



Attention

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File MC0094

On behalf of Big Bear Contracting Ltd. (Proponent), Misty Clifton Engineering Group has prepared a summary table in response to the Table I Summary of Issues (SOI) received on 22 August 2024 from the Impact Assessment Agency of Canada (IAAC). It is understood that the IAAC is not requiring the Proponent to prepare a detailed project description (DPD) at this time. A response table in plain-language summary in both English and French translation is the required deliverable at this time.

The Proponent would like to acknowledge receipt of the Table II comments, advice and recommendations. Responses to the Table II comments have not been provided at this time; however, it is believed that most of these comments will be resolved during the permitting and licensing stage of the Project.

Should there be any questions or comments, please don't hesitate to contact us.

Regards,

<Original signed by>

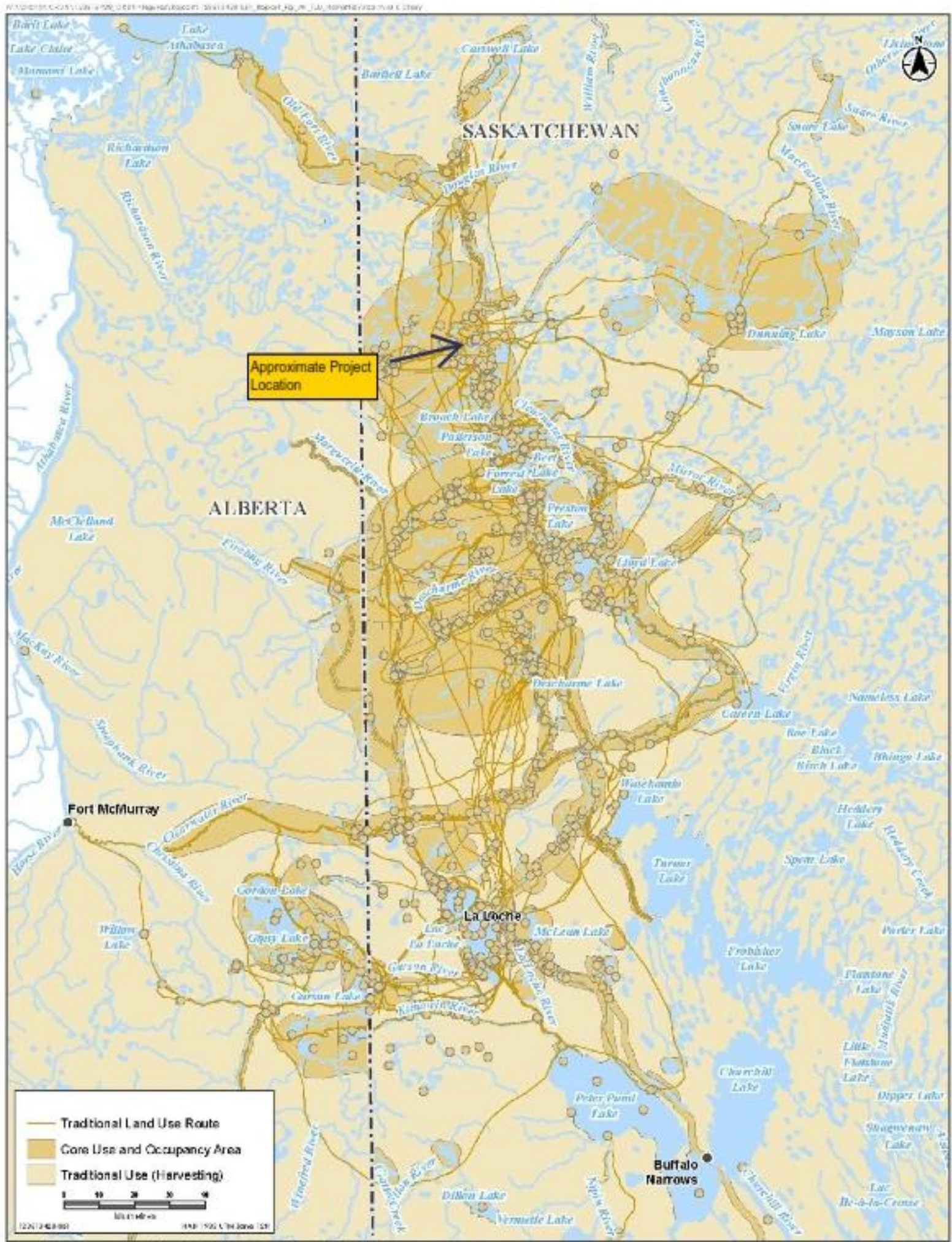
Lindsay Larre BAsC Engineering Licensee
Environmental Scientist

