

Mackenzie Valley Review Board



Final Terms of Reference
for the
Environmental Assessment
of
Tyhee NWT Corp.'s
Yellowknife Gold Project
EA0809-003

May 25, 2009

Mackenzie Valley Environmental Impact Review Board

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Glossary of Acronyms

DFO – Department of Fisheries and Oceans

INAC – Indian and Northern Affairs Canada

MVRMA – Mackenzie Valley Resource Management Act

YGP – Yellowknife Gold Project

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1 Introduction

1.1 Overview

This *Terms of Reference* outlines the process and the information the Mackenzie Valley Review Board requires for the environmental assessment (EA) of Tyhee NWT Corp.'s proposed Yellowknife Gold Project in the North Slave region of the Northwest Territories. This document has the following sections:

Section 1 provides the legal context for the environmental assessment of the proposed Yellowknife Gold Project.

Section 2 describes the scope of the proposed development and of the assessment.

Section 3 describes the Review Board's information requirements.

Section 4 summarizes the deliverables.

1.2 Legal Context

This environmental assessment is subject to the requirements of Part 5 of the *MVRMA*. It is also subject to the Review Board's *Rules of Procedure*. Guideline documents setting out the Review Board's environmental assessment process and expectations are available on the Review Board's web site (www.reviewboard.ca) or by contacting the Review Board office for further information.

The Review Board has developed these *Terms of Reference* based on an examination of information from the following sources:

- The public record of the Preliminary Screening process;
- All submissions by parties to the public registry of the ongoing environmental assessment process, including the developer's;
- Issues highlighted during a scoping session held October 16 and 17, 2008;
- Review Board experience in the conduct of environmental assessments.

1.3 Environmental Assessment History

In March 2005, Tyhee NWT Corp. ("Tyhee" or the "developer") applied to the Mackenzie Valley Land and Water Board (MVLWB) for approval to develop an underground gold mine and milling operation adjacent to the historic Discovery Mine site. The MVLWB subsequently referred the Yellowknife Gold Project ("YGP", "project" or the "proposed development") to environmental assessment by the Mackenzie Valley Environmental Impact Review Board, based on the possibility that the proposed project might have significant adverse impacts on the environment. The Review Board scoped this proposed

development and produced a *Terms of Reference* for the 2005 Yellowknife Gold Project *Developer's Assessment Report* (DAR).

Following the release of the *2005 Terms of Reference*, the developer changed the proposed project design from a primarily underground operation to a transitional open pit/underground mine plan. As a result of this change, the developer withdrew its original application in July 2008, which concluded the associated environmental assessment (EA0506-004). The developer then submitted a new application to the MVLWB that encompassed the proposed project design changes. As part of the new application, the developer submitted a 2008 YGP *Project Description Report* (PDR) that outlined some of the developer's plans for the proposed development, and also presented the company's initial interpretation of how the proposed project will impact the environment.

On August 27, 2008, Environment Canada referred the 2008 Yellowknife Gold Project to environmental assessment as per Section 126(2)(a) of the *MVRMA*, on the basis that the proposed development might cause significant adverse impacts on the environment. Environment Canada also stated that in its opinion the information from the *2008 Project Description Report* was insufficient for the purposes of fully assessing the proposed project's impacts to the environment.

2 Scoping

To better understand the information requirements for this environmental assessment, as well as to identify issues and levels of public concern for the proposed project, the Review Board organized Scoping Sessions in Yellowknife on October 16th and 17th, 2008. The 2008 Terms of Reference for the DAR of the proposed development are based on the Review Board's own experience, information resulting from the 2008 scoping sessions [and subsequent scoping submissions], and relevant sections from the 2005 Yellowknife Gold Project *Terms of Reference* for the *Developer's Assessment Report*. The specific items in the sections below set out the issues that the developer must address during this environmental assessment. Reports of the scoping sessions and scoping submission documents are available on the Review Board's web site at: <http://www.reviewboard.ca/>.

2.1 Scope of Development

The developer has applied to develop a gold mining and milling operation approximately 88 kilometers north of the City of Yellowknife on property adjacent to the historic Discovery Mine. Pursuant to Section 117(1) of the *MVRMA*, the Review Board determines that the Scope of Development includes all proposed project features (physical works and activities that will occur during the construction, operation and closure phases) that the developer identified in the 2008 *Project Description Report* for the proposed Yellowknife Gold Project (unless this document specifies otherwise), including all proposed project components associated with the Ormsby and Nicholas Lake ore bodies. The Review Board considers any proposed alternative project components or configurations that the developer has identified in the *Project Description Report*, or any alternatives that the developer adopts as a result of this environmental assessment process, to also be within the scope of development for this environmental assessment. Also, if the developer has not committed to a particular

design configuration that is critical for project success, for example a possible new all-weather road, then the Review Board must assess the potential impacts of those alternatives that are still in play and that the developer may yet adopt.

Table 1 below lists the major components of the proposed development and associated activities as defined in the 2008 *Project Description Report*. At any time during the environmental assessment the Review Board may amend the scope of development if the proposed development description changes.

The following are assessable project components that the Developer has identified to this point in the environmental assessment. As more detail emerges the Review Board may amend the development scope.

Mining Process

- Development of underground workings, portals, adits, raises, drifts, stopes and all other mine workings;
- Open pits;
- Management of topsoil, waste rock and overburden stockpiles, including associated water treatment and management;
- Management of ore stockpiles, including associated water treatment;
- Storage and use of explosives;
- Management of rock with potential for metal leaching / acid rock drainage (ML/ARD);
- Transportation of ore from Ormsby Zone or Nicholas Lake deposits to the process plant;
- Mine dewatering and the management and treatment of mine water; and
- Mining equipment operation.

Milling Process

- Construction and operation of the process plant;
- Withdrawal and consumption of fresh water from Giauque Lake;
- Storage, handling, use and disposal of process chemicals;
- Disposal of process water and tailings; and
- Construction and operation of the tailing containment area, including recycling and disposal of process water, as well as its treatment and discharge to the receiving environment.

