providing at least 27 dB noise reduction.

Non-Traditional Land and Resource Use

- Air Quality (Chapter 12): Measures aim to mitigate effects from dust and emissions. The effectiveness of these measures ranges from moderate to high.
- Noise and Vibration (Chapter 13): Measures will address potential noise disturbances. The effectiveness of these measures ranges from low to high.
- Surface Water (Chapter 15) and Fish and Fish Habitat (Chapter 16): Measures will address water quality and habitat loss. The effectiveness of these measures ranges from low to high.
- Vegetation and Ecosystems (Chapter 18): Measures will focus on habitat restoration, with effectiveness varying from low to moderate/high.
- Wildlife and Wildlife Habitat (Chapter 19): Measures aim to address habitat and species disruptions. Effectiveness of these measures ranges from moderate to high.
- Community Feedback Process: A formal process will be established to gather feedback from community members, particularly those in the LAA and RAA, as well as employees. This feedback mechanism will allow for ongoing input regarding project effects and concerns.

Surface Water

- Erosion and Sediment Control Plan: This plan identifies methods to prevent, mitigate, and control adverse impacts from sediment mobilization during each project phase for past and present activities. Erosion and sediment control measures are identified to minimize erosion potential (i.e.,

water management), prevent mobilization of sediment, and minimize sediment release offsite in the event of mobilization.

- Mine Site Water Management Plan: This plan provides water management and monitoring procedures for the effective interception, conveyance, diversion, and storage of water (contact and non-contact) associated with past and present activities at the mine site.
- Reclamation and Closure Plan: This plan outlines mitigative actions to be taken to minimize changes to surface water quantity and include reclaiming of the MRSA slopes using a Growth Media Cover to support the growth of vegetation to achieve the desired post-closure ecosystem and decommission water management infrastructure during Reclamation and Closure.
- Source control, as it relates to suspended sediments (i.e. sediment and erosion control, soil management, instream work control, and fugitive dust management) and geochemical mine material classification, designated usage, management, or storage.
- Implementation of various water management systems (e.g., ditches, pipes, pumps, etc.) to manage both contact and non-contact water across Eskay Creek as detailed in the Mine Site Water Management Plan.
- Water management systems designed and constructed in accordance with applicable regulations, as described in the Mine Site Water Management Plan.
- Active treatment of contact water and sewage prior to discharge.

Terrain and Soils

- Metal Leaching/Acid Rock Drainage Management: Excavated materials would be monitored, and potentially acid generating materials would be segregated from non-potentially acid generating materials for active management. The initial key component of the plan is identification of metal leaching, potentially acid generating, and non-potentially acid generating materials such that identification and appropriate segregation of these materials is completed. Monitoring is another key component of the plan.
- Mine Reclamation: B.C.'s reclamation laws ensure that land, watercourses and cultural heritage resources are returned to a safe and environmentally sound state, and do not leave an ongoing legacy or require public funds for clean-up activities. To safeguard the environment, public safety, and taxpayer dollars, mines are required to post reclamation security with the province. Reclamation security bonds cover the cost of reclaiming a site if a mining company defaults on their obligation to do so or becomes unable to pay their debts. This security is only returned once the mine site has been reclaimed to a satisfactory level and there are no ongoing monitoring or maintenance requirements. Reclamation objectives (i.e., what this is able to achieve) for Eskay Creek will be determined post-EA during the Mines Act permit process. Not all Eskay Creek activities would cease when mine production ends, not all facilities would be decommissioned, and not all sites would be reclaimed. Post-mine production, operations associated with active water treatment and management would continue, followed by an indeterminate period where both active and passive water treatment operations would be required. The Tom MacKay Storage Facility is a permanent structure that must remain stable and function effectively in perpetuity, which will require some degree on ongoing monitoring and maintenance.
- Best Management Practices: Mitigation measures other than those discussed above are primarily best management type practices, many of which are already in place for the existing mine, to prevent or minimize avoidable negative effects to the extent that is achievable, which would be applied through various management plans. This includes measures such as:
    - Managing landslide and debris slide risk, and soil erosion;
    - Salvage of topsoil where safe to do so, and storage of it for use in reclamation; actions to prevent the spread of invasive plant species; and
    - Dust suppression measures, and avoidance measures.

Vegetation and Ecosystems, Wildlife and Wildlife Habitat

- Not disturbing vegetation and soil where clearing is not required; planning and placement of cleared areas, and management of their edges to prevent issues like windthrows;
- Pre-clearing surveys, monitoring and reporting for wildlife, fencing to exclude wildlife;
- Water quality testing, and monitoring for wildlife use of mine contact water/effluent ponds;
- Avoidance of sensitive wildlife features such as active marmot dens if/where possible;
- Salvage of topsoil where safe to do so, and storage of it for use in reclamation, re-seed with native seeds mix to prevent the spread of invasive plant species;
- Dust suppression measures, noise suppression and avoidance measures including timing windows, and helicopter wildlife setbacks;
- Plowing refuge areas for wildlife along mine roads during winter; reducing traffic volume, speed limits, and access management; road stream crossing wildlife passages;
- Waste management procedures, and wildlife policies for employees; and
- Constructing artificial roosting structures for bats if necessary to replace known bat roosts.

Visual

- Progressive reclamation and revegetation of disturbed areas;
- Design project components to avoid unnatural shapes, colours, and patterns;
- Decommissioning and removal of infrastructure in the Reclamation and Closure phase;
- Targeted vegetation screening for small, high contrast features that cannot be otherwise camouflaged;
- A Trigger Action Response Plan to monitor dust plumes and take action if plumes reach the height of at least 2 m, with additional actions triggered by plumes rising higher than 4 m;
- Final reclamation and revegetation of disturbed areas in the Reclamation and Closure phase;
- Appropriate facility illumination levels as regulated by the Occupational Health and Safety Regulation (BC Reg 296/97) and Section 2.81 of the Health, Safety and Reclamation Code for Mines in British Columbia (Ministry of Energy, Mines, and Low Carbon Innovation 2024);
- Light fixture design, including the use of LEDs and full cut-off shields for outdoor light fixtures where possible;
- Targeted lighting designed to illuminate the intended area only; and,
- Spectral control weighting lights towards the yellow and red portions of the light spectrum.

9.6.2. FEDERAL MITIGATIONS AND CONDITIONS

The below are the current drafts of proposed mitigations and Conditions by the Federal Government. TCG is working to provide consistent or mirror language to ensure consistency and conflicts in directions.

Federal Conditions Section	IAA linkage[1]	BC EAO Valued Component or Assessment Factor	Key Mitigation Measures
Fish and fish habitat	Subparagraphs (a)(i) and (a)(ii) of the definition of effects within federal jurisdiction in section 2 of the IAA	• Surface water • Groundwater • Fish and fish habitat	1. Develop, implement and maintain measures to control erosion, sedimentation and runoff in the Designated Project area during all phases of the Designated Project to avoid the deposit of sediment in waters frequented by fish and the adverse effects of sediment suspension and deposition on fish and fish habitat in accordance with the requirements of the *Fisheries Act*, while taking into account Fisheries and Oceans Canada's *Measures to Protect Fish and Fish Habitat*. In doing so, at a minimum:

Federal Conditions Section	IAA linkage[1]	BC EAO Valued Component or Assessment Factor	Key Mitigation Measures
			1.1. stabilize, at the end of each working day, bare and exposed soils and stockpiles of materials at risk of erosion that are not actively being used; 1.2. install energy dissipation structures, stilling basins, and sediment control ponds designed to capture and manage flows from a minimum of a 24-hour, 10-year precipitation event; and 1.3. inspect these measures regularly, including during and following events that may test these measures including rainfall events, and document and repair any defective or damaged control measure in a timely manner
		• Surface water • Groundwater • Fish and fish habitat	2. Manage, during all phases of the Designated Project, all potential sources of acid-generating, potentially acid-generating and metal(loid)-leaching material including mine waste, stockpiled ore, water treatment sludge, exposed pit walls and pit benches. In doing so: 2.1. characterize, during construction and operation, potential sources of acid-generating, potentially acid-generating, and metal(loid) leaching material, including: 2.1.1. metal(loid)-leaching potential; 2.1.2. magnitude and time to onset of acidic conditions of identified acid-generating and potentially acid-generating material; and 2.1.3. distribution and tonnage; 2.2. only use material classified as non-potentially acid-generating and non-metal(loid)-leaching, in accordance with the methods in the *Prediction Manual for Drainage Chemistry from Sulphidic Geologic Materials (2009)*, for construction and reclamation purposes outside the areas of Tom MacKay Storage Facility where contact water is being collected and treated; 2.3. line the upstream faces of the north and south dams of the Tom MacKay Storage Facility prior to the deposition of any waste materials with a liner that limits seepage and anchor the liner in the bedrock of the dam foundations to improve stability; 2.4. place all material classified as acid generating, potentially acid-generating and metal(loid)-leaching, in accordance with the methods in the *Prediction Manual for Drainage Chemistry from Sulphidic Geologic Materials (2009)*, within the Tom MacKay

Federal Conditions Section	IAA linkage[1]	BC EAO Valued Component or Assessment Factor	Key Mitigation Measures
			Storage Facility prior to decommissioning; and 2.5. cover the material pursuant to condition 2.4 with a permanent oxygen limiting barrier prior to any onset of acid rock drainage.
		• Surface water • Groundwater	3. Collect contact water including seepage from the Designated Project area during all phases of the Designated Project and monitor and treat it, as necessary, prior to release into the receiving environment. In doing so, the Proponent shall take into account the water quality predictions in chapter 15 of the Application for monitoring locations identified in Table 15.5-9 of the Application
		• Surface water	4. Identify, in consultation with Environment and Climate Change Canada, Indigenous groups and other relevant authorities, technically and economically feasible measures, including source control measures identified in Technical Memo 148 of the Application, and implement these measures to manage contact water from the Tom MacKay Storage Facility and North Pit. In doing so shall: 4.1. give preference to identifying and implementing source control measures during construction and operation before identifying and implementing source control measures during decommissioning and post-closure; 4.2. provide updates to the parties being consulted beginning 3 years into construction and at a frequency thereafter determined in consultation with these parties. As part of these updates, the Proponent shall include: 4.2.1. measures and practices considered, including emerging technologies and practices at a sufficiently advanced stage of technological development to become technically and economically feasible over the lifetime of the project; 4.2.2. the timing of the implementation of the measures and practices considered pursuant to condition 4.2.1; and 4.2.3. contact water quality targets that take into account the measures in 4.2.1, including when or whether the Proponent will be able to meet regulatory requirements through

Federal Conditions Section	IAA linkage[1]	BC EAO Valued Component or Assessment Factor	Key Mitigation Measures
			passive treatment during the post-closure phase.
		• Surface water • Fish and fish habitat	5. Develop, prior to construction and in consultation with Indigenous groups, Fisheries and Oceans Canada, Environment and Climate Change Canada and any other relevant authorities and implement, during all phases of the Designated Project, a follow-up program with respect to adverse federal effects on fish and fish habitat related from changes to surface water quantity. As part of the follow-up program: 5.1. monitor, beginning prior to construction and continuing year-round through decommissioning, surface water flows and levels at Tom MacKay Creek, Ketchum Creek, Eskay Creek, Coulter Creek, Harrymel Creek and Unuk River; and 5.2. recalibrate the relevant hydrometric models using the data collected pursuant to condition 5.1. If modeling indicates effects greater than what was predicted during the environmental assessment, update the water balance model and the models that were used to predict effects to fish and fish habitat with the monitoring data collected.
		• Surface water • Fish and fish habitat	6. Develop, prior to construction and in consultation with Indigenous groups, Fisheries and Oceans Canada, Environment and Climate Change Canada and any other relevant authorities and implement, during all phases of the Designated Project, a follow-up program with respect to adverse federal effects on fish and fish habitat from changes in surface water quality. As part of the follow-up program: 6.1. monitor selenium in periphyton, aquatic invertebrates and fish; 6.2. monitor surface water in the receiving environment as defined by the monitoring locations identified in Table 15.5-9 of the Application; 6.3. confirm that sludge solids from the mine water treatment plant remain non-acid-generating under the oxygen limiting barrier in the Tom MacKay Storage Facility pursuant to condition in 2.5; and 6.4. if monitoring shows an increase in adverse effects to surface water quality pursuant to condition 6.2 or surface water quantity pursuant to condition 5.1, update, during all phases of the Designated Project, surface water quality modeling and effects predictions with the results of ongoing

Federal Conditions Section	IAA linkage[1]	BC EAO Valued Component or Assessment Factor	Key Mitigation Measures
			characterization of mine waste materials and modeling pursuant to conditions 2.1, 5.2 and 7.3.
		• Groundwater • Fish and fish habitat	7. Develop, prior to construction and in consultation with Indigenous groups, Fisheries and Oceans Canada, Environment and Climate Change Canada and any other relevant authorities, and implement, during all phases of the Designated Project, a follow-up program with respect to adverse federal effects on fish and fish habitat from changes to groundwater quality. As part of the follow-up program: 7.1. map fault zones and preferential flow pathways for groundwater prior to construction and update the Designated Project groundwater quality modeling with this information; 7.2. monitor groundwater quality upgradient, downgradient and cross-gradient from contact water sources where seepage may occur, including the Tom MacKay Storage Facility and North pit; 7.3. if monitoring shows an increase in adverse effects to groundwater quality, update during all phases of the Designated Project groundwater quality modeling and effects predictions with the results of ongoing characterization of mine waste materials and modeling pursuant to conditions 2.1, 5.2, 6.4 and 7.1 and implement modified or additional mitigation measures.
Migratory birds	Subparagraph (a)(iii) of the definition of effects within federal jurisdiction in section 2 of the IAA	Wildlife and Wildlife habitat	8. Carry out the Designated Project in a manner that protects migratory birds and avoids capturing, killing, taking, injuring or harassing migratory birds or destroying, taking or disturbing their eggs, or damaging, destroying, removing or disturbing nests and residences protected under the *Migratory Birds Convention Act, 1994* and its regulations or the *Species at Risk Act* or both, while taking into account Environment and Climate Change Canada's Guidelines to avoid harm to migratory birds.
		Wildlife and Wildlife habitat	9. Determine, under the direction of a Qualified Professional, the presence, or likely presence of migratory bird nest(s) protected under *the Migratory Birds Convention Act, 1994* and its regulations and residences protected under the *Species at Risk Act* that may be adversely affected by any Designated Project activity prior to initiating the activity.
		Wildlife and Wildlife habitat	10. Delineate, as determined by and under the direction of a Qualified Professional, setback

