

<b>Interested Party:</b>	GN	<b>No.:</b>	1
<b>Subject:</b>	Management Plans		

**Reference to Application:** Project Description

**Comment:**

In general, we agree with the Proponent that the potential impacts of the proposed activities can likely be mitigated. We do note, however, that the application package does not contain sufficient information to fully assess potential impacts on terrestrial wildlife. For the Valued Ecosystem Components considered, only a discussion of baseline conditions and a list of potential impacts are provided. There is no discussion regarding the significance of these potential impacts.

**Sabina Response:**

Sabina believes that it has presented the appropriate level of detail in the SPW application to assess whether or not the activities can be exempted under NLCA Article 12.10.2. All activities proposed in the SPW application are consistent with the larger project assessed in the DEIS. The pathways of effects were considered in detail in the DEIS. The DEIS did not identify any significant effects, and as such, no significant effects are anticipated for the SPW as a subset of the larger project.

<b>Interested Party:</b>	GN	<b>No.:</b>	2
<b>Subject:</b>	Management Plans		

**Reference to Application:** Project Description

**Comment:**

There is no standalone “Wildlife Mitigation and Management Plan” included in the application package. A number of mitigation measures are listed within the Project Description, but these measures are not presented in a separate management plan.

The GN would like to see that the terrestrial wildlife mitigation and monitoring plans are updated to include the proposed activities.

**Sabina Response:**

While there was no stand-alone TWMMMP presented in the application, Section 8.4.9 General Wildlife Potential Effects and Mitigation, provides the mitigation measures Sabina commits to implementing during execution of the SPW. These measures will be captured in a standalone management plan prior to the commencement of permitted activities.

<b>Interested Party:</b>	GN	<b>No.:</b>	3
<b>Subject:</b>	Air Quality and Noise		

**Reference to Application:** N/A

**Comment:**

From NIRB's Pre-hearing Conference Decision Report for the Back River Project, it was noted that the GN had outstanding concerns related to noise disturbance (page 20). Appendix 1: Commitments from the Technical Meeting and Pre-hearing Conference of the same report, commitment No. 13 states: At this time the Goose Property Airstrip will not be designed to accommodate aircrafts as large as a Boeing 767. If larger aircraft are selected as a viable option, Sabina commits to updating the air quality and noise models and conduct an effects assessment to address the potential effects of this larger class of aircraft. This would be included in the FEIS.

With plans to extend the airstrip within this exception request, the GN would like the Proponent to update their air quality and noise models, and conduct an effects assessment to include the potential effects of a larger class of aircraft on wildlife before any of the proposed activities proceed. This updated assessment should include more information on the type of aircraft and frequency of trips contemplated by the proponent.

**Sabina Response:**

Sabina does not intend to use a 767 type aircraft for the SPW or for the main project; this was an alternative that has been considered and discounted.

Predictive modelling is not generally required for this level of activity. Further, the airstrip extension and aircraft classification proposed as part of the SPW are identical to that proposed and assessed in the following locations of the DEIS:

- Appendix V4-1B: Air Quality Modelling Report
- Appendix V4-2A: Noise Baseline Report

Thus the air quality and noise modelling predictions presented in the DEIS will apply to the SPW.