Support/Ancillary Facilities and Activities

- Transportation activities that support the YGP's operation, including air transport of other methods for transporting staff, as well as use of the winter road for YGP-specific support activities;
- Expansion of the winter road for the purpose of supporting YGP operations;
- Construction and use of all-weather roads;
- Stream crossings and any proposed modifications to water courses;
- Construction and use of drainage control structures;
- Development and use of borrow sources for aggregate production;
- Construction and operation of power generation facilities and transmission infrastructure;
- Construction and operation of the change house, compressor house, offices, warehouses, storage yards, maintenance shops, laboratory and all other support buildings;
- Construction and operation of hydrocarbon storage and handling facilities;
- Construction and operation of camp facilities;
- Treatment of camp wastewater at Ormsby Zone and Nicholas Lake developments;
- Solid and hazardous management and construction and operation of containment areas; and
- Modification and operation of the existing airstrip at the historic Discovery minesite or construction and operation of a new airstrip.

Closure and Reclamation Activities

- Removal of structures and equipment;
- Reclamation of the Tailings Containment Area;
- Reclamation of the road network;
- Reclamation of infrastructure foundations;
- Re-vegetation of areas affected by mining ;
- Reclamation of waste rock and overburden piles; and
- Reclamation of the airstrip, roads, tailings caps, and quarries.

Table 1: Current Project Components

2.2 Scope of Assessment

The *Scope of Assessment* is the determination of those issues and items that the Review Board will examine during this environmental assessment. After having reviewed the developer's *Project Description Report*, supporting appendices, and the Public Record to date the Review Board has determined that it requires more information on the biophysical, social, economic, and cultural effects of the proposed development on the existing environment.

2.2.1 Geographic Scope

The geographical scope of this environmental assessment includes land covered by the developer's mineral leases, mining claims and a local study area surrounding the proposed development. For individual valued components of the environment the geographic scope may go beyond this minimum area.

For cumulative effects to water resources, the geographic scope includes all areas the proposed project may potentially affect, including the Yellowknife River Basin downstream of the YGP. The inclusion of lakes outside of the Giauque Lake and Round/Winter/Narrow Lake watersheds that have not been contaminated by the historic Discovery Mine development are required.

The scope of assessment will also include an examination of cumulative effects. Cumulative effects assessment will focus on other past, present and reasonably foreseeable future developments or human activities that combine with the impacts of the proposed Yellowknife Gold Project to affect the same valued components. Such cumulative effects will be assessed at a geographic and temporal scale appropriate to the particular valued component under consideration.

The geographical scope for assessing effects to the human environment shall encompass any potentially affected communities. Throughout this environmental assessment, the term 'potentially-affected community' refers to any settlement, town, village, city or hamlet as well as any First Nation or Métis group that may be impacted by the proposed development. This includes the community of Yellowknife, Dettah, N'Dilo, Behchoko, Gameti, Wekweeti and Whati.

Since the North Slave Metis Alliance (NSMA) is an organization representing the interests of Metis people in the North Slave region, the developer will include the NSMA and its constituents in any consideration that affects Aboriginal persons, communities or organizations.

2.2.2 Temporal Scope

The temporal boundaries for this environmental assessment shall reflect the potential long term effects, not the duration of YGP operations. The temporal scope will therefore include all phases of the YGP from construction to post-closure, and until such time that potential significant adverse impacts attributable to the YGP are predicted to no longer occur.

2.2.3 Impacts of the Environment on the Proposed Development

The effects of the physical environment on the proposed development, such as climate change or extreme precipitation or climatic events, must be considered in each of the applicable items in section 3 below, to the extent that an adverse impact may occur.

2.2.4 Impacts of the Proposed Development on Remediation

The Review Board shares and supports the view that remediation to any historic Discovery Mine components that Indian and Northern Affairs Canada (INAC) implemented are features of the environment that require mitigation if the proposed project adversely affects them.

3 Terms of Reference

3.1 Considerations

3.1.1 Guidance to Developer

The developer shall provide the Review Board with the information requested in sections 3.2 to 3.7. When providing this information, the developer must apply the impact prediction criteria in the Review Board's EIA Guidelines. The guidelines are located on the Review Board's website in the [Reference Library](#). These guidelines include:

- *Environmental Impact Assessment Guidelines*, Mackenzie Valley Environmental Impact Review Board, Yellowknife, NT. March 2004
- *Guidelines for Incorporating Traditional Knowledge in Environmental Impact Assessment*, Mackenzie Valley Environmental Impact Review Board, Yellowknife, NT. July 2005.
- *Socio-Economic Impact Assessment Guidelines*, Mackenzie Valley Environmental Impact Review Board, Yellowknife. March 2006.
- *Reference Bulletin: Operational Interpretation of Key Terminology in Part 5 of the Mackenzie Valley Resource Management Act*. Mackenzie Valley Environmental Impact Review Board, Yellowknife. April 2006.

The developer will provide its views on the significance of predicted impacts, including the adverse and desirable effects of the proposed development. These views will be based on residual effects, after considering mitigation measures, and the developer will explicitly describe its methods for determining residual effects.

The *2008 Project Description Report* contains relevant information about the existing environment. This information can be summarized in the *Developer's Assessment Report*.

At any time during the environmental assessment, the developer may contact the Review Board for clarification on how to interpret these instructions.

3.1.2 Issues Prioritization

The purpose of scoping is not merely to identify issues, but also to prioritize them and if possible, focus required additional work on the most important issues. Tyhee NWT Corporation will give consideration to all of the items described in Section 3.2, because every issue identified in this *Terms of Reference* requires a sufficient analysis to demonstrate whether the proposed development is likely to be the cause of – or a contributor to – significant adverse impacts on that aspect of that environmental component. However, one particular issue was identified during scoping as requiring increased attention, because of high impact potential and expressions of public concern. Impacts on water quality are the key line of inquiry in this environmental assessment, particularly in relation to the quality of mine water and effluent released to the groundwater and surface water regimes in the Yellowknife River watershed, and downstream impacts on water and aquatic ecosystems. This Key Line of Inquiry will be a major focus of the environmental assessment and be given special consideration by Tyhee NWT Corporation in the *Developer's Assessment Report*.

This Key Line of Inquiry is the topic of greatest concern that requires the most attention during the environmental assessment and the most rigorous analysis in the *Developer's Assessment Report*. Designation as a Key Line of Inquiry is intended to ensure a comprehensive analysis of the issues most likely to cause significant environmental impacts or significant public concern. Data collection and analysis of this Key Line of Inquiry in the *Developer's Assessment Report* should be at a level of detail appropriate for other interested parties to understand the technical material prior to any technical sessions on these topics.

All other issues that require examination in the *Developer's Assessment Report* are treated as Subjects of Note. These issues do not have the same priority or expected level of detail as Key Lines of Inquiry, but are nonetheless issues that require serious consideration and a substantive analysis.

