

Table 1. Blue Star Gold Corp.'s response to party comments received in relation to 20EN001, Ulu Gold Project (March 2020).

ID #	Subject	Party Concern	Party Recommendation	Proponent Response
CIRNAC-1	Community Engagement	Proponent has not provided a written summary of community engagement initiatives	<p>CIRNAC recommends that the Proponent provide a brief summary of its discussions about Ulu Gold Project activities, undertaken in Kugluktuk, Cambridge Bay, or with Omingmaktok Hunters' and Trappers' Organizations, residents of Kugluktuk and other operators in the region, as well as with various local and regional service providers and operators.</p> <p>CIRNAC recommends that the Proponent consider how it will involve the communities of Cambridge Bay and Kugluktuk in the Project. The following points should be explored:</p> <ul style="list-style-type: none"> • Incorporation of Inuit knowledge and Inuit Qaujimagatuqangit in the Project design; • Briefing community members on planned activities; • Briefing community members on monitoring results; • Training and economic opportunities for community members. 	<p>A summary of engagements undertaken to date is attached.</p> <p>Blue Star has undertaken a number of engagements over the course of the year on matters relating to both specific aspects of its operation in Nunavut as well as general aspects relating to its current and future planned activities in the region.</p> <p>As the acquisition of the Ulu project did not conclude until January 2020, Blue Star was unable to formally engage with the public on specific aspects of the Ulu project until after this time. Since the acquisition of Ulu, Blue Star has met with the KIA in person several times and has dialogued with stakeholders over email and phone. Public meetings in Kugluktuk and Cambridge Bay are planned for mid-March 2020.</p>
CIRNAC-2	Spill Response	In Section 1.4 of the Spill Response Plan, the Proponent indicates that, should any updates be needed, updated documents will be provided to the Nunavut Water Board.	CIRNAC recommends that any updated documents should also be provided to the Nunavut Impact Review Board.	Blue Star agrees to provide copies of plans approved by the NWB to the NIRB.
CIRNAC-3	Spill Response	<p>In Section 5.2 Spill Reporting of the Spill Response Plan, the Proponent indicates that, in the event of a reportable spill event, the following parties will be notified:</p> <ul style="list-style-type: none"> • Blue Star Project Manager; • NT-NU 24hour Spill Report Line; • Kitikmeot Inuit Association; 	CIRNAC recommends that the Proponent remove the CIRNAC Inspector from the reportable spill event contact list. After the Proponent contacts the NT-NU 24-hour Spill Report Line, the NT-NU 24-Hour Spill Report Line will contact the CIRNAC Inspector.	Part E Item 7b of the existing water licence 2BM-ULU1520 specifically requires that the Inspector be notified in the event of an unauthorized discharge of waste. It is inappropriate to forgo this notification and remove this requirement from the <i>Spill Response Plan</i> .

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		<ul style="list-style-type: none"> CIRNAC Inspector. 		
CIRNAC-4	Management Plans	<p>In the Project Description, the Proponent indicates: <i>"Potential environment effects and suitable mitigation measures have been considered and are presented below in Table 1. Existing management plans acquired through the property transfer are being reviewed, and where necessary, new plans are being drafted and will be made available to parties for review and comment during the NIRB screening process and during water licencing, as required."</i> (Page 4, Project Description, Ulu Project Proposal January 2020)</p> <p>CIRNAC notes that if any management plans are to be redrafted and made available later in the screening process, CIRNAC and other Intervenor may not have the chance to review the redrafted material by the end of the screening period.</p> <p>In the Project Application form, Section A1: Project Info, and Section C1: Pits, CIRNAC notes that the Proponent proposes to provide the Quarry Management Plan and the Winter Trail Management Plan only if deemed necessary.</p> <p>CIRNAC also notes that, in the NIRB Application document, sections titled Section B7: Waste Rock, Section B8: Stockpiles, Section B10: Geology Section, Section F1: Site Cleanup, and the section titled Miscellaneous Project Information, the Proponent proposes to provide the following documents during the Nunavut Water Board</p>	<p>If these documents are not provided to the NIRB for the screening process, CIRNAC notes that the plans will not be reviewed for the screening regulatory process. Therefore CIRNAC recommends that the Proponent provide these plans for review during the NIRB screening process.</p>	<p>The Ulu project is an existing project with a suite of existing approved management plans, including an <i>Interim Closure and Reclamation Plan</i>, an <i>Interim Water Management Plan</i> and a <i>Waste Management Plan</i>. Routine review and update of these plans is a condition of the water licence and occurs as a component of the water licence annual reporting. Amendment of licenced water and waste management activities occurs either through a modification process or a license amendment process, which are public processes, the latter of which allows for party review and comment of materials. CIRNAC is invited and expected to participate in the subsequent renewal and amendment process pertaining to 2BM-ULU1520.</p> <p>Further, provisions for providing management plans at a time in the future, prior to commencing specific activities, already exist in the licence, such as Part D Item 12:</p> <p><i>"The Licensee shall, within sixty (60) days following notification to the Board of its decision to resume on-site operations in accordance with Part H, item 1, submit to the Board for approval in writing a Waste Rock and Ore Storage Plan to address the management of all drainage from permanent and temporary ore and Waste Rock storage areas."</i></p> <p>Accordingly, Blue Star wishes to retain the ability to provide future Plans for Board and public review, in advance of implementation.</p>

