



2 October 2021

Impact Assessment Agency of Canada
55 York Street, 6th Floor
Toronto, ON
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By email: UpperBeaver@iaac-aeic.gc.ca

Re: Agnico Eagle Upper Beaver Project
Initial Project Description
IAAC Reference Number: 82960

To: Impact Assessment Agency

The Ontario Rivers Alliance (ORA) is a not-for-profit grassroots organization with a mission to protect, conserve, and restore Ontario riverine ecosystems. ORA works with other organizations, individuals and Indigenous communities throughout the province to share, communicate and assist in addressing risky developments.

The ORA is pleased to comment on the Agnico Eagle Initial Project Description (IPD) for their proposed plan to develop, operate and reclaim an underground gold and copper mine at the Upper Beaver Gold project “Project” site. ORA became aware of the Project when local cottagers reached out to our organization for assistance. Underlining is for emphasis only.

The ORA strongly urges the Impact Assessment Agency of Canada (IAAC) to determine that a federal Impact Assessment (IA) is required to ensure that the ecological, social, and cultural effects of this proposed Project are rigorously assessed and mitigated. A federal IA would ensure that the potential ongoing cumulative effects of this Project on the environment, Indigenous communities and the public are fully addressed to ensure a more environmentally and socially sustainable outcome.

Upper Beaver Gold Exceeds the IAA Requirements:

If a project is to be considered for an Impact Assessment, the following conditions of the Physical Activities Regulation (SOR/2019-285) of the *Impact Assessment Act* requires,

18 The construction, operation, decommissioning and abandonment of one of the following,
(c) a new metal mine, other than a rare earth element mine, placer mine or uranium mine,
with an ore production capacity of 5,000 tonnes per day or more

(d) a new metal mill, other than a uranium mill, with an ore input capacity of 5,000 tonnes per day or more.

60 The construction, operation, decommissioning and abandonment of a new structure for the 10,000,000 cubic metres per year or more of water from a natural water body into another natural water body.¹

¹ Upper Beaver Gold project, Initial Project Description, B.2 Applicable Physical Activities Regulation Conditions, P-17/126.



The IPD reports that mining and ore processing will occur at a total rate of approximately 4,000 to 10,000 tonnes per day (tpd) as an annual average over the life of the mine, and during the years of open pit operation could reach daily peaks of ore extraction reaching 15,000 tpd. The maximum potential of ore processing plant input capacity proposed is 10,000 tpd.²

The Project would also require the diversion of the Misema River around the proposed open pit mine. The predicted flow through the proposed diversion during the mine operations phase, based on current information, is expected to be on average approximately 91.5 million cubic metres per year. Based on a long term modelled record, the maximum average annual flow diversion has been estimated at approximately 126 million cubic meters per year.³

The ORA strongly recommends the IAAC require the Project undergo an IA, as it far exceeds the minimum criteria set out in the Physical Activities Regulation of the *Impact Assessment Act* for the construction, operation, decommissioning and abandonment of a mine, and has the potential to result in serious and ongoing environmental harm.

Scope of the Project:

The IPD reports that “*Agnico Eagle is also conducting other exploration programs in the region which may or may not continue in parallel with the project*”, and that “*the processing plant could also process ore trucked to the site from other compatible deposits at the same time as processing the Upper Beaver Mine ore, or potentially after the on-site ore resource is depleted*”.⁴ To that end, it has come to our attention that Agnico Eagle (AE) has a number of other mining and exploration projects in the area, at Upper Canada, Munro, Skead⁵, Anoki-McBean, as well as the Kirkland Lake Project⁶.

Their suggestion of potentially processing ore from other ore bodies would significantly increase the environmental impacts. It is therefore crucial that the IAAC initiate and facilitate a full federal IA to determine the maximum scope of the Project, taking into account on and offsite transfers from other mine sites, and potential negative impacts of the project on local, Indigenous, and downstream communities, and on the environment.

Waste Storage and Wastewater Management:

The ORA is concerned over the huge potential for this Project to pollute the environment with toxic chemicals, heavy metals, stormwater run-off and wastewater effluent. There was no information in the IPD on the type of technology that would be used to treat these toxic substances and to what extent it would be treated before being released into the environment. We are very concerned about the potential for these toxic substances to pollute surface and groundwater, and how it might impact on communities and valued ecosystems.