Federal Conditions Section	IAA linkage[1]	BC EAO Valued Component or Assessment Factor	Key Mitigation Measures
			distances around any nest(s) and residences whose presence or likely presence is determined pursuant to condition 9 within which that activity shall not occur while those nests and residences are protected under the *Migratory Birds Convention Act, 1994* and its regulations or the *Species at Risk Act* or both.
		Wildlife and Wildlife habitat	11. In consultation with Environment and Climate Change Canada and under the direction of a Qualified Professional, compensate for the loss of barn swallow *(Hirundo rustica)* nesting sites as a result of the Designated Project. In doing so, install artificial nesting structures for barn swallows (Hirundo rustica) prior to the removal of existing nesting structures, taking into account Environment and Climate Change Canada's Operational Framework for Use of Conservation Allowances and the *Beneficial Management Practices for Barn Swallow (Hirundo rustica)*.
		Wildlife and Wildlife habitat	12. Deter migratory birds from accessing contact water until such time that the quality of the contact water meets British Columbia's *Water Quality Guidelines for the Protection of Wildlife and Livestock* or Canadian Council of Ministers of the Environment's *Canadian Water Quality Guidelines* for the Protection of Aquatic Life, whichever is more protective.
		Wildlife and Wildlife habitat	13. Implement measures to control lighting, including direction, timing, colour and intensity, during all phases of the Designated Project to mitigate attraction and disorientation of migratory birds, while meeting health and safety requirements and considering the measures contained within the International Light Pollution Guidelines for Migratory Species. In doing so, at a minimum: 13.1. use directional lighting that targets only the areas where lighting is required; 13.2. optimize lighting design to reduce the total amount of lighting needed; and 13.3. use shielded fixtures where possible to reduce glare and light leakage in directions where light is not required
Impact on physical and cultural heritage, current use of lands and resources for traditional purposes, or any structure, site or thing that is of historical, archaeological, paleontological	Subparagraph (c)(i), (c)(ii), and (c)(iii) of the definition of effects within federal jurisdiction in section 2 of the IAA	Current use of lands and resources for traditional purposes	14. Develop, prior to construction and in consultation with Indigenous groups and relevant authorities, and implement, from the start of construction until the end of operation, measures to mitigate Designated Project effects on furbearers of importance to Indigenous groups, as indicated by Indigenous groups, including any active dens. In doing so: 14.1. conduct, prior to construction, surveys to identify active dens of furbearers of importance to Indigenous groups; and 14.2. establish no work buffer zones for active dens identified during pre-construction surveys in condition 14.1. Take into account

Federal Conditions Section	IAA linkage[1]	BC EAO Valued Component or Assessment Factor	Key Mitigation Measures
or architectural significance			British Columbia's Compendium of Wildlife Guidelines for Industrial Development Projects in the North Area, British Columbia - Interim Guidance when establishing buffer zones for furbearer dens
		Current use of lands and resources for traditional purposes	15. Prohibit, during all phases of the Designated Project, employees and contractors of the Designated Project from fishing, hunting, trapping, plant gathering and using off-road vehicles for recreation purposes within the Designated Project area or using the Designated Project area to access surrounding areas for these purposes unless an employee or contractor is provided access by the Proponent for the exercising of Aboriginal rights, to the extent that such access is safe. In doing so, develop, prior to construction, and implement measures to enforce a policy to this effect during all phases of the Designated Project.
		Current use of lands and resources for traditional purposes	16. Develop, prior to construction and in consultation with Indigenous groups, and implement during all phases of the Designated Project, a protocol for receiving and addressing complaints related to the effects of Designated Project activities, including via noise, light and dust generation, access changes, and employee compliance with condition 15, on the current use of lands and resources for traditional purposes. 16.1. Provide the protocol to the Agency and Indigenous groups prior to construction and make the protocol publicly available online. As part of the protocol: 16.2. document and respond to complaint(s) in a timely manner and demonstrate how issues have been addressed, including through the implementation of modified or additional measures; and 16.3. acknowledge receipt of any complaints within 48 hours
		Current use of lands and resources for traditional purposes	17. Develop, prior to construction and in consultation with Indigenous groups, and implement, during all phases of the Designated Project, a communication plan to share information with Indigenous groups on adverse effects of Designated Project activities as they related to impacts on Indigenous traditional activities. In doing so: 17.1. develop and implement procedures for the Proponent to communicate up-to-date schedules of Designated Project activities likely to affect Indigenous traditional activities, and maps of where these activities are occurring.

Federal Conditions Section	IAA linkage[1]	BC EAO Valued Component or Assessment Factor	Key Mitigation Measures
		Current use of lands and resources for traditional purposes	18. Implement, during construction and operation, measures to mitigate impacts to ungulates and bears from Designated Project–related vehicle traffic on the Eskay Creek Mine Access Road and highways 37 and 37A. In doing so: 18.1. require employees and contractors of the Designated Project to give ungulates and bears the right-of-way and remain in their vehicles until the animals have vacated the road, unless it is unsafe to do so; and 18.2. develop, prior to construction, and implement during construction and operation, a protocol for documenting and responding to Designated Project vehicle collisions with large mammals, including ungulates and bears, as well as sightings of large mammals along the transportation corridor by Designated Project employees and contractors while working for the Designated Project. As part of the protocol: 18.2.1. require employees and contractors to self-report, as soon as is safe, observed interactions with and fatality of large mammals, as well as sightings of large mammals along the transportation corridor and shall require all employees and contractors to apply this protocol; and 18.2.2. document the information provided pursuant to condition 18.2.1 and implement measures to improve awareness of the presence of large mammals in the area.
		Current use of lands and resources for traditional purposes	19. During winter for all phases of the Designated Project, plow gaps in snowbanks in areas where ungulates are known to overwinter along the Eskay Creek Mine Access Road every 500 metres on alternating sides between the mine site and kilometre 41.
		Current use of lands and resources for traditional purposes	20. Require all helicopters associated with the Designated Project to fly at altitudes greater than 500 metres above ground level over high elevation mountain goat winter and sensitive life stage habitat except for approach, take-off and landing maneuvers for the purpose of constructing or accessing mine infrastructure or for safety reasons.
		Current use of lands and resources for traditional purposes	21. Develop, prior to construction, and implement during all phases of the Designated Project measures to mitigate fugitive dust emissions attributable to the Designated Project, including dust associated with vehicles on roads within the Proponent's care and control and the handling

Federal Conditions Section	IAA linkage[1]	BC EAO Valued Component or Assessment Factor	Key Mitigation Measures
			and storage of granular materials that could become sources of fugitive dust, taking into account *Best Practices for the Reduction of Air Emissions from Construction and Demolition Activities (2005)* prepared for Environment and Climate Change Canada. In doing so: 21.1. apply water, or any environmentally equivalent alternative dust suppressant on roads and other areas within the Proponent's care and control that may generate dust when dust plumes are occurring; 21.2. establish speed limits to a maximum of 60 km/h on roads within the Proponent's care and control during all phases of the Designated Project and require that all persons abide by these speed limits; 21.3. cover, spray or seed, as needed, materials stored in stockpiles or being transported within the Designated Project area that may generate dust, including soil and other granular material; and 21.4. consider dust in the selection of road capping material for the mine site.
		Current use of lands and resources for traditional purposes	22. Undertake, in consultation with Indigenous groups and relevant authorities, progressive reclamation of areas disturbed by the Designated Project. In doing so: 22.1. identify, in consultation with Indigenous groups, plant species native to the region and plant species used for traditional purposes including trees, shrubs and herbs; 22.2. use the plant species identified pursuant to condition 22.1 for reclamation; and 22.3. develop, prior to decommissioning, a follow-up program to verify the effectiveness of final reclamation measures and implement the program during decommissioning and post-closure. In doing so: 22.3.1. conduct annual vegetation surveys on reclaimed landforms within the Designated Project area to measure, at a minimum, vegetation species, average vegetation coverage, and absence of weeds during decommissioning and for the first five years of post-closure or until the levels of environmental change established pursuant to condition 34.5 are met.
Impact on physical and cultural		Physical and cultural heritage of, and structures, sites or	23. Develop, prior to construction and in consultation with Tahltan Nation and Tsetsaut/Skii km Lax Ha,

Federal Conditions Section	IAA linkage[1]	BC EAO Valued Component or Assessment Factor	Key Mitigation Measures
heritage, current use of lands and resources for traditional purposes, or any structure, site or thing that is of historical, archaeological, paleontological or architectural significance		things of historical, archaeological, paleontological or architectural significance to, Indigenous peoples	a chance find procedure to implement in the event that suspected physical and cultural heritage resources, including culturally modified trees and physical evidence of human habitation or use, and structures, sites or things of historical, archaeological, paleontological or architectural significance to Indigenous peoples are discovered by the Proponent or brought to the attention of the Proponent by another party, within the Designated Project area during construction. The chance find procedure shall respect Tahltan Archaeology Standards for all discoveries. As part of the procedure: 23.1. follow Tahltan Archaeology Standards and develop and implement procedures respecting the handling, recording, transferring and safekeeping of any discovery, including procedures to prevent unauthorized access to any such discovery; and 23.2. inform, in writing, the Agency and Tahltan Nation within 24 hours of any discovery subject to the requirements of the Chance Find Procedure referred to in condition 23.
Health, social or economic conditions of the Indigenous peoples of Canada	Paragraph (d) of the definition of effects within federal jurisdiction in section 2 of the IAA	Community health and wellness	24. Develop, prior to construction, and implement during all phases of the Designated Project measures to promote safe, respectful and inclusive conduct in the workplace and community, including actions to respond to Call for Justice 13.1 in *Reclaiming Power and Place: The Final Report of the National Inquiry into Missing and Murdered Indigenous Women and Girls*. In doing so: 24.1. implement a workplace anti-harassment, anti-bullying, anti-discrimination and anti-violence policy that incorporates gender-appropriate, gender-specific, and culturally appropriate policies and processes, including sexual harassment and trauma counselling as well as confidential and culturally sensitive care; 24.2. implement a workplace policy on the use and possession of drugs and alcohol, which prohibits the use of, or being under the influence of, illicit drugs or alcohol during work hours; 24.3. develop and deliver mandatory cross-cultural awareness training for employees of the Designated Project and contractors associated with the Designated Project;

Federal Conditions Section	IAA linkage[1]	BC EAO Valued Component or Assessment Factor	Key Mitigation Measures
			24.4. develop and implement a Worker Code of Conduct that outlines expectations and requirements in relation to the measures developed to promote safe, respectful and inclusive conduct in the workplace and the community, incorporating above policies; 24.5. implement a fair and timely process to investigate and resolve incidents and complaints; and 24.6. develop and implement an overarching strategy to build workforce resilience, including a workplace health promotion program, to support mental well-being and positive social behaviour.
		Employment and economy	25. Have a qualified individual with experience in recruiting Indigenous Peoples develop, prior to construction and in consultation with Indigenous groups and other relevant authorities, and implement, during construction and operation, measures to create and enhance opportunities for Indigenous peoples, including Indigenous women and Indigenous businesses, to obtain and retain employment, procurement or contracting opportunities related to the Designated Project. In doing so: 25.1. identify the prerequisite skills and training, both certified and uncertified, required to be employed by the Designated Project; 25.2. identify existing gaps in relation to the prerequisite skills and training referred to in condition 25.1 among Indigenous peoples that may be employed by the Designated Project and describe measures under the care and control of the Proponent for filling these gaps, including the provision of on-the-job training and apprenticeship programs for Indigenous Peoples; 25.3. inform Indigenous groups, using targeted communication procedures designed in consultation with Indigenous groups, of the skills and training prerequisites and measures to achieve these prerequisites including the Indigenous Skills and Employment Training and the Skills and Partnership Fund; 25.4. inform Indigenous groups of employment and procurement opportunities related to the Designated Project, using targeted communication procedures designed in consultation with Indigenous groups; and

Federal Conditions Section	IAA linkage[1]	BC EAO Valued Component or Assessment Factor	Key Mitigation Measures
			25.5. develop measures to inform Indigenous peoples of employment opportunities related to the Designated Project, the procurement process, and procurement opportunities and adapt these measures to the needs of Indigenous groups as determined through consultation.
		Employment and economy	26. Develop, prior to the end of year 3 of operation and in consultation with Indigenous groups, and implement during operations and decommissioning, measures to support the transition of Indigenous employees and their communities through the decline in employment and contracting opportunities associated with mine operations to mine decommissioning. The Proponent shall adapt these measures to the needs of Indigenous groups as determined through consultation.
		Air quality Soil Surface water Country foods	27. Develop, prior to construction and in consultation with Indigenous groups, Health Canada, Environment and Climate Change Canada and any other relevant authorities, and implement a follow-up program with respect to adverse federal effects from the Designated Project on air quality, soil, surface water and country foods as it relates to the health of Indigenous peoples, taking into account available Indigenous knowledge provided by Indigenous groups related to current use of lands and resources for traditional purposes. As part of the implementation of the follow-up program: 27.1. identify, in consultation with Indigenous groups, the species of fish, vegetation and wildlife consumed as country foods that may be adversely affected by the Designated Project and the locations where these species shall be monitored; 27.2. monitor, beginning prior to construction and continuing through post-closure, contaminants of potential concern, including arsenic, inorganic arsenic, cadmium, chromium, iron, lead, manganese, mercury, methylmercury, molybdenum, nickel, selenium, and zinc, in the species and at the locations identified pursuant to condition 27.1. The Proponent shall co-locate soil sample sites with vegetation samples sites and co-locate water sample sites with fish samples sites; 27.3. monitor, throughout construction and operation on an annual and short-term basis including for 1-hour and 24-hour periods, ambient air concentrations of NO2, PM10 and PM2.5, within the Designated Project area at monitoring locations that are

Federal Conditions Section	IAA linkage[1]	BC EAO Valued Component or Assessment Factor	Key Mitigation Measures
			representative of nearby human receptors; and 27.4. if the monitoring results referred to in conditions 27.2 to 27.3 exceed predicted levels in the Application or thresholds of appropriate guidelines and standards, modify or implement additional mitigation measures pursuant to condition 37 and update the human health assessment in the Application. The Proponent shall submit any updates to the human health risk assessment to the Agency and relevant authorities
Accidents and Malfunctions	22(1)(a)(i)	Malfunction and accidents	28. Take all reasonable measures to prevent accidents and malfunctions that may result in adverse federal effects and shall mitigate adverse federal effects from accidents and malfunctions that do occur.
		Malfunction and accidents	29. Consult, prior to each phase, Indigenous groups and relevant authorities about the measures to be implemented in condition 28 to prevent accidents and malfunctions.
		Malfunction and accidents	30. Develop, prior to each phase of the Designated Project and in consultation with Indigenous groups, Environment and Climate Change Canada and any other relevant authorities and implement during the applicable phase an accidents and malfunctions response plan for the Designated Project. In this plan, include: 30.1. a description of the types of accidents and malfunctions that may cause adverse federal effects during any phase of the Designated Project, including the malfunction or failure of infrastructure, and spills of hazardous substances affecting fish and fish habitat; 30.2. the measures to be implemented in response to each type of accident and malfunction referred to in condition 30.1 to mitigate any adverse federal effects caused by the accident or malfunction; 30.3. for each type of accident and malfunction referred to in condition 30.1, the roles and responsibilities of the Proponent and each applicable relevant authority or other party that may be called upon to respond to an accident or malfunction in implementing the measures referred to in condition 30.2; and

Federal Conditions Section	IAA linkage[1]	BC EAO Valued Component or Assessment Factor	Key Mitigation Measures
			30.4. thresholds for reporting and notification of each relevant authority and other parties identified pursuant to 30.3.
		Malfunction and accidents	31. Maintain each accident and malfunction response plan referred to in condition 30 up to date during the phase to which it pertains. Submit any updated plan to the Agency and to parties consulted for the development of the plan within 30 days of the plan being updated.
		Malfunction and accidents	32. In the event of an accident or malfunction with the potential to cause adverse federal effects, implement the measures appropriate to the accident or malfunction, including any measure referred to in condition 30.2, as soon as practicable and: 32.1. implement the accident and malfunction communication plan referred to in condition 33; 32.2. notify relevant authorities with responsibilities related to emergency response (including environmental emergencies) in accordance with applicable legislative and regulatory requirements; 32.3. notify, as soon as possible and pursuant to the accident and malfunction communication plan referred to in condition 32, Indigenous groups of the accident or malfunction, and notify the Agency in writing no later than 24 hours following the accident or malfunction. When notifying Indigenous groups and the Agency, the Proponent shall specify: 32.3.1. the date and time when and location where the accident or malfunction occurred; 32.3.2. a summary description of the accident or malfunction; 32.3.3. a list of any substance and approximate quantity thereof potentially released into the environment as a result of the accident or malfunction; and 32.3.4. a description of the relevant authorities notified pursuant to condition 32.2; 32.4. submit a written report to the Agency no later than 60 days after the day on which the accident or malfunction occurred. The written report shall include:

Federal Conditions Section	IAA linkage[1]	BC EAO Valued Component or Assessment Factor	Key Mitigation Measures
			32.4.1. a detailed description of the accident or malfunction and of its adverse federal effects; 32.4.2. a description of the measures that were taken by the Proponent to mitigate the adverse federal effects caused by the accident or malfunction; 32.4.3. any view from Indigenous groups and advice from relevant authorities received with respect to the accident or malfunction, its adverse federal effects and the measures taken by the Proponent to mitigate these adverse federal effects; 32.4.4. a description of any residual adverse federal effects and of any modified or additional measure required by the Proponent to mitigate or monitor residual adverse federal effects; and 32.4.5. a description of any changes made to avoid a subsequent occurrence of the accident or malfunction; and 32.4.6. details concerning the implementation of the accident and malfunction response plans referred to in condition 30;
			33. Develop, prior to construction and in consultation with Indigenous groups and relevant authorities and implement an accidents and malfunctions communication plan in relation to the Designated Project. Keep the plan up to date during all phases of the Designated Project and shall include in the plan: 33.1. the types of accidents and malfunctions requiring the Proponent to notify each Indigenous group, including any Designated Project-related occupational traffic incidents along the transportation corridor through the Nass Wildlife Area and Nass Area; 33.2. how Indigenous groups shall be notified by the Proponent of an accident or malfunction identified pursuant to condition 33.1 and of any opportunity for the Indigenous groups to assist in the response to the accident or malfunction; and 33.3. the names and contact information of the Proponent and Indigenous group

Federal Conditions Section	IAA linkage[1]	BC EAO Valued Component or Assessment Factor	Key Mitigation Measures
			representatives for the purposes of notification pursuant to condition 33.2.
Follow-up Program	22(1)(k)		34. Where a follow-up program is a requirement of a condition set out in this document, develop the follow-up program taking into account any guidance documents provided by the Agency and determine, as part of the development of each follow-up program and in consultation with the parties being consulted during the development, the following information, unless already specified in the condition 34.1. a description of the effects predictions or mitigation measures or both that will be evaluated through the follow-up program as required in the particular follow-up program condition; 34.2. the methodology, location, frequency, timing and duration of monitoring associated with the follow-up program; 34.3. the scope, content and frequency of reporting of the results of the follow-up program to the parties consulted for the development of the follow-up program; 34.4. the minimum frequency at which the follow-up program must be reviewed and, if necessary, updated; 34.5. the levels of environmental change relative to baseline that would require the Proponent to implement modified or additional mitigation measure(s), including instances where the Proponent may require Designated Project activities causing the environmental change to be stopped; 34.6. the technically and economically feasible mitigation measures to be implemented by the Proponent if monitoring conducted as part of the follow-up program shows that the levels of change referred to in condition 34.5 have been reached or exceeded in order to return changes to levels below those referred to in condition 34.5; and 34.7. the specific quantifiable end points that must be achieved before the follow-up program can end. Those end points should indicate that the accuracy of the impact assessment has been verified or that the mitigation measures are effective or both.
			35. Update the details for each follow-up program pursuant to condition 34 during the implementation of each follow-up program, at the minimum frequency determined pursuant to condition 34.4 and in consultation with the parties being consulted during the development of each follow-up program

Federal Conditions Section	IAA linkage[1]	BC EAO Valued Component or Assessment Factor	Key Mitigation Measures
			36. Provide the information determined for each of the follow-up programs referred to in conditions 4, 5, 6, 21 and 26, including the information determined for each follow-up program pursuant to condition 34, to the Agency and to the parties being consulted during the development of each follow-up program prior to the implementation of each follow-up program. Provide any update made pursuant to condition 35 to the Agency and to the parties being consulted during the development of each follow-up program within 30 days of the follow-up program being updated.
			37. Where a follow-up program is a requirement of a condition set out in this document: 37.1. implement the follow-up program according to the information determined pursuant to condition 34 and any requirement specified in conditions specific to each follow-up program; 37.2. conduct monitoring and analysis to verify the accuracy of the environmental assessment predictions as it pertains to the particular condition or to determine the effectiveness of any mitigation measure or both; 37.3. determine whether modified or additional mitigation measure(s) are required based on the monitoring and analysis undertaken pursuant to condition 37.2; 37.4. if modified or additional mitigation measure(s) are required pursuant to condition 37.3, develop and implement these mitigation measure(s) as soon as feasible and monitor them pursuant to condition 37.2. The Proponent shall notify the Agency in writing within 24 hours of any modified or additional mitigation measure being implemented. If the Proponent implements any additional or modified mitigation measure not previously submitted to the Agency pursuant to condition 36, the Proponent shall submit a detailed description of the measure(s) to the Agency within 7 days of their implementation; and 37.5. report all results of the follow-up program, including whether assessment predictions are accurate or mitigation measures are effective, or both as required in the follow-up program condition, to the Agency no later than March 31 following each reporting year during which the follow-up program is implemented and, subject to information determined pursuant to 34.3, to the parties being consulted during the development of the follow-up program. Where consultation with Indigenous groups is a requirement of a follow-up program, the Proponent shall discuss the follow-up program with each

Federal Conditions Section	IAA linkage[1]	BC EAO Valued Component or Assessment Factor	Key Mitigation Measures
			group and shall determine, in consultation with each group, opportunities for participation and resources required to support their participation in the implementation of the follow-up program, including the conduct of monitoring, the analysis and reporting of follow-up results and whether modified or additional mitigation measure(s) are required, as set out in condition 37.

9.6.3. TAHLTAN PROPOSED MITIGATIONS AND STRATEGIES

The following are mitigations identified by TCG in the REAA and through correspondence and engagement with Skeena Resources, Canada, and EAO. The information is draft and will be updated in the next revision with additional engagement with Tahltan communities and members and with Skeena Resources, Canada, and EAO.

The following mitigations and strategies have been developed based on guidance from THREAT and direction from Tahltan members to address the potential effects identified by Skeena Resources, as well as additional effects in this chapter. These measures, along with further mitigations identified through condition reviews with Skeena Resources and the Environmental Assessment Office (EAO), and the potential Tahltan Conditions outlined in the ITT, will be considered collectively.

The final set of mitigations, strategies, and conditions will be confirmed through the Tahltan Risk Assessment process to ensure they reflect Tahltan values, priorities, and the long-term sustainability of Tahltan territory.

Water and Water Quality

Proposed mitigations and strategies to reduce the uncertainties and address Tahltan member concerns with water management include:

- Collaborate on additional surface and groundwater monitoring sites for 2025 and future field programs and establishing commitments to continue this throughout Construction and Operations to address concerns related to hydraulic containment of water.
- Implementing additional hydraulic containment mitigations such as grouting, lining, monitoring and water treatment measures to address lateral and vertical water containment across critical mine facilities.
- Commitments to collaborate on closure cover methods and engineering designs to minimize open pit high wall source-term influence during operations and closure stages of the Eskay Creek Mine.
- Establishing conditions to require review of Best Available Technology 3-5 years before the Water Treatment Plant requires replacement to ensure opportunities are being explored to not require active treatment in perpetuity. The review must be completed to the satisfaction of Tahltan before replacement can occur if BAT is not applicable at that time.

- Establishing mitigations or conditions for co-design of water management research for movement from active water treatment to passive water treatment with hydraulic containment of mine components.

- Establish mitigations, conditions, or strategies to field verify water management items (e.g., seepage pathways, water quality, hydraulic containment, water treatment in perpetuity) against conservative model assumptions in timely sequenced stages to maximize outcomes during the Construction and Operations stages. Field verification requires timely and sufficient field data and eliminates a delay between Trigger-Action-Response- Plan (TARP) activated mitigation and actual implementation of the mitigation.

- For the TMSF, additional mitigations and strategies proposed for consideration, where operationally feasible, include:

    - Develop a tailings management plan in collaboration with Tahltan;

    - Include a partial liner upstream of the dam shell (below the toe and along valley sides) to minimize seepage losses.

    - Include a grout curtain in the bedrock below the dam and especially in the creek channel and fault zones to minimize the impact of preferential flow paths.

    - Utilize a secure landfill double-liner system (with leak detection / leachate collection between liner layers), for the upstream dam face. This will facilitate performance monitoring and reliability of the liner system and the effectiveness of mitigations when required.

    - Reduce the current uncertainty in the location of preferential flow paths by completing additional site investigation programs that target gaps in hydraulic conductivity and uniformity of rock quality.

    - Increase the number of seepage recovery/interception wells around the facility.

    - Identify ways to improve the understanding of long-term behaviour of the seepage from the TMSF.

    - Evaluate amendments such as lime addition to waste rock to improve porewater and seepage chemistry.

    - Reduce the dam heights by disposing of less material in the impoundment.

- For the MRSA, additional mitigations proposed include:

    - Improve hydraulic containment with adjacent waterways and address seepage concerns with the MRSA (can include liners or other mitigations).

    - Investigate potential fracture flows and effects related to hydrogeology of the MRSA.

    - Consider a grout cut-off between the MRSA and Tom McKay Creek.

    - Improve hydraulic containment towards Eskay/Ketchum/Unuk Rivers/streams.

    - Grouting and other mitigations to the South Pit after mining.

- Improve seepage quality by improving PAG waste segregation; lining and/or covering the ore stockpiles (especially long life piles Low Grade and Medium Grade (LGO/MGO)). Assuming the LGO and MGO do not get milled due to long-term oxidation and are placed in the open pits, long-term.

- For the Open Pits additional mitigations proposed for consideration, where operationally feasible, include :
    - Segregate the waste properly and place NAG non-ML material as a cover over the North Pit highwall.
    - Place ML rock in North pit or TMSF to minimize contaminant loading to groundwater.
    - Improve hydraulic containment such that the pit lake level can be maintained at a higher elevation and a larger proportion of the exposed pit wall PAG material remains under lake level, than would occur with the lower elevation water level. This may be done by placing plugs in underground workings that reduce seepage losses from the pit; reduce blast fracturing in bench development resulting in less degradation of wall rock during mining.
    - Where possible and feasible, blast out PAG remnants from the high wall and permanently store the blasted material in the base of the pit and below the lowest final water cover elevation.
    - Consider a closure cover alternative that reduces the influence of the ML/ARD from the wall rock including neutralizing or infiltration-reducing/oxygen-limiting materials:
    - Reduce the loading to the water treatment plant by including in-pit treatment and developing methods to prevent the eventual loss of stratification in the pit:
- For Source Terms additional mitigations proposed include:
    - The surface water quality model includes a sensitivity scenario where all solubility constraints are removed from source terms. This sensitivity scenario will provide a check on the influence solubility constraints have on the predicted water qualities.
    - A monitoring program to support and confirm the attenuation mechanisms assumed to provide solubility constraints for specific parameter.
    - Manage ore stockpiles to limit stockpiles which can include a spectrum of mitigations such as liners or other strategies.
- For Water Quality additional mitigations proposed include:
    - Reduce uncertainty around treatment efficacy for As, Ni, Tl, Se and TSS.
    - Reduce hydraulic loading to the WTP by identifying sources that could potentially bypass treatment, if managed appropriately; ongoing research program to improve treatment efficacy in the WTP; and identify in-pit treatment options site wide;
    - Water Quality Model - water quality models project frequent and significant exceedances and increases in POPCs throughout Tom MacKay Creek and the lower reach of Ketchum Creek. There are land use concerns and interconnection to Tahltan values. Source terms, exceedance rates, regional water balance model, site wide surface and ground water

modelling advanced are important matters given its near term and long term outcomes to the project.

Reclamation and Closure

Proposed mitigations and strategies to reduce the uncertainties and address Tahltan member concerns with reclamation and closure include the consideration of the following:

- Ensuring the projects bond is sufficient for restoring the land and waters to a healthy state to support current and future generations use and connection to the land and waters.
- Address access barriers to continue to support Tahltan long-term access and connection to the land and waters.
- Establishment reclamation research requirements and co-design strategies to reduce uncertainties with the mountain pass habitat reclamation success for important wildlife and vegetation habitat values for Tahltan.
- Explore covering the MRSA at closure to reduce contact water/infiltration for treatment and seepage losses.
- Consider completing an assessment of the potential water reduction and change in contaminant loading as a result of a closure cover
- Consider greater opportunities for progressive reclamation and implement potential changes to mine components during operations so are delayed to final stages when financial resources are lower.
- The current closure design requires long-term management and closure alternatives which should be driven by design and Tahltan future land uses. A review of existing mitigations to consider additional requirements to address reclamation and closure project changes earlier in the timeline of the project is recommended to achieve the outcomes.
- A fully costed closure estimate being provided as part of the EA process to support the Tahltan decision. This cost estimate includes water treatment capital and operating costs and sludge management costs for 7-generations, post closure.
- Consider reclamation and closure mitigation options that are more consistent with
    - Allowing the land and water to be returned to a level of environmental health to support future land use by Tahltan.
    - Reducing or eliminating the need for mitigations, treatment or monitoring beyond closure.
- Consider alternatives for the TMSF cover systems including:
    - Eliminating the hybrid cover system.
    - A water cover with seepage control.
    - Water shedding anoxic dry cover.
    - Creating cells in the TMSF to allow progressive reclamation with a dry cover that creates suboxia.

- Explore reclamation and closure mitigations and adjustments to address long-term water management including options such as diverting Tom McKay Creek through the pit; approaches to reduce pit high wall oxidation; use it to flush the pit lake back into the waterways if water quality is acceptable.

- Post-closure, dispose of water treatment sludges in the TMSF and determine when off-site sludge disposal will be required, and include the cost for off-site disposal as part of the closure bonding.

Wildlife and Wildlife Habitat

Proposed mitigations and strategies to reduce the uncertainties and address Tahltan member concerns with wildlife and wildlife habitat include:

- Establish programs and co-design access management plans to remove and reduce barriers for Tahltan members to enable easy access to the land for harvest of wildlife.

- Implement tracking and transportation management measures that focus on reducing wildlife mortalities from increased traffic on Highway 37 and the Eskay Creek Mine Access Road.

- Establish and implement health monitoring programs in collaboration with the TCG for wildlife and plant communities in the project area.

- Establish fences and deterrents for wildlife and birds near the Tailings Facility to prevent access.

Human Health and Socioeconomics

Proposed mitigations and strategies to reduce the uncertainties and Tahltan member concerns with human health and socioeconomics include:

- Establish mitigations to reduce or restrict the existing out-migration of people, families, and services from the Tahltan Nation territory, both with the ECRP and cumulatively, to maintain Tahltan and attract workers, services, and infrastructure to the Nation.

- Establish monitoring plans and support programs to track changes in mental health and community well-being of Tahltan members and Tahltan communities.

- Monitor effects and changes to traditional food availability through lower nutritional quality and access effects to Traditional Tahltan foods.

- Establish co-designed fugitive dust emission monitoring and management plans to monitoring exposure of emission sources for Tahltan Values.