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		<p>processes in renewal and amendment of the existing water licence:</p> <ul style="list-style-type: none">• Revised Interim Closure and Reclamation Plan;• Revised Interim Water Management Plan;• Revised Waste Management Plan;• Contaminated Soil Excavation and Soil Treatment Facility management Plan;• Landfill Operations and Maintenance Manual; and,• Waste Rock and Ore Management Plan. <p>Further, CIRNAC also notes that Table 1 in the Environment Heritage Resource Management Protection Plan lists that both the Waste Management Plan and the Interim Closure and Reclamation Plan are listed with the publish year 2020 by Blue Star Gold Corp. Neither of these plans are present in the documents supplied to the NIRB for the screening of the Ulu Project Proposal.</p> <p>The Interim Closure and Reclamation Plan by Blue Star in 2020 is also referenced in sections 3.1 Ground Stability, 3.4 Water Quality, 3.5 Sediment and Soil Quality, 4.1 Vegetation, and 4.2 Aquatic Life of the Environment Heritage Resource Management Protection Plan.</p>		
DFO-1	Public Concern	Whether the project proposal is likely to arouse significant public concern; and if so, why;	DFO-FFHPP is not aware of any significant public concern at this stage of review.	Noted.
DFO-2	Adverse eco-systemic or	Whether the project proposal is likely to cause	DFO-FFHPP has reviewed the Proponent's application pursuant to its mandate to determine whether it is likely to	Noted.

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	socio-economic effects	significant adverse eco-systemic or socio-economic effects; and if so, why;	cause the death of fish by means other than fishing and the harmful alteration, disruption or destruction of fish habitat. DFO-FFHPP has no concerns with the Project as proposed.	
DFO-3	Adverse impacts on wildlife habitat or Inuit harvest activities	Adverse impacts on wildlife habitat or Inuit harvest activities	DFO-FFHPP has reviewed the Proponent's application pursuant to its mandate to determine whether it is likely to result in the death of fish by means other than fishing and the harmful alteration, disruption or destruction of fish habitat which are prohibited under subsections 34.4(1) and 35(1) of the Fisheries Act unless authorized. Specific information regarding the location and volume of the watercourse for camp water usage and mineral exploration are required to properly assess potential impacts to fish and fish habitat.	Once a new camp location, and drill targets are selected, Blue Star will estimate the volume of the domestic and industrial water supplies to ensure that water withdrawal remains below 10% of available capacity, which is considered to be protective of fish and fish habitat.
DFO-4	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 Fisheries and Oceans Canada 'Interim code of practice: End-of-pipe protection screens for small water intakes in freshwater' for further mitigation measures for intake structures (http://www.dfo-mpo.gc.ca/pnw-ppe/codes/screen-ecran-eng.html).	Noted.
DFO-5	Any matter	Any matter of importance to the Party related to the project proposal.	It is your Duty to Notify DFO-FFHPP if you have caused, or are about to cause, the death of fish by means other than fishing and/or the harmful alteration, disruption or destruction of fish habitat. Such notifications should be directed to http://www.dfo-mpo.gc.ca/pnw-ppe/contact-eng.html .	Noted.
GN-1	Terrestrial Wildlife Cumulative Effects	The Project proposal contains insufficient information pertaining to wildlife management and mitigation which impedes the GN's accurate review of the Project's potential environmental effects. The GN has identified 3 issues where the Project proposal is lacking in information concerning potential adverse impacts on wildlife habitat:	The GN submits this missing information is necessary for the Board to conduct its screening. Accordingly, pursuant to <i>s. 144(1) of NuPPAA</i> , the GN recommends the NIRB request of the Proponent to provide additional information described below: <ol style="list-style-type: none"> 1. A complete Project description with necessary details related to the proposed geophysics surveys; 2. The Project's Zone of Influence (ZOI); 	Blue Star acknowledges and seeks to understand, to the best of its ability, the socio-ecologic import of caribou to Nunavummiut and intends to plan and execute its work in a way that minimizes negative effects to caribou, specifically the imperiled Bathurst herd. The Ulu Gold Project is an existing project. Exploration and camp use has occurred on the property in the past and is

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		<p>1. <u>Cumulative Impacts on Caribou Ranges</u>: The Project proposal indicates no cumulative effects without substantiation. The proposed Project area is located within the annual ranges of Bathurst and Dolphin-Union caribou herds. As such, Project activities may affect caribou spring migration and calving. The Project area is also in proximity (1-11 km) of the calving area, post-calving areas and within the historic calving area of the Bathurst herd (Figures 1 and 2). The potential impacts of the Project activities may affect these areas and cause disturbance during caribou calving, post-calving, and migration. The proposed Project, combined with other existing and approved Projects in the area (e.g. Hood River Project, Tibbit to Contwoyto Winter Road, Sabina Winter Ice Road, and Lupin Winter Access road), may cause cumulative effects on Dolphin-Union and Bathurst caribou herd abundance and habitat quality. Such cumulative effects may also impact 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 post-calving periods, which occur around June 2 to June 28, inclusive. The Project proposal does not reflect potential impacts on Bathurst caribou herd calving and post-calving areas and does not provide an assessment of potential cumulative effects on caribou herds in the area. It is also unclear if and how the Proponent used Inuit</p>	<p>3. An assessment of potential cumulative effects; 4. Revision of the Wildlife Protection Plan that includes the detailed description of proposed mitigation measures and a monitoring program.</p> <p>With this information and a revised Wildlife Protection Plan, the NIRB and other intervenors can accurately and fulsomely determine whether potential Project effects and mitigation measures are sufficient to effectively reduce Project-induced ecosystemic impacts.</p> <p>Further, the GN recommends the NIRB consider the location of the proposed new camp infrastructure, fuel storage facilities, and exploration activities be limited to areas well outside the seasonal ranges and migration corridors of the Bathurst caribou herd.</p>	<p>currently ongoing. The purpose of the application before parties is to amend the existing water licence.</p> <p>The mitigation measures proposed by Blue Star in its <i>Wildlife Protection Plan</i> are the same as those that were submitted to the NIRB during the review of its adjacent Hood River property in 2019. The mineral tenure for the Hood River property extends further to the south and east of Ulu, to an area geographically closer to Bathurst Caribou habitat, while the study areas, being the Hood River watershed directly overlap. Accordingly, adopting the same mitigation measures for Ulu as for Hood River is considered to be protective, conservative and consistent.</p> <p>The employment of mobile mitigation measures is supported by the HTOs with which Blue Star consulted, as well as the KIA, and is considered to be suitably responsive to changes occurring on the landscape.</p> <p><u>Regarding geophysics 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 avoidance of habitat, and unintentional interactions or disturbances.</p>

