

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- Terrestrial 2	Terrestrial Ecology - VECs		<p>MNR feels that there is a still a lack of connection between indicators and measures in table 1-1; Valued Ecosystem Components Selected for Terrestrial Ecology. We question that the only birds measured as a VEC are upland birds. Measures do not appear to consider the actual presence of the identified VEC (identified as the indicator). This is troublesome for the reason that just because a habitat exists, it does not mean that it would be used by the VEC (in the case of individual species) for a number of reasons. For example, for furbearers and upland breeding birds the presence of the specifically identified species is not considered in the measures, rather only habitat suitability. The measure of a VEC should be of the VEC as identified. The rationale also doesn't line up with the indicators or measures. For example, where a habitat type is identified such as wetlands, wildlife use is not identified an indicator even though rationale for selecting the VEC is because it is important as wildlife habitat. Wildlife groups that use the wetland VEC are also not listed such as fish, amphibians, reptiles, non-migratory birds. It is felt that measures should include composition and diversity of wildlife species and communities, not just wetland plant communities. Suitability of habitat is only measured, not the actual use of the habitat, which is felt to be inappropriate. The EA or the TSD should provide a rationalization of how the species were selected, and how the effects were considered.</p> <p>It would appear that snapping turtles are identified and included in the VEC grouping of SAR, and are not a standalone VEC representing amphibians and reptiles. Snapping turtle is not thought to be an appropriate herptofauna surrogate as it has more general habitat requirements that differ from other amphibians and reptiles that are currently present in the project area that will be impacted by the development. A species that is considered to be more of a habitat specialist should be considered for the VEC for amphibians and reptiles. There should be a clearer link between the amphibian surveys that were completed and how it can be related to a VEC. The table should specifically identify amphibians and reptiles as a VEC so that it can be carried through the document and assessed appropriately. Specifically, in the effects assessment in section 3, of the Terrestrial Ecology TSD, or section 6 or the EA document amphibians and reptiles are not assessed under wildlife. Snapping turtle is assessed in the documentation under effects assessment, not a surrogate for other herptofauna, rather that it is assessed as an individual SAR.</p> <p>If muskrats are going to be used as the VEC for aquatic furbearers, another species should be used as a better indicator for water quality (i.e., an amphibian or reptile). The comment about amphibians and reptiles under potential environmental effects is meant to accompany a different comment. It would appear that there was a shift in the information during consolidation of comments as this has been observed in a few other places in the responses document.</p>	<p>Valued Ecosystem Components for the Project were selected based on:</p> <ul style="list-style-type: none"> ■ Results of baseline studies ■ Feedback from regulators and Project stakeholders ■ Ability to act as a surrogate for other valued species ■ Ecological function and socio-economic importance <p>A preliminary list of VECs was provided in January 2012 in newspaper publications, public open house events, presentations to government, Chiefs and Consultation Committees and visits to Aboriginal communities.</p> <p>The measures selected for the VECs reflect parameters that can reliably be collected during baseline inventory and follow-up monitoring programs (e.g., breeding bird point counts are a reliable measure of upland breeding bird abundance and thus a measurement endpoint for this VEC was selected as "relative abundance of breeding birds". In contrast, the population of furbearers, for example, was not determined within the scope of the baseline studies and therefore the effects assessment measurement endpoints did not use a population measurement but instead used a conservative measure based on habitat availability and suitability, and assumed that all suitable habitat would be used by furbearers and therefore they would expect to be present). As the collection of baseline information is largely a 'point in time' survey, assumptions based on the availability and suitability of habitats must be made as it is unreasonable to determine habitat usage by each VEC. This effects assessment relied on scientific research into habitat preferences by VECs and then used a conservative approach in that all potential effects on suitable habitat for VECs was considered an effect on the actual VEC even though they may not utilize the habitat. This conservative assessment is considered to appropriately address the effects on wildlife communities.</p> <p>In addition to upland birds, 3 other bird species were considered as VECs, including, Bald Eagle, Common Nighthawk, and Canada Warbler.</p> <p>Upland Breeding Birds were chosen as a VEC based on their small territory size and high bird density, which means large numbers of upland birds may be affected by habitat loss. Upland birds are also considered an appropriate VEC as migratory birds are susceptible to population declines as a result of changing environmental conditions on breeding and overwintering habitats.</p> <p>The health and extent of wetland habitat is considered an appropriate measure for the Wetlands VEC. Wildlife health is directly related to the health and extent of their associated habitat and individual wildlife species are included as separate VECs.</p> <p>In addition to muskrats and snapping turtles, fish VECs were also considered as indicators of water quality. Additionally, water quality is also being monitored throughout all phases of the Project. The required Environmental Effects Monitoring, which will be undertaken in the operations phase, will also include bio indicators for water quality.</p> <p>Species that are habitat specialists were not selected as VECs as they are not the ideal species to represent other species (act as surrogates). If it is felt there is a pathway of effect that is not covered by the wildlife VECs selected and would be otherwise covered by a particular amphibian or reptile, then we need to consider this. However, if this is not the case then there is no reason to include another VEC.</p>	MNRF 11B