Further, there was no information in the IPD revealing what chemicals would be used in the processing of the ore and contained in the wastewater, or how these toxic chemicals would be

² Upper Beaver Gold project, Initial Project Description, B.4 Capacity Estimate, P-27/126.

³ Upper Beaver Gold project, Initial Project Description, Part F, 3.4 Maximum Production Capacity, P-27/46.

⁴ Upper Beaver Gold project, Initial Project Description, Ore Processing, P-18 & 22/126.

⁵ Agnico Eagle, Project Update to Cottagers and Surface Rights Owners, December 3, 2020, slide 15/53.

⁶ Agnico Eagle Kirkland Lake Project – Regional Geology Map.



contained, monitored and treated. These are critical gaps which ought to have been discussed at this preliminary and critical stage.

The ORA is also concerned about seepage from tailings, waste rock, ore and overburden stockpiles. There was very little to no information about how and to what extent wastewater effluent would be treated, how stormwater run-off would be handled and treated, containment ponds and contents of ditches would be treated, or how the environment would be protected from the seepage of those contaminants.

“The precise [effluent] discharge location has not yet been determined but it is expected to be to the Misema River downstream of the Victoria Creek inflow to the Misema River.”⁷ There is no information in the IPD regarding how fish and fish habitat will be impacted by all of this pollution, or what kind of mitigation and monitoring plans would be in place.

It is also important to remember that the scope and complexity of this Project would increase significantly if AE does decide to ship ore in from other mine sites to be processed at the Upper Beaver site.

For these reasons, ORA strongly urges the IAAC to require this Project to undergo an IA to fully assess and require mitigation of the myriad of potential environmental and social impacts.

Cumulative Effects:

The ORA is very concerned that the accumulated downstream sediments and contaminants from past mining activities in the area would be stirred up and sent downstream when water flow is redirected through the Misema River System with the aid of four new dykes placed at the west end of Ava Lake and below York Lake (the new open pit mine) diverting the Misema River into two new diversion channels joining Ava Lake directly to the Misema River downstream of York Lake.

The cumulative effects of those historical toxics and heavy metals, combined with the proposed Project's water taking, wastewater effluent, seepage from tailings, collection ponds and ditches, stormwater run-off, climate change, and any other mines releasing contaminants into the watershed, would place a very heavy burden on water quality and water quantity in the Misema River system, Blanche River, Englehart River on into Lake Timiskaming. The cumulative effects could only be thoroughly assessed and properly mitigated through a rigorous federal IA.

ORA submits that based on the sheer size and complexity of the Project, and its potential for significant ongoing cumulative negative environmental effects, that it necessitates a full federal IA.

Rationale for an Open Pit Mine:

The IPD claims that the proposed Project site has had a long history of mineral exploration and development that has created serious mine hazards, leaving the site unstable and unsafe. Consequently, the proponent is proposing to divert the Misema River around York Lake with the aid of four dykes and two new diversion channels and dewater York Lake to establish an open pit gold and copper mine.

⁷ Upper Beaver Gold project, Initial Project Description, Water Management Facilities and Drainage Works, P-24/126.



The IPD provides very little information on how AE determined it was unstable and unsafe or the nature and detail of these conditions, other than approximately 20 metres (m) of unconsolidated materials and 20m of bedrock are present above the proposed mine workings into the underground workings. It reported that “*Agnico Eagle and their technical consultants are concerned that mining under these materials could cause an instability, and potentially a catastrophic failure and collapse of the underground workings, causing the Misema River to flow into the underground mine*”.⁸

Also, an AE Project Update to cottagers and surface rights owners, dated December 3, 2020, detailed a field investigation and a geotechnical review of drilling information in 2019 and 2020. The 2019 results were reviewed by a technical team, and they interpreted “*that the stability issue already known at surface, potentially extend at proximity and under the York Lake*”.⁹

The assessment on rock stability concluded that “*There is a risk for future underground development work in this area and the safety of the workers. Removing the mineralized zone from the project to avoid the area would significantly impact the project viability. Changes to the design of the project are necessary to mitigate these risks and to maintain the project feasibility and economics.*”¹⁰ Note that the mineralized zone is essential to project viability.

ORA is concerned that there is no mention in the IPD about exploring any other solutions to stabilizing this “unconsolidated rock” without having to divert the Misema River and dewater York Lake to create an open pit mine.

