

Table 1. Blue Star Gold Corp.’s response to Party Comments received on application 19EA019

ID #	Subject	Party Concern	Party Recommendation	Proponent Response
CIRNAC1	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".	Agreed. Blue Star will update the <i>Spill Response Plan</i> to reflect this.
CIRNAC2	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.	The Hood River Gold Project is not considered a metal mine under the <i>MDME Regulations</i> , so the discharge requirements of the <i>Regulations</i> do not apply to the Hood River Project. Further, Blue Star looks forward to addressing effluent discharge limits during the upcoming water licence renewal and amendment process with the Nunavut Water Board.
CIRNAC3	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 o Screening Decision Report, should the project proceed: <ul style="list-style-type: none">• Temporary camps should be located on gravel, sand, or other durable land,	Blue Star agrees with these proposed terms.

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			<ul style="list-style-type: none">• 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.	
CIRNAC4	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	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	<p>When filling out the application online, various predicted effects were identified by Blue Star as Negative and Mitigable. This assessment generally aligns with that provide in the supporting document titled <i>Hood River Gold Project: Effects Assessment</i>.</p> <p>Following submission of the application online, the NIRB system generates a pdf file that includes all information provided in the application. It appears that somehow there is</p>

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		<p>Gold Project Effects Assessment" document valued components associated with the project are evaluated showing effects, proposed mitigation measures, and analysis of residual impacts.</p>	<p>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.</p>	<p>a conversion error that changes Negative Mitigable Effects submitted in the application to Negative Non-Mitigable Effects as presented in the publicly available application document. This issue and accompanying evidence have been brought to the NIRB’s attention and the NIRB has confirmed that the issued will be remedied as soon as possible.</p> <p>Regarding cumulative effects: as all potential effects, are considered to be either negative and mitigable, or positive, Blue Star considers there to be no residual effects to be carried forward into a cumulative effects assessment.</p> <p>Further, it is understood that effects such as those to wildlife including loss of habitat, sensory disturbance, habituation or attraction, and unintentional interactions may occur through execution of project activities or in combination with other activities that may have a spatial or temporal overlap with the project, such as non-project overflights or traditional land use. However, given the robust mitigation measures proposed and the temporary seasonal nature of the project activities, any cumulative effects that may arise are considered immeasurable and small, intermittent and short term.</p> <p>Further, parties are reminded that in their communication issued on April 23, 2019, the NIRB provide a notice of screening; accordingly, the Proponent feels that the level of assessment provide with the application and herein appropriate for screening.</p>
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DFO1	Public Concern	Whether the project proposal is likely to arouse significant public concern; and if so, why;	DFO-FPP is not aware of any significant public concern at this stage of review.	-
DFO2	Adverse eco-systemic or socio-economic effects	Whether the project proposal is likely to cause significant adverse eco-systemic or socio-economic effects; and if so, why;	DFO-FPP requires additional information to assess the Proponent’s application pursuant to its mandate to maintain the on-going productivity of commercial, recreational, and Aboriginal fisheries.	-
DFO3	Adverse impacts on wildlife habitat or Inuit harvest activities	Whether the project proposal is likely to cause significant adverse impacts on wildlife habitat or Inuit harvest activities; if so, why	DFO-FPP has reviewed the Proponent’s application pursuant to its mandate to determine whether it is likely to result in serious harm to fish which is prohibited under subsection 35(1) of the Fisheries Act unless authorized. The proposal includes water withdrawal for domestic and industrial use. Specific information regarding the location and volume of the lakes is required to properly assess potential impacts to fish and fish habitat.	Once a camp location is selected, Blue Star will estimate the volume of the domestic water supply to ensure that domestic water withdrawal remains below 10% of available capacity, which is considered to be protective of fish and fish habitat. As industrial water use for the project has already been screened and is currently permitted, Blue Star feels that new, additional studies for an existing permitted use is not necessary.
DFO4	Predictability and mitigability of effects	Whether the project proposal is of a type where the potential adverse effects are highly predictable and mitigable with known technology, (please provide any recommended mitigation measures)	The Proponent has indicated that the intake structure will be screened. Please refer to the Department of Fisheries and Ocean’s ‘Freshwater Intake End-of-Pipe Fish Screen Guideline’ for further mitigation measures for intake structures	Noted.