Issue #	Issue from SOI	Proponent Response
Fish and Fish Habitat		
1	Identify water bodies (streams, lakes, wetlands) that have the potential to be directly or indirectly affected by Project activities. Provide more information on the Project's potential to cause direct or indirect effects on the identified water bodies during construction and operation.	<p>Grygar Lake is 200 m north of the Project, Hodge Lake 2.5 km to the northeast, and there are many smaller unnamed lakes and creeks. Figure 4.1 included in the Initial Project Description (IPD) illustrates water bodies surrounding the Project. It is believed that with sufficient mitigations during the construction of the aerodrome, that the Project will not cause adverse effects to any surrounding waterbodies. The potential adverse effects include releases of deleterious substances and release of sediment to the surface waterbodies. These effects can be mitigated through an environmental protection plan (EPP), which will be developed prior to construction activities. An erosion and sediment control and spill management will be described within the EPP.</p> <p>In addition, as applicable, the Proponent will comply with any requirements under the <i>Fisheries Act</i>.</p> <p>All fuel storage locations (temporary or permanent) will be located as far away from surficial waterbodies as possible. Construction setback distances to Grygar Lake will be established in the EPP and implemented throughout the duration of the Project.</p>
Migratory Birds and their Habitat		
2	Provide additional information on potential impacts (e.g., habitat loss, lighting, noise, vibrations, worker presence, accidental spills, etc.), monitoring, avoidance, and mitigation measures for Project activities on migratory birds.	<p>Disturbance will not exceed the project footprint and is being limited as much as possible. Equipment and vehicles will be shut down when not in use to minimize noise disturbance.</p> <p>The Transport Canada guidance document <i>Sharing the Skies: Guide to the Management of Wildlife Hazards – TP 13549</i> will be referenced for appropriate mitigations to be included in the EPP.</p> <p>Vegetation clearing will be targeted for the fall/winter to avoid sensitive specie timing windows, as feasible. Potential impacts to the environment will be assessed in a screening assessment and/or pre-construction survey, and mitigation measures will be developed where necessary along with follow-up monitoring programs. If construction is scheduled to occur during sensitive wildlife timing windows such as the general nesting period for migratory birds (mid-April to late-August) and qualified personnel will conduct nest surveys prior to construction. Timing windows according to the nesting zones by Environment and Climate Change Canada will be enforced.</p> <p>Additional mitigation measures will be implemented if migratory birds are observed at the time of construction. These may include adjusting the construction schedule by postponing activities near occupied nests, implementing a barrier between the occupied nest and the activity, moving equipment daily to prevent nesting activity, relocating nests or wildlife, and/or monitoring the nest to determine if the inhabitant is showing signs of stress. The spill management plan as part of the EPP will provide mitigations for accidental spills or releases.</p>
Structures, Sites, or Things of Historical, Archaeological, Paleontological, or Architectural Significance to Indigenous Peoples		
3	Clarify how Indigenous groups will be notified, and identify related mitigation measures, should any item of historical, archaeological, paleontological, or spiritual importance to Indigenous peoples be discovered.	<p>A Heritage Resource Impact Assessment was completed by AtlHeritage at the end of August 2024. No archaeological sites were discovered and heritage clearance has been recommended to the Heritage Conservation Branch. Construction will not commence until clearance is obtained.</p> <p>The Proponent is committed to engagement with Clearwater River Dene Nation (CRDN) throughout the duration of the Project. Should any discoveries be made, work will be halted and the Proponent will notify CRDN and the required regulatory agencies. A chance find protocol will be included as part of the EPP.</p>
Indigenous Peoples' Current Use of Lands and Resources for Traditional Purposes		
4	Provide information that clearly illustrates the Project's proximity to traditional territories of Indigenous groups in the Project area.	<p>Please see Figure 12 referenced below provided by CRDN which illustrates the recorded CRDN traditional use and occupancy (2010-2020).</p> <p>Other traditional territories in the area include Buffalo River Dene Nation, Birch Narrows Dene Nation, Black Lake Denesuline First Nation, Fond du Lac Denesuline First Nation, and Athabasca Chipewyan First Nation. Figure 4.3 below illustrates the proximity to the above listed Nations. The closest Nation to the Project is Athabasca Chipewyan First Nation (201A), which is approximately 105 km (direct distance as there is no driveable route to the Project).</p>
5	Clarify if there are any traditional land use activities occurring within the study area of	<p>An Indigenous Rights and Knowledge Survey (IRKS) has been completed for the area surrounding the Project, focusing on CRDN land use (<i>Clearwater River Dene Nation Indigenous Rights and Knowledge Survey</i>, Origin Heritage Consultants Inc., 2021). The IRKS was completed in relation to the Fission Patterson Lake South (PLS) project, which is relevant for the proposed aerodrome Project as the PLS site is located approximately 15 km southeast (direct distance, further by road). To date the IRKS has been</p>