However, according to the Upper Beaver Project Report on 2018 and 2019 Diamond Drilling Programs, “*Results of the drilling have confirmed good potential for extension of the Upper Beaver mineralization to a vertical depth of 2000m below surface and have increased confidence in the shallow to intermediate depth resources for the Upper Beaver deposit, updated resource/reserve calculation expected for year-end 2019*”.¹¹ “*The new deep pilot-hole, started in 2018 and completed in 2019, intersected gold-copper mineralization at a vertical depth of approximately 2,000 meters below surface...*”.¹¹ A search of the over 3500 pages of this report mentioned nothing about a safety or instability risk, about the mine not being viable, or about water from York Lake migrating into the mine.

It is also worth noting that a 30 March 2012 Technical Report and Preliminary Economic Assessment of the Upper Beaver Gold-Copper Deposit, made no mention of it being unsafe or unstable anywhere in its 186-page report. In fact, the only mention of stability is when it says “*rehabilitation measures will be designed to ensure long-term physical and chemical stability of the site in accordance with Ontario’s closure plan approval process*”.¹²

Furthermore, the IPD did not mention that there were 3 potential project scenarios assessed:

- **Scenario A:** *Underground mining with the area of concern isolated by hydrostatic barricades*
 - *Pros: A lower environmental impact*
 - *Cons:*

⁸ Upper Beaver Gold project, Initial Project Description, Water Management Facilities and Drainage Works, P-21/126.

⁹ Agnico Eagle, Project Update to Cottagers and Surface Rights Owners, December 3, 2020, slide 26/53.

¹⁰ Agnico Eagle, Project Update to Cottagers and Surface Rights Owners, December 3, 2020, slide 32/53.

¹¹ Agnico Eagle Upper Beaver Project Report on 2018 and 2019 Diamond Drilling Programs, Kirkland Lake, Ontario Larder Lake Mining Division, NTS 32-D-04, Mark Masson, P.Geo, December 9, 2019, P-7 & 66/3583.

¹² Technical Report and Preliminary Economic Assessment of the Upper Beaver Gold-Copper Deposit, Kirkland Lake, Ontario, Canada, for Queenston Mining Inc. by P&E Mining Consultants Inc., NI-43-101F1, Technical Report No. 239, March 30, 2012.



- *A high level of complexity*
- *Safety risks remain*
- *Impact on economics due to the loss of potential ounces of gold.*
- **Scenario B:** *Underground mining with dewatering/diversion York Lake*
 - *Pros: Remove risk associate hydraulic conductivity*
 - *Cons:*
 - *The risk of ground stability remains*
 - *Still need to avoid the area of concern*
 - *Impact on economics due to the loss of potential ounces of gold*
 - *Environmental impact*
 - *Required removal of overburden in the York lake area an*
 - *Potential concerns from users of the area.*
- **Scenario C:** *Underground mining, extraction from surface of the area of concern with small pit and dewatering/diversion York Lake.*
 - *Pros:*
 - *Remove risk associate with ground stability and hydraulic conductivity*
 - *Opportunity to rehabilitate historic legacies*
 - *Maintains the economics of the project*
 - *Cons:*
 - *Environmental impact*
 - *Potential concerns (noise, air, etc.)*¹³

AE chose Scenario C as the “viable solution”, with the addition of diverting the Misema River. Scenario A would have lowered the environmental impact; however, the key factors considered in the decision were safety, economic viability, eliminating ground stability risk at surface, and opportunity to rehabilitate.¹⁴

ORA is not at all convinced there was a safety and stability risk and submits that it is more likely because of “*an impact on economics due to the loss of potential ounces of gold*” as set out in the list of cons in Scenario A above. In fact, Scenario C would gain easier access to the crown pillar from the surface through a much larger open pit mine.