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		<p>Qaujimajatuqangit to identify seasonal caribou areas.</p> <p>2. <u>Project Activities</u>: The exploration surveys and associated activities may disturb wildlife by converting/degrading terrestrial habitat as indicated but not limited to:</p> <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; and • Spill prevention and management. <p>The description of Project activities in the NIRB Public Notice of Screening includes airborne and ground-based geophysical surveys but no geophysical surveys are mentioned in the Project description. However, the Project proposal states: <i>"Geophysical and other airborne surveys may be undertaken in the future if needed."</i> (NIRB Application for Screening #125502)</p> <p>Details of potential environmental effects of these surveys provided in the proposal are lacking. Project descriptions should include consistent descriptions of all planned activities, provide detailed assessments of impacts, and proposed adequate mitigation measures to address potential adverse environmental effects.</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><u>Regarding Zone of Influence</u>: The level of assessment provided with the application and herein is appropriate for screening. A discussion of a zone of influence is not required and is typically discussed in the context of a full environmental assessment.</p> <p><u>Regarding Cumulative Effects</u>: Blue Star has conducted a cumulative effects assessment that it considers adequate for the scope of the project, and sufficient for a screening level assessment, as has been undertaken by the NIRB.</p> <p>As potential effects are considered to be mitigable, Blue Star considers there to be no residual effects to be carried forward into a cumulative effects assessment.</p> <p>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 interaction with 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 rise are considered small, unquantifiable within the range of wildlife of concern, intermittent and short term.</p>

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		<p>3.Environmental Impacts and Mitigation: The Project proposal lacks information related to environmental impacts and mitigation measures. The effects assessment table indicates that residual impacts on wildlife are not predicted after implementation of the Wildlife Protection Program (Effects Assessment, 2020). <i>The Environment and Heritage Resources Protection Plan</i> (2020) does not discuss impacts on wildlife.</p> <p>The <i>Wildlife Protection Plan</i> (2020) mentions indirect habitat loss and disruption of movement as 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 <i>Wildlife Protection Plan</i> (2020) or other Project proposal documents. A cumulative effects assessment is recommended to be conducted for caribou that included all existing and planned Projects in the area.</p> <p>The <i>Wildlife Protection Plan</i> (2020) states: “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 (2020); Section 5.5).</p> <p>The recommended altitude for flights where caribou may be present is 600 metres during calving and post calving, and 300 metres for other times of the year (EDI, 2008). Flights over areas where caribou have been observed and core</p>		<p>Further, regarding existing and planned projects in the area: the Tibbitt to Contwoyto Winter Road (including 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 Ulu Project. Other existing or planned projects in the area include the adjacent Hood River Project and the proposed Grays Bay Road: the Hood River Project has some exploration planned and activities on site are expected. The regulatory review of Grays Bay Road and Port project has been placed on hold.</p> <p>Finally, Blue Star acknowledges and understands that the Ulu Project occurs in an area that may be used by Dolphin and Union (Island) and Bathurst (mainland) caribou. Accordingly, given the socio-ecological importance of caribou to Nunavummiut and Arctic ecosystems, Blue Star has drafted a robust, comprehensive <i>Wildlife Protection Plan</i> to specifically outline measures to mitigate effects to wildlife.</p> <p><u>Regarding the <i>Wildlife Protection Plan</i>:</u> the <i>Wildlife Protection Plan</i> already addresses camp siting in relation to sensitive habitats (including calving and core calving areas); refer to 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 300m;• Table 4<ul style="list-style-type: none">○ Aircraft will avoid caribou during calving and post calving by 610m (June 5–July 31);○ Aircraft will avoid caribou during all other seasons by 300m (August 1– June 4).

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		<p>calving areas should be avoided. Mineral licks should be avoided by 1 kilometre during spring. Although similar avoidance measures are mentioned in Table 4 of the <i>Wildlife Protection Plan</i> (2019), there is no clear statement that no low altitude aerial surveys will be permitted if caribou are present in the area.</p> <p>The <i>Wildlife Protection Plan</i> (2020) indicates it includes mitigation measures that align with the concept of mobile caribou conservation measures developed for the Kivalliq Region but, no detailed comparison is provided, and no mechanism is proposed to assess effectiveness of these measures (Poole and Gunn, 2015).</p>		<p>Blue Star will revise Section 5.5 of the Plan as follows: “If wildlife are observed, pilots will avoid wildlife by 300 m, or as otherwise presented in Table 4,...” Blue Star wishes to highlight that the flying height restrictions related to caribou proposed in the Wildlife Protection Plan 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 ineffective in mitigating effects to caribou that regularly move and migrate across the landscape. Accordingly, Blue Star does not see the need to revise the Wildlife Protection Plan in this instance.</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 specifically address avoiding flights over calving areas as this is covered by a suspension of activities.</p> <p>Blue Star does not believe that a screening assessment for an existing project 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>
GN-2	Absence of A Waste Management Plan	The Project proposal contains insufficient information pertaining to waste management which impedes the GN’s accurate review of the Projects’ potential environmental effects.	The GN submits this missing information is necessary for the Board to conduct its screening. Accordingly, pursuant to s. 144(1) of NuPPAA the GN recommends the NIRB requests	The Ulu project is an existing project with a suite of existing approved management plans, including a <i>Waste Management Plan</i> . Routine review and update of these plans is a condition of the water licence and occurs as a component of the water

