

Identifier	Topic	Reference to EIS/EA Report	Summary of Previous Comment	Proponent's Response to Previous Comment	Follow-up comment/ Request for Information	New Proponent Response	Subsequent Comment
					<i>Date: September 2015</i>	<i>Date: August 2017</i>	
EAB3	Alternative assessment, Bounding Scenario		<p>Concerns have been raised by myself, and other technical reviewers around the use of bounding scenarios for determining impacts and evaluating alternatives. A challenge with the approach is that the impacts and mitigation measures can differ between the different phases of the project, construction, operation, closure and post-closure. Provide more discussion and rationale provided to accurately identify and describe the different characteristics of each phase.</p>	<p>The bounding scenario approach to assess the potential effects of a multi-phase project is a widely accepted environmental assessment approach that provides clarity and allows for a focused and conservative assessment.</p> <p>A description of the characteristics of each project phase is summarized in Chapter 1 and further detailed in Chapter 5.</p> <p>Technical disciplines evaluated the Project description by phase and determined a bounding scenario that would be conservative in capturing how the Project could be anticipated to interact with that component of the environment. These detailed evaluations are provided in the Technical Supporting Documents (TSD). For example, the Hydrology TSD determines the bounding scenario for Stream Flows, Lake Water Levels and Navigability by evaluating each activity within each project phase.</p> <p>The Lake Water Levels summary table is attached as an example.</p>	<p>The Ministry and other technical reviewers continue to have concerns around the use of the bounding scenario approach. Considering only one phase of the project may not allow for a meaningful evaluation of the alternatives and assessment of effects. There is increased uncertainty as a component may appear to have the most impact during one phase but may actually cause a larger impact during another.</p> <p>Have there been mining-related EA projects in Ontario that used this approach to evaluate alternatives and project impacts? If so, please indicate which ones.</p> <p><u>Alternatives Assessment</u></p> <p>Section 7 of the approved ToR outlines the means by which the alternatives methods will be evaluated to determine the preferred project design. Section 7.2.1 (page 52) of the approved ToR states: <i>“the EA will evaluate criteria for the physical, biological and socio-economic environments to determine the potential effects of the alternative methods for the entire life-cycle of the Project, including construction, operations, closure and post-closure.”</i></p> <p>In accordance with the approved ToR, all phases of the project should be considered when selecting the preferred alternatives.</p> <p>Section 2.2.3.1 (page 17) of the Alternatives Assessment Report TSD seems to indicate that the technical and economic criteria for the alternatives assessment would include consideration of construction, operations, and closure. However, using a bounding scenario approach would render a large portion of the criteria not applicable.</p> <p><u>Effects Assessment (of the preferred alternatives)</u></p> <p>The Ministry continues to have concerns regarding the one bounding phase approach that was used in the effects assessment of some environmental components. In accordance with our Code of Practice: Preparing and Reviewing Environmental Assessments in Ontario (January 2014) – page 17 – <i>“Proponents are also encouraged to conduct appropriate scoping in time to ensure that all elements of the undertakings life cycle (commissioning, operations, decommissioning) are assessed, in order to appropriately protect the environment for current and future generations.”</i></p> <p>Are the effects similar in all phases of the project or do some phases contain different effects than others? If the effects assessment is bounded to one phase of the project, there is increased uncertainty as potential effects could be missed in the project phases that haven't been fully evaluated.</p>	<p>Response provided in the attached technical memorandum.</p> <p>Version 3 EIS/EA submitted including all information available between 2014 and 2017 submission date. Additional clarifying discussion by project phase has been added where appropriate within the annotated text of the amended Version 3 EIS/EA document which covers the entire lifecycle of the project.</p> <p>Attachment: Technical Memorandum – Response to Comments regarding the Method for Assessment of Potential Environmental Impacts and Alternatives - Hammond Reef Gold Project</p>	

Version 3 Hammond Reef Gold Project EIS/EA – Addendum (Part B)
 Responses to Provincial Information Requests

1656263

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					<i>Date: September 2015</i>	<i>Date: August 2017</i>	
					<p>Please clarify if the TSDs provide an assessment of potential effects and proposed mitigation for the entire life-cycle of the project. If so, this needs to be brought forward into the main body of the EA document for the purpose of clarity and transparency. This information is necessary to clearly document and fully support your conclusions.</p> <p>The environmental impact assessment matrix provided in Table 6-55 to Table 6-57 (page 6-169 to page 6-204) of the EA identifies potential effects and proposed mitigation for various environmental components over the entire life-cycle of the project. You indicated that inclusion of these tables is intended to allow an easy overview of the details within Chapter 6 of the EA. However, for some of the environmental components, the narrative provided in the body of the EA only describes the bounding phase and not all phases of the project. For these environmental components please provide a narrative that describes the potential effects and proposed mitigation during each phase of the project as identified in Table 6-55 to Table 6-57.</p>		