In fact, an Agnico Eagle website Blog posting, dated 10 September 2019, reported on the Pinos Altos mine in northern Mexico: “*How to recover the Santo Niño crown pillar – the valuable ore reserves that lie between the bottom of the open pit and the upper level of the underground mine – without exposing employees to any additional risks or ground instability and with an eye to safeguarding the future of the underground mine? Given the strengthening market demand and gold price, we were determined to optimize this asset and move it totally underground, says Marc Legault, Senior Vice-President, Operations for U.S.A. and Latin America... Their high skill in collaborating and executing on this ‘first’ for our Mexico mines and for the achievement in keeping everyone safe on this very complex project has allowed us to learn and take note of best practices for our future projects*”.¹⁵

The Pinos Altos project was complex and risky for employees, yet they found a way to mine it to recover all the gold. They start with an open pit mine and then transition to underground to maximize their profits. They have learned from this project and use it as a best practice for their

¹³ Agnico Eagle, *Project Update to Cottagers and Surface Rights Owners, December 3, 2020, slide 35 to 37/53.*

¹⁴ Agnico Eagle, *Project Update to Cottagers and Surface Rights Owners, December 3, 2020, slide 38/53.*

¹⁵ Agnico Eagle, *A crowning achievement for our Pinos Altos team, September 10, 2020, blog posting.*



projects. AE intends to untop the crown pillar at the Upper Beaver Project. It is the area beneath and around York Lake, the mineralized zone, that makes the project “viable”.

Open pit mines result in a larger area of surface disruption and tend to produce much larger amounts of waste rock, while underground mines remove ore using shafts and ramps as well as other underground infrastructure and the ratio of waste rock to ore generated tends to be much lower.¹⁶

The ORA seriously questions the stated rationale for the open pit mine in terms of safety and stability. The potential negative impacts from an open pit mine versus an underground mine would mean increased waste rock, noise, air, vibration, dust, light, and effluent pollution, and the loss of York Lake.

All of the foregoing assumptions and project scenarios posed by AE provide additional justification for the need of an IA so that there is a forum to investigate AE’s claims of the project site being unsafe and unstable, and to look at “alternative means of carrying out the undertaking”. AE must be required to seriously consider ways that do not include an open pit operation, the draining of York Lake, or the diversion of the Misema River, and to look at these alternatives singly and in combination. All of these scenarios, including an alternatives assessment, must be fully accessible to the public and made available for their review and comment. Absent an IA process, such public participation in decision-making cannot occur.

Misema River Diversion, York Lake Dewatering and Damming of Ava Lake:

The proposed Misema River diversion is extremely complex in that “*The conceptual design subject to detailed engineering has four short dykes (approximately 30 to 75m in length) placed at the west end of Ava Lake and below York Lake, and two channels (25 and 125m in length) joining Ava Lake directly to the Misema River downstream of York Lake.*”¹⁷

AE indicates that by establishing an open pit mine some of the historic tailings and other mine hazards can be mitigated. “*The channels will be designed to handle the necessary water flows, as well as passage of fish, at least equivalent to the current conditions. After that is completed, fish will be transferred from York Lake, and York Lake will be dewatered. There is the potential that on closure of the mine, the open pit could be reflooded to create a larger lake at the current York Lake location.*”¹⁸

However, AE has not addressed how they would mitigate the environmental impacts of the proposed mining operation to protect Beaverhouse Lake, Ava Lake and the Misema River, let alone how removing the current historic tailings will justify the massive pollution potential of an open pit mine on the surrounding surface water and natural environment. Even if York Lake was filled with water again after decommissioning, how fit would it then be for fish and fish habitat?

It must also be noted that the Tailings Storage Facility is proposed to be located at a higher elevation and immediately above Beaverhouse Lake and local cottagers. If this infrastructure were to fail and/or run-off or seepage from it were to seep into Beaverhouse Lake it could contaminate

¹⁶ *Environmental Code of Practice for Metal Mines, Environment Canada.*

¹⁷ *Upper Beaver Gold project, Initial Project Description, Open Pit and Diversion, P-21/126.*

¹⁸ *Upper Beaver Gold project, Initial Project Description, Open Pit and Diversion, P-21/126.*



the lake, kill fish and destroy habitat. The Misema River system is also a source of drinking water for many families living adjacent to and downstream of the Project site.

The IPD reports that “*Agnico Eagle intends to ensure that mining activities do not noticeably change Beaverhouse water levels*”¹⁹; however, with four new dykes, three new river crossings, the Permit to Take Water for the dewatering of the historical mine workings, the new development for the Project, and the eventual dewatering of York Lake, the Misema River diversion, water taking for the processing of ore, and considerations for climate change, it is doubtful they could keep that promise. Local cottagers are concerned that navigation into Howard Lake and Misema Lake could be lost if water levels drop any more.

The dewatering of York Lake for an open pit mine, the diversion of the Misema River and the damming and redirection of flow in Ava Lake, all to maximize gold recovery, are extreme measures that must be rigorously investigated, assessed for alternatives, and mitigated through a federal IA if this Project is to proceed.