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		<p>The Proponent has indicated that a substantial portion of proposed Project activities at site relates to cleanup, demolition, and progressive reclamation activities which, generate waste materials. These activities may potentially cause adverse impacts to ecological integrity if waste is not managed in a responsible and diligent manner. The GN would like to note the following four areas of the proposal that are lacking in information:</p> <p>1. Land-farm Operation and Management</p> <p>The Proponent has indicated that contaminated soils on site will be treated through establishing a land-farm. However, information is lacking about the development, use, monitoring, and eventual reclamation of the land-farm. The Proponent has not provided an estimate of the total volume of contaminated soils to be reclaimed, nor the expected lifespan of the land-farm. A section of the proposal concerning operations and management for the land-farm should be fulsomely developed and included in the Waste Management Plan. A Spill Contingency Plan should also be included.</p> <p>2. Landfill Operation and Management</p> <p>The Proponent has not provided sufficient information or impact mitigation plans for the proposed construction, operation, maintenance, and closure/reclamation of the</p>	<p>of the Proponent to provide the following additional information:</p> <ol style="list-style-type: none"> 1. A Land-farm Operations & Management Plan and Land-farm Spill Contingency Plan; 2. Landfill Operations & Management Plan; 3. Waste Incineration Plan; 4. Hazardous Waste Management Plan; and 5. Waste Management Plan that includes the detailed description and proposed management of Project waste, and including the components listed above. <p>The GN recommends the Proponent develop a complete and fulsome Waste Management Plan that includes specific details about the construction, operation, maintenance, monitoring, and closure/reclamation of the proposed waste management facilities. The Proponent should also provide details on the proposed entity/entities providing backhaul shipment, handling, and eventual disposal of hazardous waste at an approved facility.</p> <p>With this new information and Waste Management Plan, the NIRB and other intervenors can fulsomely assess whether potential Project effects and mitigation measures are sufficient to effectively mitigate Project-induced ecosystemic effects.</p> <p>The GN has developed guidelines for waste management for various materials and categories of waste, which are available on the Department of Environment's website. The Proponent may find the <i>Environmental Guideline for the General Management of Hazardous Waste</i> (2010), the <i>Environmental Guideline for the Burning and Incineration of Solid Waste</i> (2010) useful references. The GN recommends</p>	<p>licence annual reporting. Amendment of licenced waste management activities occurs either through a modification process or a license amendment process, which are public processes, the latter of which allows for party review and comment of materials. The GN is in the subsequent renewal and amendment process pertaining to 2BM-ULU1520.</p> <p>At the time of submission, Blue Star is in the process of finalizing its designs for the non-hazardous waste landfill and the soil treatment facility (also know as a landfarm). The management plans include facility design and specific sampling and handling procedures will be provide to the NWB and parties imminently as part of the water licencing amendment process. In the interim, Blue Star can advise the following:</p> <ul style="list-style-type: none"> • A certified waste receiver such as KBL Environmental in Yellowknife will be utilized. • A Qualified Professional acting as the Remediation Manager will be on site at all times during remediation activities to ensure compliant and safe waste segregation, handling, sampling and disposal. • Blue Star is aware of the DOE 's Guidance and considers that in its <i>Waste Management Plan</i>. • The Soil Treatment Facility is an engineered facility, expected to be in operation for 4-5 years depending on environmental conditions and treatment success, and is designed to accommodate the approximately 4,000 m³ of legacy petroleum hydrocarbon contaminated soil believed to be on site. • A standalone <i>Soil Treatment Facility Management Plan</i> is being drafted, including technical supporting documents describing existing contamination, soil sampling procedures and facility design, and will be submitted to the NWB.

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		<p>proposed landfill. The Proponent has indicated that only non-hazardous, non-combustible waste will be placed in the landfill but, a list of type of waste considered acceptable and/or unacceptable for placement within the landfill is not included. This information should be compiled into a section on Landfill operation and management to be included in the Waste Management Plan.</p> <p>3.Incineration of On-Site Waste</p> <p>The Proponent has indicated using open burning of combustible, non- hazardous demolition waste as a means to reduce the volume of waste going to the planned landfill. The Proponent has not provided sufficient detail on the method of open burning. Per the GN's <i>Environmental Guideline for the Burning and Incineration of Solid Waste</i> (2010):</p> <ul style="list-style-type: none">• Open burning and the improper incineration of solid waste can result in environmental, health, and safety hazards from the pollutants found in smoke and exhaust gases and in the bottom ash;• Open burning produces more smoke and pollutants, including dioxins and furans, than an incinerator capable of achieving complete combustion; and• In general, open burning on the ground results in the incomplete combustion of waste and the release of various harmful pollutants to the air which can cause	<p>the Proponent review and apply the guidelines where appropriate.</p>	<ul style="list-style-type: none">• A standalone <i>Landfill Management Plan</i> is being drafted, including the landfill design and related operations and maintenance considerations, , and will be submitted to the NWB.• Waste acceptable for deposit in the landfill includes non-hazardous building demolition waste, non-hazardous equipment and tires, untreated wood waste, decontaminated, non-hazardous steel from demolition of tanks, trailers and sea cans, and decontaminated fabrics such as geomembrane liners and weather-haven camp fabric.• A suitable incinerator will be used predominantly for management of camp waste.• Controlled open burning is planned for use in a limited capacity, where clean combustible waste may be too large for incineration.