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DFO5	Any matter	Any matter of importance to the Party related to the project proposal.	It is your Duty to Notify DFO-FPP if you have caused, or are about to cause, serious harm to fish that are part of or support a commercial, recreational or Aboriginal fishery. Such notifications should be directed to http://www.dfo-mpo.gc.ca/pnw-ppe/violationinfraction/index-eng.html .	Noted.
ECCC1	Mitigation Monitoring and No Activity Buffers for Birds and Bird Nests	<p>On Page 16 of the Wildlife Protection Plan, the Proponent states that if active nests are encountered, they will do the following:</p> <ul style="list-style-type: none">• Cease activities in the vicinity immediately to ensure that the nest is not disturbed.• Establish a No Activity Buffer as outlined in Table 3.• Ensure the No Activity Buffers is maintained until the Wildlife Monitor confirms the nest is no longer in use (for raptors), or until the end of the breeding season or until the young have fledged (all other active bird nests).• Record nest coordinates. <p>It is unclear if the “No Activity Buffers” outlined in Table 3 of the Wildlife Protection Plan will be adaptively managed. ECCC notes that</p>	ECCC recommends that the Proponent clarify if the “No Activity Buffers” will be adaptively managed on a case-by-case basis based on the distance at which nesting birds react to human disturbance.	<p>Should an active nest be encountered, Project personnel may consult with Registered Professional Biologists for specific guidance based on the species and behaviours observed.</p> <p>Blue Star will revise the <i>Wildlife Protection Plan</i> to reflect this adaptive management.</p>

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		appropriate setback distances are determined on a case-by-case basis based on the distance at which nesting birds react to human disturbance.		
	Incineration of Sewage	<p>The Waste Management Plan and the Project Application states that sewage from Pacto toilets will be backhauled, discharged to a sump or incinerated. If incinerated, the ash will be backhauled for disposal offsite.</p> <p>Incineration of sewage is discouraged unless the incinerator is specifically designed to handle this waste and the manufacturer's operating instructions are strictly followed to achieve appropriate combustion. It is unclear from the Waste Management Plan if the incinerator that will be used is specifically designed to handle the incineration of sewage.</p>	<p>ECCC recommends that the Proponent clarify if the incineration equipment chosen is specifically designed to handle sewage.</p> <p>Should the Proponent require additional information ECCC has developed a technical document for batch waste incineration that is available at the following link: www.ec.gc.ca/gdd-mw/default.asp?lang=En&n=F53EDE13-1.</p>	<p>An incinerator has not yet been procured. Blue Star commits to procuring an incinerator suitable for handling sewage.</p>
GN1	Cumulative Impacts on Caribou Range Project Activities Environmental Assessment and Mitigation	<p><u>1-Cumulative Impacts on Caribou Ranges:</u> The proposed Project area is located within the annual ranges of Dolphin-Union and Bathurst caribou herds and the Project activities may affect caribou migration. The Project area is also adjacent to the Bathurst caribou herd calving area and within the Bathurst caribou herd post-calving area (see figure 1). The potential impacts of the Project activities may affect these areas</p>	<p>The GN suggests that missing information is necessary for the Board to conduct its screening. Accordingly, the GN asks that the NIRB exercise its power pursuant to s. 144(1), and direct the Proponent to provide the information described below:</p>	<p><u>Regarding Geophysical Surveys:</u> Ground-based geophysical surveys typically involve a small crew walking overland in specified pattern, carrying backpack equipment. Airborne geophysical surveys may involve low level flights with a rotary or fixed wing aircraft or a drone, traversing a specific pattern. Geophysical surveys are a standard, conventional mineral exploration technique.</p> <p>Potential effects of geophysical surveys are consistent with other aspects of the exploration program that involve air travel and overland travel, being displacement from or</p>