Fish and Fish Habitat:

The ORA is concerned about the impacts of the Project on water quality, water quantity and flow and how it will impact on fish and fish habitat. Dewatering York Lake and diverting the Misema River is an extreme measure that would displace fish and destroy fish habitat, and represents a potential cost to the fishery, local cottagers, Indigenous communities, and downstream residents. These potential impacts and mitigation measures were not adequately articulated in the IPD.

The IPD made little mention of what mitigation measures would be in place to protect surface water quality, fish and fish habitat in the surrounding lakes, creeks and wetlands from uncollected seepage and stormwater run-off from the Project.

The IPD also does not provide information regarding impact avoidance alternatives. For instance, what are the implications of not draining York Lake or diverting river flows?

The proposed extraction and processing of 10,000 to 15,000 tpd of ore from this Project, as well as the open-ended comments that ore from other mines outside of this Project could be processed at the Upper Beaver mine and may continue processing ore even after the mine is decommissioned, is highly problematic. If this were to be the case, the impacts from this operation would likely result in significant and ongoing effects to fish and fish habitat, and to ecological processes, extending many kilometers downstream through several lake and riverine ecosystems.

The IPD reports that “*a plan for habitat compensation will be developed through consultation upon and approved through a rigorous federal process, and when implemented, will mitigate effects to aquatic resources, including habitat loss such as at York Lake*”.²⁰ However, it lacks comprehensive fisheries information for broader watershed assessment, including Traditional Knowledge, historical fish community assessments, and requires aquatic and terrestrial area of impact calculations for the proposed destruction of aquatic and terrestrial habitats. For instance, locals reported that Rainbow Trout, Brook Trout, Cisco, Ling are present in the area but were not

¹⁹ Upper Beaver Gold project, Initial Project Description, Open Pit and Diversion, P-40/126.

²⁰ Upper Beaver Gold project, Initial Project Description, Compensatory Aquatic Habitat, P-25/126.



reported in the IPD. There is also spawning habitat for White Sucker at the outlet of Beaverhouse going into Ava Lake.

As stated above, any seepage of contaminants, stormwater run-off, and wastewater effluent from the proposed Project would also threaten surrounding creeks, wetlands, Beaverhouse Lake, Ava Lake, and potentially the Misema River system all the way down to the Blanche River, Englehart River and on into Lake Timiskaming.

The provincial Mining Class Environmental Assessment is a broken screening process that has been badly eroded and no longer provides a meaningful consultation and approvals process. In ORA's opinion, the only path to a rigorous consultation process and proper mitigation of the environmental effects from this Project is through a federal IA.

Species at Risk and Migratory Birds:

Local cottagers have reported that in addition to the Little Brown Myotis, there are several other Species at Risk and Migratory Birds that should have been reported. The IPD made no mention of Bald Eagles, Osprey, Geese and even Lynx, which have been reported by local cottagers in the area. The IPD only identified five Species at Risk present nearby during previous studies, but off site: the Little Brown Myotis, Whippoorwill, Canada Warbler, Common Nighthawk and the Rusty Blackbird. However, since birds have wings and move about, they and others would likely be present in the study area as well if a proper on-site study was done.

The IPD's reference to "previous studies", is a 2011 study (Azimuth 2011), which in our opinion is outdated and unreliable. The potential effects on Species at Risk and Migratory Birds have not been covered adequately, and no monitoring or mitigation measures have been articulated in the IPD. There was not even a mention of geese being present in the study, which is difficult to believe.

Species at Risk and Migratory Birds are a federal concern and have not been accurately reflected in the IPD, nor were any monitoring and mitigation measures offered. ORA submits that AE's deficient consideration of species at risk and migratory birds is yet another reason why a full federal IA must be undertaken.

Climate Change:

The IPD reports that "*Additional fresh water will be required for ore processing and a fire water supply, and it is expected to be pumped from Ava Lake*".²¹ It is important to note that the IPD does not consider the impacts or unpredictability of climate change on water quantity and flows throughout the lifespan of the Project, and that is not acceptable or responsible.

There is little to no information on climate change and how it might affect the resilience of the Project or the environment's resilience to the Project, or measures or technologies to mitigate those effects. There is no information in the IPD on how the Project's activities and footprint would impact on carbon sinks, its Greenhouse Gas (GHG) emissions, or what if any measures would be taken to reduce its GHG emissions for the life of the Project.