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		<p>vegetation or tundra fires through the uncontrolled release of hot sparks and embers, and is actively discouraged by the Government of Nunavut's Department of Environment as a method for disposing of unsegregated or mixed solid waste.</p> <p>The Proponent has indicated that an incinerator is currently used for disposal of camp waste (food and human). To the extent possible, this incinerator should also be used to dispose of other solid waste generated through demolition and cleanup of the old camp and general site reclamation.</p> <p>Details on how the Proponent intends to segregate demolition waste originating from the old camp, determine what is combustible and non- hazardous, and generally manage waste incineration should compiled into a section on Waste Incineration to be included in the Waste Management Plan.</p> <p>4.Hazardous Waste Management</p> <p>The Proponent has described steps pertaining to hazardous waste storage and management within the January 2020 Spill Response Plan. This hazardous waste storage description does not describe appropriate material segregation and does not address how hazardous materials should be safely transported for backhaul to an approved facility. This information should be compiled into a Section on Hazardous Waste</p>		

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		Management to be included in the Waste Management Plan.		
GN-3	Spill Response Capacity Relative to Fuel Storage Capacity	<p>The Proponent has indicated they are in the process of procuring bulk storage (single tank or bladder, up to 100 000 L). It is unclear whether the Proponent has a sufficient Spill Response Plan to address a possible spill equivalent to this volume. It is also unclear if fuel is to be delivered to the site in barrels followed by transfer to bulk storage, or, if bulk transport will be used (e.g. Bulk Aviation Transport Tanks [BATTs] or large tanks hauled over the winter trail).</p> <p>The proposal currently lacks sufficient detail about the Proponent's intended response to a fuel spill related to the capacity of the containers used. Additionally, the proposal lacks sufficient detail about the methods and containers used for fuel transport, storage, and transfer.</p>	<p>The GN recommends the Proponent provide additional detail about the methods and containers used for fuel transport, storage, and transfer. The GN recommends update their January 2020 Ulu Gold Project Spill Response Plan to include this information and verify whether they can adequately respond to a spill involving the failure of its largest container at any point in which the container is holding fuel.</p> <p>The GN further recommends that the proponent develop a Spill Contingency Plan for the land-farm operation or update the existing <i>Ulu Gold Project Spill Response Plan</i> (January 2020) to include a section on spill response for the land-farm. This should include specific reference to how water within the treatment cells (e.g. snowmelt, rainfall) will be tested and treated.</p> <p>A large spill kit (220L) may be adequate for a single barrel of fuel but, may not fully address an incident involving multiple barrels (e.g. during transport) or, the rupture of a fuel bladder or large spill during transfer.</p> <p>The GN recommends the Proponent provide additional detail in its proposed steps for responding to possible spills relating to larger storage containers (e.g. tanks, bladders). Particular attention should be given to spill response during transport. The Proponent notes that heavy equipment at the site can assist with cleanup in the event of a spill. This equipment may be available for use on a spill at the site but may not be immediately deployable to clean up a spill during transportation. Additionally, secondary containment</p>	<p>Examination of fuel resupply and storage options for the upcoming season is ongoing and may include fuel delivery to site in barrels or in BATTs. Future resupply via an overland winter trail may occur, but is not planned for 2020.</p> <p>All fuel storage onsite will occur within suitable secondary containment, adequate to hold 110% of the largest container within containment.</p> <p>Measures pertaining to Soil Treatment Facility soil and water management are included in the <i>Soil Treatment Facility Management Plan</i>, to be provided to the NWB imminently.</p> <p>Blue Star commits to maintain and make immediately available appropriate and adequate spill response equipment materials and personnel during fuel transfer, and to maintain fuel storage and transfer within secondary containment.</p> <p>In the event of a spill, spent spill response materials will be suitably containerized and backhauled for treatment and disposal at a suitable facility.</p> <p>Contaminated soil that may result from a spill event may be disposed of in the Soil Treatment Facility on site if there is capacity and if materials meet treatment criteria. Otherwise contaminated materials will be suitably containerized and backhauled for treatment and disposal at a suitable facility.</p>

ID #	Subject	Party Concern	Party Recommendation	Proponent Response
			<p>should be designed and built to accommodate the capacity of larger fuel storage vessels (tanks, bladders) if used.</p> <p>In the event of a spill, it is not clear how the Proponent will handle used spill kit materials and other contaminated materials. Additional detail on how contaminated materials will be handled, stored, and disposed of should be included in a Waste Management Plan.</p>	
GN-4	Absence of detail regarding blasting and quarry activities	<p>The Proponent has indicated a new quarry will be developed and used to support various project activities, including resurfacing and lengthening of the existing airstrip.</p> <p>Quarry development and use can have negative impacts on the environment. Blasting creates vibration, overpressure, toxic fumes, and dust, among other impacts. These impacts can lead to habitat degradation and avoidance behaviour in wildlife. Quarrying can have impacts on local permafrost structure and create change in geophysical stability of the local environment.</p> <p>The Proponent has not included sufficient detail about planned quarry activities, such as estimated volume, lifespan, management, and reclamation and closure of the quarry. The Proponent has not included sufficient detail about how they intend to mitigate and manage impacts to wildlife and the environment from the effects of blasting.</p>	<p>The GN recommends the Proponent develop a Quarry Management Plan. This plan should contain details about proposed quarry activities, including quarry design, construction, ongoing operations, water management, safety, impacts to wildlife and the environment, the monitoring and mitigation of those impacts, and closure and reclamation of the quarry.</p> <p>The GN also recommends that the Proponent develop a Blasting Plan. This plan should contain details about proposed blasting activities, including estimated number and intensity of blast events, blast design, blast operations and safety, details on explosives spill management, contact water management, impacts to wildlife and the environment, and the monitoring and mitigation of those impacts.</p>	<p>While quarrying will occur on site, it is expected to be limited in extent and duration as quarry materials may be required for airstrip maintenance and landfill cover.</p> <p>Accordingly, Blue Star is undertaking to develop a <i>Borrow Management Plan</i> to address use of esker materials and blast rock obtained through quarrying. This Plan will be provided to the NWB imminently.</p> <p>The <i>Wildlife Protection Plan</i> addresses drilling and blasting impacts to wildlife and provides mitigation measures that will be implemented including conducting pre-disturbance surveys and suspension of activities. Blue Star does not see the need to revise the <i>Wildlife Protection Plan</i> at this time.</p> <p>Further, the <i>Environment and Heritage Resources Protection Plan</i> address other drilling and blasting related potential effects.</p> <p>Provisions within the existing water licence 2BM-ULU1520 including Part G Item 7, consider quarrying, with NWB approval.</p>
GN-5	Archaeological Resources Effects	Project activities that may affect heritage resources include exploration activities (prospecting and drilling), establishment of a new temporary camp, extension of the existing	<p>The GN recommends the following:</p> <ol style="list-style-type: none"> 1. The Proponent hire a qualified archaeologist(s) in order to conduct archaeological assessments of any areas where ground disturbance activities are 	Blue Star has retained a Project Archaeologist to conduct an archaeological impact assessment in advance of any new ground disturbance outside the existing Ulu pad area, to work

