

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-Terrestrial 3</a>	<i>Date: June 2015</i>	<i>Date: August 2015</i>	<i>Date: October 2016</i>	
MNRF-12	Terrestrial Habitat - Impact assessment methodology, moose VEC	EIS/EA 2.5.3, 6.2.1.2.1, 6.4.1	<p>MNR has concerns with using RSA as a means to assess impacts. When the MSA or LSA is measured against the RSA, the impacts can be falsely portrayed. That is, when the MSA is 1% of the area it is measured against, the outcome will always be insignificant. Also, some monitoring at the regional scale is not appropriate. For example, a decline of the moose in the area of the mine site due to site development would not be captured by the monitoring methodology used and proposed (i.e., MNR moose survey data at the WMU scale) as MNR moose population surveys are not designed to monitor moose populations for this purpose at this scale. In addition to this, effects on moose that are located north of the site (i.e., in WMU 12a) within 5km of the project are not even considered, while moose located over 200km away from the site (on the eastern edge of 12b) are being assessed. Also, it is questioned why Sawbill Bay of Marmion Lake, immediately adjacent to the project site, is only being assessed at the regional scale as it does not appear to be included in the MSA or LSA. (MNR-157, MNR-188, MNR-189, MNR-202, MNR-220, MNR-240)</p>	<p>Impacts from the road to wildlife and people are considered by the terrestrial ecology component through loss of habitat and risks of vehicle collisions and by the socio-economic component in the Traffic Impact Study.</p> <p>The selection of study areas was completed using best practices. These study areas were presented at public open house events, in presentations to government, Chiefs and Consultation Committees and during visits to Aboriginal communities.</p> <p>The Regional Study Area (RSA) was not used to assess impacts of the Project; however, the purpose of a RSA is to provide regional context and environmental setting. The RSA was developed to capture population effects on far ranging animals such as moose. The background information on moose populations acquired was based on the WMU. The methods for evaluating effects on moose from the mine development were conducted at the LSA level and then the results are interpreted in the context of the RSA or the moose population level.</p> <p>The effects on Sawbill Bay and Marmion Lake immediately adjacent to the LSA were considered throughout the effects assessment in that the assessment did not start and stop at the mapped boundaries.</p> <p>Canadian Malartic's position is that there should consistency in application of methodology and guidelines throughout Ontario and Canada and throughout this Project Canadian Malartic has used</p>	<p>MNRF disagrees with how the proponent used the RSA to assess effects to moose population.</p> <p>Techniques and approaches used for other projects is not an acceptable response.</p>	<p>In response to the concerns with using RSA as a means to assess impacts: In the Terrestrial Ecology TSD, the impacts of the project were assessed at the MSA and LSA level for all of the VECs, except for moose. This is because moose was assessed at the population level and not at the individual level. Therefore it is our opinion that the RSA is an appropriate scale within which to assess population level effects on moose.</p> <p>Furthermore, the RSA is based on the MNRFs WMU 12b boundary which extends approximately 100 km to the east, roughly 85 km to the west, approximately 10 km to the north and 25 km to the south of the MSA. Because the MNRF tracks moose population trends in WMUs, it is our opinion that the RSA is an appropriate study area within which to assess population level effects of the project on moose.</p> <p>For arguments sake, if the LSA is used to determine the significance of residual effects on moose, it is expected that the results of the assessment would not change substantially.</p> <p>Based on the assessment documented in the Terrestrial Ecology TSD, it was determined that there will be two residual effects on moose that are not fully mitigated: (1) habitat loss/fragmentation and (2) change in habitat suitability for moose.</p> <p>(1) Habitat loss/fragmentation was assessed by comparing the Project footprint to the habitat available both in the LSA and the RSA. Within the LSA, it was determined that 10.5% of the highly suitable moose habitat will be removed (which represents 0.1% of the RSA). The magnitude of this effect in the LSA is considered moderate.</p> <p>(2) The change in habitat suitability was assessed through the use of a habitat suitability model. The model was set up to determine effects at the scale of the RSA (i.e. the RSA was subdivided into 10 km<sup>2</sup> evaluation units/areas). The model for moose considered all areas within the MSA, LSA and RSA (including Marmion Lake and Sawbill Bay). Taking into consideration the results in the LSA only (more than 10 polygons overlap with the LSA) the results show that only one polygon changes from suitable habitat to least suitable habitat based on the HS (habitat suitability) scores. This change represents a 10 km<sup>2</sup> area of decreased suitability for moose. This change is less than 10% compared to baseline conditions. Therefore the magnitude of this effect in the LSA would be considered Low.</p> <p>Therefore, the key criteria that were considered in the overall determination</p>	<a href="#">MNRF-12B</a>

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				<p>similar methodologies to those that have met with acceptance at other projects in Ontario and elsewhere in Canada as discussed in our meeting with MNR in July of 2014. We consider this to be appropriate for the purposes of this EA.</p>		<p>of significance of residual effects in the LSA for moose would be as follows:</p> <p>Summary of Residual Effects to Moose in the LSA Habitat Loss/fragmentation - Geographic Extent: Low; Magnitude: Moderate; Duration: Moderate Change in Habitat Suitability - Geographic Extent: Moderate; Magnitude: Low; Duration: Moderate</p> <p>Based on the ecological context within which these effects were considered on moose, a determination of Low significance was made. This takes into account that moose are wide-ranging animals with extensive home ranges and the effect of habitat loss in the MSA is not likely to have measurable effect on the moose population in the LSA. The predicted change in habitat suitability due to the project is also of low significance when the suitability of moose habitat in the LSA is considered as the effect is localized to an area immediately adjacent to the MSA and the effects are reversible at closure. This overall determination is consistent with the assessment as presented in the Terrestrial Ecology TSD (Golder 2013).</p> <p>In response to the perceived exclusion of Sawbill Bay of Marmion Lake in the LSA: The LSA for the assessment for all terrestrial VECs included all the vegetated communities (e.g. wetland communities along the shoreline) of Marmion Lake and Sawbill Bay which were mapped on Figure 2-10 of the Terrestrial Ecology TSD. So, in other words, all the shallow aquatic communities within proximity to the site are included in the LSA, however the deep aquatic portions of Marmion Lake and Sawbill Bay were not included in the Terrestrial Ecology LSA. The deep aquatic portions of Marmion Lake and Sawbill Bay were included in the Hydrology LSA, the Aquatic Environment LSA, the Lake Water Quality LSA, the Socio-Economic LSA and the Air Quality LSA.</p>	