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	<p>the Project, and if so, identify potential effects and proposed mitigation measures.</p>	<p>submitted to the Canadian Nuclear Safety Commission-Government of Canada, Government of Saskatchewan agencies and the two principal proponents advancing the first mining projects in the area.</p> <p>The CRDN IRKS provides helpful information about the CRDN's use of lands and resources and the exercise of rights and practice of culture which occurs across its Traditional Territory. While the CRDN IRKS document is focused on addressing one of the proposed nearby mines, it contains directly relevant information that is applicable to the Grygar and Hodge Lake areas, the Project area (the aerodrome and associated support facilities and areas), areas adjacent to the Project and the host landscape. Overall, it shows that Project could be characterized as occurring within an area of moderate to intense land and resource use and utilization by the CRDN. Figure 15 below provides an illustration of the recorded CRDN traditional use and occupancy within the Patterson Lake Area.</p> <p>Mitigations for traditional land use are summarized in Table 1.</p> <table border="1" data-bbox="895 596 2933 1641"> <thead> <tr> <th colspan="2" data-bbox="895 596 2933 651">Table 1.0 – Mitigation Measures – Traditional Land Users</th> </tr> <tr> <th data-bbox="895 651 1243 737">Potential Impacts</th> <th data-bbox="1252 651 2933 737">Mitigations</th> </tr> </thead> <tbody> <tr> <td data-bbox="895 737 1243 812">Increased disturbance to local communities</td> <td data-bbox="1252 737 2933 812"> <ul style="list-style-type: none"> • Continued engagement with local stakeholders and rights-holders to ensure concerns are heard and adequately addressed. • Project is isolated from communities with no nearby neighbours. </td> </tr> <tr> <td data-bbox="895 812 1243 1316">Changes in traditional and other land use</td> <td data-bbox="1252 812 2933 1316"> <ul style="list-style-type: none"> • CRDN members will be utilized for the monitoring of traditional land use in the area. • Management plans and monitoring programs will be developed and implemented where required. 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Indigenous Peoples' Health, Social, and Economic Conditions		
6	Describe a contingency plan to ensure continuous access to clean water on site in the event of an accidental release or chemical spill into Grygar Lake from aerodrome operations.	<p>Big Bear Camp currently has an on-site water treatment plant which provides potable water for the camp (licensed with the Water Security Agency). Potable water will either be sourced from the Big Bear Camp water treatment plant, or a new groundwater production well will be installed and licensed with the WSA.</p> <p>As a contingency (should the water treatment plant have issues or an accidental spill occur that impacts clean water supply), potable water can temporarily be trucked from CRDN's water treatment plant. A spill management plan will be developed so adequate emergency spill response equipment is available for the Project.</p>
7	Provide information on the potential positive and negative health impacts of the Project, such as access to and availability of medical and emergency services, use of the Project for emergency evacuations and wildfire management and services, and first aid and emergency preparedness needs of the Big Bear Camp.	<p>The Project is expected to have positive health impacts for this area of the Province. Emergency services for this area of the Province are very limited and the construction of the aerodrome will allow for access to emergency services that otherwise would not be available. According to CRDN Engagement Lead Cameron Willier, emergency evacuations in surrounding communities have become more frequent due to wildfires. It is believed that an aerodrome will assist with emergency situations such as these and have a positive impact for residents. Local roadways should also experience lower traffic volumes when staff are flown into the proposed nearby mine sites, which will result in safer transportation for local residents.</p>
8	Provide information about potential positive and negative impacts of the Project on food security of Indigenous peoples.	<p>The Project is not expected to have negative impacts on food security of Indigenous peoples as the Project is not expected to have significant impacts on hunting, trapping or fishing. The construction activities associated with the aerodrome may increase noise levels in the area which may cause intermittent and short-term disturbances for the hunting and trapping areas that have been identified on Figure 15 below. These disruptions are expected to be minimal during construction and operations.</p> <p>During operations, flights are mostly expected during dusk/dawn time periods (which are not generally utilized for hunting activities and therefore should not impact food security).</p> <p>Mitigation measures will be in place to protect Grygar Lake and all water sources. According to Figure 15 below, Grygar Lake is not utilized for fishing activities by CRDN traditional land users.</p> <p>Disturbances to gathering and harvesting activities may occur, however these impacts are expected to be monitored any disturbed areas will be re-seeded with native vegetation as soon as possible.</p>
9	Provide additional information on potential Project effects to drinking water and recreational water quality, as well as country foods during all phases of the Project.	<p>For the protection of groundwater and surface water, emergency response plans will be included in the EPP, in accordance with the Saskatchewan Environmental Code and spill response requirements to provide quick detection, control, and management of any spill during construction/operation and to manage disposal of hazardous waste.</p> <p>Storage of hazardous materials will be located away from waterbodies and the storage facility will be properly licensed with the Province to ensure environmental protection.</p> <p>To protect country foods, the Project footprint will be designed to the smallest extent possible. Any disturbed areas will be re-seeded with native vegetation as soon as possible. Potential impacts to the wildlife will be assessed in a screening assessment and/or pre-construction survey, and mitigation measures will be developed where necessary along with follow-up monitoring programs.</p> <p>CRDN members will be utilized for the monitoring of traditional land use in the area.</p>
10	Provide information about potential positive and negative effects and mitigation measures for the health, social, and economic conditions of Indigenous peoples throughout the duration of the Project.	<p>The Project is expected to have positive impacts for health, social and economic conditions for Indigenous peoples. Employment of CRDN members will be a priority of the Project.</p> <ul style="list-style-type: none"> • Health – it is expected that access to emergency services will improve for CRDN members and surrounding communities. • Safety – In addition to better access to emergency services, the Project will reduce traffic on local roadways resulting in safer travel conditions for local residents. • Social and economic – the Project will positively affect social and economic conditions by providing job opportunities. On a larger economic scale, the aerodrome may also improve and enhance mining in Saskatchewan by improving access to northern mines and communities.