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		<p>airstrip, construction of landfill(s), use of quarry/borrow sites, use of a winter trail, and use of heavy equipment to haul rock and supplies.</p> <p>The GN notes that the proposed use of a winter trail to transport fuel and supplies constitutes a concern as not only snow cover might mask unrecorded archaeological sites but the likelihood of vehicles impacting unidentified (unrecognized) protruding cultural features is high (i.e. inuksuit, caches, look-out, dwelling, etc.).</p> <p>A search of the Nunavut Archaeological Site Database indicates that there are numerous archaeological sites within the proposed project area, including many sites along the proposed winter trail route. This however does not preclude the presence of unrecorded sites or cultural features as areas may not have been the object of a systematic archaeological assessment.</p>	<p>planned to occur (exploration areas, campsite, airstrip extension, landfill(s), quarry/borrow sites, and winter trail);</p> <ol style="list-style-type: none"> 2. The Proponent adheres strictly to the assessed winter trail route; 3. The Proponent works closely with the Territorial Archaeology Office to clearly identify and mark the locations of archaeological sites that might potentially be affected by development or remediation activities; and 4. No activities be conducted in the vicinity (50 m buffer zone) of any archaeological sites. If archaeological sites or features are encountered during the Project, activities should immediately be interrupted and moved away from this location. Each site encountered needs to be recorded and reported to the Department of Culture and Heritage. <p>All archaeological and palaeontological sites in Nunavut are protected by law. The Proponent should understand that it is their responsibility to ensure no heritage resource sites are disturbed throughout Project activities. Accordingly, no person shall alter, disturb, or remove any artifact from an archaeological site. Moreover, the building of inuksuit is not recommended.</p>	<p>with the Territorial Archaeologist and to advise Blue Star on activities in relation to heritage resource conservation.</p>
GNWT-1	Bathurst caribou	<p>The proposed Ulu Gold Project overlaps the Bathurst caribou calving and post- calving range (please see Figure 18 of the Bathurst Caribou Range Plan) and is likely to impact Bathurst caribou when they are most sensitive to disturbance. The herd's calving grounds since 1996 have been west of Bathurst Inlet and the proposal falls within this area. Calving and post-calving ranges of migratory barren-ground</p>		<p>Currently the calving range is broadly defined by the GNWT as the extent of caribou collar locations during the calving season. Further analysis shows that there are core areas used and the Project does not occur within these core areas or within designated protected areas (See Figure 18 of the Bathurst Caribou Range Plan).</p> <p>Blue Star acknowledges that the Ulu Project overlaps with the Bathurst Planning area but the core Ulu Project area is outside</p>

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		caribou herds have been consistently identified as necessary to the survival of these populations, and the most important and sensitive ranges, both from a traditional knowledge and scientific. Displacement from preferred calving ranges has been linked to negative effects on calf survival and population trend (Recovery Strategy for Barren-Ground Caribou in the NWT-draft). Restricting these areas from development will ensure caribou are protected from sensory disturbance that may contribute to population decline. The Bathurst herd is at a critical point, with the 2018 population estimate of about 8,200 demonstrating a decline of more than 98% from peak numbers in 1986. As a result, any human-caused factors that may impede recovery need to be kept to a minimum.		<p>of the Bathurst Herd Centre of Habitation (Please refer Figure 13 of the Bathurst Caribou Range Plan) and is outside of the Higher Use Calving and Post-Calving (Please refer to Figure 18 of the Bathurst Caribou Range Plan).</p> <p>Through implementation of its <i>Wildlife Protection Plan</i>, Blue Star believes project-related effects to Bathurst caribou will be adequately mitigated.</p>
GNWT-2	Bathurst Caribou Range Plan	The Bathurst Caribou Range Plan (BCRP), finalized in August 2019, was developed collaboratively with Industry, non-governmental organizations, federal, territorial, Indigenous governments and organizations in the Northwest Territories, Nunavut and Saskatchewan. The BCRP recognizes the sensitivity and importance of calving and post-calving ranges and recommends protection of caribou be provided during this time through establishment of adaptively managed conservation areas, allowing for boundary changes over time. The BCRP also provides other management tools such as mobile caribou conservation measures (BCRP, pg. 2) that are protective of the Bathurst Caribou herd in other parts of its range.		Noted.

