

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: March 2014</i> <a href="#">MNR-AA</a>	<i>Date: June 2015</i>	<i>Date: August 2015</i>	<i>Date: June 2017</i>	
MNRF-17	Emergency Response		<p>The alternative assessment has been carried out using a bounding scenario approach. As identified, this assessment does not fully evaluate each project component during each phase of the project, but instead selects the phase which reps the 'worst case' scenario in terms of the selected evaluation criteria.</p> <p>There are concerns with this approach as it adds another level of complexity to understanding the process which was used to determine the conclusion.</p> <p>It is not clear how the VECs were weighted against each other to determine the highest degree of risk, or how the ranking was determined to select each phase.</p> <p>By selecting only one phase to use to compare alternatives, the true differences between alternatives over the life of the project are not really assessed. By focusing on only on one phase, it increases the risk that the real effects are missed if a phase was incorrectly predicted of having less of an impact.</p> <p>The Figures in the ARA are not consistent. There are graphics for some of the alternatives, but not all of them (i.e., sewage treatment facility, TMA, closure etc.). And there are graphics for some of the single alternatives, (which are confusingly referred to as 'preferred'), but not all of them. Figure 4-3 is confusing and needs clarification. It needs to be identified what is included as 'disposal alternatives' (New Comment)</p> <p>The screening is not consistent with what was presented in the ToR. The EA fails to meet this requirement as set out in the Code of Practice: Pg 9 "The proponent must ensure that the EA represents accurately the</p>	<p>The bounding scenario approach to the assessment 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>Some Project components were considered to have only one feasible alternative and are presented and described as such in Section 2.1 of the Alternatives Assessment Report TSD. It is neither practicable nor necessary to evaluate alternative means for every aspect of the Project.</p> <p>The fiber optic line and auxiliary transmission line were re-evaluated and are no longer required or considered part of the Project.</p> <p>The Alternatives Assessment completed and documented for the Project is considered to adequately present the alternatives considered and the rationale for selecting the preferred alternatives for the Project. We do not feel that further revision to the Alternatives Assessment TSD is required to comply with the EIS Guidelines.</p> <p>In order to address comments from both the Ministry of Natural Resources and Ministry of the Environment regarding the location of the worker accommodation camp and its proximity to Marmion Lake, further evaluation of additional on-site camp location alternatives has been undertaken since 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</i></p>	<p>Reference to techniques and approaches used for other projects is not an appropriate response.</p> <p>MNRF has concerns with the bounding scenario approach for points made in our review. Using the worst case scenario does not address all possible effects and outcomes that may result and does not evaluate these effects adequately as per EA requirements.</p> <p>MNRF has concerns that the alternatives for this project for the transmission lines, the access roads, the worker camp (consultation) have not been adequately assessed and consulted to meet minimum requirements of an EA. It is not clear to the reader, how the conclusions and decisions were determined from the information that is presented.</p> <p>MNRF feels the revised Alternative Assessment TSD remains lacking in providing a thorough assessment of alternatives. Specifically for the components of the project that will require authorization from MNRF.</p>	<p>Additional information provided in the following:</p> <ol style="list-style-type: none"> <li>1) Supplemental Assessment of Access Road and Transmission Line Routing Alternatives in Part 4 of the Version 3 Alternatives Assessment TSD</li> <li>2) Comprehensive Alternatives Assessment Tables for the Construction, Operation, and Closure Phases in Part 3 of the Version 3 Alternatives Assessment TSD</li> </ol>	<a href="#">MNRF-17B</a>

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			<p>planning and decision making process that was followed in a clear and understandable way and must communicate that clearly in the EA document". Table 3-1 of the ARA TSD, does not include the waste rock storage, tailings management, tailings pipeline, tailings depositions, fibre optic/aux transmission line or closure/rehabilitation.</p>	<p><del>Assessment TSD Attachment 1 of the Final EIS/EA Report Addendum.</del></p> <p>The Alternatives Assessment TSD outlines the alternatives that were considered for the Project. The Alternatives Assessment TSD was revised after the draft EIS/EA, additional work on accommodation camp alternatives and closure planning alternatives was undertaken in response to government feedback, and is provided in supplemental technical memorandums. The closure planning alternative assessment was provided in Part B of the Version 2 Conceptual Closure and Rehabilitation Plan TSD. The expanded accommodation camp alternatives assessment is provided in <i>Part 2 of the Version 3 Alternatives Assessment TSD as Attachment 1 of the Final EIS/EA Report Addendum.</i></p> <p>The Alternatives Assessment TSD includes two separate sections – an alternatives assessment of the Project components (not including the mine waste disposal alternatives), and a stand-alone mine waste disposal alternatives assessment. The mine waste disposal alternatives assessment was prepared and formatted in accordance with Environment Canada's <i>Guidelines for the Assessment of Alternatives for Mine Waste Disposal</i> which prescribes a detailed multiple accounts analysis for the evaluation of alternatives. It was the request of Environment Canada that this mine waste alternatives assessment report be provided as a stand-alone document.</p>			