

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

1656263

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-EM1	Environmental monitoring		<p>The monitoring and contingency plan is very poorly thought as it exists in the document. The first goal of the EMP is to ensure that negative impacts on the physical and biological environments are mitigated. Yet the monitoring and contingency/non-compliance strategy does not appear to meet this goal in many instances.</p> <p>For example, loss/alteration of vegetation and loss of upland forest/wetlands is identified as an effect with several locations within the mine footprint including the processing site, the TMF and the WRMF. The monitoring objective is to ensure successful colonization of native plants in regenerating areas and the contingency strategy only identifies removal of invasive plants if necessary. An effective monitoring strategy to meet the previous stated goal would need to include an objective to restore the site with the vegetation that existed previously (not just native vegetation) and a contingency plan would need to include planting these species or closest appropriate species if they don't develop naturally within a reasonable timeframe.</p> <p>Similarly, an affect was identified regarding displacement of wildlife due to loss of habitat yet no mitigation measures to ensure replacement of lost habitat, no monitoring is proposed to look at wildlife habitat, changes in abundance or distribution of wildlife VEC species and there is no contingency/non-compliance strategy that identifies how habitat would be replaced if wildlife VEC species are impacted such as replacement of critical habitat post closure.</p>	<p>Chapter 8 of the Final EIS/EA report outlines the proposed Environmental and Social Management Planning considerations for the Project. It is not to be considered as a final environmental management plan, but lays out the general environmental and social objectives, roles and responsibilities, and planned information sharing that the detailed environmental management plans will be developed from. Chapter 8 includes proposed Monitoring Program Considerations for the physical and biological environment which are directly tied to VECs and were developed by professional scientists familiar with the Hammond Reef Project. As outlined in the roles and responsibilities section of chapter 8, the monitoring plan is expected to be developed in consultation with the government and finalized based on government feedback and review.</p> <p>It is important to recognize that not all Project impacts can be fully mitigated. For instance, the goal of the closure plan and associated monitoring considerations, is not to fully restore the site the pre-existing condition as this cannot be practically or economically done (e.g., in the TMF, WRMF and pit areas. As detailed in the Conceptual Closure and Rehabilitation Plan TSD, the goal for the Closure Phase of the Project is to restore the site to an acceptable land use. This will include re-vegetation with native species and post-closure monitoring of re-vegetated areas as outlined in the CCRP and summarized below.</p> <p>Re-vegetated areas will be inspected twice annually during the growing season (late spring and late summer) during the active reclamation phase and annually thereafter for a period of up to 5 years following closure, to determine the success of the program (adequate cover and resistance to erosion) and the need for any remedial work. The species mix or mixes for site re-vegetation will be determined through onsite test work programs to be conducted during operations and progressive reclamation, to help ensure re-vegetation success at closure.</p> <p>Inspections will be carried out visually and will include photographic records. During monitoring, particular attention will be focused on potentially erosion prone areas such as slopes. Signs of gullying, riling, and/or slumping will be identified for follow-up action. Photographic records will be standardized to the extent possible to allow year to year comparisons of vegetation success. Based on these surveys, areas of poor, or incomplete, vegetation cover will be identified.</p>	MNR-14