

March 12, 2022

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Via email: UpperBeaver@iaac-aeic.gc.ca

Re: Comments on the Tailored Impact Statement Guidelines & Public Participation Plan - Upper Beaver Gold Project (Reference No. 82960)

Our family provides the following comments in response to the Impact Assessment Agency of Canada's email inviting comments and concerns on the draft Tailored Impact Statement Guidelines ("TIS Guidelines") and the draft Public Participation Plan.¹

I. BACKGROUND

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The idea of having an open pit mine, an underground mine, a mill, associated waste ponds and a dry stacking area abutting our property is unnerving. Our family wants this remote piece of rugged natural environment in northern Ontario left as it is for future generations.

Last fall we provided comments on the Initial Project description, which has culminated in the Impact Assessment Agency conducting a detailed assessment for the Upper Beaver Gold Project (the "Project").

Our comments are provided based on:

- Life experience growing up in mining towns in northern Ontario.
 - Owning property abutting the mine provides intimate knowledge of the work site.
 - Knowledge of mining catastrophes and legacy scars left in the spent mine footprint.
 - Knowledge of associated health risks related to miners.
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Our family appreciates this communication vehicle that is providing a forum for us to voice our sententious concerns, and to be able to request information related to the mine's specific location on Beaverhouse Lake. Understanding the Federal and Provincial oversight responsibilities and authority to challenge the Project logistics and help to eliminate inherent risks to the Project, the miners, and the general public.

II. PRIMARY CONCERNS

1) The Open Pit, Destruction of York Lake and Re-routing Misema River.

Can the ore body in this specific situation, with the significant water and geologic conditions at this specific location be deemed essential to the local economy given the known risks and major environmental modifications that include the destruction of York Lake, an open pit and control dykes on the Misema River system ?

This Open Pit activity is not a low impact or low risk activity. The open pit could result in significant effects to ground water and surface water. Peculation rates and aquifer recovery rates, as well as lake water levels and potential chemical contamination. The Open Pit activities might directly impact water levels in Beaverhouse Lake and Ava Lake and the Misema River. Water levels in the aquifer water quality and volumes. (See Page 15 Table 1 - Item 1)

Proponent has stated that draining and destruction of York Lake and the development of an open pit is required to make the Project viable. (see Open Pit and Diversions C.3.4.2 Page 21) There is significant risk of continuous ingress of water into the open pit portion of the mine as well as the migration into Underground Main Shaft. The hydrological effect of the Open Pit development is uncertain.

As per the Google definition “ **Hydrology**” is essentially a natural science, and nature is often full of surprises. Studies show that we should beware of simplistic reasoning backed up by common sense, as it is often inaccurate. In hydrology, as in many other natural sciences, observation and measurement prevail.” As defined, the resulting hydrologic effects of the Open Pit are uncertain, and the size of the open pit could increase significantly as natural forces come into play.

What if the Open Pit does not resolve the Proponents concern related to Underground Mine water issues? Who is responsible for the cost to remedy this large Open Pit scar. Who, how and when will the Open Pit remedy be acted on ? Is the Mine going to abandon the Project because of the water safety concerns?

The Proponent must provide evidence that the Open Pit will solve the water ingress into the main shaft as assumed by the Proponent and not create a greater issues with the destruction of York Lake and negative ground and surface water impacts. (Ref. Detailed Project Description Pg. 22 C.3.4.2 Open Pit and Diversion)

Concern #1

The Open Pit activities should not be started until IA experts have jointly investigated all other options and concluded the open pit and destruction of York Lake is essential to the Project viability. The terms and cost to remediate the Open Pit and destruction of York Lake must be defined in absolute terms. The river water levels and fish habitat must be maintained. All Open Pit work activities must be pre-approved and inspected and tested by 3rd Party professionals. Until the Proponent has completed models and studies demonstrating the Open Pit portion of the Project will not cause negative effects to the surface or ground water, or create unwanted nuisances to the public this part of the Project should not proceed.

RECOMMENDATION NO. 1: The Agency ought to prohibit any **Open Pit** development during the Advanced Exploration stage until the completion of IA expert clarifications and validation of hydrologic modelling effects on water.

2) The **Underground-Main Shaft** is located very close to Beaverhouse and Ava Lakes. The proposed location is at the highest elevation on the Project footprint. The Proponent should provide the justification for relocating the main Underground Mine so close to the lakes and therefore the cottagers; and public canoe route.

Concern #2

Advanced Exploration Work relating to ramps, ventilation and main shafts should not begin until IA have questioned and evaluated evidence and studies that the demonstrate the shaft location is in the only “absolutely” practical site.

Main mine shaft locations are evaluated and designed by performing a work study and value analysis, by rating a number of potential locations. Historically, its been proven many main shafts were located in a poor location in relation to ore bodies. IA must ensure the main shaft location considers maximum environmental benefits (ie) Not destroying York Lake, not creating dams and diverting rivers, not risking ground water and altering surface water levels . The Proponent needs to provide alternate locations for the main shaft, preferably further away from

Beaverhouse Lake. In doing this it makes the Project more favourable for cottagers, recreational users and at the same time eliminating significant environmental risks. The main shaft location value and risk analysis must be evaluated and risk reward assessed.