²¹ Upper Beaver Gold project, Initial Project Description, Water Management Facilities and Drainage Works, P-24/126.



This is a critical gap given the centrality of climate considerations within an IA. Indeed, it is noted in the preamble of the *Impact Assessment Act* that IA contributes to Canada's ability to meet its environmental obligations and its commitments in respect of climate change.

Noise, Light, Air and Vibration Pollution:

The IPD has not mentioned the air quality monitoring or mitigation measures for dust and other contaminants under the Project. The local cottagers would like to know what measures would be put in place to ensure toxic dust, noise from processing and trucks, and nighttime light pollution will be controlled and mitigated.

The sheer size and complexity of the Project, the potential contaminants, nighttime light pollution and 24-hour noise, dust and vibration must be addressed through a federal IA.

Road Access:

The IPD suggests that a portion of the access road on site will require re-routing to avoid the open pit and secure the mine development area, and that an access road will need to be developed for cottagers and other land users.

This access road has been a historic right of way and access road for the last 100 years. AE just made an announcement that they would be closing access to the road, with no consultation or discussion. AE has not been forthcoming with when it might be closed, what type of road, the level of construction, who will be responsible for maintenance, where the road will be or how much farther they would have to travel to their cottages. This information was not included in the IDP, and there has been no transparency or consultation with stakeholders. The cottagers have been left in a state of uncertainty and wonder over an issue that is paramount to their ability to access their properties. Is this a sample of what is to come with this company, the kind of consultation they intend or the level of transparency?

The need to critically review, test and publicly investigate claims being made by AE regarding road access is another reason the ORA is requesting a full federal review of this Project.

Conclusion:

The cottagers living on Beaverhouse Lake and the surrounding area are opposed to the Upper Beaver Gold project because of the ramifications of an open pit mine, its size, complexity, its potential environmental effects, and the open-ended assertion that it could take on ore from other mining operations for processing, even after the Upper Beaver mine has been decommissioned.

The entire surrounding area for many miles in any direction is a hotbed for gold exploration; therefore, this Project, or an iteration of it, could go on for many, many years. Throughout that time the environment and the community would be subjected to noise, dust and light pollution, vibration, and contaminants, with the potential of polluting Beaverhouse Lake, Ava Lake and the Misema River, all the way out to Lake Timiskaming.

Our world is in a daily state of crisis because of the effects of a warming climate. Extreme heat is resulting in drought, water shortages, power outages, wildfires, loss of property and deaths. While on other days, extreme rain is causing flooding, infrastructure failure, property losses and



lives lost. In some parts of the world people are forced to leave their area because lakes and rivers are drying up. This is predicted to only worsen as time progresses.

It is crucial that we carefully consider the ecosystem costs for developments such as the Upper Beaver Gold project. What is a healthy environment worth to our planet's survival? A short-sited view would see AE's proposal as a great boon to the company, to local workers, and to the economy. However, we are in unprecedented times, and AE has big plans, not just for this site, but for a number of mining sites within a large section of the Kirkland Lake area. There was a huge gap in the IPD when it did not provide any meaningful consideration to climate change.

This is a time when the federal government is calling upon municipalities and large corporations to build resilience into their infrastructure so it can withstand a harsh climate that will only continue to worsen over time. We are looking at an uncertain future because no one can accurately predict how hot or how wet or extreme it will get, or what pressures that will place on this Project or it on the environment.

It is of paramount importance that these types of mammoth projects do not contribute to polluting our surface and groundwater, that its GHG emissions are minimal to none, and that they are prepared for the challenges their infrastructure will face with climate change. The only way this will happen is through a federal Impact Assessment.

This proposed Project is extreme, and it threatens a very beautiful and pristine retreat that many of these cottagers have had in their families for many generations.

For all the reasons set out above, we respectfully request that the IAAC designate this Project for a full federal Impact Assessment to ensure a rigorous environmental impact assessment and a meaningful consultation process. It is essential that all potential negative effects are thoroughly mitigated, with strict monitoring, compliance and oversight put in place to protect the environment and the community.

The ORA strongly supports the submission by the Beaverhouse Lake Cottagers.

We thank you for this opportunity to comment and look forward to answering any questions.

Respectfully,

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