

Identifier	Topic	Reference to EIS/EA Report	Summary of Comment	Proponent's Response	Subsequent Comment
			<i>Date: March 2014</i>	<i>Date: June 2015</i>	
MNR 4	Hydrology		<p>The EA has not identified how Marmion lake levels can be addressed without impacting existing environmental, social and economic objectives and commitments.</p> <p>The TSD states that a model to estimate inflows because of the “high percentage (34%) of missing days in the record of outflow from Raft Lake”. Between 2001 and 2012, only 36 days are missing which is only 0.9%. Using actual data would have eliminated the high percent differences shown between the actual and synthesized data as shown in Table 3. Water levels in the Marmion reservoir are critical to fish habitat which support an active recreational and commercial tourism fishery, support existing hydroelectric generation facilities downstream and support recreational and tourist industry navigation through the Marmion sluiceway which is also critical to the local angling tournament which is very important to the economy and culture of Atikokan. The EIS document states that that changes in Marmion lake levels can be addressed within the bounds of the Seine River Water Management Plan (SRWMP) but the EIS document has not indicated how they can be addressed without impacting existing environmental, social and economic objectives. The response to previous concerns (eg <i>MNR-6, MNR-251, MNR-266</i>) about water levels both in Marmion and downstream indicate no impact but the EIS has not provided information on how responses to predicted declines in water levels (up to 9cm) can be addressed without sacrificing existing objectives and demands from existing social economic uses and environmental needs. In the EIS document, it repeatedly states that impacts are restricted to the mine site (part of the no significant changes to bio-physical resource) but it fails to adequately explain how water level impacts will not extend downstream from Marmion Reservoir in low water conditions.</p> <p>We have initiated discussions with MOE on how these concerns could be addressed in the permitting process (e.g., conditions around no approval to take water when levels are below SRWMP levels in MOE’s Permit to Take Water).</p> <p>Previous low water years (i.e., 2010) have presented issues with operations of the sluiceway. Bad timing can have economic impacts (i.e., the bass tournament, tourist industry). The EA needs to identify there can be potential impacts from the mine project, with regards to fluctuating water levels such as this. We have yet to see the analysis of what would have happened if the mine had been operating during a drought year such as 2010 and how that would have affected achievement water levels management objectives such as operation of the sluiceway and minimum flow requirements as discussed with MNR and dam operators.</p>	<p>Canadian Malartic understands that the Marmion Reservoir is regulated and managed subject to the Seine River Watershed Management Plan. The predicted effects to water levels and outflows are not considered significant.</p> <p>The maximum predicted water level reduction of 9 cm is considered to be an extreme upper bound’ scenario, as predicted by a single year model. The continuous year modelling (which considers management of water levels and outflows in accordance with the Seine River Watershed Management Plan) predicted a one-time maximum reduction of 6.8 cm over the 27 year modelling period, and an average annual maximum reduction of 4.4 cm (which would occur in the winter). Predicted reduction in water levels at the time of the Atikokan Bass Classic ranged from 0 to 2.8 cm. The Seine River Water Management Plan allows for water level fluctuations of greater than 2 m. The average reduction of 4.4 cm due to the Project equals a change of 2% within the existing water level range.</p> <p>Canadian Malartic does not control the Raft Lake Dam and therefore cannot directly control or manage the potential changes imposed by the Project on reservoir water levels or outflows. However, Canadian Malartic is committed to fully participating in the Seine River Watershed Committee, by sharing information on Project water requirements and use. Canadian Malartic understands that the Hammond Reef Gold Project will be subject to the conditions of a Permit to Take Water, issued by MOE, and will comply with the conditions of that permit.</p>	<a href="#">MNRF-4</a>