- Implement co-designed water management strategies and mine designs, including water treatment and closure methods to reduce potential Human Health Risk Assessment exposure pathways through air and water discharges or emissions.

- Establish mitigations to address:

    - Concerns over increased stress on existing health, social and community services in Tahltan Territory.

    - Concerns and questions related to impacts associated with mine work life and shift work schedules on Tahltan families.

- Concerns about alignment of residual effects assessments with baseline data and potential health impacts from air and metal pollutants.
- Requests for additional details on health risks from cumulative exposures and the interplay of socio-economic factors.

Infrastructure and Employment

- Establish mitigations and legacies to address concerns on mining revenues, benefits, services, infrastructure, housing, and employment leaving Tahltan Territory with communities shrinking over time. It is important to ensure communities are growing with the benefits, services, housing, and employment being available to meet specific community needs;
- Establish mitigations and legacies to address community infrastructure and housing declines or decreased availability are factors with people leaving the territory, poor health conditions, and attracting/holding skilled workers in the communities. This is linked to declining or poor medical/mental health/emergency services.
- Recommendations for positive legacy contributions (Benefits to Tahltan): Community housing, in-territory treatment facilities, elders care homes, youth recreational facilities.
- Mitigations, strategies, and legacies for partnerships with communities to support growth and economic development with the proposed life of mine timeline and short operational duration for an open pit mine.
- Mitigations, strategies, and legacies for employment and business opportunities for Tahltan members.

Tahltan Cultural, Heritage, Way of Life

Proposed mitigations and strategies to reduce the uncertainties and Tahltan member concerns with culture, heritage and way of life include:

- Co-design access management plans and establish commitments to ensure Tahltan access and connection to the project area and surrounding lands and waters are maintained during and after mine operations.
- Implement Tahltan Archaeological Standards and Tahltan Archaeological Monitors during construction, operations and closure of the mine.
- Establishment commitments to install Tahltan cultural signage, acknowledgement of being on Tahltan Territory, and creation of dedicated Tahltan cultural spaces at the mine.
- Develop and establishment commitments to deliver Tahltan Cultural Sensitivity Training education for all Eskay Creek Mine workers.
- Establishment commitments to require Tahltan counselors and Elders on the mine site each month to support Tahltan members.
- Co-develop and implement workplace cultural and bereavement policies at Eskay Creek Mine to ensure Tahltan cultural activities and duties are respected and accommodated.
- Offer Tahltan traditional food and meal options at the Eskay Creek Mine site.

- Promote respectful and safe workplace culture by requiring the co-development of Tahltan cultural policies.

Fish and Fish Habitat

- All the items raised with seepage, seepage pathways, water quality, geochemical source terms, water treatment in perpetuity have relation to the health of aquatic ecosystems and fish habitats for these AOIs.
- Apply mitigations that address stream hydrology in the mine construction, operation and closure phases to maintain stream hydrology that will not cause significant erosion or changes in hydrogeological pathways,
- Mitigations related to the uncertainties with the trophic pathway models and quantify risk to fish health. It can be a useful tool in understanding the potential cumulative effects of the mine on fish health.
- Skeena has requested a Request For Review (RFR) of lower Ketchum Creek and provided lidar for the lower creek. It is based on a reduction in flow during operations by 7-9% in the lower ~200 m of Ketchum Creek during the critical months of Jan-March.

Mitigations, such as additional liners, additional monitoring, greater access to the land as potential mitigations and others have been identified for all or some of Tahltan Values for this AOI, and will be further refined based on additional information, mitigations, and/or reduction in uncertainties/risk to Tahltan Values and the adjustments in through the finalization of the Tahltan Risk Assessment.

Tahltan Proposed Conditions are currently draft (see Section 10.2) and are still being collaborated on with Skeena Resources, EAO, Canada, and Tahltan communities. In developing the draft conditions the above mitigations were built into management plans with mitigations using the following strategies:

- Meeting or advancing the Project to work towards alignment with Tahltan Core Priorities and Sustainability Requirements;
- Exercise of rights and removal of barriers for current and future generations;
- Field verification of predictive models in a timely manner to ensure mitigations are in place before the project is too far advanced and the scope of mitigations are limited or add to misalignment with the Tahltan Risk Assessment; and
- Supporting community, health, and socio-cultural measures to reduce potential effects.

10. Risk Assessment Conclusions

10.1. CONCLUSIONS

This section of the draft Tahltan Risk Assessment Report is currently under review by Tahltan members. It relates to potential impacts from the Project that are specific to Tahltan's Aboriginal title and rights and potential mitigation strategies being considered by TCG for seeking to address those impacts."

The conclusions will be finalized as part of the internal Tahltan members review and directions to finalize the Tahltan Risk Assessment and the significance to Tahltan in upcoming engagements. It will also support updating the potential impacts to Tahltan rights for the 19(4) assessment.

The conclusions will include updated recommended determinations with the proposed mitigation, terms and conditions identified in Section 9.6 and 10.2 that can be applied to the project, with the potential effects to Tahltan lands, culture, and communities summarized with the level of significance.

The assessment stages have identified the AOIs where potential effects either directly or in a mixed context with other resource development activities are identified from the Project. The potential severity of the negative effects in relation to Tahltan Core Priorities are identified for these AOIs. The Project related potential effects have been identified with the Lower Iskut, Iskut and Ningunsaw, Unuk, Oweegee, Consent, Mountain Pass-Prout Plateau, and Project Footprint AOIs, all with varying effects nested within the Regional and Cumulative Effects AOIs. The other AOIs have not identified source effects from the Project and are not being considered in determining the severity of effects and conclusions. The Consent, Mountain Pass-Prout Plateau, and Project Footprint AOIs have the greatest potential effects, followed by the Iskut and Ningunsaw, Unuk, Oweegee AOIs where effects are related to the Transportation Corridor, downstream effects from the Project, and potential future linked effects to development to lesser effects. Regional effects are tied to socio-cultural, infrastructure and services, human health, employment and economy, and culture/way of life effects from the Project and resource development. Cumulative potential effects are tied to the interconnected potential effects by AOI, and the pace and scale of development.

The initial determination of the overall effects of the Project's potential effects for each AOI, including negative and positive effects; this includes, Skeena Resources proposed mitigations and effects assessment; the technical uncertainties identified by TCG with Tahltan Values, and the concerns and uncertainties related to Tahltan Values and the interdependence with Tahltan Core Priorities; evaluated with the Risk Assessment Factors and the Sustainability Requirements provide estimates for further internal review and determination.

This information has also identified additional mitigations or conditions that can reduce the potential effects, apply strategies that allow for the timely assessment of predictive models with measures that set mitigations into place where the results are not field confirmed, set the ability to have effects monitored and managed to the satisfaction of Tahltan, advance requirements to address where Sustainability Requirement(s) are not fully met through the LOM and beyond, report on the progress to move the Project towards sustainability for all phases of the Project, and address Tahltan way of life and access to lands and water . With these items being identified the work to date on the review of the Project has shown where there are concerns to be mitigated, approaches to reduce the effects to the development of the project, and strategies to bring the Project in better alignment with the Tahltan Sustainability Requirements to support the possible next stages into regulatory authorizations.

10.2. TAHLTAN CONDITIONS

The following conditions are building off the uncertainties, contingencies, and possible mitigations identified by TCG with the REAA, ITT; correspondence with Skeena Resources, EAO and the Province; and meetings and engagement with Tahltan members, Skeena Resources, EAO, and MCM and MENV. Currently, due to Skeena Resources interests to pursue a Tahltan Consent Decision, an EA Certificate Decision, and the necessary regulatory authorizations by the end of 2025, is resulting in overlapping assessments and major permit reviews with limited time and space to reflect on the best "home" for the draft conditions to be delivered (Tahltan, EAO, or potential permit condition). It is expected the draft conditions will continue to evolve until the TRA is ready to be delivered for the TCG *Notice of Decision* determination in October 2025. The following are provided to capture the strategies to reduce the potential effects on Tahltan in a manner to support the project advancing if an approval is provided by Tahltan. The draft conditions are still subject to change, several have all or in parts been redacted due to the confidentiality and sensitivities to Tahltan, and are provided without prejudice.

There are some defined terms being applied with these draft conditions which include:

"Collaborate" means to work together in a respectful and meaningful way to understand and respect each other's perspectives and to achieve shared goals."

e.g., “The Holder must Collaborate with TCG in developing the plan” (and where applicable also include “The plan must be developed to the satisfaction of TCG”)

“Senior Officials Table” means the body established under section 6.2 of the DAA.

“Work with" means that Skeena Resources is supporting the work that TCG is doing to gathering directions, knowledge, or developing content with Tahltan for Skeena materials and plans. It is content unique and owned by Tahltan.

So, for example: Rather than saying “a collaborated plan with the Tahltan Central Government” it will read “Work with TCG to gather directions and knowledge…”

10.2.1. DOCUMENT REVIEW

1.1. The requirements within this condition apply to all plans, programs or other documents required in this Certificate except for any documents required under the Regional Cumulative Effects and Regional Socio-Cultural Effects conditions.

1.2. The TCG may, within 45 days, or another period if a condition in this Certificate provides otherwise, of receiving a document required by a condition notify the Holder that:

1.2.1. The Holder may implement the actions in the document, or

1.2.2. A revised document must be provided for review by the TCG.

1.3. If the TCG provides a notification under paragraph 1.2.2, the Holder must revise the document and provide it to the TCG for review in accordance with the notification, including any additional consultation required by the TCG.

1.4. If the TCG does not provide a notification to the Holder within the period referred to in subsection 10.2.1, the Holder may implement the actions in the document, unless a condition in this Certificate provides otherwise.

10.2.2. DOCUMENT UPDATES

2.1. The requirements within this condition apply to all plans, programs, or other documents required in this Certificate.

2.2. The TCG may require the Holder to make changes to any document if the TCG determines that the implementation of the document is not:

2.2.1. meeting one or more objectives set out in the relevant condition of this Certificate or the purpose and objectives set out in the document;

2.2.2. having the effects, set out in the document, that are contemplated or intended; or

2.2.3. consistent with changes in industry best practices or technology.

2.3. Any updates to documents by the Holder, based on subsections 2.2 or 3.2.10 must follow any notifications and instructions provided by the TCG regarding the updates.

10.2.3. DOCUMENT DEVELOPMENT

3.1. The requirements within this condition apply to all plans, programs, or other documents, except for the plan identified under condition 9 and any documents required under Regional Cumulative Effects and Regional Socio-Cultural Effects conditions.

3.2. The Holder must ensure that each document includes the following information:

3.2.1. Purpose and objectives of the document;

3.2.2. Roles and responsibilities of the Holder, Project personnel and any contractors employed for the purposes of implementing the document;

3.2.3. Names and, if applicable, professional certifications and professional stamps, of those responsible for the preparation of the document;

3.2.4. Schedule for implementing the actions in the document throughout the relevant project phases;

3.2.5. How the effectiveness of any mitigation measures will be evaluated including the schedule for evaluating effectiveness;

3.2.6. How the Holder will implement adaptive management to address effects of the Project if the monitoring conducted under subsection 3.3 shows that those effects:

3.2.7. Are not being mitigated to the extent contemplated in the Application; or

3.2.8. Are different than those predicted in the Application;

3.2.9. Schedules and methods for the submission of reporting required under the applicable condition, and the form and content of those reports; and

3.2.10. Process and timing for updating the document, including any consultation with agencies and Tahltan Nation that would occur in connection with such updates.

3.3. The Holder must ensure that if a document includes monitoring requirements, the document includes:

3.3.1. A description of baseline information that will be used to support monitoring of the effectiveness of mitigation;

3.3.2. Methods, location, frequency, timing and duration of monitoring; and

3.3.3. Scope, content and frequency of reporting of the monitoring results.

3.4. A description of how the Holder will implement measures that:

3.4.1. Are developed in accordance with the plan;

3.4.2. Are determined to be technically and economically feasible for the Holder to implement; and

3.4.3. Can be lawfully implemented by the Holder.

10.2.4. TAHLTAN COLLABORATION

4.1. Where a condition of this Certificate requires a plan, report or other document to be developed in collaboration with Tahltan Central Government, the Holder must:

4.1.1. Provide written notice to Tahltan Central Government that:

4.1.1.1. The Holder is initiating the development of the document;

4.1.1.1.1. Invites Tahltan Central Government to Collaboratively develop the content of the document; and

4.1.1.1.2. describes:

4.1.1.1.2.1. The Holder's proposed time frame to develop the document:

4.1.1.1.2.2. If applicable, the Holder's proposed Qualified Person(s) or Qualified Professional(s) that will oversee the development and implementation of the document; and

4.1.1.1.2.3. Any other requirements on the development of the document.

4.2. Undertake a full and impartial consideration of the views and other information provided by Tahltan Central Government, including Tahltan Indigenous knowledge, recommendations, guidance, policies or similar documents.

4.3. TCG will identify where Collaboration is required by the Holder and where the Holder will Work with TCG and Tahltan communities on the design, information collection, development, reporting of the document, and any specific requirements to meet the satisfaction of Tahltan pursuant to Section 5 Tahltan Satisfaction.

4.4. Provide a written explanation to Tahltan Central Government as to:

4.4.1. How the views and information provided by Tahltan Central Government have been considered and addressed in a revised version of the document; or

4.4.2. Why the views and information have not been addressed in a revised version of the document;

4.4.3. Seek to achieve consensus on the document with Tahltan Central Government

10.2.5. TAHLTAN SATISFACTION

5.1. Where a condition requires the Holder to develop and/or implement a plan, report or other document to the satisfaction of TCG, the Holder must:

5.1.1. Describe how the Holder is working towards meeting Tahltan Sustainability Criteria and Tahltan Core Principles as identified in the condition;

5.1.2. Describe how any changes to the document requested by TCG were incorporated and provide an explanation for any changes that were not incorporated;.

5.2. Where a condition requires a plan, report or other document to be developed and/or implemented to the satisfaction of the TCG and there is disagreement between EAO and TCG about required revisions and/or whether the current document is approved to be implemented:

5.2.1. The EAO and TCG will attempt to work collaboratively to resolve the disagreement;

5.2.2. The EAO and TCG may refer the issue further to the Senior Officials Table ;

5.2.3. The EAO, TCG, or the Senior Officials Table may agree to engage with the Holder or other individuals to discuss the issue or seek additional information;

5.2.4. The EAO, TCG, and the Senior Officials Table may, upon mutual agreement, refer the disagreement to a facilitator for resolution within 30 days;

5.2.5. If the disagreement remains following 5.2.4, then TCG may provide any outstanding concerns with the document to the EAO and the Holder and the EAO may indicate to the Holder that:

5.2.5.1. The Holder may proceed with implementation of the document, with or without revisions.

5.2.5.2. The Holder may not proceed with implementation of the document and provide further instructions for revisions.

10.2.6. TAHLTAN SOURCES AND TYPES OF KNOWLEDGE

6.1. Where a condition requires the Holder to develop and/or implement a plan, report or other document to the satisfaction of TCG, the sources and types of information that must be considered, include:

6.1.1. Tahltan Knowledge, and Core Priorities, provided by Tahltan Central Government;

6.1.2. Tahltan technical knowledge and best management practices, provided by Tahltan Central Government;

6.1.3. relevant information about, and made available through: programs required by this Certificate, permits or other authorizations for the ECRP Mine Site, or other programs implemented by the Holder, Tahltan, and government or other third parties;

6.2. The Holder will work with TCG and Tahltan communities through the Tahltan principle of Kotah (Visiting) to holistically and respectfully seek information and guidance on these Tahltan Values through efficient and respectful process, where a Condition identifies the following:

6.2.1. disturbances that could affect the exercise of rights by Tahltan based on input provided by Tahltan Central Government;

6.2.2. identification of areas within the Consent, Mountain Pass-Prout Plateau, Project Footprint, Middle Iskut-Ningunsaw River, and Oweegee AOIs of the Project in which the disturbances may interact with locations where Tahltan members' are exercising rights ("interaction areas") to the extent those locations are identified by Tahltan Central Government to the Holder;

6.2.3. mitigation measures for interaction areas that will be implemented intended to avoid or reduce effects to the Tahltan members' health, exercise of rights, and peaceful enjoyment of the lands and waters, including timing, extent, and location;

10.2.7. INDIGENOUS MONITOR

6.3. The Holder must provide opportunities for at least one full time equivalent for an Indigenous Monitor from Tahltan Central Government during Construction. If requested by Tahltan Central Government, the Indigenous Monitor(s) may be retained by either Tahltan Central Government or the Holder.