ID #	Subject	Party Concern	Party Recommendation	Proponent Response
GNWT-3	Wildlife Protection Plan	The Wildlife Protection Plan submitted by the developer does not provide adequate protection from sensory disturbance to Bathurst caribou during calving and post- calving periods (p. 20). Restricting activities when caribou are observed near camp within a distance of 1 km is inadequate when recent research on the George and Leaf River herds in northern Quebec shows that caribou may experience disturbance within 2-4 km of exploration camps in summer and up to 21 km in winter (Plante et al 2018). Further, no trigger distance and threshold numbers of caribou are provided for when the developer uses satellite collar information for making decisions on project activity reductions nor do they discuss issues of lag time in location data being received and forwarded by ENR. These trigger distances and threshold numbers would necessarily differ from those for visual observations made during flights.		<p>Blue Star acknowledges ENR-GNWT concerns about Bathurst caribou during calving and post-calving periods.</p> <p>The Plante et al (2018) paper only studied disturbance effects during summer and winter periods which did not include calving and post-calving periods. Overall, they did note that none of the disturbance types were consistently avoided across herds or seasons and that the ZOI were highly variable among disturbance types and years. The authors state that the avoidance of <u>human settlements</u> (villages) was more important in winter (up to 21 km) than in summer (2–4 km). The authors concluded that it is still unknown whether anthropogenic disturbances contribute to the recent decline of the caribou herds and that future studies should investigate the influence of population density on the degree of avoidance of human disturbances.</p> <p>Blue Star acknowledges that Section 6.5.2 could be revised for clarity and proposes to revise the Plan as follows: <u>Current and historical Bathurst caribou collar locations will be obtained from the GNWT, under a data sharing agreement to assist with planning of exploration activities during calving and post-calving to avoid areas repeatedly used by caribou during this time.</u></p> <p>Blue Star maintains that being responsive to changing wildlife use of the landscape through the implementation of mobile protection measures, real time observations and current and historic collar data continue to be adequately protective.</p>
Tłıchq Government-1	Bathurst caribou herd	Tłıchq Government is concerned about this exploration project due to the recent dramatic decline of the Bathurst herd and the close proximity of the project to the Bathurst calving ground.	We know that caribou are very sensitive, especially to human disturbance. In order to have caribou for future generations we have to be smart in the way we share the land with the caribou today.	Blue Star agrees with the Tłıchq Government. Blue Star commits to engaging with the Tłıchq Government, minimizing potential Project effects on caribou and to supporting recovery efforts.

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		<p>The 2018 Government of the Northwest Territories calving ground survey of the Bathurst herd estimated the overall herd at 8,207 caribou and shows that the population has continued to decline by 58% since the previous survey in 2015. A comparison of 2015 – 2018 shows that the Bathurst herd has declined at an annual rate of approximately 29% per year over the last three years. Low rates of survival in adult female caribou and low rates of productivity of calves are thought to be the main reasons for the continued decline.</p> <p>Based on a recent assessment of barren ground caribou, the Northwest Territories Conference of Management Authorities listed barren-ground caribou as ‘threatened’ in the Northwest Territories in February 2018. Based on a comparison of the 2009 and 2018 Bathurst caribou population estimates, the overall extent of decline for the herd within the past 10 years is 74%, which meets the population criterion of ‘endangered’.</p> <p>The timing of project operation, during summer months, is concerning as the time period from May to August is the most sensitive for caribou. This is the time when caribou cows care for their newborn calves, and will avoid areas of disturbance. During Tłı̨cẖ Government’s Ekwò Nàxoède K’è (formerly known as, Boots on the Ground) caribou monitoring program, we have observed low rates of calves during the last two</p>	<p>Protecting the caribou is a massive and complex task that requires us all to work together. We completely understand the importance of economic development for Nunavut, and the residents of the NWT, and the challenges that come when combining development and economic opportunity with protecting wildlife. However, indigenous communities both in the NWT and in Nunavut still need the caribou to continue our way of life.</p> <p>We are hopeful that through your careful consideration of important protective measures, this project will not be a disturbance to caribou and our shared way of life.</p>	<p>In its Screening Decision Report for Blue Star’s adjacent Hood River Project, the NIRB imposed the following project specific conditions (#35):</p> <p><i>“During the period of May 15 to July 15, the Proponent shall suspend all project operations, including low-level over flights, drilling, blasting/trenching, and use of snow mobiles and allterrain vehicles outside the immediate vicinity of the camp. Should the results of localized monitoring satisfy the Land Use Inspector that project operations may resume without disturbing pregnant caribou cows or cows with young calves, the suspension may be lifted for the period specified. “</i></p> <p>Blue Star expects a similar condition to be imposed by the NIRB for its Ulu Gold Project.</p>

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		years and this gives reason for concern that recovery of the herd is slow. Thus, any disturbance to the cow and calves should be avoided to allow the few calves being born to have the ability to grow and repopulate.		

Engagement Summary

Table 1 - Summary of interests expressed during stakeholder engagement and responses provided.

Topic	Comment	Response
Community Engagement & Involvement	Plan a public meeting well in advance, talk to the HTO, have an office in town, maps are helpful.	Noted.
	Do you have a policy around financial contributions to the community?	We have a desire to put something like this in place, either a fund or an award.
	Every mine should have a committee of elders from the surrounding community.	Noted.
	Need to have an environmental committee of people from the HTO, hunters, elders, youth. Need to pay an honorarium.	We will consider that.
	Look forward to working together.	Noted.
	Good time for a community meeting is up until the end of April. After that, there is a festival and then people are out on the land.	Noted.
	You should participate in Frolics.	Will look into that for next year.
	Having a liaison officer is helpful, one in each Cambridge Bay and Kugluktuk.	Noted.
	In the summer, will you have an elder visit site?	We will consider that.
	You need tickets for door prizes. Door prize should be something useful in the north. Do the draw at the end of the meeting.	Noted.
Exploration Program	How big will your camp be this year?	Up to 30 people.
	How far are the helicopter trips from a camp to a drill site?	It varies, depending on where we build the camp and where prospecting results indicate we should drill.
	What are you exploring for?	Gold.
	Drilling creates waste on the land that needs to be dealt with.	We have developed an Abandonment and Restoration Plan and a Waste Management

		Plan that outline how wastes are dealt with and how we will keep drill sites clean.
	Will you be using airplanes?	Yes, for resupply. At this point in time, we do not plan on flying for a geophysical survey.
	Is the project dependent on the Grays Bay Road?	No, but it would benefit from the Grays Bay Road should it be built in the future.
	Why have you not done anything on the project yet?	We had a small prospecting program a couple of years ago and have been analyzing those results. We continue to do some desktop studies to inform a future program and now the timing is right for the company to go ahead and start the next phase of exploration.
	How many diamond drills will you use?	This year, we plan to use 1 or 2. In the future, we may use more.
	Will you drill year-round?	No. This year we plan to drill in late summer/fall only. In the future we may drill in the spring, summer and fall.
	How many prospectors will you need to hire, and will you need to hire every year?	We will likely need prospectors over the next three years. We may need up to 6-12 prospectors.
	Why can't you use the Ulu camp [for Hood River works]?	We are currently not allowed to as we do not yet own it. There is also some cleanup work ongoing at Ulu and so even if we were allowed to use it, there would not be room for us in the camp.
	Makes sense to put a camp near a work area.	Agreed.
	Safety of people is important.	Noted.
	How is the site accessed?	By air, either a plane or a helicopter.
	Suggest putting a camp next to the biggest, deepest lake. Add a dock and a small camp.	Noted.
	Any dewatering of lakes and taking out of fish that are planned?	No, none at this point.