RECOMMENDATION NO. 2 :

Proponent must stop all work in the Advanced Exploration stage and provide IA with Main Shaft location selection methodology including cost/environmental benefit matrix comparing all of the to alternate locations. (* See Online for Example of Mine Shaft - Evaluation of Shaft Locations in Underground Mines , South African Institute of Mining and Metallurgy)

3) **Public Access to Beaverhouse Lake** is presently servicing the Proponent and the Public. The Project should consider a private entrance and road into the Project. A new dedicated “private” road will better service the Project. This new access would be extra wide and have the capacity of handling “Oversized Loads” as well as result in added safety for public and employee travel. The Cottagers and Public must be involved and provide input prior to the Proponent unilaterally selecting a new landing.

Concern #3:

Any Proponent work that impacts access to the cottage road or landing could mean the difference between live and death. This road is the “only” access onto and off of Beaverhouse Lake, Ava Lake and York Lake in case of an emergency. This road must be open 24 x 7.

RECOMMENDATION NO. 3 :

Proponent must halt work in the Advanced Exploration stage that impedes or impacts road conditions or access to the Landing.

Concern #4:

Communication and Co-ordination between the Provincial and Federal agencies, the Proponent, and the Public are lacking cohesion. responsibilities and authority seems to be disjointed. The provincial ECA and the Environmental Register of Ontario (ERO) merges into the Federal Impact Assessment Agency but continuity is lacking. There seems to be a lack written procedures and authority for the Advance Exploration stage, the system lack a matrix outlining authority and responsibility in the first two stages.

RECOMMENDATION NO. 4 : This Project is very complicated impacting many environmental and logistic concerns. A Project this complicated needs a single point of contact a “Project Manager” with authority and responsibility to communicate, mediate, motivate and coordinate all of the Parties in this early stage of project development.

Concern #5:

Perceived lack of Field Work Oversight, 3rd Party Inspection during Advanced Exploration.

RECOMMENDATION NO. 5 : Assignment of a dedicated field person reporting to the Project Manager.

Concern #6:

Project Scope of Work doesn't appear to be fixed. After the merger with KL Gold the Proponent wants to take advantage of synergies. This is according to News Releases and communication from the Proponent. The Proponent has had 3 CEO's Boyd, Makuch, & Al-Joundi in the space of 4 weeks. Given the changes at the highest management level ... Does the Proponent have clear direction of the Project scope ? Yet the Tailored Project description has stated “ the Upper Beaver Gold project is not part of a larger project that is not listed on the Project List. “ (C.2 Pg 17 Last sentence.)

RECOMMENDATION NO. 6 : Freeze all site Work related to facilities and/or plant processes.

RECOMMENDATION NO. 7: Insist the Proponent freeze the Project Scope of Work immediately before any further evaluation.

RECOMMENDATION NO. 8: Require the Proponent to provide information about potential inequities created by an influx of transient workers and impact to social conditions resulting in a very large project coming to the area. (ie) General impact on rental housing and food costs. Public social impacts like noise and nuisance issues, opportunity for drug and alcohol related increases.

Concern: 9

What is the Impact Assessment Agency of Canada's mandate. To challenge the Proponent ? To work with the Proponent to help facilitate the Project ? To work with the Public and other concerned Parties to help them challenge the Proponent ? ... or simply to maintain records and

correspondence? Who has authority to make decisions related to Project Risk(s) vs. Commercial Cost(s)

RECOMMENDATION NO. 9: Require the Impact Assessment Agency of Canada to define their authority and responsibilities in the Project assessment process.

RECOMMENDATION NO. 10: Require the Impact Assessment Agency of Canada to outline the formula or matrix that ensures transparency in their assessment of a Project viability. What is that process and who oversees the calculations, how is the weighting of the individual evaluation criteria arrived in their Risk Assessment Matrix. The alternative that best contributes to sustainability must be the preferred Project. Is no Project an option?

RECOMMENDATION NO. 11: Require the Proponent to develop written procedures with the cottagers and public to facilitate and voice concerns related to nuisances from mining activities . (ie) mechanical noise, dust, work hours, seasonal work timing and other irritants as they occur.

RECOMMENDATION NO. 12: Require the proponent to provide positive and negative information about the societal or public interest need as a result of the Project. How the Project will effect the surrounding communities with increased younger population and increased disposable income. Rental housing effects? Nuisance issues?

RECOMMENDATION NO. 13: Require the Proponent to provide information about collaborative mechanisms which will be used to enable public participation and how public perspectives will be used in the IS.

RECOMMENDATION NO. 14: Direct the Proponent to consider sustainability trade-offs, with an over riding philosophy not to allow trade-offs that are negative steps or block positive attributes in any basic requirement.

Thanks for the opportunity to comment on the impact assessment process. Also see my PDF file for more direct comments on the Tailored Impact Assessment Guidelines Template forward with this document

Regards,
Chris Marshall, Beaverhouse Lake Cottager