3.1.3 Valued Components

Environmental impact assessments commonly use valued components (also referred to as valued ecosystem components or valued socio-economic components) to focus impact predictions on important components of the bio-physical and human environment. Individual species or societal goals are common valued components.

The *Key Lines of Inquiry* and *Subjects of Note* identified in this document involve valued components. The developer must use the issues identified during the environmental assessment as the basis for the selection of any valued components. The developer may select additional valued components, but must ensure that all *Key Lines of Inquiry* and *Subjects of Note* thoroughly reflect the identification of relevant valued components, and also provide a rationale for selecting valued components in the *Developer's Assessment Report*.

3.1.4 Impact Predictions

The methods for describing environmental conditions, as well as for identifying and measuring impacts on the environment must be consistent with best practices in relevant

subject areas. The Developer must also present predictions in a way that facilitates the formulation of testable questions for future follow-up programs, as well as textually and schematically indicate the pathways of predicted impacts. The Developer must also explain any methods for predicting how changes in the environment (for example, climate change) could affect the proposed development.

For the Developer's Assessment Report, the Developer will:

- indicate the methodologies for:
 - describing the existing environment;
 - predicting potential impacts;
 - evaluating potential impacts; and
 - reaching any conclusions.
- document all models and studies so that analyses are transparent, and where appropriate, reproducible;
- identify which studies included the assistance of communities and/or participants
- identify participant selection criteria;
- specify data collection methods together with the uncertainty and reliability of the associated data and subsequent conclusions;
- support all analyses, interpretations of results, and conclusions with reference to appropriate literature;
- identify and justify any assumptions;
- identify all proposed mitigation measures, along with evaluations of confidence levels in the effectiveness of those measures, and describe the residual impacts.

3.1.5 Significance Determination

The developer must provide its views on the significance of impacts, using the following criteria:

Direction

The main focus of the environmental assessment is to assess whether the proposed development is likely to cause significant adverse impacts on the environment or be cause for public concern. The Review Board encourages the Developer to report anticipated positive changes as well, since the Review Board or parties to the environmental assessment may use this information to evaluate the overall impact of the proposed development.

Magnitude

Magnitude refers to the degree of change that may occur, for example the volume of diverted water. Where possible the Developer must report magnitude in absolute and relative terms.

Likelihood

Likelihood refers to the probability of an impact occurring.

Geographical Extent

Geographical extent refers to the affected local study area. In using this criterion the Review Board suggests that the Developer must consider spatial intensities of impacts. For

example, where an impact may affect various areas to differing degrees, the Developer may have to analyze and report impacts in a separate manner by reporting the particular effects of high, medium, low magnitude impacts rather than reporting an average impact on a large area.

Duration

The Developer must consider both the duration of individual events (i.e. waste water discharges) and the overall time frame during which the impact may occur (i.e. during construction, operation, and closure). In addition, the Developer must report the length of time that the effects will last.

Frequency

The Developer must consider the frequency of impacts and events causing impacts, as well as the length of time between occurrences.

Ecological Context

Ecological context refers to the type of the impact as well as the nature of the affected environmental component. For example, the mortality of a hundred caribou may be significant, whereas the mortality of a thousand mosquitoes may not be significant. The Developer must consider that an impact on a highly valued component may trigger significance at relatively low magnitude, duration, and likelihood.

Reversibility

Reversibility is the ability for a valued component to return to an equal or improved condition at the end of the proposed project. Effects that are reversible might be less significant than effects that are irreversible.

Residual Effect

The developer must indicate the significance of the residual effect, after considering the implementation of mitigation measures, when determining the overall significance of each effect on the environment. The developer must articulate the methods to determine residual effects.

3.1.6 Uncertainty Analysis

Any impact prediction or impact analysis contains an amount of uncertainty. This may be a result of limitations in understanding of natural systems or rare occurrences such as natural disasters and very warm winters. The Developer's Assessment Report must provide a reasonably accurate description of the uncertainties associated with each prediction or analysis. Similarly, when making a significance determination the uncertainty analysis must include a description of the confidence in underlying assumptions, models, data sources, etc. The uncertainty analysis must also identify parameters that should receive particular attention when developing follow-up programs.

3.1.7 Incorporation of Traditional Knowledge

The *Guidelines for Incorporating Traditional Knowledge into the Environmental Impact Assessment Process* describe how the developer can acquire and consider Traditional Knowledge. The developer can obtain the guidelines via the Review Board website:

<http://www.reviewboard.ca>. The Review Board gives equal weight to science and traditional knowledge. The developer therefore will make all reasonable effort to collect and facilitate the collection of traditional knowledge relative to the YGP. In the assessment of each environmental component, the developer must identify all areas where it has attempted to engage with communities in the collection and/or sharing of traditional knowledge.

3.1.8 Use of Appropriate Media

The developer shall provide information to the Review Board and to participants in a manner that is most useful and understandable to that audience. The use of maps, posters and models is encouraged to help participants fully understand the information being presented by the developer.

The developer should be mindful that not all participants to the environmental assessment have the same level of technical expertise. The DAR should be written at a level that is easily understood in the public domain. When it is necessary to present complex or lengthy documentation to satisfy the requirements of a specific section of the ToR, the developer should make every effort to simplify their response.

3.2 General Information Requirements

3.2.1 Existing Environment and Baseline Conditions

Impact prediction involves analyses of proposed activities and their interactions with the existing environment. In order to assess impacts adequately, the Review Board requires an understanding of existing conditions described below. Throughout this section, references to water refer to both surface and subsurface waters, where applicable.

In providing this information, the developer is encouraged to consult with government agencies (including INAC, Fisheries and Oceans Canada, Environment Canada and GNWT Environment and Natural Resources) when designing studies intended to provide information needed by the Review Board and parties to the EA.

