

ID	TAR Section	Comment	Proponent Response
TAR_MoE_001	Overall	The importance of the recognition and planning for longer term discharge has also be identified as an important aspect of future mine management and permitting by the Mount Polley Independent Expert Investigation and Review Report.	Noted
TAR_MoE_002	Overall	Through meetings held by MPMC through the spring of 2016 an overriding message presented to the company was that a discharge to Quesnel Lake is not the preferred option for the long term.	Noted
TAR_MoE_003	Overall	It should be noted that all the qualified professionals identified to compile the information in the Draft TAR appear to meet the province’s requirements to be considered qualified professionals.	Noted
TAR_MoE_004	Overall	The authors may want to go through the Draft TAR and check for references to tables, typos and any other possible errors.	The Draft TAR has been checked as and revised as appropriate with respect to tables, typos and any other possible errors.
TAR_MoE_005	Overall	The draft quite often references other documents such as the PEEIAR the CEMP and Annual Reports and as such these documents will have to be made available to all reviewers at the same time as the TAR (along with clear reference to applicable section of the document) so that they can follow through on each line of reasoning and its supporting documentation.	Noted
TAR_MoE_006	Exec Summary	The executive summary notes that it is “proposed” that the discharge be removed from Hazeltine Creek by November 2017. In fact this is not a proposal, this is a legal requirement of the current permit and this timeline was included to allow for the development, implementation and authorization of an alternative to the use of Hazeltine creek as a receiving environment considering its low capacity to receive a treated discharge once it is returned to a more natural state.	Addressed in the "Approach" section of the Executive Summary.
TAR_MoE_007	Water Treatment	Best Achievable Technology (BAT) discharge treatment assessment is addressed in Draft TAR. The original BAT for the Short Term Water Management Plan (STWMP) was conducted against a time limited scenario (Springer pit filling and need for treated discharge limiting what could be implemented). The LTWMP BAT notes that it is building off the existing treatment systems which make sense however the LTWMP needs to review BAT in terms of the longer implementation period beyond the Operational phase and it does not appear that the current Operational BAT assessment addresses some of the parameters of concern, nutrient parameters, Sulphate and Selenium.	A Closure BAT Assessment was prepared (refer to Appendix K). The Closure water treatment section of the TAR (Section 5.5.3) was modified to address the TAR comments.
TAR_MoE_008	Appendix E	It is also not clear that a BAT evaluation has been performed on the conceptual design for closure/post closure water treatment utilizing more passive treatment (engineered wetlands and supporting subsequent treatment) discharging to multiple watersheds introduced in Appendix E.	A Closure BAT Assessment was prepared (refer to Appendix K).
TAR_MoE_009	Section 5 (and Appendix G Options Analysis for LTWMP)	While the description of the options analysis provided is well explained the level of detail provided with respect to some evaluation criteria is too limited. For assimilative capacity a quantitative range is provided however no quantitative range is provided for the economic criteria of capital and operating costs therefore it is not possible for reviewers to ascertain in even a general sense the relative economic costs of the various options (this concern has been raised previously). In the case of the Quesnel River discharge option information to support the statement that large dilution zone may impinge on fish spawning areas is not provided and there is no quantitative assessment of Quesnel River dilution modelling provided to support the determination that the Quesnel River option was thoroughly evaluated.	Additional information has been added for criteria in Appendix G such as Quesnel River mixing. Quantitative costing information is not available because detailed costing was not deemed necessary for the decision. This is because the relative costs are certain, even though the absolute costs are not. For example, a longer pipeline to Quesnel River over less developed terrain and the installation of a river diffuser is certain to cost more than a pipeline to Quesnel Lake, and both options are certain to cost more than all other options. Therefore detailed cost information would not change the options analysis rankings or scorings.
TAR_MoE_010	Section 5 (and Appendix G Options Analysis for LTWMP)	Site Specific Science Based Environmental Benchmarks (SSBEB) was ranked as the second most viable option. However MoE biologists have indicated to MPMC previously that they do not believe SSBEBs would be applicable in this situation and as such their inclusion as a viable option (particularly the second most viable) is misleading.	Text has been added to both the TAR and Appendix G to note that this option is not being pursued based on conversations with MoE.