	When you drill, do the rocks go into the lake?	We drill in such a way that we can capture all of our cuttings and prevent them going into the lake.
	Cuttings-are they a fine sand and water mixture?	Essentially yes.
	Will you use salt when you are drilling?	Depends on the conditions encountered.
	Will core be split before it is sent out?	Yes.
	How big is the [Hood River] land parcel?	Approximately 8,000 hectares
	Haven/t been to the area so can't advise on a good location for a camp site.	Noted.
	How long do we plan to be working in the area?	Seasonally for the next several years. If we are successful, we hope to be working here for a long time!
	There are some diamond concessions in your land parcel. Are you looking for diamonds or just gold.	Gold.
	How many holes, meters do you plan to drill? Shallow or deep?	We plan to drill about 2000 m this year. The number of holes and potential depths is still to be determined.
Employee Assistance	Is there a plan for family assistance for local hires?	Supporting education is important to Blue Star. We are open to considering family support
	For people at mines who may be struggling with addiction, can they get help?	Employees will have access to an Employee Assistance Program
Project Information	Appreciate quarterly or annual updates on project progress	Noted.
	Where is Inukshuk Exploration based?	Inukshuk Exploration is now owned by Blue Star. Blue Star is based in Vancouver, BC.
	Are you a legit company?	Yes, we are a registered corporation.
	Where did your name come from?	The blue star in the Nunavut flag. As all of our work in is Nunavut and we thought that the star, representing the North Star, would be good guidance for us.

	What is the predicted lifespan of the project?	Depends on drilling results.
	How optimistic are you that you will complete your 2019 program?	We are planning to establish a camp site and have a small drill program late summer.
	What is the timeframe for your mine?	We need to explore before we can mine, and if successful, will need to go through a regulatory process before we can mine. Having a mine is still a number of years away.
	You are just planning on doing exploration now. Will you sell it and build a mine?	That is one of many options that may play out in the future. At this point, Blue Star is interested in exploring and developing the property.
Reclamation	It is important to reclaim the area when you are finished working.	Noted.
	Hood River flows into the ocean. Don't want any pollution.	Noted.
	Is there reclamation security?	Not yet. We will post security with the KIA under a new land use licence.
	Just because security is addressed in a licence doesn't mean that there is the money there to clean up the site.	Noted. We will work with the KIA to post the amount of security that they require.
	The land needs to be kept clean.	Noted.
	Don't leave pipe sticking out after drilling. Also, make sure pipes are clean, no grease.	Noted.
	Anywhere there is a camp, they leave garbage.	We plan to have a very clean camp and commit to cleaning up after ourselves.
	Have you looked at having an incinerator?	Yes.
Traditional Land Use	To access the area to hunt, have to go down via Burnside River, almost as far as Lupin, to get to the area. Very rocky.	Noted.
	No one hunts around there.	Noted.

	It's important for hunters to have access to the mine area, for fuel, access, food. Have to check in with security.	Noted.
	If you are engaging with other HTOs, you seem to know what you are doing. I am not too concerned.	Noted.
Training and Employment	A number of residents have completed Prospector Training courses	We look forward to hiring locally to the greatest extent possible, and we will have a prospecting program.
	Employment and training is important.	Noted.
	How long will training take, in order to start work on site?	It depends on the job. We plan to provide training while on the job, as needed.
	Contact the CLO In Kugluktuk if you have job postings.	Noted.
	Can women drill too?	Yes, absolutely.
	How many people will do housekeeping?	In a small exploration camp, people will do multiple jobs. A couple of camp helpers may do some cleaning, among other things.
	Will the work be seasonal?	Yes.
	What kind of training can be provided to graduates?	On the job training can be provided for most roles on site. Anyone who is of legal age to work and wants to work, can be trained on site.
	How will we hire-in person or over the phone?	We'd like to hire in person, but may have to do so over the phone or email sometimes.
	Will there be sub-contractors to build the camp?	A contractor will be hired to build the camp. We'd like that contractor to be and Inuit-owned form if possible and hire local workers.
	What is the minimum age to work?	18

	Are there employment opportunities for people living in each Cambridge Bay and Kugluktuk?	Yes.
Wildlife	Recommend looking into existing KIA wildlife protection measures	Noted.
	Bathurst caribou have experienced a steep decline in herd numbers	Noted.
	Wolverine, fox and wolves use the rocky area around Ulu.	Noted.
	Important to protect caribou now and for the generations to come	Noted.
	Need to share info on wildlife observations and encounters, people want to know.	Noted.
	Concern with Bathurst caribou. Need to protect calving and post-calving areas in particular.	We are engaging with the community, the HTOs, the GN and the KIA to determine what appropriate protection measures look like for the project and will consider this input in developing our Wildlife Protection Plan.
	HTO supports mobile protection measures for caribou, suggest looking at what TMAC and Sabina are doing.	Noted.
	How will you monitor for grizzly bear?	Observations in the field, from the helicopter or the ground will be shared with other works over the radio.
	Could use a dog to ward off problem wildlife.	Noted.
	What is the community sentiment on proximity to calving and post-calving areas?	We have heard that protection is important and that there is support for mobile protection measures.