The developer is required to provide the following information on:

1. Surface and groundwater quality, reflecting the range of natural variability in the existing environment. This will provide baseline information in order to differentiate project effects from natural conditions and changes due to previous developments. This includes:
 - a) water quality analysis for any water bodies (including Round Lake, Winter Lake, Narrow Lake and Giauque Lake) that previous development may have affected in order to identify the extent of previous contamination;
 - b) detailed characterizations of representative control lakes that have not been affected by previous development, with rationales for the control water bodies selected;
 - c) water quality analyses for any water bodies near proposed mine-related components.
2. Topographical maps to indicate the direction of surface and sub-surface watershed flows from the proposed development's basin to the Yellowknife River;
3. A water balance that incorporates inflows to and outflows from the mine site, with particular emphasis on the Winter Lake System (including Round Lake, Winter Lake and Narrow Lake) or other tailings facility alternatives, and that also accounts for seasonal variations and peak-flow periods such as during the spring freshet;
4. Sub-surface geology and local seismicity;
5. Aquatic organisms and aquatic habitat in all potentially affected water bodies and in control lakes;¹
6. Wildlife and wildlife habitat, including usage of eskers by wildlife;
7. Local air quality (including consideration of seasonal variability);
8. Local permafrost distribution and stability;
9. Physical and chemical makeup of soils and lake sediments for potentially affected lakes including Giauque Lake, and control lakes;
10. Distribution and abundance of any rare plants within the study area;
11. Local and regional labour pool and business community available to provide employment, goods and services at the proposed Yellowknife Gold Project, relative

¹ Fisheries and Oceans Canada and Environment Canada may help identify appropriate indicator or keystone species.

- to the labour pool and business capacity of the Mackenzie Valley. Include a focus on local small communities, Yellowknife, and the North Slave and Tlicho regions;
12. Existing physical infrastructure in the study area. Include roads (winter and all-season), buildings, the developer's exploration facilities, and historic mining infrastructure and other industrial works;
 13. Current socio-economic conditions and relevant trends in the potentially-affected communities, using appropriate indicators;
 14. Historic and present land use in the study area. Include identification of traditional land use groups and a description of any areas where overlapping land-usage occurs; and
 15. Cultural and heritage resources within the study area. Include an identification of the cultural groups who associate with these resources.

3.2.2 Development Description

In order for the Developer's Assessment Report to function as an independent document, the developer shall produce a development description that depicts the most probable project design(s). Relevant sections from the 2008 *Project Description Report* may be summarized or reproduced as appropriate in the *Developer's Assessment Report*.

The developer is required to describe:

- 1) Tailings area plans, including information on the following:
 - a. designs for the tailings facilities;
 - b. a water balance (inflow and outflow) for the impoundment area(s); and
 - c. geological, geotechnical and geothermal analyses.
- 2) Potential effects of the proposed YGP on water quality downstream of the proposed Tailings Containment Area, the proposed Ormsby and Nicholas Lake developments. This will include a tailings input-output analysis, which will include:
 - a. an Effluent Management Plan describing the steps the developer will take for treating effluent prior to discharge into the Tailings Containment Area (TCA) and from the TCA; and
 - b. pre- and post-treatment effluent quality and quantity prior to discharge into the TCA and from the TCA.
- 3) Existing airstrip modifications, with geotechnical engineering plans that verify the stability of such changes against the frequency and types of aircraft that will likely use the airstrip;
- 4) Project infrastructure, including descriptions of infrastructure and proposed mine development plans for both the Nicholas and Ormsby deposits;
- 5) Geochemical analysis for aggregate/crush, including estimated volumes and propensities towards acid rock drainage/metal-leaching;

- 6) Waste-rock/ore storage areas, for the proposed ore, waste rock, soil and overburden storage facilities with focus on the locations, with relevant quantitative threshold separation criteria, where the Developer will place any acid-producing or metal-leaching material, as well as the projected volumes for such material;
- 7) Conceptual domestic/industrial/hazardous waste management plans, (non-waste-rock material), the locations, and descriptions of hazardous and non-hazardous waste facilities, with particular attention to the volume of material that the developer will process in these facilities;
- 8) Water management structures, including a prediction for the volume of water that such structures will manage, and data supporting the ability for these structures to manage sudden, high-volume flow events such as freshet and storm runoff;
- 9) Water treatment facilities, with location and description;
- 10) Dewatering/drawing-down schedule;
- 11) Storage and disposal strategies, and annual volumes for all chemicals or other reagents for the milling process;
- 12) Winter/all-season road designs for Ormsby and Nicholas Lake, for existing or potential all-season or seasonal roads that will support the proposed project;
- 13) Water intake infrastructure plans, at Giauque and Nicholas Lake, including contingency plans if the re-suspension of historic tailings in Giauque Lake becomes a problem;
- 14) Power generation infrastructure, and transmission line rights-of-way;
- 15) Explosives storage facility design, describing the types of explosive(s) the developer will use, storage, handling and application procedures, including a description for how the developer will prevent the contamination problems that other mines have experienced with similar compounds;
- 16) Truck loads and incoming/outgoing weights, for all phases from construction to closure, by annual winter road season;
- 17) Updated project lifespan estimate, of the proposed Yellowknife Gold Project, divided into the following project phases: construction; operation; closure and reclamation;
- 18) Updated direct person-years of employment estimated by project phase (construction, operation, etc.);
- 19) Updated work schedule, with transportation arrangements and the developer's proposed worker and employee housing plans; and
- 20) Preventive measures, to prevent adverse effects to remediated (Discovery Mine) areas.

3.2.3 Community Engagement

Community engagement is one of the processes through which the residents of a potentially affected community may raise concerns about the proposed development. The developer

must be diligent in contacting, consulting and incorporating concerns from such parties. Section 4 of the Review Board's *Guidelines for Incorporating Traditional Knowledge in Environmental Impact Assessment*, available on the public registry, contains suggestions for working with communities to obtain traditional knowledge.

The developer is required to provide information regarding:

- 1) Public engagement events, dates, discussion topics, and the individuals and organizations that the developer has consulted, as well as:
 - a. methods used to identify, inform and solicit input from potentially-affected parties;
 - b. commitments and agreements made in response to issues that the public raised during these consultations, and how these commitments altered the planning of the proposed YGP; and
 - c. outstanding issues that remain, and document any further efforts towards resolution that either parties make.

3.3 Biophysical Environment

3.3.1 KEY LINE OF INQUIRY: Mine Site Water Quality

During scoping, potential impacts of the proposed Yellowknife Gold Project on local and downstream water quality were identified as a Key Line of Inquiry by most interested parties.² The developer will consider all potential impacts of water quality on the Yellowknife River watershed. That may include discussion of issues considered in section 3.3.2, such as Fish and Aquatic Habitat, for example (some overlap with other sections of the Terms of Reference is inevitable).

In providing this information, the developer is encouraged to consult with expert government agencies (including INAC, Environment Canada, and Fisheries and Oceans Canada) when designing plans for the monitoring, evaluating and managing of impacts on water resources. The following information should be integrated with the water resources information contained in the *2008 Project Description Report*.