Issue #	Issue from SOI	Proponent Response
		It is expected that any negative impacts (such as releases to the environment during construction activities or storage of fuel at the Site) can be mitigated through protection plans and regulatory permits. Mitigation measures for impacts to traditional land uses have been presented in Table 1 above.
Indigenous Peoples' Rights		
11	Describe further engagement efforts that will be carried out with all Indigenous groups (including Indigenous youth) who may be impacted by the Project or have interests in the project area. Provide a summary of potential issues, concerns, and/or benefits of the Project that have been expressed through Indigenous engagement efforts to date.	<p>The Proponent will provide adjacent community members and land users with a telephone number and email address that can be used to report concerns about the Project, including concerns about noise from Project construction and/or operations activities.</p> <p>The Proponent, along with the engagement lead from CRDN, are committed to ongoing engagement and dialogue and encourage Indigenous participation in the Project.</p> <p>To date, no concerns have been raised. Any dialogue has been positive (no voiced opinions have been presented).</p>
12	Provide an update on Indigenous consultation and engagement activities. Include a summary of key issues or concern and any issues that relate to the adverse impact that the designated project may have on the rights of the Indigenous peoples of Canada recognized and affirmed by section 35 of the <i>Constitution Act, 1982</i> .	<p>The Proponent is committed to continued discussions with local stakeholders and rights-holders to hear concerns (current or in the future) so they can be adequately addressed.</p> <p>To date, no concerns have been raised from conversations that have occurred. Any dialogue has been positive (no voiced opinions have been presented). Aside from the engagement that was summarized in the IPD document, no additional engagement has been completed.</p>
Other Factors that IAAC Considers Relevant		
13	Clarify the ownership and administration of project lands.	The land on which the Project is located is owned by the Saskatchewan Government (Crown Land). The land is located within CRDN traditional Treaty 8 territory. Big Bear Contracting Ltd. currently holds an industrial lease with the Province for operation of Big Bear Camp, which will be extended to the new aerodrome project should it be approved.