TAR_MoE_011	Section 5 (and Appendix G Options Analysis for LTWMP)	The long term closure/post closure option of utilizing wetlands treating distributed discharges does not include any capital and operating costs to provide an understanding of the viability of this option and to support any associated bonding requirements under the MEM permit. The assessment of the closure option also does not provide any reliable prediction of receiving environment quality	Tables of receiving environment quality have been provided to MEM in follow up to the bonding trigger Information Requirements.
TAR_MoE_012	Table of Concordance: 2.1 Meteorology and Climate	f) - considering the long term nature of the plan and the fact that it considers multiple decades under the mine closure scenario it needs to “identify the potential impacts of projected climate change on the projects operations closure and post closure phases” the Appendix B water balance indicates the Cariboo Springer Pit lake could reach spillover by 2045 a period by which climate change impacts could significantly impact. In addition LTWMP closure treatment is noted in Appendix E as evaluating out to 2100 and that seasonal variations in flow quality and quantity have not been fully accounted for.	Addressed in Section 3.2.2. of the TAR. Details are in Appendix B sections 3.1.4 and 6.6.1

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TAR_MoE_013	Table of Concordance: 2.6 Sediment Quality	While this permit relates to a effluent discharge it does include constituents that could impact sediment quality in the area of the discharge and as such the requirements of section 2.6 should be included for both the proposed discharge to Quesnel Lake and the subsequent discharge locations proposed during mine closure.	A concise baseline sediment quality section has been added to address Section 2.6 of the Table of Concordance: Quesnel Lake, Bootjack Lake, Polley Lake, Hazeltine Creek.
TAR_MoE_014	Table of Concordance: 2.6 Aquatic Life	References the location of applicable information as Sections 3.6 in each subsection except the last, believe they should each reference Section 3.5.	Addressed
TAR_MoE_015	Table of Concordance: 3.2 Specific Information for Effluent Storage and Discharge	See notes above regarding BAT assessment for closure treatment systems. Most of the requirements to this section of the TOC need to be applied to the closure storage and discharge.	A Closure BAT Assessment was prepared. Refer to Appendix K.
TAR_MoE_016	Table of Concordance: 3.2 Specific Information for Effluent Storage and Discharge	g) un-clear as to why sampling and flow at discharge points is not applicable to the operational discharge?	Sampling points are provided in the CEMP. The Table of Concordance has been updated to include the Section where details of the CEMP are referred to.
TAR_MoE_017	Section 6.1.2	Draft TAR does not provide any reference to how the model will conservatively account for potential additional groundwater contaminant loads observed since 2015 in the vicinity of the monitoring wells between Springer Pit and Bootjack Lake. Golder has stated that these loads are not likely originating from Springer Pit, which suggests that additional source(s) need to be included in the model, or that the loadings from Springer/Cariboo Pits need to be artificially increased with an empirical factor of safety. The sections referenced do not provide a clear explanation or rationale for how mass loadings from other site facilities (including, but not limited to PAG waste stockpile, haul road, seepage losses from unlined sumps/ditches) are accounted for in the modeling. If such explanations are present, they should be more clearly presented (e.g. by section number(s) within appendices rather than just referencing an entire appendix.	This information has been provided to MEM in follow up to the bonding trigger Information Requirements. This information has also been added to the TAR Section 6.1.
TAR_MoE_018	Table 3.14	in the Baseline box there are two footnotes, a) and b) but at the bottom of the table only a) is listed	Addressed
TAR_MoE_019	Table 3.16	the title should refer to Bootjack Lake, not Quesnel Lake	Addressed
TAR_MoE_020	Table 3.17	the title should refer to Polley Lake, not Quesnel Lake	Addressed
TAR_MoE_021	Section 6.5 Uncertainty Assessment (pg. 148)	references the Uncertainty Assessment Summary Table as 6-10 but is actually Table 6-9	Addressed