The developer is required to assess and describe:

- 1) Downstream concentrations of residual cyanide, its breakdown products (for example ammonia) and derivatives that may form with metals in the ore other than gold. Describe potential for copper cyanide-complexes, and lead from the mineral *galena*. Describe any predicted effects from these substances and indicate the relevant management strategies;

² Although final license limits pertaining to water quality may be set by regulators, this will only occur if the Review Board has first determined that impacts to water quality will not be significant.

- 2) The extent of chemical loading and dispersion into the receiving environment by effluent from the Tailings Containment Area and the Nicholas Lake activities, both during mine operation and after closure. Describe whether and how predictions are supported by effluent modeling;
- 3) The potential effect of YGP operations on contaminants concentrations in the sediments downstream of the proposed Ormsby and Nicholas Lake developments;
- 4) A comprehensive plan for water quality monitoring, evaluation and management that indicates how the developer will meet water quality objectives prior to discharge, including:
 - a. a plan to monitor, evaluate and manage the aquatic environment that will integrate water quality and quantity, fish and aquatic habitat monitoring;
 - b. an adaptive management strategy to mitigate adverse impacts to water quality, quantity, aquatic organisms and aquatic habitat; and
 - c. a description of how the developer incorporated traditional knowledge and community input in the development of these programs.
- 5) The effects of YGP operations on the local hydrology and water balance, which will include predicted changes in timing, volume and deviation of peak and minimum water flows resulting from the proposed development, and effects on water balance from the operation of the TCA;
- 6) The effects of the proposed development on the promotion of acid rock drainage and metal leaching, including a plan for its monitoring, evaluation and management. The plan will include:
 - a. a discussion of all results of testing for metal leaching and acid rock drainage from tailings, waste rock and low grade ore that YGP operations will generate, with their implications on water quality; and
 - b. a plan for the identification, segregation, management and disposal of rock with potential for metal leaching and acid rock drainage.
- 7) Describe the probability of tailings in Winter Lake oxidizing and causing acid rock drainage or metal-leaching effects within any tailings containment facility, and appropriate mitigations;
- 8) Identify the potential impacts on the Yellowknife River basin downstream of the proposed development, with particular emphasis on effects to the City of Yellowknife's drinking water quality, and the need for establishing remote water quality monitoring points;
- 9) Explain the potential impacts on groundwater flows, including plans for managing and mitigating any adverse impacts these effects may cause. Describe and quantify the influence and impacts of underground workings on groundwater flows for both the proposed Ormsby and Nicholas Lake developments in addition to mitigation strategies for such effects;

- 10) Describe the potential impacts of mine water discharge from the proposed Ormsby and Nicholas Lake developments, which will include:
 - a. quality and quantity of mine water discharged from mine workings;
 - b. mine de-watering effects on the hydrology, groundwater flows and chemistry of the local study area;
 - c. the particular effects of introducing any de-watering effluent into any waterbody, and the mitigation strategies for preventing adverse effects to those and downstream water bodies; and
 - d. post-closure effects of all mine workings on the surrounding ground water regime.
- 11) Indicate whether erosion and sedimentation will occur as well as mitigation measures and contingency plans to address such problems;
- 12) Identify potential impacts to water quality if continued use of the existing airstrip damages the tailings cap at the Discovery Mine site;
- 13) Identify the potential impacts of drawing water from Nicholas Lake and Giauque Lake, for any purpose, and the mitigation strategies for preventing adverse effects. Include probability of re-suspending contaminated tailings currently capped by the water cover that Giauque Lake provides; and
- 14) Set out the potential impacts to water quality from each project component.

The Review Board encourages the Developer to consult the information available on the Public Registry relating to issues identified during the public scoping process.

3.3.2 Fish and Aquatic Habitat

For all activities that might impact fish and aquatic habitat, the developer is required to provide information on:

- 1) Commitments for minimizing loss of fish habitat;
- 2) The downstream effects of all effluents originating from YGP operations on aquatic organisms and their habitat, including:
 - a) productive capacity of aquatic ecosystems, with particular reference to species of fish that are important for recreational or subsistence purposes;
 - b) rare and or sensitive aquatic organisms and habitats;
 - c) impacts from blasting (the developer is encouraged to refer to the following DFO website: http://www.dfo-mpo.gc.ca/oceans-habitat/habitat/water-eau/explosives-explosifs/page03_e.asp); and
 - d) increased sedimentation in watercourses, especially from the waste rock pile and winter road activities; and

- e) erosion.
- 3) A description and quantification of any adverse effects to downstream aquatic habitat resulting from the removal of water flows from Winter Lake, with particular focus on the productive capacity of downstream inflow areas;
- 4) The effects of YGP operations on Giauque Lake's aquatic organisms and habitat which will include:
 - a) the effects of freshwater withdrawal on Giauque Lake's over-wintering habitat, littoral habitat and oxygen concentration; and
 - b) the effects of the freshwater intake and supporting infrastructure footprint.
- 5) The effects of road development, including water crossings, on any potentially impacted water bodies or watercourses, aquatic organisms and habitat;
- 6) The potential effects of YGP operations on contaminants concentrations in fish;
- 7) The effects of YGP operations on the aquatic organisms and habitat of Nicholas Lake;
- 8) The effects of fresh water withdrawal from Nicholas Lake for mining and camp purposes on aquatic habitat and organisms; and
- 9) Identification of best management practices to minimize impacts on fish in this type of environment, a listing of all commitments to mitigate impacts on fish, fish habitat and other aspects of the aquatic ecosystem, and, where the two differ, a rationale for why certain management practices have not been adopted.

3.3.3 Wildlife and Wildlife Habitat

The proposed development will be an artificial feature of the environment that may affect local and migratory wildlife in a number of ways.