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	<p>and cause caribou disturbance during calving and post-calving.</p> <p>The proposed Project, together with other existing and approved Projects in the area (e.g. Tibbit road, Sabina road, Lupin Winter Access road), may cause cumulative effects on Dolphin-Union and Bathurst caribou herd’s habitat quality and abundance. The cumulative effects may also affect other wildlife and vegetation. The proposed exploration activities are scheduled for May – October, potentially beginning as early as March. The Project’s schedule overlaps with the Bathurst caribou herd calving and postcalving, which occurs throughout June. The Project proposal does not reflect potential impacts on Bathurst caribou herd calving and post-calving areas and does not provide an assessment of the cumulative effects on caribou herds in the area. In particular the Project application indicates no cumulative effects without providing any substantiation.</p> <p>It is not clear if and how the Proponent used IQ data to identify seasonal caribou areas.</p> <p><u>2-Project Activities:</u> The exploration surveys and associated activities may disturb wildlife by converting/degrading terrestrial habitat as indicated but not limited to:</p>	<p><u>1.</u> A complete Project description with necessary details related to the proposed geophysics surveys;</p> <p><u>2.</u> The Project’s Zone of influence;</p> <p><u>3.</u> An assessment of potential cumulative effects;</p> <p><u>4.</u> Revision of the Wildlife Protection Plan that includes the detailed description of proposed mitigation measures and a monitoring program to ensure proposed mitigation is effective.</p> <p>The GN further recommends that the Proponent co-ordinate the development of the environmental information with the Government of Nunavut’s regional biologist and local wildlife conservation officers in dealing with their mitigation measures and response measures.</p>	<p>avoidance of habitat, and unintentional interactions or disturbances.</p> <p>The nature of the activities and the equipment involved, the mitigation measures described elsewhere in the application (i.e. <i>Wildlife Protection Plan</i>), and the terms and conditions typically imposed by the NIRB pertaining to flying heights, activity timing, and overland travel, are considered by Blue Star to be suitable to mitigate adverse environmental effects associated with this activity.</p> <p>Further, geophysical surveys are an existing component of the existing currently authorized exploration project, screened by the NIRB under 14EN033.</p> <p><u>Regarding Zone of Influence:</u> In their communication issued on April 23, 2019, the NIRB provide a notice of screening; accordingly, the Proponent feels that the level of assessment provided with the application and herein appropriate for screening and that a discussion of a zone of influence is not required.</p> <p><u>Regarding Cumulative Effects.:</u> Refer to Blue Star’s response to CIRNAC4.</p> <p>Further, regarding existing and planned projects in the area: the Tibbitt to Contwoyto Winter Road (including the portion of the road route used for Lupin winter access) and Sabina’s road for the Back River project have no spatial or temporal overlap with the Hood River Gold Project. Other existing or planned project s in the area include the adjacent Ulu mine and the</p>
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		<ul style="list-style-type: none">• Low altitude flights, take offs, and landings during geophysical surveys and logistics operations;• Generation of noise from drilling;• Generation of overpressure and vibration from blasting (e.g. seismic exploration);• Construction and operation of a seasonal camp;• Waste and chemicals management;• Spill prevention and management. <p>The description of Project activities in the Public Notice of screening includes airborne and ground-based geophysical surveys but no geophysical surveys are mentioned in the Project description. The Project Application states that:</p> <p>“Geophysical and other airborne surveys may be undertaken in the future if needed.” (NIRB Application for Screening #125461).</p> <p>No details on potential environmental impacts of these surveys were provided in the application. The Project description should include a consistent description of all planned activities, provide for an assessment of impacts,</p>		<p>proposed Grays Bay Road: the Ulu mine is undergoing progressive reclamation currently with no exploration planned or underway at this time and so activities on site are expected to be to be quite limited; the regulatory review of the Grays Bay Road project has been placed on hold, and so at this point in time is considered not to be a reasonably foreseeable project.</p> <p>Finally, Blue Star acknowledges and understands that the Hood River Gold Project occurs in an area that may be used by Dolphin and Union caribou as well as Bathurst caribou. Accordingly, given the socio-ecological import of caribou to Nunavummiut and the Arctic ecosystem, Blue Star has undertaken to draft a robust, comprehensive <i>Wildlife Protection Plan</i> to specifically outline measures to mitigate effects to wildlife, replacing the existing, much less thorough yet approved <i>Wildlife Mitigation and Monitoring Plan</i> (WPC Resources 2014).</p> <p>Blue Star also wishes to remind parties that the Hood River Gold Project is an existing project. Exploration and camp use has occurred on the property in the past, and exploration is currently authorized to be undertaken. The purpose of the application before parties is to amend the existing water licence to include domestic water use and to site a temporary seasonal camp.</p> <p><u>Regarding the Wildlife Protection Plan:</u> The <i>Wildlife Protection Plan</i> already addresses camp siting in relation to sensitive habitats (including calving and core calving areas); refer to</p>