6.4. The Holder must develop a Terms of Engagement for the Indigenous Monitor(s) in consultation with Tahltan Central Government and provide it to the satisfaction of the EAO at least 60 days prior to the planned commencement of Construction.

6.4.1. The Holder must ensure that the Terms of Engagement includes at a minimum:

6.4.2. Project site access protocol;

6.4.3. The role of the Indigenous monitor(s);

6.4.4. Training opportunities for the Indigenous Monitor(s)

6.4.5. Means of communication between the Holder and the Indigenous Monitor(s) and EAO Compliance and Enforcement, including the means by which the Indigenous Monitor(s) may request the opportunity to participate in inspections with EAO Compliance and Enforcement; and

6.4.6. The process and timing for updating the terms of engagement, including any consultation with Tahltan Central Government that would occur in connection with such updates.

6.5. The Holder must comply with the Terms of Engagement throughout Construction, providing that an Indigenous Monitor is acceptable to Tahltan Central Government and the Holder is available and interested, unless otherwise directed by the EAO.

10.2.8. TAHLTAN WATER MANAGEMENT PLAN

7.1. The Holder must develop a plan to direct and inform water management and mitigation on the Mountain Pass-Prout Plateau and Project Footprint AOIs for the ECRP. It must be a collaborated plan with the Tahltan Central Government on the development of the Water Management Plan.

7.2. The Holder must provide the plan to TCG for review no later than 90 days before the commencement of Operations, unless otherwise authorized by the TCG.

7.3. The plan must be developed to the satisfaction of the TCG and EAO for approval, implementation, and adaptive management updates for the Life of Mine (LOM) and to the satisfaction of a Qualified Professional retained by the Holder.

7.4. The plan must include at least the following:

7.4.1. The purposes of the plan, which are to:

7.4.1.1. Collaborate with TCG on the development of the Tahltan vision, management, monitoring, and reporting objectives for surface water and groundwater management on the ECRP Mine Site. Mountain Pass-Prout Plateau, and Project Footprint AOIs to be protective of areas within this area and downstream of the ECRP Mine Site, including Tom MacKay Creek, Ketchum Creek, Eskay Creek, Coulter Creek, Harrymel Creek, and Unuk River waterways;

7.4.1.2. establish a process for:

7.4.1.2.1. identifying potential measures to advance management of water in accordance with those objectives;

7.4.1.2.2. evaluating potential measures by Tahltan, EAO, and the Holder to determine the extent to which each potential measure in 7.4.1.2.1is technically and economically feasible for the Holder to implement; and

7.4.1.2.3. prioritizing the identification, evaluation, and implementation of potential measures in 7.4.1.2.1 is.

7.4.1.3. The manner in which representatives of the Tahltan Nation are involved in the process described in paragraph 7.4.1.2;

7.4.1.4. Implement collaborative water management strategies and mine designs, including water treatment and closure methods to reduce potential HHRA exposure pathways through air and water discharges or emissions;

7.4.1.5. Establishment of monitoring and reporting requirements for the field verification of the groundwater model to assess the uncertainties, including potential seepage pathways;

7.4.1.6. Review and effectiveness of source control measures prior to 6 months before commencing operations, with adjustments to mitigations and monitoring 3 months before commencement of Operations and every 2 years through Closure;

7.4.1.7. Review and effectiveness of snow management measures prior to 6 months before commencing Operations, with adjustments to mitigations and monitoring 3 months before commencement of the 3rd year of winter operations and every 2 years following through closure;

7.4.1.8. Develop a program, prior to construction and continuing year-round through decommissioning, related to effects with surface water quantity and the uncertainties of the surface-groundwater relationships, the potential effects to water quality and flows, and potential effects to fish and aquatic ecosystems in Tom MacKay Creek, Ketchum Creek, Eskay Creek, Coulter Creek, Harrymel Creek, and Unuk River, where:

7.4.1.8.1. A program to the field verification related to seepage pathways and surface/groundwater relationships to confirm the information prior to final dam construction in 2027;

7.4.1.8.2. Including mitigations to address potential effects prior to the construction of MRSA;

7.4.1.9. A description of how the Holder will carry out annual reporting, which must include at least the following:

7.4.1.9.1. water (surface and ground) quality;

7.4.1.9.2. water (surface and ground) quantity;

7.4.1.9.3. aquatic ecosystem health and indicators;

7.4.1.9.4. fish health and population metrics;

7.4.1.9.5. invertebrate sampling; and

7.4.1.9.6. mitigation measures implemented as part of the Project or are planned and their efficacy.

7.4.1.10. Review of the plan, every (2-3 years) including the designation of additional monitoring and mitigations by Tahltan to support the Project to become more consistent with Tahltan Sustainability Requirements;

7.4.1.11. Collaborate with Tahltan on requirements to investigate, monitor, measure, and report on the availability of Best Available Technology on the water treatment and contact water management requirements to become consistent with Tahltan Sustainability Requirements commencing at Construction and through the life of the mine, including post-closure;

7.4.1.11.1. Includes reporting 3 years before the planned replacement of the WTP core components in perpetuity, until the site can be meet the condition, or if determined by future Tahltan generations to other conditions or measures;

7.4.1.11.2. Contact water quality targets taking into account the above measures with the ability to meet Tahltan and other government regulatory requirements through passive treatment during the life of mine phases including post-closure.

7.4.1.12. The Holder must implement the Tahltan Water Management Plan, and any updates made pursuant to section 7.3, following submission of the plan to the TCG and EAO, throughout Construction, Operations, and Closure under the direction of a Qualified Professional retained by the Holder to the satisfaction of the EAO and Tahltan.

10.2.9. TAHLTAN AQUATIC AND FISH MANAGEMENT

8.1. The Holder must develop a plan to direct and inform aquatic and fish management and mitigation on the Mountain Pass-Prout Plateau and Project Footprint AOIs for the ECRP. It must be a collaborated plan with the Tahltan Central Government on the development of the Aquatic and Fish Management Plan and meet the satisfaction of Tahltan for approval, implementation, and adaptive management updates for the Life of Mine (LOM).

8.2. The Holder must provide the plan to TCG for review no later than XX days before the commencement of XX, unless otherwise authorized by the TCG.

8.3. The plan must be developed to the satisfaction of the TCG for approval, implementation, and adaptive management updates for the Life of Mine (LOM) and to the satisfaction of a Qualified Professional retained by the Holder. The report must be developed to the satisfaction of the TCG and to the satisfaction of a Qualified Professional retained by the Holder.

8.4. The plan must include at least the following:

8.4.1. The purposes of the plan, which are to:

8.4.1.1. establish the management, monitoring, and reporting objectives for aquatic ecosystem and fish management on the ECRP Mine Site and Mountain Pass-Prout Plateau and Project Footprint AOIs to be protective of areas within this area and downstream of the ECRP Mine Site, including Tom MacKay Creek, Ketchum Creek, Eskay Creek, Coulter Creek, Harrymel Creek, and Unuk River waterways;

8.4.1.2. establish a process for:

8.4.1.2.1. identifying potential measures to advance management of aquatic ecosystem and fish in accordance with those objectives;

8.4.1.2.2. evaluating potential measures by Tahltan, EAO, and the Holder to determine the extent to which each potential measure in 8.4.1.2.1is technically and economically feasible for the Holder to implement; and

8.4.1.2.3. prioritizing the identification, evaluation, and implementation of potential measures in 8.4.1.2.1.

8.4.1.3. The manner in which representatives of the Tahltan Nation are involved in the process described in paragraph 8.4.1.2;

8.4.1.4. establish the monitoring and reporting requirements for the field verification of trophic transfer effects modelling, the potential effects to aquatic ecosystems and fish habitat, and surface and groundwater modelling 6 months prior to the construction of the MRSA to assess the uncertainties, including potential seepage pathways.

8.4.1.5. Collaboration of mitigations to address potential effects prior to the commencement of operations.

8.4.1.6. Monitoring of the potential effects prior to construction and continuing year-round through decommissioning.

8.4.1.7. Develop a program, prior to construction and continuing year-round through decommissioning, related to surface water quantity and quality, the potential effects to water quality and flows, and potential effects to fish and aquatic ecosystems in Tom MacKay Creek, Ketchum Creek, Eskay Creek, Coulter Creek, Harrymel Creek, and Unuk River, where:

8.4.1.7.1. monitor selenium in periphyton, aquatic invertebrates, and fish

8.4.1.7.2. monitor surface water in the receiving environment in co-designed locations

8.4.1.7.3. confirm that sludge solids from the mine water treatment plant remain non-acid generating under the oxygen limiting barrier in the Tom MacKay Storage Facility

8.4.1.7.4. if monitoring shows an increase in adverse effects to surface water quality or surface water quantity, update during all phases of the surface water quality modeling and

effects predictions with the results of ongoing characterization of mine waste materials and modeling

8.4.1.7.5. Develop additional mitigations with Tahltan to address the above effects including XX within XX months

8.4.1.7.6. Frequent sampling/analysis of

8.4.1.7.6.1. Surface water chemistry and toxicity;

8.4.1.7.6.2. Sediment chemistry and toxicity;

8.4.1.7.6.3. Tissue chemistry (at minimum for benthic invertebrates and fish as applicable);

8.4.1.7.6.4. Periphyton or phytoplankton, as applicable;

8.4.1.7.6.5. Aquatic invertebrate (including benthic invertebrates or zooplankton, as applicable) communities;

8.4.1.7.6.6. Fish communities; and

8.4.1.7.6.7. Fish health metrics and observations.

8.4.1.7.7. retain a Qualified Professional to develop, conduct and report the results of a fish quality baseline monitoring program that updates the fish tissue baseline data

8.4.1.7.8. Additional fish tissue data be collected including samples from the Unuk River mainstream at far-field locations downstream of Harrymel Creek

10.2.10. TAHLTAN REPORTING

9.1. The Holder is required to produce a report (or reports) on the effectiveness of all relevant Tahltan conditions' management plan and mitigations on the Project's ability to become more consistent with Tahltan Sustainability Requirements every 2 years from the date of issuance of the TCG Notice of Decision

9.2. The Holder is required to provide reporting on the Project's ability to become more consistent with Tahltan Sustainability Requirements plans as required in (list conditions);

9.2.1. The Holder must provide the report(s) to TCG for review no later than 90 days before the time required for materials are to be shared with Tahltan Leadership and members, unless otherwise authorized by the TCG;

9.2.2. The report(s) must be developed to the satisfaction of the TCG and to the satisfaction of a Qualified Professional and/or Qualified Person retained by the Holder;

9.2.3. The report must include at least the following:

9.2.3.1. An assessment of how the Project's management plans and its measures, monitoring, and mitigations align with each of the Tahltan Sustainability Requirements and Tahltan Core Priorities; and

9.2.3.2. Additional recommendations from the Qualified Professional and/or Qualified Person for mitigation measures to increase alignment with Tahltan Sustainability Requirements and Tahltan Core Principles.

9.2.3.3. If the report identifies that one or more of the Tahltan Sustainability Requirements and Tahltan Core Principles is not met to the satisfaction of TCG then the Holder must:

9.2.3.3.1. Undertake additional engagement with TCG regarding:

9.2.3.3.2. Additional mitigation measures to mitigate effects; and

9.2.3.3.3. A re-assessment of the materials, management plans, and mitigations by a Qualified Professional and/or Qualified Person retained by the Holder.

9.3. The Holder must provide the report from 9.2.3 to TCG within 3 months following the completion through the LOM unless otherwise authorized by the TCG.

9.4. Unless the reporting is determined through a bilateral commitment between Tahltan and Skeena Resources, TCG and Skeena Resources will jointly design a schedule and scope for reporting sequencing and materials within 90 days of Construction;

10.2.11. TAHLTAN AIR QUALITY MANAGEMENT

10.1. The Holder must develop a plan to direct and inform air quality with mitigations on the Consent, Mountain Pass-Prout Plateau and Project Footprint AOIs for the ECRP. It must be a collaborated plan with the Tahltan Central Government on the development of the Air Quality Management Plan.

10.2. The Holder must provide the plan to TCG for review no later than XX days before the commencement of XX unless otherwise authorized by the TCG and EAO.

10.3. The plan must be developed to the satisfaction of the TCG for approval, implementation, and adaptive management updates for the Life of Mine (LOM) and to the satisfaction of a Qualified Professional/or Qualified Person retained by the Holder.

10.4. The plan must include at least the following:

10.4.1. The purposes of the plan, which are to:

10.4.1.1. Collaborate with TCG on the development of the Tahltan vision, management, monitoring, and reporting objectives for air quality management on the ECRP Mine Site, Mountain Pass-Prout Plateau and Project Footprint AOIs to be protective of areas within this area;

10.4.1.2. identify the air quality disturbances that could affect the exercise of rights by Tahltan based on input provided by Tahltan Central Government;

10.4.1.3. identification of areas of the Project in which the disturbances may interact with locations where Tahltan members' are exercising rights ("interaction areas") to the extent those locations are identified by Tahltan Central Government to the Holder;

10.4.1.4. mitigation measures for interaction areas that will be implemented intended to avoid or reduce effects to the Tahltan members' health, exercise of rights, and peaceful enjoyment of the lands and waters, including timing, extent, and location;

10.4.1.5. a description of how the effectiveness of the mitigation measures will be evaluated to inform adaptive management as deemed necessary by the Holder and the Tahltan Central Government;

10.4.1.6. Addressing inconsistent application of air quality modelling criteria against standards, with the updating of air quality model prior to construction;

10.4.1.7. Establish a collaborated fugitive dust emission monitoring and management plans to monitoring exposure of emission sources for Tahltan Values, with the results from the plan being used to support Socio-cultural, and Human Health conditions;

10.4.1.8. Updating of air quality monitoring, mitigations and permitting conditions, to address inconsistencies;

10.4.1.9. establish a process for:

10.4.1.9.1. identifying potential measures to advance management of air quality in accordance with those objectives;

10.4.1.9.2. evaluating potential measures by Tahltan, EAO, and the Holder to determine the extent to which each potential measure in 10.4.1.9.1 is technically and economically feasible for the Holder to implement; and

10.4.1.9.3. prioritizing the identification, evaluation, and implementation of potential measures in 10.4.1.9.1;

10.4.2. The manner in which representatives of the Tahltan Nation involved in the process described in paragraph 10.4.1.1;

10.2.12. TAHLTAN RECLAMATION AND EFFECTIVE CLOSURE/ FUTURE GENERATIONS REQUIREMENT

11.1. The Holder must develop a plan to direct and inform reclamation and effective closure/future generations with mitigations on the Consent, Mountain Pass-Prout Plateau and Project Footprint AOIs for the ECRP. It must be a collaborated plan with the Tahltan Central Government on the development of the Reclamation and Effective Closure/Future Generations Management Plan.