The developer is required to provide:

- 1) A list of all wildlife species that the proposed Yellowknife Gold Project may impact, highlighting keystone species;
- 2) Predictions of potential impacts to those species in (1) using the impact prediction criteria in the *General Considerations* section;
- 3) An investigation into potential impacts of the proposed development on the Bathurst Caribou herd (adult population, adult survivorship, and potential herd recovery effects of more hunting) and moose populations;
- 4) A Conceptual Wildlife Monitoring and Management Plan that incorporates furbearers, migratory birds, waterfowl, large ruminants, and large carnivores. The Review Board encourages the developer to consult with the Department of Environment and Natural Resources, GNWT to create an appropriate wildlife monitoring and management program:
 - a. conceptual wildlife monitoring plans for wildlife [from (1)] in the vicinity of the YGP that especially outline what effects the mine causes and what effects are part of the natural environment, with specific attention to how the

developer will accommodate any rare, threatened or endangered species listed on the *Species At Risk Act* or under the auspices of the *Committee on the Status of Endangered Wildlife in Canada*; and

- b. conceptual adaptive management measures to avoid, minimize, and mitigate effects to wildlife if the developer detects problems for wildlife that the development has or may have caused.
- 5) The developer's proposed strategies for restricting wildlife access to any project component that may threaten the ability of wildlife to thrive in the area, including open pits, toxic tailings facilities, roads and airstrips; and
- 6) A determination of whether or not the proposed project may block migratory routes or confuse migratory animals and what mitigation strategies the developer will implement to avoid adverse impacts to such wildlife.

3.3.4 Vegetation

The developer is required to describe:

- 1) The type, extent and reach of impacts to local plant communities and rare or highly valued species in the project area, including:
 - a. the effects of vehicle, mill and power plant emissions on vegetation; and
 - b. the effects of dust emissions on vegetation;
- 2) The impacts of removing vegetation, for any project purpose, on the various species that depend on vegetation for food, shelter or other reason.

3.3.5 Terrain

The developer is required to describe:

- 1) How each project component will impact the surrounding environment when the developer exposes or otherwise disturbs any bedrock or soils;
- 2) Conceptual adaptive management plans to monitor and mitigate against adverse effects on local terrain;
- 3) The possibilities for potential impacts of continued use of the existing airstrip, even with modifications; and
- 4) The effects of YGP operations, with particular attention to the effects of each open pit and waste rock pile, on permafrost conditions in the mining area and how the developer can mitigate adverse impacts from those effects.

3.3.6 Air Quality and Climate

The developer is required to describe:

- 1) The standards, guidelines and regulations that the developer will incorporate before during and after YGP operations to minimize and mitigate effects to air quality;

- 2) Through modeling that takes into account seasonal variations, predictions for how project emissions will disperse from the proposed development on a local and regional scale and the effects of such emissions. The Review Board encourages the developer to consult the GNWT or Environment Canada to develop such strategies. The scope of such plans will include:
 - a. emissions from the gold refinery;
 - b. dust from roads, waste rock and ore stockpiles, tailings containment areas, quarries, and mill activities; and
 - c. emissions from vehicles, diesel generators and other combustion sources.
- 3) The technologies and strategies, in conceptual incineration management plans for mitigating air quality impacts that the developer will use to prevent significant adverse impacts to air quality. The plan should indicate how the developer will minimize emissions and meet or exceed the Canada-wide Standards for Dioxins and Furans and the Canada-wide Standards for Mercury emissions through the use of appropriate technologies and operating practices. These guidelines are available on the following websites (respectively):
http://www.ccme.ca/assets/pdf/d_and_f_standard_e.pdf, and;
http://www.ccme.ca/assets/pdf/hg_epg_cws_w_annex.pdf.
- 4) Conceptual air quality monitoring and adaptive management plans, which will include thresholds for action and mitigations strategies, as well as how the developer will report monitoring results to regulators and any impacted communities;
- 5) The potential for tailings to become airborne and contaminate the surrounding environment;
- 6) The developer's plans for minimizing impacts from dust production and settlement;
- 7) YGP operations as a source for acidic precipitation as well as an evaluation of those effects;
- 8) Predictions for the effects of YGP operations in generating greenhouse gas emissions, which will include:
 - a. the developer's total annual atmospheric loading of greenhouse gases in CO₂ equivalent values;
 - b. a list of the developer's commitments to minimizing greenhouse gas emissions.

3.4 Human Environment

The Developer's Assessment Report will examine all components of the human environment that the proposed Yellowknife Gold Project might affect, both beneficially and adversely. The developer is encouraged to examine the Review Board's *Socio-Economic Impact Assessment Guidelines* and to consider previous environmental assessments of projects of a similar nature and scale.

3.4.1 Employment and Business Opportunities

The Guiding Principles of Part 5 of the *MVRMA* (Section 115) requires the Review Board to have regard for the economic well-being of the residents and communities of the Mackenzie Valley. The developer will assess the potential effects of the proposed Yellowknife Gold Project on the economy of the North Slave and Tlicho regions and each potentially-affected community. As part of this assessment, the developer will use statistically defensible analysis to support any assertions about the available labour pool.

In assessing access to employment and business opportunities, the developer will provide the following:

Employment

- 1) An estimate of human resource requirements for the proposed development that includes a listing of all direct and contract employee requirements by skills category for each phase of the life of the proposed Yellowknife Gold Project, including work at the mine and in any other required activities (e.g., transportation). The developer will identify the skill levels that each position requires;
- 2) An assessment of the likely percentage of direct employment for northern and Aboriginal residents at the proposed Yellowknife Gold Project, in light of the current and likely future (life of mine) labour pool context;
- 3) Any target goals for northern and Aboriginal employment;
- 4) A description of any barriers to direct or contract employment, advancement and retention for northern residents, with particular emphasis on Aboriginal people and residents of smaller Tlicho and North Slave communities. This description must include:
 - a. employee availability and employability in light of minimum skill requirements;
 - b. an investigation of current training opportunities for community members; and
 - c. additional training programs required to maximize direct employment benefits for northern residents and/or Aboriginal persons.
- 5) The developer's strategies and commitments for maximizing direct employment and retention of northern and Aboriginal persons, including a description of:
 - a. hiring and retention policies related to minimum education levels, criminal records, and drug and alcohol use; and
 - b. the developer's plans, strategies or other commitments to increase the mine-ready workforce and support career paths in mining. The developer must specifically outline how these strategies will create or contribute to training opportunities for northern and Aboriginal persons in general, and its employees in particular.
- 6) A discussion of whether and how the developer's targets, strategies and commitments for maximizing employment of Aboriginal and northern residents will extend to contractors;

Business Opportunities

- 7) By project phase, an estimate of all contractor and subcontractor goods and services that the proposed Yellowknife Gold Project will require, as well as an estimate of what percentage of goods and services the developer can source from Tlicho- and North Slave-based businesses;
- 8) The developer's policies, plans, strategies and commitments associated with maximizing contracting to Northern owned and operated businesses;
- 9) An assessment of any barriers to maximizing the utilization of northern businesses; and
- 10) The developer's prediction for any training, education or other improvements necessary to maximize regional business capacity to benefit from this proposed development.