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	<p>and propose an adequate mitigation to address any adverse environmental effects.</p> <p><u>3- Environmental Assessment and Mitigation:</u> The Project proposal lacks information related to the environmental impacts and mitigation measures. The effects assessment table indicates that the residual impacts on wildlife are not predicted after implementation of the Wildlife Protection Program (Effects Assessment, 2019). The Environment and Heritage Resources Protection Plan (2019) does not discuss impacts on wildlife. The Wildlife Protection Plan (2019) mentions indirect habitat loss and disruption of movement as the interaction pathways but only the risk of direct and indirect mortality is discussed and assessed. No assessment of habitat loss and disruption of movement is provided in the Wildlife Protection Plan (2019) and other Project application documents. A cumulative effects assessment should be conducted for caribou, including all existing and planned Projects in the area.</p> <p>The Proponent shall not construct a camp within calving and post-calving areas.</p> <p>The proposed mitigation of Project effects on caribou is not consistent. The Wildlife Protection Plan (2019) states:</p>		<p>section 5.1. Accordingly, Blue Star does not see the need to revise the <i>Wildlife Protection Plan</i> in this instance.</p> <p>The <i>Wildlife Protection Plan</i> addresses flying heights as follows:</p> <ul style="list-style-type: none">• Section 5.5 Pilots avoid wildlife by 300 m;• Table 4<ul style="list-style-type: none">○ Aircraft will avoid caribou during calving and post calving by 610 m (June 5-July 31);○ Aircraft will avoid caribou during all other seasons by 300 m (June 5-July 31). <p>Blue Star acknowledges that Section 5.5 could be revised for clarity and proposes to revise the Plan as follows: “<i>If wildlife are observed, pilots will avoid wildlife by 300 m, or as otherwise presented in Table 5, ...</i>” Blue Star wishes to highlight that the flying height restrictions related to caribou proposed in the <i>Wildlife Protection Plan</i> are more stringent (610 m) than those requested by the GN (600 m).</p> <p>Blue Star is not aware of any mineral licks identified in Nunavut. Accordingly, Blue Star does not see the need to revise the <i>Wildlife Protection Plan</i> in this instance.</p> <p>The GN’s request that “<i>Flights over areas where caribou have been seen in the past...should be avoided</i>” is impractical and ineffective in mitigating effects to caribou. Accordingly, Blue Star does not see the need to revise the <i>Wildlife Protection Plan</i> in this instance.</p>
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		<p>“If wildlife are observed, pilots will avoid wildlife by 300 m, except where low elevation surveys are required, during take-off and landing, and at pilot’s safety discretion.” (Wildlife Protection Plan (2019); Section 5.5).</p> <p>Typically the required altitude for flights where caribou are present is 600 m during calving and post calving, and 300 m for other times of the year (EDI, 2008). Flights over areas where caribou have been seen in the past and core calving areas should be avoided. Mineral licks shall be avoided by 1 km during the spring time. Although similar avoidance measures mentioned in the Wildlife Protection Plan (2019); Table 4, there has to be a clear statement that no low altitude aerial surveys shall be allowed if caribou are present in the area.</p> <p>The Wildlife Protection Plan (2019) states that it includes mitigation measures that align with the concept of the mobile caribou conservation measures developed for the Kivalliq Region but no detailed comparison is provided and no mechanism is proposed to assess their effectiveness (Poole and Gunn, 2015).</p>		<p>Section 6.5.2 outlines minimum measures to be implemented during caribou calving season, including activity suspension and grounding helicopters. Accordingly, Blue Star does not see the need to revise the <i>Wildlife Protection Plan</i> to address avoiding flights over calving areas.</p> <p>Blue Star does not believe that a screening assessment for an existing exploration program in the Kitikmeot Region is the appropriate venue for assessing the effectiveness of measures developed for the Kivalliq Region. Accordingly, Blue Star does not see the need to revise the <i>Wildlife Protection Plan</i> in this instance.</p> <p><u>Regarding Coordination with the GN:</u> Prior to submitting the application to the NIRB, Blue Star met with the GN in person in Vancouver, Kugluktuk and Iqaluit. The local conservation officer was in attendance during the two meetings that Blue Star had with the HTO in Kugluktuk. On March 13, 2019, Blue Star reached out to the GN, advising of their upcoming trip to Kugluktuk and requesting a meeting to discuss the project. The GN advised that they would attend the public meeting instead of meeting privately, and that the only comment they had was pertaining to inclusion of Bathurst calving grounds on maps used for public consultation. The GN did not end up participating in the public meeting. Further, prior to commencement of the public review of Blue Star’s application, Blue Star offered to make application documents, including the <i>Wildlife Protection Plan</i>, available to the GN to allow for</p>
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				<p>extra time for review and discussion. The GN did not respond to this offer.</p> <p>Blue Star views this pre-application engagement effort to be extensive, and also sees the public review process administered by the NIRB to be a suitable opportunity for the GN to provide input into the development of mitigation and response measures.</p>
	Archaeological Considerations	<p>Blue Star Gold Corporation is proposing to conduct exploration related activities in the Hood River Property in the Kitikmeot region, approximately 200 kilometers southeast from Kugluktuk.</p> <p>The project is proposed to take place from June 2019 to June 2024 and will include: establishing of a temporary seasonal base camp to accommodate 60 personnel; conduct prospecting and ground-based geophysical surveys; conduct on-land drilling exploration activities; use of existing airstrip.</p>	<p>The proponent's archaeologist has already filed a Class 2 permit application to conduct the archaeological assessment of the different components associated with the proposed exploration activities in the Hood River Property.</p> <p>The Department of Culture and Heritage recommends that the applicant should avoid conducting activities in the vicinity (50 m buffer zone) of archaeological/historical sites. If archaeological sites or features are encountered, activities should immediately be interrupted and moved away from this location. Each site encountered needs to be recorded and reported to our office.</p> <p>All archaeological and palaeontological sites in Nunavut are protected under the</p>	

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			<p>Nunavut Act. The Proponent must understand that it is their responsibility to ensure that no heritage resource sites are disturbed in the course of their activities. No person shall alter, or otherwise disturb an archaeological site, or remove any artifact from an archaeological site without the proper authorizations. Moreover, the building of inuksuit is not recommended.</p>	
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