11.2. The Holder must provide the plan to TCG for review no later than XX days before the commencement of XX (X stage/milestone), unless otherwise authorized by the TCG.

11.3. The plan must be developed to the satisfaction of the TCG for approval, implementation, and adaptive management updates for the Life of Mine (LOM) and to the satisfaction of a Qualified Professional /or Qualified Person retained by the Holder.

11.4. The plan must include at least the following:

11.4.1. The purposes of the plan, which are to:

11.4.1.1. Collaborate with TCG on the development of the Tahltan vision, management, monitoring, and reporting objectives for reclamation and effective closure/future generations management on the ECRP Mine Site, Consent, Mountain Pass-Prout Plateau and Project Footprint AOIs to be protective of areas within this area;

11.4.1.2. identify the reclamation and effective closure/future generations disturbances that could affect the exercise of rights by Tahltan based on input provided by Tahltan Central Government;

11.4.1.3. identification of areas of the Project in which the disturbances may interact with locations where Tahltan members' are exercising rights ("interaction areas") to the extent those locations are identified by Tahltan Central Government to the Holder;

11.4.1.4. mitigation measures for interaction areas that will be implemented during reclamation, closure, and post-closure intended to avoid or reduce effects to the Tahltan members' exercise of rights, and peaceful enjoyment of the lands and waters, including timing, extent, and location;

11.4.1.5. a description of how the effectiveness of the mitigation measures will be evaluated to inform adaptive management as deemed necessary by the Holder and the Tahltan Central Government;

11.4.2. The manner in which representatives of the Tahltan Nation are involved in the process described in paragraph 11.4.1;

10.2.13. TAHLTAN WILDLIFE AND VEGETATION MANAGEMENT PLAN

12.1. The Holder must develop a plan to direct and inform wildlife and wildlife habitat, vegetation and ecosystem management with mitigations on the Consent, Mountain Pass-Prout Plateau and Project Footprint AOIs for the ECRP. It must be a collaborated plan with the Tahltan Central Government on the development of the Wildlife and Wildlife Habitat Management Plan with Vegetation and Ecosystem components included.

12.2. The Holder must provide the plan to TCG for review no later than XX days before the commencement of XX , unless otherwise authorized by the TCG.

12.3. The plan must be developed to the satisfaction of the TCG for approval, implementation, and adaptive management updates for the Life of Mine (LOM) and to the satisfaction of a Qualified Professional retained by the Holder.

12.4. The plan must include at least the following:

12.4.1. The purposes of the plan, which are to:

12.4.1.1. Collaborate with TCG on the development of the Tahltan vision, management, monitoring, and reporting objectives for wildlife, wildlife habitat, vegetation, and ecosystem management on the ECRP Mine Site and Mountain Pass-Prout Plateau and Project Footprint AOIs to be protective of areas within this area;

12.4.1.2. identify the wildlife, wildlife habitat, vegetation, and ecosystem disturbances that could affect the exercise of rights by Tahltan based on input provided by Tahltan Central Government;

12.4.1.3. identification of areas of the Project in which the disturbances may interact with locations that Tahltan members' are exercising rights ("interaction areas") to the extent those locations are identified by Tahltan Central Government to the Holder;

12.4.1.4. mitigation measures for interaction areas that will be implemented to avoid or reduce effects to the Tahltan members' health, exercise of rights, and peaceful enjoyment of the lands and waters, including timing, extent, and location;

12.4.1.5. a description of how the effectiveness of the mitigation measures will be evaluated to inform adaptive management as deemed necessary by the Holder and the Tahltan Central Government;

12.4.1.6. Addressing inconsistent application of wildlife, wildlife habitat, vegetation, and ecosystem criteria against standards, with the updating of wildlife and wildlife habitat management prior to construction;

12.4.1.7. Updating of wildlife, wildlife habitat, vegetation, and ecosystem monitoring, mitigations and permitting conditions, to address inconsistencies;

12.4.1.8. establish thresholds and mitigations for Tahltan objectives;

12.4.1.9. meet Tahltan wildlife, wildlife habitat, vegetation, and ecosystem objectives;

12.4.1.10. sets the measures for Tahltan and joint monitoring of wildlife, wildlife habitat, vegetation, and ecosystem in and around the Consent Area AOI;

12.4.1.11. sets measures for Tahltan accessing lands in and around the Consent Area AOI, and other wildlife, wildlife habitat, vegetation, and ecosystem way of life related measures;

12.4.1.12. Offsets and ecosystem replacements for suitable wildlife, wildlife habitat, vegetation, and ecosystem, sensitive Tahltan wildlife and wildlife habitat, suitable wetland complexes, or sensitive Tahltan plant communities, including pine mushrooms, berries, or others where disturbance has occurred through past barriers, present, and/or future barriers related to the Project in and around the Consent Area AOI

12.4.2. establish a process for:

12.4.2.1. identifying potential measures to advance management of wildlife, wildlife habitat, vegetation, and ecosystems in accordance with those objectives;

12.4.2.2. evaluating potential measures by Tahltan, EAO, and the Holder to determine the extent to which each potential measure in 12.4.2.1is technically and economically feasible for the Holder to implement; and

12.4.2.3. prioritizing the identification, evaluation, and implementation of potential measures in 10.4.2.1.

10.2.14. TAHLTAN TRADITIONAL FOOD SOVEREIGNTY

13.1. The Holder must develop a plan to direct and inform Tahltan traditional food sovereignty on the Consent, Mountain Pass-Prout Plateau and Project Footprint AOIs for the ECRP. It must be a collaborated plan with the Tahltan Central Government on the development of the Tahltan Traditional Food Sovereignty Management Plan.

13.2. The Holder must provide the plan to TCG for review no later than XX days before the commencement of XX , unless otherwise authorized by the TCG.

13.3. The plan must be developed to the satisfaction of the TCG for approval, implementation, and adaptive management updates for the Life of Mine (LOM) and to the satisfaction of a Qualified Professional /or Qualified Person retained by the Holder.

13.4. The plan must include at least the following:

13.4.1. Collaborate with TCG on the development of the Tahltan vision, management, monitoring, and reporting objectives for the ECRP Mine Site and Consent, Mountain Pass-Prout Plateau and Project Footprint AOIs to be protective of areas within this area;

13.4.2. identify the Tahltan traditional food sovereignty disturbances that could affect the exercise of rights by Tahltan based on input provided by Tahltan Central Government;

13.4.3. identification of areas of the Project in which the disturbances interact with locations that Tahltan members' are exercising rights ("interaction areas") to the extent those locations are identified by Tahltan Central Government to the Holder;

13.4.4. mitigation measures for interaction areas that will be implemented during LOM intended to avoid or reduce effects to the Tahltan members' health, exercise of rights, and peaceful enjoyment of the lands and waters, including timing, extent, and location;

13.4.5. a description of how the effectiveness of the mitigation measures will be evaluated to inform adaptive management as deemed necessary by the Holder and the Tahltan Central Government;

13.4.6. Updating of Tahltan traditional food sovereignty monitoring, mitigations and permitting conditions, to address inconsistencies;

13.4.7. create an assessment of the quality and safety of Tahltan foods harvested in the AOIs and work with TCG and others in a regional assessment, if commenced by TCG. This work can be used for Wildlife and Vegetation, Socio-cultural, Human Health, and Quiet Enjoyment of Lands conditions;

13.4.8. identify the foods to be sampled through this plan;

13.4.9. identify culturally appropriate practices for sampling activities

13.4.10. sets the measures for Tahltan and joint monitoring of food sovereignty in and around the Consent Area AOI

13.4.11. sets measures for Tahltan accessing lands for food sovereignty in and around the AOIs, and other food sovereignty way of life related measures.

13.4.12. develop and implement a metal-uptake monitoring program focused on wildlife health, and the information will also be used in the Way of Life, Human Health and Socio-cultural conditions.

13.4.13. establish thresholds and mitigations for Tahltan objectives;

13.4.14. meet Tahltan traditional food sovereignty objectives;

13.4.15. sets the measures for Tahltan and joint monitoring of Tahltan traditional food sovereignty in and around AOIs;

13.4.16. sets measures for Tahltan accessing lands in and around the AOIs, and other Tahltan traditional food sovereignty habitat way of life related measures;

13.4.17. Include information collected through the Wildlife and Vegetation condition regarding offsets and ecosystem replacements for suitable wildlife and wildlife ecosystems, or other sensitive Tahltan traditional food sovereignty areas, where disturbance has occurred through past barriers, present, and/or future barriers related to the Project in and around the Consent Area AOI

13.5. establish a process for:

13.5.1. identifying potential measures to advance management of Tahltan traditional food sovereignty in accordance with those objectives;

13.5.2. evaluating potential measures by Tahltan, EAO, and the Holder to determine the extent to which each potential measure in 13.5.1is technically and economically feasible for the Holder to implement; and

13.5.3. prioritizing the identification, evaluation, and implementation of potential measures in 13.5.1.

10.2.15. TAHLTAN WAY OF LIFE, TRADITIONAL USES FOR CURRENT AND FUTURE GENERATIONS, AND QUIET ENJOYMENT OF LAND

14.1. The Holder must develop a plan for the management of effects to Tahltan Way of Life, Traditional Uses for Current and Future Generations, and Quiet Enjoyment of Land on the Consent, Mountain Pass-Prout Plateau and Project Footprint AOIs for the ECRP. It must be a collaborated plan with the Tahltan Central Government on the development of the Tahltan Way of Life, Traditional Uses for Current and Future Generations, and Quiet Enjoyment of Land Management Plan.

14.2. The Holder must provide the plan to TCG for review no later than XX days before the commencement of XX , unless otherwise authorized by the EAO.

14.3. The plan must be developed to the satisfaction of the TCG for approval, implementation, and adaptive management updates for the Life of Mine (LOM) and to the satisfaction of a Qualified Professional /or Qualified Person retained by the Holder.

14.4. The plan must include at least the following:

14.4.1. The purposes of the plan, which are to:

14.4.1.1. Collaborate with TCG to work with TCG and Tahltan communities on the development of the Tahltan vision, management, monitoring, and reporting objectives for the ECRP Mine Site. Consent, Mountain Pass-Prout Plateau and Project Footprint AOIs to be protective of areas within this area;

14.4.1.2. create an assessment of the quality and safety of Tahltan quiet enjoyment of land, way of life, traditional practices in the region through working with TCG and Tahltan communities;

14.4.1.3. identify the values to be sampled through this plan;

14.4.1.4. identify culturally appropriate practices for sampling activities;

14.4.1.5. sets the measures for Tahltan and joint monitoring of quiet enjoyment of land, way of life, traditional practices in and around the AOIs;

14.4.1.6. sets measures for Tahltan accessing lands for quiet enjoyment of land in and around the AOIs, and other quiet enjoyment of land way of life related measures.

14.4.1.7. Application of the metal-uptake monitoring program focused on wildlife health results and outcomes as identified in the Traditional Food Sovereignty condition;

14.4.2. establish thresholds and mitigations to meet Tahltan objectives;

14.4.3. establish a process for:

14.4.4. identifying potential measures to advance management of Tahltan quiet enjoyment of the lands and waters, and way of life and traditional practices in accordance with those objectives;

14.4.5. evaluating potential measures by Tahltan, EAO, and the Holder to determine the extent to which each potential measure in 14.4.4 is technically and economically feasible for the Holder to implement; and

14.4.6. prioritizing the identification, evaluation, and implementation of potential measures in 14.4.4..

10.2.16. TAHLTAN SOCIO-CULTURAL MEASURES

15.1. The Holder must develop a plan to direct and inform Tahltan socio-cultural measures for Tahltan communities, Tahltan involved with the ECRP, and on the for Regional, Consent, Mountain Pass-Prout Plateau and Project Footprint AOIs for the ECRP. It must be a collaborated plan with the Tahltan Central Government on the development of the Tahltan Socio-cultural Management Plan and meet the satisfaction of Tahltan for approval, implementation, and adaptive management updates for the Life of Mine (LOM).

15.2. The Holder must provide the plan to TCG, and EAO for review no later than XX days before the commencement of XX , unless otherwise authorized by the EAO.

15.3. The plan must be developed to the satisfaction of the EAO and TCG and to the satisfaction of a Qualified Professional /or Qualified Person retained by the Holder.

15.4. The plan must include at least the following:

15.4.1. Collaborate with TCG on the development of the Tahltan socio-cultural measures management on the Regional, ECRP Mine Site and Consent, Mountain Pass-Prout Plateau and Project Footprint AOIs, to be protective of areas within this area;

15.4.2. Collaborate with TCG and with Tahltan communities to determine the measures and objectives to support design and implementation;

15.4.3. Work with TCG and Tahltan communities to identify the Tahltan socio-cultural measures that could affect the exercise of rights by Tahltan based on input provided by Tahltan communities and Tahltan Nation;

15.4.4. identification of areas of the Project in which the disturbances may interact with locations that Tahltan members' are exercising rights ("interaction areas") to the extent those locations are identified by Tahltan communities and Tahltan Nation to the Holder;

15.4.5. mitigation measures for interaction areas that will be implemented during LOM intended to avoid or reduce effects to the Tahltan members' health, exercise of rights, and quiet enjoyment of the lands and waters, including timing, extent, and location;

15.4.6. a description of how the effectiveness of the mitigation measures will be evaluated to inform adaptive management as deemed necessary by the Holder and the Tahltan Central Government;

15.4.7. Updating of Tahltan socio-cultural measures of land monitoring, mitigations and permitting conditions, to address inconsistencies;

15.4.8. create an assessment of the quality and safety of Tahltan socio-cultural measures in the AOIs

15.4.9. identify the values to be sampled through this plan;

15.4.10. sets the measures for Tahltan and joint monitoring of socio-cultural measures in and around the AOIs;

15.4.11. sets measures for Tahltan accessing lands for socio-cultural measures in and around the AOIs, and other socio-cultural measures way of life related measures.

15.4.12. establish thresholds and mitigations for Tahltan objectives;

15.4.13. meet Tahltan socio-cultural measures objectives;

15.4.14. Develop and establishment commitments to deliver Tahltan Cultural Sensitivity Training education for all Eskay Creek Mine workers.

15.4.15. Establishment to require Tahltan counselors, Elders, and/or Tahltan Knowledge Holders on the mine site each month to support Tahltan members.

15.4.16. Develop and implement workplace cultural and bereavement policies at Eskay Creek Mine to ensure Tahltan cultural activities and duties are respected and accommodated.

15.4.17. Offer Tahltan traditional food and meal options at the Eskay Creek Mine site.

15.4.18. Promote respectful and safe workplace culture by requiring the co-development of Tahltan cultural policies.

15.4.19. Install Tahltan cultural signage, acknowledgement of being on Tahltan Territory, and creation of dedicated Tahltan cultural spaces at the mine.

15.4.20. Collaborate with TCG and with Tahltan communities to develop strategies to reduce or restrict the existing out-migration of people, families, and services from the Tahltan Nation Territory, both

with the ECRP and cumulatively, to maintain Tahltan and attract workers, services, and infrastructure to the Nation.