3.4.2 Distribution of Beneficial and Adverse Socio-economic Impacts

The developer will provide predictions for how the proposed Yellowknife Gold Project will contribute to regional economic growth and development while minimizing adverse socio-economic impacts.

The developer will provide the following information and analysis:

- 1) Qualitative and quantitative estimates for all beneficial and adverse economic impacts from the proposed Yellowknife Gold Project, including:
 - a. capital costs associated with placing the mine in operation (estimates should be in 2009 dollars CAD and may be in a +/- 20% range);
 - b. annual operating costs during the life of the proposed Yellowknife Gold Project (+/- 20% range);
 - c. federal, territorial and municipal taxes that the developer will remit by year, as well as from linked economic development (+/- 20% range);
 - d. total employment impact, including a prediction of employment multipliers for the proposed development;
 - e. a prediction of any impacts the proposed development may have on public infrastructure (e.g., waste or water treatment sites); and
 - f. a prediction of any impacts the proposed Yellowknife Gold Project may have on other types of economic activity occurring in potentially-affected communities, with emphasis on the traditional economy.
- 2) The developer's policies, strategies, plans, and commitments for the mitigation of any adverse socio-economic impacts including those that the above points identify.

3.4.3 Social Impacts

During environmental assessments, the *MVRMA* requires a developer to identify and mitigate any likely adverse impacts on the social environment. This includes direct and indirect effects from the proposed development itself, including the relationship between

economic changes from the proposed project and social outcomes.

The developer shall describe:

- 1) Potential impacts associated with the proposed development on community wellness and population health issues. The appropriate criteria and indicators should be developed in dialogue with the potentially-affected communities and responsible government agencies, and a prediction made of how community wellness may be impacted for each potentially-affected community;
- 2) The physical, mental, and cultural health of mine workers and mine workers' families, including the impacts of long-distance commuting on families. This discussion should identify any alternative shift rotations considered by the developer, with the rationale for the chosen rotation;
- 3) Human resources management plans and programs the developer will offer to identify and mitigate potential adverse social impacts, including discussion of:
 - a. increased income and money management;
 - b. potential stresses associated with long-distance commuting and stress management programs;
 - c. substance abuse and treatment policies;
 - d. avoidance of cross-cultural conflict at the work site; and
 - e. support for "home" -community and family – support programs.
- 4) Potential impacts on public safety, especially in regards to the use of the winter road, and identification of mitigation to minimize vehicle accidents; and
- 5) Identification and description of any lessons that the developer may take from the social and economic impacts of previous mine developments in the Mackenzie Valley and northern Canada, and how the developer has incorporate such lessons into the impact identification, prediction and mitigation for the proposed Yellowknife Gold Project.

3.4.4 Cultural Impacts

Heritage Resources

The analysis of heritage resources is inclusive of both sites and objects of cultural significance, and cultural impact assessment includes consideration of both tangible and intangible aspects of culture. The Review Board encourages the developer to consult with the relevant culture group about whether and how to submit evidence to the Review Board for the public record (confidentiality issues related to heritage resources and traditional knowledge are discussed in the Review Board's *Guidelines for Incorporating Traditional Knowledge and Rules of Procedure*).

The Developer shall describe:

- 1) All consultations with traditional knowledge holders, archaeologists, anthropologists, and the Prince of Wales Northern Heritage Centre that the developer conducted during its cultural impact assessment, and indicate where and

- how such interactions influenced mine planning;
- 2) A list of all known archaeological and heritage resources, sites or areas of cultural significance, and areas of high potential for unfound heritage resources in or near the required environmental assessment local study area; and
 - 3) All recommended mitigation measures that consultation produced for the protection of local known and high potential areas of cultural and heritage resources, and the developer's commitments to adopt these measures or reasons for not adopting.

Traditional Land Use and Wildlife Harvesting

The developer must identify any adverse impacts that the proposed Yellowknife Gold Project will have on traditional land use and traditional harvesting activities.

The developer will provide the following:

- 1) Description of potential impacts the proposed Yellowknife Gold Project may have, on its own or in combination with other developments, on hunting, fishing, trapping and other activities for persons and organizations from the potentially-affected communities, including:
 - a. loss of use of the immediate area for wildlife harvesters (including hunting, trapping, fishing, berry picking and medicinal plant collection);
 - b. loss of harvesting success and quality of harvested materials due to any Yellowknife Gold Project activities, with a focus on the impacts of increased traffic and non-resident hunting along the winter road, other disturbance impacts and the potential for real or perceived contamination of food sources; and
 - c. loss of the use of the area for any leisure activities.
- 2) The developer's plans and commitments for mitigation against adverse impacts on traditional land use and traditional harvesting, or compensation for losses that cannot be prevented.

3.4.5 Human Environment Monitoring

- 1) The developer will provide description of any commitments, plans and strategies proposed to engage with the responsible authorities and affected communities in monitoring and reporting on the following:
 - a. success of local and regional residents and aboriginal people in gaining employment at the proposed Yellowknife Gold Project, and the success of training initiatives;
 - b. success of local and regional businesses in providing goods and services to the proposed Yellowknife Gold Project;
 - c. employee retention and worker and family wellness;

- d. the potential contribution of the proposed Yellowknife Gold Project to beneficial and adverse social impacts at the regional and local levels;
 - e. the use of the winter road; and
 - f. impacts on wildlife harvesting and practice of traditional culture on the land.
- 2) The developer will identify relevant existing initiatives monitoring community wellness and investigate how it will engage with, contribute to, and consider results from these programs in its ongoing adaptive management programs.

3.5 Accidents and Malfunctions

As part of the assessment process, the Review Board requires the developer to submit conceptual plans to demonstrate the ability to prevent adverse environmental impacts in the event of accidents or malfunctions. The Review Board considers such possible outcomes in the environmental assessment process.

