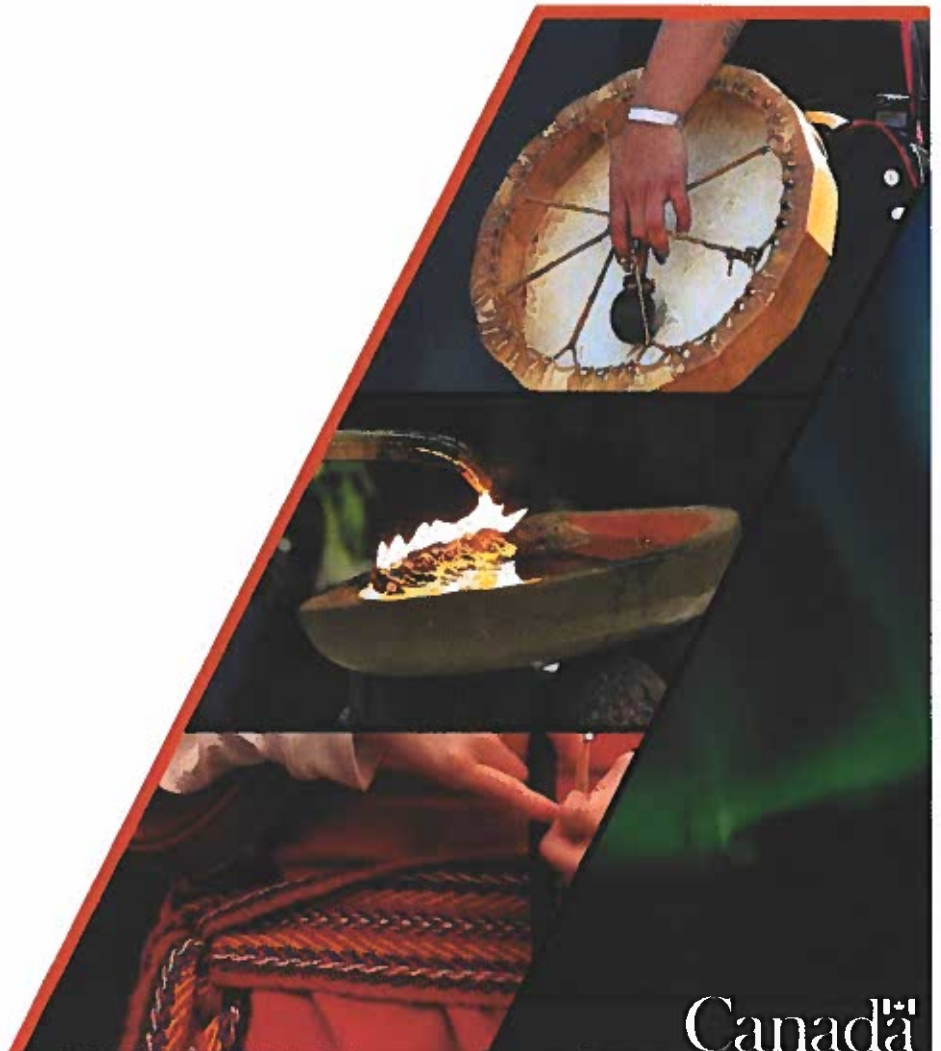




CIRNAC COMMENTS TO NIRB

Re: Notice of Screening for Blue Star Gold Corp.'s
“Hood River Gold Project” Project Proposal



Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

Your file - Votre référence
NIRB file #19EA019
Our file - Notre référence
CIDM #1250130

May 14, 2019

Cory Barker
Technical Advisor I
Nunavut Impact Review Board
PO Box 1360
Cambridge Bay, NU, X0B 0C0
Via electronic mail to: info@nirb.ca

