

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-11	Alternative Assessment - Worker Camp		<p>Component was not included in the approved ToR. The EA does not adequately assess alternatives, specifically alternative locations. MNR has concerns with the camp being located too close to the shores of Marmion Lake and related impacts. MNR also identifies potential socio-economic impacts which have not been identified or addressed.</p> <p>As previously identified through earlier comments on the draft, the assessment of low level impact on Outdoor Tourism and Recreation and neutral effect on Fishing through the development of a mine and the construction of a 1200 man camp on the shore of what is one of the most popular fishing lakes in the area by both residents and tourism guests is unsubstantiated by the information provided in the document. The potential impact of increased harvest from what is essentially a small town being established on Marmion and adjacent lakes needs to be identified and evaluated in the document.</p> <p>Please include the description in the EA (pg 1-33) as well there should be a description of the land use intent for each of the GLUAs. I.e. Marmion- easy access to highly productive angling area for Atikokan residents and the tourist industry, forestry and mining will not adversely affect recreational qualities. Greytrout - Logging operations, maintenance of lake trout, moose and deer populations, tourism and recreation opportunities are the priority, Finlayson - timber production, mineral exploration/development, recreation and tourism. The report should also describe how these land use priorities have been considered and addressed, specifically, the 120 modified management area around Marmion Lake. (</p> <p>Please demonstrate in the EA where these components are included in as 'support and ancillary infrastructure'.</p> <p>The response does not address the comment. MNR is not overly concerned with vibration to local fish populations during construction. But more so with the cumulative effects of the presence and operation of a 1200 man worker camp on the shore of Marmion Lake. The EA does not address the impacts of increase disturbance on the shores and associated impacts from use such as experienced with cottage lot subdivisions. The EA also does not address the area of concern around Marmion as defined in the Crown Land Use Atlas policy.</p> <p>The preferred alternative identified for the accommodation camp is not a combination of the on-site and off-site options. A combination alternative would have considered a smaller camp, where a portion of the workers would be accommodated at camp and a portion of the workers would be accommodated by the town of Atikokan.</p> <p>The EA needs to provide evidence to support the statement that there will be no effect on the aquatic ecology and it needs to provide a better reflection of the impacts to constructing and operating a 1200 man camp on the shores of a lake that currently provides a high quality fishery, as well as recreational and tourism values. The placement of a 1200 worker camp on the shores of Marmion Lake for the life of the mine is considered a substantial development which needs to be reflected in the EA.</p> <p>MNR is also concerned about the process undertaken for the inclusion for the worker camp and the lack of consultation before the EA. As previously expressed, we feel there should</p>	<p>Canadian Malartic has committed to providing incentives for workers to live in Atikokan and expects that part of the work force will take advantages of the incentives provided. Therefore, the preferred camp alternative is a combination of both off-site and on-site accommodation.</p> <p>The potential effects of the planned accommodation camp have been conservatively considered in the Final EIS/EA Report. The selected approach was to consider an upper-bound ('worst case') occupancy of 1,200 workers for the duration of the Project. 1,200 workers is an upper bound estimate for when the mine is operating at full production. The Socio-economic TSD estimates an actual annual average workforce of 550 and it is expected that many workers will take advantage of incentives provided by Canadian Malartic to live in Atikokan as opposed to the on-site camp.</p> <p>The potential environmental impacts have been predicted based on baseline data collected and data as provided by other agencies including the MNR, and have included substantial public consultation to understand tourism implications, workforce implications, and to weigh impacts and benefits of the proposed mine as described in various sections throughout the EA. The potential environmental impacts have been mitigated through water management measures, restriction of workforce fishing, and investment in tourism and recreation. The effects are not deemed to be significant and are outweighed by the potential economic benefits from creation of jobs, contracts, and services.</p> <p>Further evaluation of additional on-site camp location alternatives has been undertaken, based on advice received by MNR following submittal of the Final EIS/EA. A total of five alternative locations were considered, including the original alternative, a new location west of the shoreline, two new locations east of the shoreline, and a new location on Reef Road. A memorandum summarizing this evaluation is found in <i>Part 2 of the Version 3 Alternatives Assessment TSD. Attachment 1 of the Final EIS/EA Addendum.</i></p> <p>The comparative evaluation indicates that the alternative located East of Sawbill Bay and West of the TMF (Alternative 5) is the new preferred location for the on-site worker accommodation camp. Therefore, the preferred camp location is no longer within the 120 m modified management area around Marmion Lake. Alternatives 2 and 4 in the Attachment are also considered favourable, however were not selected as the preferred alternative because of social and environmental considerations.</p>	<p><a href="#">MNR 5</a></p>

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			<p>have been additional alternatives considered. For example: A smaller worker camp on site and part of the work force housed offsite, reducing the size of the camp and its footprint; Alternatives to the camp location (i.e., a location that is not directly on the shores of the lake). The EA suggests (on Fig 3-4) that the footprint will more than double the existing disturbance. As well depending on the implementation schedule of the project, the site could be significantly regenerated by the time development occurs. For these reasons the existing disturbance should not be used to discount consideration of camp location alternatives.</p> <p>The EA should identify a number of alternatives for the Worker camp. The alternatives should have included on site, off site and a compromise of a smaller worker site and accommodations offsite, as well alternatives for location of the worker camp. Options for camp location has never been presented for review. This is especially important since the worker camp was not presented in the ToR and MNR (and likely the public) has an interest in review of the alternative locations for the site. There needs to be a better description of the alternatives considered, and rationalization of preferred alternative, than was has been provided in this response.</p>	<p>Canadian Malartic has been clear and transparent in our communications with public, government and Aboriginal partners over the past three years. Extensive consultation on the Project has taken place as outlined in Chapter 7:</p> <ul style="list-style-type: none"> <li>• Six public Open House events were undertaken</li> <li>• Aboriginal consultation has been determined as sufficient by First Nations and Métis</li> <li>• More than 25 meetings have taken place with the lead agencies of the EA Process since 2012</li> </ul> <p>Section 5.2.6 of the Final EIS/EA Report, titled “Support and Ancillary Infrastructure” includes the accommodation camp, communications tower, and weather station.</p> <p>A description of the General Land Use Areas are provided in the original response to comment MNR-25, which upon issue became an official component of the Final EIS/EA Report.</p> <p><b>Reference:</b> Assessment of Alternative Camp Locations Technical Memorandum in Part 2 of the Version 3 Alternatives Assessment TSD</p>	