The developer is required to provide:

- 1) Predictions for the risks, modes of failure, and impacts of accidents and malfunctions including how the developer will use such information in planning and designing, with particular consideration to:
 - a. a failure of any feature of the tailings containment area;
 - b. major fuel spills at the YGP site or along transportation routes;
 - c. accidents involving the transportation and handling of cyanide containing compounds; and
 - d. the occurrence of 100-year extreme precipitation events causing greater-than-expected inflows into the tailings facility.
- 2) A risk analysis of factors that may change the volume of any tailings containment facility, for example the formation of ice lenses in underlying sediment;
- 3) The developer's contingency plans for higher than expected inflows to any mine workings;
- 4) Emergency response measures, that will include:
 - a. storage, transportation and handling system failures of cyanide and other hazardous compounds;
 - b. storage, transportation and handling system failures of hydrocarbons;
 - c. storage, transportation and handling system failures of explosives; and
 - d. failures of the Tailings Containment Area, including worst case scenarios such as catastrophic failure of the dyke, as well as tailings spills.
- 5) Conceptual Spill Response and Contingency Plans that describe the measures that the developer will take in the event of spills to prevent impacts to the environment. The developer is encouraged to refer to *GNWT's Guide to the Spill Contingency*

Planning and Reporting Regulations and INAC's Guidelines for Spill Contingency Planning to develop such a plan;

- 6) Strategies, in a conceptual Adaptive Management Plan, for how the developer will manage deviations from any predictions for effluent quality and level of impacts to the environment;
- 7) A description of the level of accountability that the developer will hold for the actions, accidents and/or malfunctions of any contractors under the developer's employ, in addition to an explanation for how the contractor's environmental management plans will meet or exceed the goals for the developer's environmental management plans;
- 8) Any other potential impacts of the environment on the proposed development that may cause any affect or malfunction to any of the environmental management systems or mine infrastructure, including :
 - a. climate change effects; or
 - b. geotechnical instability due to various causes such as seismic events.

3.6 Cumulative Effects

In addressing cumulative effects, the Review Board encourages the Developer to consult Appendix H of the Review Board's *Environmental Impact Assessment Guidelines*. As part of the consideration for the proposed development's cumulative effects, the developer is required to describe:

1. How the proposed development will contribute to cumulative effects on valued components, including:
 - a. the effects of the developer's planned use of the historic Discovery Mine airstrip;
 - b. cumulative biophysical effects from the proposed development on water quality in the Yellowknife River system, including any downstream effects from the Tailings Impoundment Area or Waste Rock Storage Facilities. The developer should include a matrix, with reference to any supporting data, that depicts how each project aspect will contribute to cumulative and residual effects in the aquatic environment in the area;
 - c. cumulative effects on fish and other aquatic organisms;
 - d. cumulative social, economic and cultural effects with special emphasis on:
 - i. practice of traditional language and traditional economy, time spent on the land, and other activities essential to the maintenance of aboriginal culture;
 - ii. heritage resources in the historic Discovery mine area; and
 - iii. long-distance commuting and impacts on families and local small communities.
 - e. cumulative effects on wildlife related to the YGP and other human activities,

with particular attention to the Bathurst Caribou; and

- f. cumulative impacts the proposed Yellowknife Gold Project may have in combination with other developments, on hunting, fishing, trapping and other activities for traditional harvesters from the potentially-affected communities.
2. Plans for the monitoring of cumulative effects and the adaptive management of the proposed project's contribution to regional cumulative effects.

3.7 Closure and Reclamation

The design and implementation of closure and reclamation plans serve as an assurance that the proposed development will not leave an adverse footprint on any ecosystem. The Review Board encourages the developer to consult with INAC Canada to create the plan and report on such meetings in the Developer's Assessment Report.

The developer is required to describe:

- 1) Preliminary Closure and Reclamation Plans, modeled after INAC's Mine Site and Reclamation Guidelines for the Northwest Territories, which should include:
 - a. a list of Closure and Reclamation components, activities and objectives including a rationale for why the developer chose a particular option and how it best meets the goals for responsible reclamation. The developer will also list other options it considered, with a rationale for their exclusion;
 - b. a depiction of the project area after closure and reclamation of the mine in relation to its present condition, which should include various reclamation scenarios for the site, with particular attention to how the developer will reclaim the open pits;
 - c. structural demolition and equipment removal plans;
 - d. the methods and location for on- and off-site disposal of materials;
 - e. conceptual post-closure structural and chemical monitoring plans, for detecting acid rock drainage and metal leaching effects, that assures protection for the surrounding environment, including a schedule for reporting;
 - f. a cost-estimate component of reclamation activities; and
 - g. the developer's liabilities for the Tailings Containment Area, airstrip, quarries, as well as for any Discovery-project remediations, including relevant financial securities.
- 2) The adequacy of the Tailings Containment Area closure design to prevent acid rock drainage from tailings, with respect to providing a sufficient barrier for the prevention of tailings oxidation, the re-suspension of tailings due to wave action, movement of groundwater through the tailings sediment, or any other pathway for contamination to spread from the Tailings Containment Area post-closure. The Developer should indicate how the Tailings Containment Area will interact with local watersheds after closure, including the impacts of that interaction;

- 3) Conceptual management and monitoring programs for waste rock, overburden or other material that may cause an acid rock drainage effect or metal leaching;
- 4) The social and economic effects of mine closure, including the developer's commitments for assisting workers in the transition from employment with the proposed Yellowknife Gold Project after closure;
- 5) A history of consultations, since October 2008, that the developer has had with local communities and Aboriginal groups for the identification of various Closure and Reclamation issues, as well as a record that shows how the developer has adapted plans to alleviate such concerns; and
- 6) The developer's plans for establishing a self-sustaining vegetation community on the mine site after closure, which should include the following:
 - a. re-vegetation techniques including an investigation on what species the developer will consider for this activity; and
 - b. an outline for how soon the area will rebound to a natural state of vegetation, if ever, with supporting data.

4 Deliverables

As part of the DAR, the Developer must provide the following items:

- a. a table that cross references items in the 2008 Terms of Reference with the corresponding sections of the main body of the DAR, including reference to the relevant data in the appendices;
- b. English, Dogrib and Chipewyan plain language, non-technical summary of the DAR;
- c. an audio translation of the plain language summary of the DAR in both Dogrib and Chipewyan languages;
- d. a summary the company's corporate history in Canada and the Northwest Territories;
- e. a description of corporate and individual responsibilities for the proposed development and associated operations, including the governance relationship between Tyhee Development Corp and Tyhee NWT Corp;
- f. a description of the relationship between the Tyhee NWT Corp and its contractors/subcontractors and provide details as to how the company will ensure that the contractors/subcontractors will be responsible for and honour commitments made by Tyhee NWT Corp;
- g. a detailed record of the environmental performance of the company and its contractors during exploratory work in support of the proposed development; and
- h. any policy, directives or terms of reference concerning the developer's Environmental, Health and Safety Committee.

