

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: August 2015</i> <a href="#">MNRF 4</a>	<i>Date: September 2016</i>	<i>Date: April 2017</i>	<i>Date: June 2017</i>	
MNRF-4B	Hydrology (Seine River water taking)	Hydrology TSD_V2 Page 1	<p>MNRF has identified there is high potential for significant effects from the water level reduction. A 9 cm draw can have significant impacts to the environment (fish habitat), recreational uses and tourism (navigation and fish health) and economic impacts water power stakeholders (water power generation).</p> <p>MNRF does not find the response has addressed the issues.</p> <p>The lack of control over the Raft Lake Dam is not relevant.</p> <p>The SRWMP is a water management plan between the province and the water power proponents. The plan sets out water levels management objectives such as operation and minimum flow requirements that are legally binding to the signatures. CMC will be included as other users on the system in participating in the WMP development. But this alone does not provide a solution in addressing potential impacts. It needs to be addressed in the EA.</p> <p>The EA needs to better demonstrate contingency plans and measures that will be in place in the event water levels in the Marmion Lake reservoir are such that water cannot be taken (i.e. in drought situations where water levels are below the rule curve, such as in 2010). The response provided by the proponent is not satisfactory because it did not reflect 2010 data which would have provided a better portrayal of the potential effects and a realistic scenario of effects.</p> <p>MNRF suggests that the proponent meet with the stakeholders to develop a Memorandum of Agreement.</p> <p>MNRF also has some concerns with a recent response to letters of the two water power proponents. From this response provided, it would appear there is a need for a new water balance plan in the EA. The response also includes reference to operational measures to include on-site water storage area. MNRF requests a better description of where the storage site is, how much they will store, and how it will be effective as a contingency plan, and the predicted term of effectiveness.</p> <p>* Any new or contingent water sources additional to this EA, will need to have independent review and assessment</p>	<p>As stated in previous responses, the maximum predicted water level reduction of 9 cm is considered to be an extreme upper bound for potential project impacts. It is based on several conservative assumptions and does not consider adaptive management of the Raft Lake Dam to accommodate project withdrawal or project contingency measures during low flow and water level conditions. A 9 cm reduction in water level is not expected to occur.</p> <p>Positive discussions have been held between CMC and the downstream hydropower operators. An agreement has been reached in principle and negotiations and the development of formal agreements with the waterpower operators are in progress. The agreements will consist of a water management, communication and operating framework technical agreement between CMC and both power operators and separate compensation agreements with each individual power operator.</p> <p>Additionally, CMC has developed contingency water management plans that demonstrate that the project can be operated during low flow and water level conditions while imposing no net withdrawal of water from the Marmion Reservoir. Details on the proposed low flow and water level contingency measures are provided in the attached memorandum.</p> <p>Through regular communication with the hydropower operators that control the Raft Lake Dam, ongoing adaptive management of water levels at the Raft</p>	<p>MNRF remains concerned that water taking from Marmion Reservoir during low water periods could affect the Water Power Operators' ability to meet their minimum flows and levels obligations under the Seine River Water Management Plan (SRWMP). The additional water demand by the proposed mine facility will add stress to the system during drought periods and could result in an increased number of non-compliance incidents.</p> <p>- Requests that CMC provide daily water taking and discharge volume reports to MNRF during periods that the reservoir is at or below minimum levels as described in the SRWMP.</p> <p>- MNRF requests that any agreement struck between CMC and the Water Power Operators address this concern.</p> <p>- Requests that MOECC consult with MNRF about regulatory methods of mitigating this effect prior to MOECC issuance of a Permit to Take Water.</p>	<p>CMC is actively working with the hydro power producers that operate the Raft Lake Dam on an Memorandum of Understanding (MoU) with respect to water withdrawal for the Project. The MoU will include protocols for exchange of information related to Project water taking and discharge and contingency measures to address concerns related to low water level conditions.</p> <p>CMC will provide the daily water taking and discharge reports to the MNRF upon request by the MNRF.</p> <p>The MoU will include contingency measures to mitigate Project related impacts to water levels during low water level conditions. The MoU will be provided to the MOECC and MNRF for comment prior to finalization.</p>	N/A

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

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				<p>Lake Dam and implementation of project contingency measures during low flow and water level conditions, the project is not expected to impose impacts on water levels such that the annual water level fluctuations extend beyond their normal operating range.</p> <p><b>Attachment:</b> Technical Memorandum: Contingency Measures to Eliminate Water Taking from Marmion Reservoir during Low Water Level and Outflow Periods at Raft Lake Dam - Hammond Reef Gold Project</p>			