15.4.21. Work with TCG and Tahltan communities to establish strategies and monitoring plans and support programs to track changes in mental health and community well-being of Tahltan members and Tahltan communities.

15.4.22. Work with TCG and Tahltan communities to establish strategies and where possible, monitor effects and changes to traditional food availability through lower nutritional quality and access effects to Traditional Tahltan foods.

15.4.23. The application of the fugitive dust emission monitoring and management plan in the Air Quality condition for the monitoring exposure of emission sources for Tahltan Values.

15.4.24. Implement outcomes from the Water Management Plan in relation to the strategies and mitigations to reduce potential HHRA exposure pathways through air and water discharges or emissions;

15.4.25. Work with TCG and Tahltan communities to establish strategies and where possible, mitigations, to address:

15.4.25.1. Concerns over increased stress on existing health, social and community services in Tahltan Territory.

15.4.25.2. Concerns and questions related to impacts associated with mine work life and shift work schedules on Tahltan families.

15.4.25.3. Concerns about alignment of residual effects assessments with baseline data and potential health impacts from air and metal pollutants.

15.4.25.4. Requests for additional details on health risks from cumulative exposures and the interplay of socio-economic factors.

15.4.25.5. Enhancing support for community-based essential services

15.4.25.6. Supporting on-the-land learning and cultural activities and cultural infrastructure

15.4.26. Updating and maintaining data established through the Socio-Economic Baseline study

15.4.27. Increasing cultural resources and spaces for camp employees

15.4.28. Increasing support related to food access, security, and sovereignty

15.4.29. Further assessing with Tahltan impacts of the 2-week worker rotation and analysing options for alternative scheduling for in-Territory Tahltan employees

15.4.30. Track the effectiveness of the Cultural Leave Policy and any other policies designed to support Tahltan cultural practices through monitoring and evaluation

15.4.31. Confirming process about how Tahltan will be involved in development of key mitigation Management Plans: Ground Transportation and Worker Transition.

15.4.32. establish a process for:

15.4.32.1. identifying potential measures to advance management of Tahltan socio-cultural measures in accordance with those objectives;

15.4.32.2. evaluating potential measures by Tahltan and the Holder to determine the extent to which each potential measures are technically and economically feasible for the Holder to implement; and

15.4.32.3. prioritizing the identification, evaluation, and implementation of potential measures;

10.2.17. REGIONAL CUMULATIVE EFFECTS INITIATIVES

16.1. The Holder must participate in any regional cumulative effects assessment or management activities that include the Regional, Consent, and/or Cumulative Effects AOI carried out jointly by TCG and the Province, if required by, and to the satisfaction of, the TCG and EAO.

16.2. The regional cumulative effects assessment will be based on both Tahltan Cumulative Effects and Provincial Cumulative Effects programs, knowledge, and criteria to inform outcomes.

16.3. An assessment carried out under subsection 16.1 excludes any cumulative effects assessment carried out for the purposes of another reviewable project, under section 27 or 28 of the *Environmental Assessment Act*.

10.2.18. REGIONAL SOCIO-CULTURAL EFFECTS INITIATIVES

17.1. The Holder must participate in any regional socio-cultural effects assessment or management activities that include the Regional, Consent, and/or Cumulative Effects AOI carried out solely by TCG or jointly by TCG and the Province, if required by, and to the satisfaction of, the TCG.

17.2. A regional socio-cultural effects assessment will be led by Tahltan to work at a regional or territory level using Tahltan programs, knowledge, and criteria to create or modify socio-cultural assessments, mitigations, and recommendations to inform outcomes that are Tahltan specific to aid in addressing the concerns and uncertainties identified in the Tahltan Risk Assessment and the REAA and other regulatory reviews in the Nation.

10.2.19. TAHLTAN HUMAN HEALTH PLAN

18.1. The Holder must develop a plan to direct and inform Tahltan human health mitigations for Tahltan communities, Tahltan involved with the ECRP, and on the for Consent, Mountain Pass-Prout Plateau and Project Footprint AOIs for the ECRP. It must be a collaborated plan with the Tahltan Central Government.

18.2. The Holder must provide the plan to TCG, and EAO for review no later than XX days before the commencement of XX , unless otherwise authorized by the TCG and EAO.

18.3. The plan must be developed to the satisfaction of the EAO and TCG for approval, implementation, and adaptive management updates for the Life of Mine (LOM) and to the satisfaction of a Qualified Professional retained by the Holder.

18.4. The plan must include at least the following:

18.4.1. Collaborate with TCG on the development of the Tahltan vision, management, monitoring, and reporting objectives with a focus on environmental contaminants with the potential to impact human health (including for off work camp residents, and Tahltan members on the land) and establish triggers that would initiate additional mitigation measures, notifications and/or additional actions for the Human Health management on the ECRP Mine Site and Consent, Mountain Pass-Prout Plateau and Project Footprint AOIs, and to be protective of identified areas within this area;

18.4.2. Collaborate with TCG to gather directions and knowledge with Tahltan communities to determine the measures and objectives to support design and implementation;

18.4.3. identify the Tahltan human health measures that could affect the exercise of rights by Tahltan based on input provided by Tahltan communities and Tahltan Nation;

18.4.4. mitigation measures for interaction areas that will be implemented during LOM intended to avoid or reduce effects to the Tahltan members' health, exercise of rights, and quiet enjoyment of the lands and waters, including timing, extent, and location;

18.4.5. a description of how the effectiveness of the mitigation measures will be evaluated to inform adaptive management as deemed necessary by the Holder and the Tahltan Central Government;

18.4.6. Monitor effects and changes to traditional food availability through lower nutritional quality and access effects to Traditional Tahltan foods;

18.4.7. Implement outcomes from the Water Management Plan in relation to the strategies and mitigations to reduce potential HHRA exposure pathways through air and water discharges or emissions;

18.4.8. Establish a Tahltan water, soil, plant, fish and wildlife monitoring program contaminants and bioaccumulation program when developing the wildlife health programs identified in the Traditional Food Sovereignty condition for measuring selected environmental contaminants; and

18.4.9. Establish mitigations to address the outcomes of 18.4.1:

Appendix A

SECTION 19(4) ASSESSMENT

1. TAHLTAN NATION

1.1. INTRODUCTION

In accordance with the Declaration Act Agreement and the Tahltan Impact Assessment Policy, TCG has carried out an assessment under Section 19(4) of the Environmental Assessment Act with respect to the potential effects of the Project on Tahltan and its Aboriginal rights, as recognized and affirmed by Section 35 of the *Constitution Act*, 1982 (Tahltan 19(4) Assessment).

The Tahltan 19(4) Assessment will be included in Part C of the EAO's Effects Assessment Report, which will be collaboratively written by TCG and EAO. Along with the Tahltan Risk Assessment, Part C of the Effects Assessment Report will be included as part of the referral package being provided to the Ministers to support a provincial decision on the Project.

An overview of the scope of the Tahltan 19(4) Assessment, a general description of the methodology, information requirements, and roles and responsibilities of TCG and the EAO in conducting and supporting the Tahltan 19(4) Assessment were set out in Appendix 1 of the Assessment Plan for the Project. During the Process Planning phase for the Project, TCG, the EAO, and the Agency worked collaboratively and sought consensus on the description of the Tahltan 19(4) Assessment set out in that appendix.

Preparation of the Tahltan 19(4) Assessment has been guided by the work plans created and maintained by the Collaboration Team established under the Declaration Act Agreement, including the detailed work plans created for the Application Review and Effects Assessment and Recommendation phases.

1.1.1. TAHLTAN NATION

The Tahltan are an Athabaskan-speaking people who inhabit the Stikine Country of the northern interior of BC. The Tahltan Nation is comprised of two Nations – the Tahltan Nation and the Iskut Nation – and is governed by a combined tribal council-type organization: the Tahltan Central Government. Tahltan territory encompasses about 93,500 km^2. In the west, the boundary runs parallel to the Alaskan border. In the northeast, it reaches into the Yukon, just west of Watson Lake. The eastern boundary is situated at the height of land between the Stikine and Kechika watersheds, and the southern boundary extends to the mouth of the Iskut River. The south/eastern border includes Unuk River, and upper Nass tributaries and western half of the Stikine plateau, including the sacred headwaters of the Stikine, Nass and Skeena rivers.

The Tahltan Nation's identity and the essence of who we are as a distinct society is integrally tied to Tahltan lands and the wealth of the resources therein. The Tahltan people rely on the same territory and resources that sustained our ancestors for Tahltan society to continue in the future. Tahltan people continue to practice their traditional economy which includes fishing, hunting, and gathering as well as participating in the modern economy located within and outside of our traditional territory.

The Tahltan Nation has three principal communities: Telegraph Creek, Iskut, and Dease Lake. There are also culturally important villages and assembly sites throughout the Nation, such as, the Tahltan Village, a historic site located at the junction of the Tahltan and Stikine Rivers that was also the traditional summer dwelling

place for the Tahltan people. The Tahltan Nation has 16 reserves as part of the Tahltan Band Council and Iskut First Nation.
The guiding principle of the Tahltan Central Government remains the Declaration of the Tahltan Tribe. In 1910, as part of a growing movement to assert First Nations rights on the coast and the southern interior of BC, the chief of the Tahltan Nation, Chief Nanok along with 80 other members of the tribe signed the declaration. The document claims sovereignty over Tahltan land and declares any land interests concerning the territory of the Tahltan Nation to be settled directly with the Tahltan people. It represents a legal declaration of rights of Tahltan individuals to the Canadian government and British monarch. Tahltans have yet to extinguish their Aboriginal title by any other legal process.

Across Canada, the TCG represents approximately 6,000 Tahltan Nation members living on- and off-reserve. About one-third (2,000 Tahltan Nation members) live in Tahltan territory, though not all are living on reserve lands, while the remaining 4,000 people live across Canada (Tahltan Nation Development Corporation 2020).

1.2. SUPPORTING PRINCIPLES

Given that the conclusions of the Tahltan Risk Assessment Report have informed the Tahltan 19(4) Assessment, it has also been guided by the principles identified in Part 3 of the Declaration Act Agreement and the laws and stewardship principles in Section 4.1.1 of the Hybrid AIR.

The principles identified in Part 3 of the Declaration Act Agreement are:

Part 3 Principles

3.1 The Parties' work under this Agreement will be guided by the following principles:

a) **Recognition and Implementation of Tahltan's Title and Rights.** To continue to advance reconciliation between Tahltan and the Province based on the recognition of Tahltan's Title and Rights in Tahltan Territory and, as applicable, the implementation of the 1910 Declaration, the UN Declaration, the Declaration Act, the Draft Principles, the Calls to Action of the Truth and Reconciliation Commission, and the Supreme Court of Canada's decision in Tsilhqot'in Nation v. British Columbia, 2014 SCC 44;

b) **Respect for and Implementation of TCG Decision-Making.** To respect and implement Tahltan's right of self-determination and decision-making authority as Title and Rights holders and stewards over the land, water and resources throughout Tahltan Territory;

c) **Sustainability and Balance.** To ensure the sustainability of resource development in Tahltan Territory for future generations and to achieve current and future environmental, land and water use, social, cultural and economic goals;

d) **Informed Decision-Making.** To foster Assessments that support informed decision-making by TCG and the Province that incorporate Tahltan Knowledge;

e) **Predictability, accountability, transparency and administrative fairness.** To demonstrate process predictability, shared accountability, transparency and administrative fairness in the reconciliation of Tahltan and Provincial jurisdiction in the Assessments and decision-making processes in relation to the Application; and

f) **Effective coordination.** To seek to achieve effective and coordinated regulatory processes.

The laws and stewardship principles described in Section 4.1.1 of the Hybrid Application Information Requirements include those described under the headings of "Connection and Hierarchy of Sustainability" and "Ownership and Generosity". The following understandings of "Connection and Hierarchy of Sustainability" and "Ownership and Generosity" have been applied in the Tahltan 19(4) Assessment.

<u>Connection and Hierarchy of Sustainability</u>

Tahltan Law and Knowledge is based on the connection of Tahltan with the land and the inclusion of all Tahltan with land, water, and creatures. This foundational principle is a core element of sustainability (Jones et al. 2021).

> *"All animals were originally born of a woman called Atsentmā', meaning "meat mother" or "game mother" (Teit 1919: 231–32). This woman assigned each animal with its own appropriate habit and food source. The Meat-Mother was thought to live far in the north. Showing disrespect to animals or failing to make full use of them as food, would cause the Meat-Mother to call her children "home." While the punishment lasted, there would be a scarcity of game."*

Tahltan law allows rights of access and use to non-Tahltan on Tahltan territory, but does not allow for rights of exclusive management or exclusion. Land alienation is not an option under a proprietorship model of ownership, which sees ownership in terms of belonging over generations.

In relation to stewardship, some of the key principles to be aware of include 1) oneness or interconnectedness of all things; 2) respect; 3) Aht̄ (Tahltan concept that refers to the bad consequences that follow when the right order has been violated – somewhat similar as the Precautionary Principle in western science); and 4) sharing or generosity (reciprocity between all things).

Humans are part of the ecosystems and human actions have to be done in a way where the health of the ecosystems are not impaired. Tahltan oral histories, laws, and principles all indicate where these actions are not followed, significant impacts occur and relationships with the land and water are damaged to the detriment to all Tahltan.

The interconnection occurs across the Nation, across the clan, a Chief or Head of Family area, and a family area as evident of the Tahltan Stewardship Principles (Jones et al. 2021).

> *"The earth is animate and the same as our mother; for, if there were no earth, there would be no people. The latter are her children, and the animals also. She looks after them all, and provides food for all. The rocks are her bones, and water her milk. A child cannot live without sucking its mother's milk, and people cannot live without water" (Teit 1919: 227).*

> *"Sometimes the grounds of a clan got in bad shape, needed rest, for game and fur were getting scarce. Then they let part or all of it rest until the game became plentiful again, maybe from 2 to 5 years, and the clan hunted on the grounds of other people. This was always arranged in a friendly way without trouble. The Indians looked well after the fur and the game of the country so that they should not get scarce." (Teit n.d.)*

> *"…snares were kept in place until catch the yearlings (the one that walks around with mother) in the springtime, indicates that the mother caribou had chased the yearling away because she is going to have a calf. — the chief made a decision, a chief for the game, just like a game warden. — never set snare until the fall time when the calves are weaned, the young ones get big. Then they just live on fish." (Carlick n.d.)*

<u>Ownership and Generosity</u>

The land is not owned but shared with all living and non-living beings; stewardship requires the balance of providing for all while setting the rules for allowable uses for accessing the land. In addition, accessing the land is based on the principle of sharing and sharing in way which provides for today and future generations.

> "In the Tahltan cycle of stories dealing with Big Raven in his role as transformer or shaper, a recurring theme is how Raven, travelling along the coast in the post-Flood world, destroys the monopoly control that certain powerful figures have over many of the goods and resources necessary to life,

> such as water, light, fire and knowledge. Raven steals these goods and resources and distributes them among all the people, so that their benefits can be enjoyed by all. The story which explains the origin of the tides (controlled by a man who refused to allow the tides to recede, thus blocking access to tidal foods), begins by describing a world of scarcity: "Now the people in many parts of the country had no food. Game and all kinds of food were in the possession of a few persons (or families), who alone controlled these things. Thus many people were constantly starving" (Teit 1919: 201). Scarcity and the hoarding of food and resources are the realities that define the world as it was before Raven set to work transforming it. In the words of Carolyn Doody (Thompson 2012: 121), the connection between the Tahltan language and the land points to the reality of "interdependency, the land provides for us and in turn we take care of it." The reciprocity involved in respecting the land shows itself also in what it means to belong to the land. Ownership carries with it obligations, not only to other human beings, but to the land itself and how it is used." (Jones and McLaren 2020).