**Re: Notice of Screening for Blue Star Gold Corp.'s "Hood River Gold Project"
Project Proposal**

Dear Mr. Barker,

On April 18, 2019, the Nunavut Impact Review Board (NIRB) invited parties to comment on Blue Star Gold Corp.'s "Hood River Gold Project" project proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) reviewed the project proposal and related documents and offers the responses below as it pertains to the NIRB's request:

Additionally, the Board respectfully requests that the KIA and Crown Indigenous Relations and Northern Affairs Canada (CIRNAC) assist the NIRB by providing an indication of any currently permitted or reasonably foreseeable (i.e. recently submitted to either the KIA or CIRNAC) prospecting, staking or locating a mineral claim projects within close proximity of the project area for this project proposal:

Subsurface mineral rights are issued by the Mining Recorder's Office. The most current display of mineral tenure can be found on the Nunavut Map Viewer at the following link: <https://services.aadnc-aandc.gc.ca/nms-scn/gv/index.html>. Please note that the issuance of a subsurface right does not include surface rights access or the permission to conduct land use activity. For more information please contact the Mining Recorder's Office at 867-975-4275.



Any matter of importance to the Party related to the project proposal:

Fuel:

In the "Hood River Gold Project Spill Response Plan" there are two lists of items to be included in 68L and 220L spill kits. CIRNAC recommends that the any spill kit to be used at fuel transfer or refueling locations include: shovels, pumps, barrels, and drip pans in addition to the items currently listed in the "Hood River Gold Project Spill Response Plan".

Waste:

The project application indicates that the proponent intends to discharge water that may accumulate in secondary containment (potentially after treatment) to the tundra. CIRNAC recommends project specific terms and conditions should the project proceed to ensure any discharge to tundra meets the discharge requirements of the Metal and Diamond Mining Effluent (MDME) Regulations under the Fisheries Act.

Temporary Camp:

In the project application within the "Activities" table it is noted that the temporary camp location is yet to be determined. The temporary camp site location should be selected and operated in such a way to minimize the potential for damage to the land/tundra. CIRNAC recommends the following terms and conditions to be included in the Screening Decision Report, should the project proceed:

- Temporary camps should be located on gravel, sand, or other durable land,
- A riparian protection zone should be established around waterbodies and there should be no mechanized clearing carried out adjacent to any watercourse,
- Land use area should be clean and tidy at all times,
- Erosion and sediment control measures on disturbed areas should be implemented to avoid sediment from entering the water body,
- The environmental footprint of the should be minimized, and
- Upon abandonment and at the end of each field season all garbage, fuel, equipment should be cleaned-up, removed and all lands restored.

Cumulative Effects:

In the project application the Proponent has indicated "none" in the discussion section for cumulative effects, no further rationale was provided. Within the "Identification of Environmental Impacts Matrix", there are negative and non-mitigatable impacts

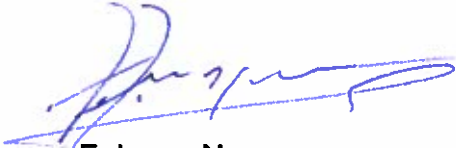


identified for many of the physical and biological aspects associated with the project. In the "Hood River Gold Project Effects Assessment" document valued components associated with the project are evaluated showing effects, proposed mitigation measures, and analysis of residual impacts.

CIRNAC recommends the proponent review these sections and revisit the cumulative effects analysis in such a way that cumulative effects discussion, identification of negative and non-mitigatable impacts vs. negative and mitigatable in the project application, and the "Hood River Gold Project Effects Assessment" document are consistent. Discussion would be useful to assist with understanding why an impact is identified as negative and non-mitigatable in the matrix and yet listed as negative and mitigatable with proposed mitigation measures in the "Hood River Gold Project Effects Assessment" document.

CIRNAC appreciates the opportunity to provide comments and looks forward to working with the NIRB and the Proponent, as necessary, throughout any further review of this project. If you have any questions, please contact Krista Pooley at (867) 975-4741, or by e-mail at krista.pooley@canada.ca.

Sincerely,



Felexce Ngwa
Manager, Impact Assessment