Source: Cree Nation - Governance and Land Use and Treaty for Métis and Dene - Governance and Land Use



CLEARWATER RIVER DE LA BARRÉ

Recorded CRDN Traditional Use and Occupancy (2010 - 2020 Data)

Figure 12

Disclaimer: Recorded sites and locales have not been verified in the field

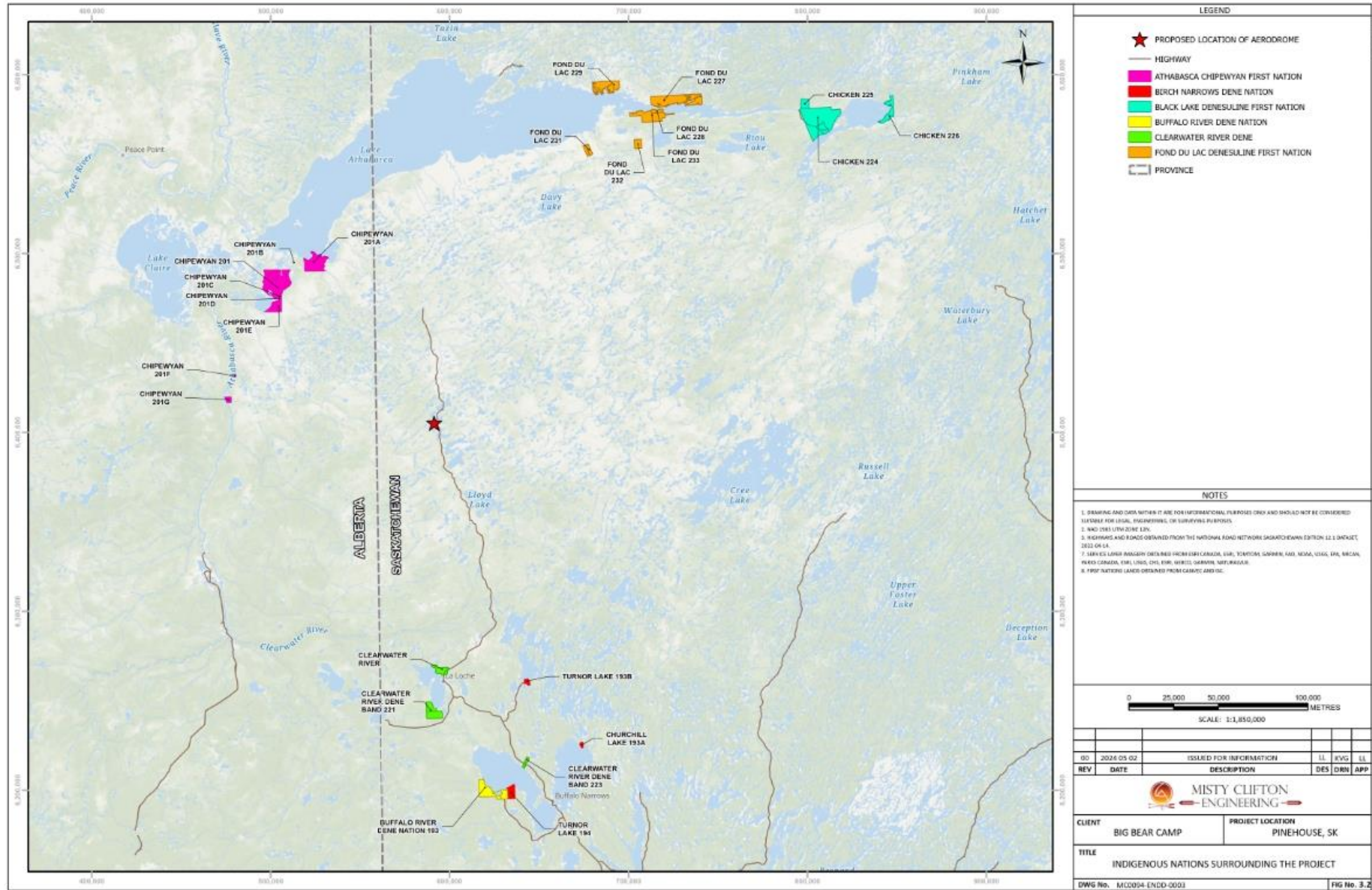
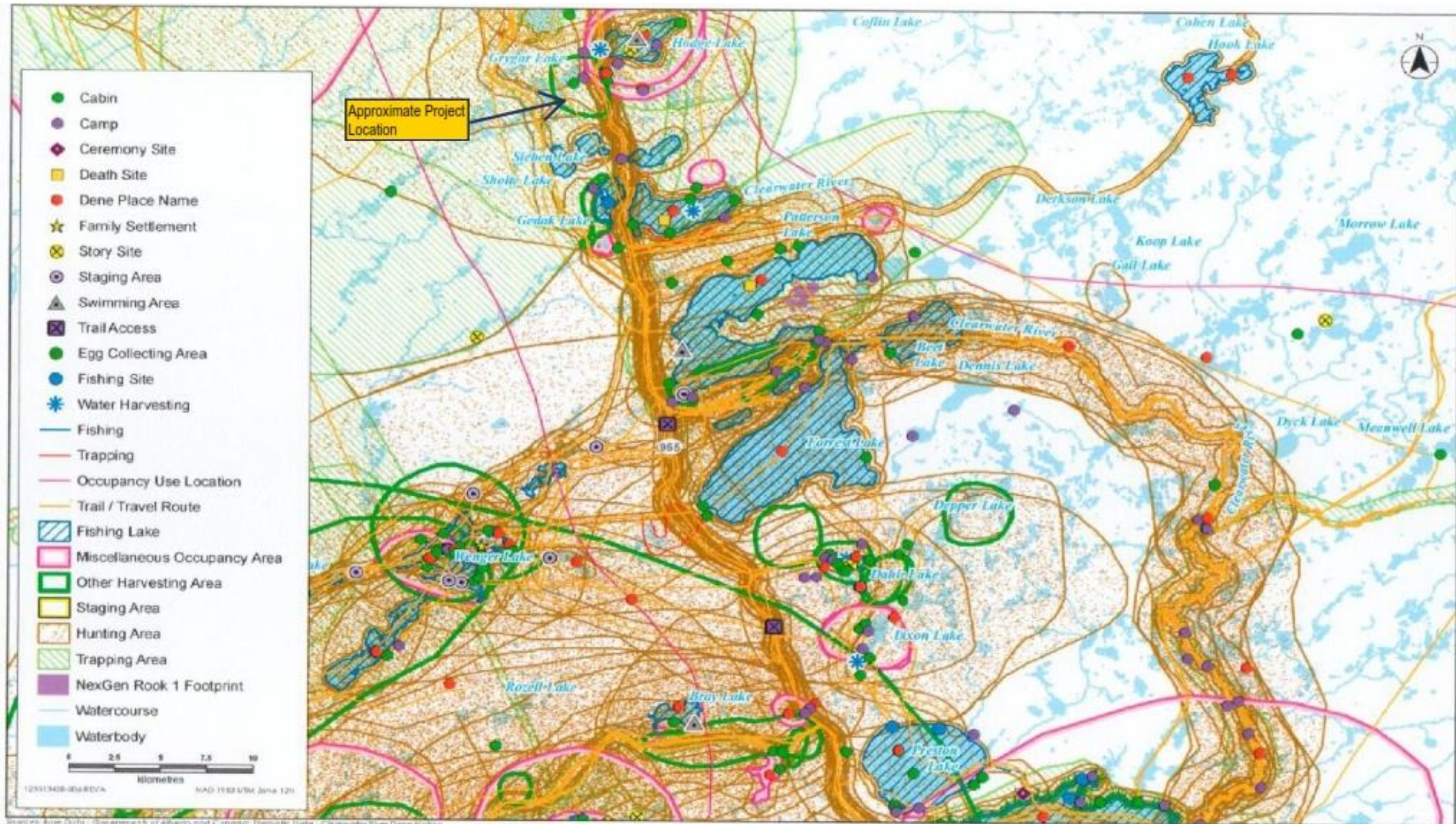


Figure 4.3 – Surrounding Indigenous Nations in Proximity to the Project



Recorded CRDN Traditional Use and Occupancy Within the Patterson Lake Area (2010 - 2020 Data)

Figure 15