Finally, the principles can be summarized as "…ownership cannot be separated from belonging; in fact, ownership is belonging. To claim possession of a piece of land is to assert not only that the land belongs to you but that you belong to the land." (Jones and McLaren 2021).

1.3. SCOPE

The scope of the Tahltan 19(4) Assessment includes the Tahltan Values and interests identified by TCG in Section 4.3 of the Hybrid AIR. In the Hybrid AIR, TCG confirmed that based on available information, the Tahltan Values and interests identified by TCG in Section 4.3 of the Hybrid AIR represent the matters required for assessment under Section 25(1) of the Act with respect to the effects of the Project on Tahltan and its Aboriginal rights.

The Tahltan 19(4) Assessment provides TCG's assessment of potential impacts to these Tahltan Values and interests from the Project.

<u>Areas of Interest/Assessment Boundaries</u>

As described in the Assessment Plan, the Tahltan 19(4) Assessment assesses impacts on Tahltan Aboriginal rights in the context of the following Areas of Interest:

a) Cumulative Effects Study Area

b) Regional Study Area

c) Landscape and Site Specific, and

d) Project Footprint.

As outlined in Section 4.2.9 of the Hybrid AIR, these boundaries are based on several features, including: clan areas, head family territories, sacred areas, place names, ethnographic and Tahltan history, family areas, Tahltan high sensitivity areas, settlement and assembly areas, harvesting and gathering areas, environmentally sensitive areas, trade areas, warfare/boundary areas. The finalized boundaries of the Areas of Interest are set out in the outlined in Skeena's Revised Environmental Assessment Application (REAA).

For each Tahltan Value, TCG has applied the Tahltan Continuum and considered the ancient, historic, and current conditions for each Tahltan Value by using a back casting approach of:

a) 7-15 generations (ancient)

b) 1-7 generations (historic), and

c) Today's current conditions (current).

Given the temporal proximity between current conditions, and one generation past, these timeframes may be considered as both conditions and repeated.

<u>Cumulative Effects</u>

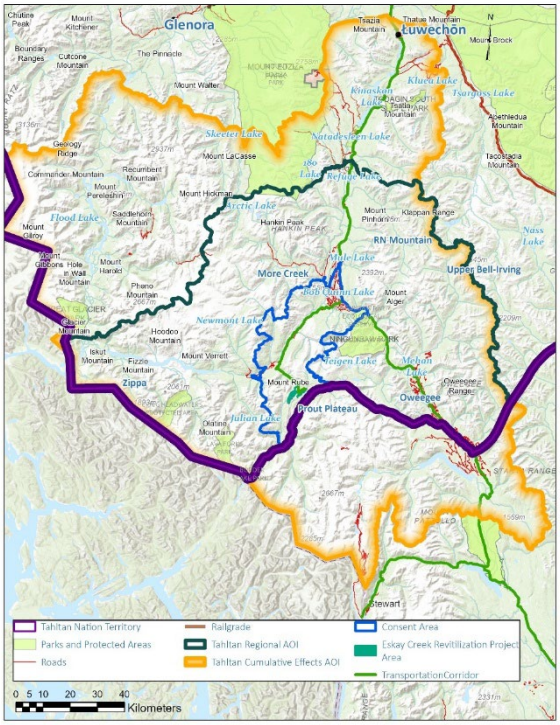
As described in the Assessment Plan, cumulative effects have been assessed in accordance with the Tahltan Impact Assessment Policy and the Tahltan Risk Assessment process outlined in the Hybrid Application Information Requirements.

1.3.1. AREAS OF INTEREST

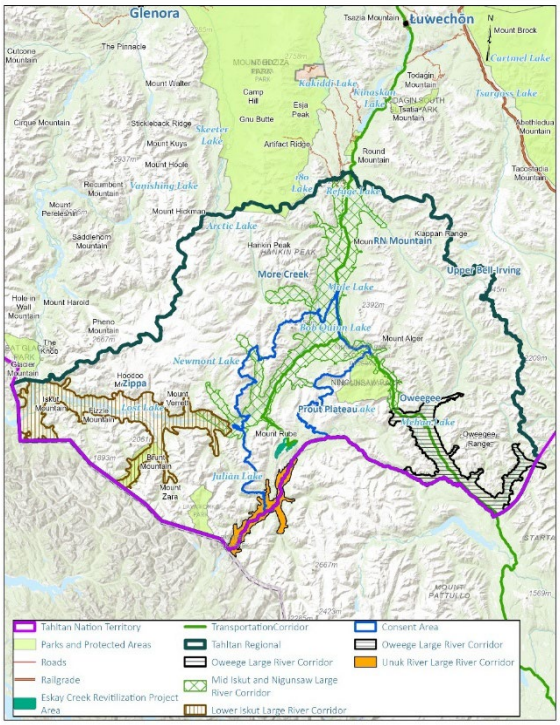
The spatial assessment boundaries were defined and designated by Tahltan through the DAA and represent Areas of Interest (AOI) where a wholistic approach to determining potential effects on Tahltan Values, Core Priorities, Risk Assessment Factors, and Sustainability Requirements. These areas were defined by Tahltan Knowledge and Values, building out from the Consent Area (see DAA) AOI with the following additional AOIs (Map 1- 3):

1. Regional
2. Low Elevation – Iskut River
3. Low Elevation – Unuk River
4. Low and Upper Elevation – Oweegee
5. Upper Elevation – More Creek
6. Upper Elevation – Zippa Mountain, Upper Bell-Irving River, RN Mountain
7. Upper Elevation - Consent Area and Mountain Pass-Prout Plateau
8. Upper Elevation – Project Footprint
9. Cumulative Effects

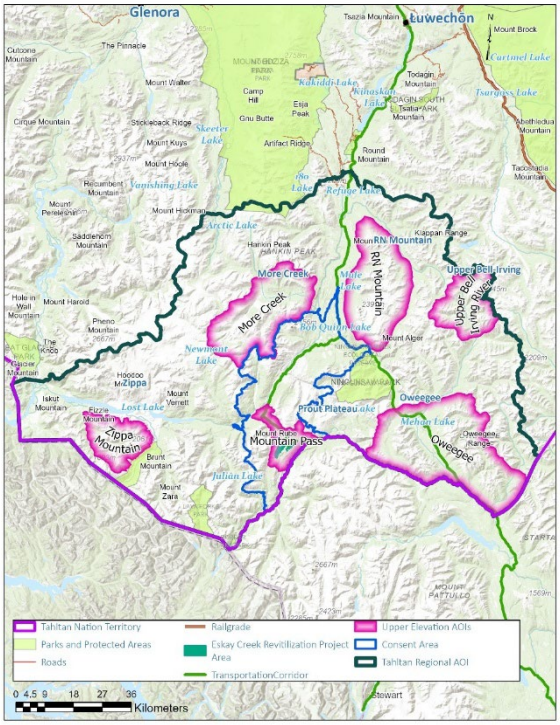
While the Tahltan Risk Assessment provides overview of the indirect (ECRP not contributing), mixed (partial contribution), direct (Project related), and nil (none) existing and potential effects in each of the AOIs and collectively, for the 19(4) assessment only the AOIs (primarily the Consent, Mountain Pass-Prout Plateau, and AOIs with the Transportation Corridor) and effects that can be attributed to the Project (mixed and direct) are identified. However, the full scope and context of the AOIs are considered in the TRA conclusions, proposed conditions, and are included, where relevant, to Tahltan effects, key issues, cumulative effects, and conclusions reported for this assessment.



Map 4. Regional, Cumulative Effects, and Consent Area Areas of Interest boundaries.



Map 5. Low elevation Areas of Interest boundaries.



Map 6. Upper elevation Areas of Interest boundaries.

1.4. METHODOLOGY

In preparing the Tahltan 19(4) Assessment, TCG has considered:

a) TCG policies and guiding documents such as the 1910 Declaration, the Tahltan Resource Development Policy, and the Tahltan Impact Assessment Policy;

b) the Tahltan Risk Assessment Factors and the Tahltan Sustainability Requirements, as set out at Schedules C and D of the Declaration Act Agreement;

c) the information in Skeena's REAA for the Projects and the results of engagement with Skeena in relation to the REAA;

d) Tahltan Knowledge;

e) the EAO's assessment of the Project including the draft Environmental Assessment Report, sustainability recommendations, and draft EA Certificate, including proposed certificate conditions and project description;

f) information from the Technical Advisory Committee;

g) input and information from the public comment period and Tahltan members engagement carried out by TCG, and

h) the results of consensus-seeking efforts with the EAO on Project effects.

1.5. INFORMATION REQUIREMENTS

The information required from Skeena and TCG for the Tahltan 19(4) Assessment was set out in the Hybrid AIR, including additional studies and/or modelling. TCG has engaged with Skeena to provide feedback, information, and recommendations on the development of the REAA with respect to supporting the Tahltan 19(4) Assessment. TCG has also worked collaboratively with the EAO to develop information requests for Skeena related to the REAA including any information gaps, additional studies, and data that needs to be collected to support the Tahltan 19(4) Assessment.

As described in the Hybrid AIR, TCG has provided relevant information to Skeena for each Tahltan Value and this information has been characterized, as applicable, in both the Tahltan 19(4) Assessment and Part C of the EAO's Effects Assessment Report. Tahltan's information requirements for the Tahltan 19(4) Assessment have included additional Tahltan Knowledge shared by TCG, the application of Tahltan Knowledge in the REAA, and the use of the information in the Tahltan Risk Assessment.

1.6. ROLES AND RESPONSIBILITIES

Drawing from the conclusions of the Tahltan Risk Assessment Report, and applying the scope and methodology described above, the TCG has prepared the Tahltan 19(4) Assessment.
TCG and the EAO have also collaboratively written Part C chapter of the EAO's Environmental Assessment Report that pertains to the potential effects of the Project on Tahltan and its Aboriginal rights. This work has considered the requirements of the Assessment Plan, the Declaration Act Agreement, and the work plans developed through the Collaboration Team.

1.7. TAHLTAN ASSESSMENT

The Tahltan Assessment and the Tahltan Risk Assessment has advanced to the Effects Assessment stage and Tahltan continue to collaborate and support achieving milestones to support decisions on the project. The EAO, Skeena Resources, Canada, and TCG have collaborated consistently and TCG and EAO have collaborated

consistent with the DAA and the Consensus Tracking Tool. The draft Tahltan Risk Assessment is being shared with EAO and Skeena Resources with recognition of placeholders in some sections where additional direction will be provided through internal engagement with members and through collaboration with all Parties through the remaining stages of the Effects Assessment Stage.

The Project related potential effects have been identified with the Lower Iskut, Iskut and Ningunsaw, Unuk, Oweegee, Consent, Mountain Pass-Prout Plateau, and Project Footprint AOIs, all with varying effects nested within the Regional and Cumulative Effects AOIs. The other AOIs have not identified source effects from the Project and are not being considered in determining the severity of effects and conclusions. The Consent, Mountain Pass-Prout Plateau, and Project Footprint AOIs have the greatest potential effects, followed by the Iskut and Ningunsaw, Unuk, Oweegee AOIs where effects are related to the Transportation Corridor, downstream effects from the Project, and potential future linked effects to development to lesser effects. Regional effects are tied to socio-cultural, infrastructure and services, human health, employment and economy, and culture/way of life effects from the Project and resource development. Cumulative potential effects are tied to the interconnected potential effects by AOI, pace and scale of development. All of the effects are considered with TSP management directions, Tahltan Core Priorities, and alignment with Sustainability Requirements.

1.8. PROPOSED KEY MITIGATIONS MEASURES BY SKEENA RESOURCES

The full details of the key mitigations are reported in Skeena Resources REAA and are summarized by EAO in the draft Assessment Report. This section will be updated as the draft Tahltan Risk Assessment and EAO Assessment Reports are advanced.

1.9. KEY ISSUES RAISED

Tahltan have identified concerns and with proposed mitigations and conditions to reduce the effects of the Project focused on:

- Water Quality and Management;
- Reclamation and Closure ;
- Human Health and Socioeconomics;
- Wildlife and Wildlife Habitat;
- Tahltan Cultural, Heritage, Way of Life;
- Infrastructure and Employment; and
- Fish and Fish Habitat.

At this time, they are included as part of the proposed conditions being collaborated by all Parties, so the details can be revised as the draft Tahltan Risk Assessment and EAO Assessment Reports are advanced.

1.10. TAHLTAN CONDITIONS RELATING TO IMPACTS TO TAHLTAN RIGHTS AND TITLE

The current draft conditions are reported in Section 10.2 of the draft Tahltan Risk Assessment and focus on the potential effects and impacts to Aboriginal rights related to:

- Water, fish, and aquatic ecosystems management;
- Air quality, noise and vibration, mine design, traffic, vegetation, and wildlife management and its effects on Tahltan and the connection with land, water, plants, and animals;
- Socio-cultural, human health, culture and heritage, traditional practices and way of life, and quiet enjoyment of land matters and its effects on Tahltan, communities, and families and the connection with land, water, plants, and animals;
- Reclamation and closure, access to Tahltan lands, alignment with Tahltan Core Priorities for current and future generations; and

- Reversal of socio-economic negative trends of out migration of people, revenues, benefits, services, and housing with positive effects and legacies.

As the conditions and the Tahltan Risk Assessment are finalized the scope and description of potential effects on Aboriginal rights will be revised.

1.11. TAHLTAN CONCLUSIONS

This section of the draft Tahltan Risk Assessment Report is currently under review by Tahltan members. It relates to potential impacts from the Project that are specific to Tahltan's Aboriginal title and rights and potential mitigation strategies being considered by TCG for seeking to address those impacts.

The conclusions will include final recommended determinations with the proposed mitigation, terms and conditions identified in Section 9.6 and 10.2 that can be applied to the project, with the potential significant effects to Tahltan lands, culture, and communities summarized.

The assessment stages have identified the AOIs where potential effects either directly or in a mixed context with other resource development activities are identified from the Project. The potential severity of the negative effects in relation to Tahltan Core Priorities are identified for these AOIs. The initial determination of the overall significance of the Project's potential effects for each AOI, including negative and positive effects; this includes, Skeena Resources proposed mitigations and effects assessment; the technical uncertainties identified by TCG with Tahltan Values, and the concerns and uncertainties related to Tahltan Values and the interdependence with Tahltan Core Priorities; evaluated with the Risk Assessment Factors and the Sustainability Requirements provide estimates for further internal review and determination. This will also be updated in preparing the draft report for the Public Comment Period.

This information has also identified additional mitigations or conditions that can reduce the potential effects, apply strategies that allow for the timely assessment of predictive models with measures that set mitigations into place where the results are not field confirmed, set the ability to have effects monitored and managed to the satisfaction of Tahltan, advance requirements to address where Sustainability Requirement(s) are not fully met through the LOM and beyond, report on the progress to move the Project towards sustainability for all phases of the Project, and address Tahltan way of life and access to lands and water . With these items being identified the work to date on the review of the Project has shown where there are concerns to be mitigated, approaches to reduce the effects to the development of the project, and strategies to bring the Project in better alignment with the Tahltan Sustainability Requirements to support the possible next stages into regulatory authorizations.