
HAMMOND REEF GOLD PROJECT RESPONSE TO COMMENTS ON FINAL EIS/EA

COMMENT – T(3)-02

Source: Canadian Environmental Assessment Agency

Summary of Comment

The potential changes to the environment including, but not limited to decreased air quality (response to T(3)-01); restricted access to areas due to the mine study area, project activities, property boundary, human health, or safety and security concerns (response to T(3)-04); and wildlife displacement (Terrestrial Ecology TSD section 3.6) suggest possible effects on trapping activities within the Aboriginal interests study areas may occur. The nature of the effects on trapping, for example the geographic extent and magnitude of the effects to trapping (air quality, access restrictions, wildlife displacements) and effects to the overall trapping experience (sensory disturbances, such as noise, from project activities), is unclear for all trapline areas.

Subsection 2.2.7.3 of the Socio-Economic TSD indicates there are six trapline areas within the study areas. Subsection 3.3.1.9.1 lists four trapline areas will be affected by the removal of 2063 hectares of land that would otherwise be available for trapping. Section 8 of the Aboriginal Interests TSD indicates that there are agreements with trapline holders for three trapline areas affected by the removal of land base in the local study area. It is unclear if mitigation or accommodation measures have been proposed for the other trapline areas within the study areas where no formal agreement is held with the trapline holder.

Information on the predicted effects, mitigation, accommodation and follow-up is needed to comply with Subsections 10.3.1 and 13.1.2 of the EIS Guidelines which requires information on the environmental and socio-economic effects of the Project on Aboriginal interests, including potential effects on trapping.

Proposed Action

1. For trapping activity in the Aboriginal interests local and regional study areas, describe the predicted adverse effects on trapping due to the Project or project activities, prior to mitigation. Consideration of effects should include the extent to which traplines would be completely or partially lost, trapping success may decline due to wildlife changes or trapping experience may decrease due to decreased air quality or other sensory disturbances (e.g. noise).
2. For each trapline area, tabulate descriptions of the adverse effects on trapping activity; mitigation measures; accommodation measures, including but not limited to agreements; follow-up measures; and residual effects and the significance of those residual effects based on the Agency's methodology for assessing significance (including the criteria of magnitude, geographic extent, duration, frequency, reversibility, ecological/social/cultural context). Include explanations on how the proposed measures address the adverse effects for each trapline area in the table.

Reference to EIS/EA

EIS Subsection 6.3.2.4

Socio-Economic TSD Subsection 2.2.7.3

Aboriginal Interests TSD Subsection 7.3.3.2

Terrestrial Ecology TSD Subsection 2.2.3.1.3

T(2)-12, T-56

**HAMMOND REEF GOLD PROJECT
RESPONSE TO COMMENTS ON FINAL EIS/EA**

Response

The potential effects to tenured trapline areas was assessed in the Socio-economic TSD. The assessment considered direct effects due to loss of access and indirect effects due to adverse effects on the terrestrial environment. Loss of access was identified as an adverse effect requiring mitigation to avoid effects on trapline areas. Negotiation, including compensation where necessary, was identified as potential mitigation. Agreements are in place with the trapline holders that will be directly affected by the project. With respect to potential indirect effects due to effect on the terrestrial environment, no residual adverse effects of moderate or greater significance were identified in the Terrestrial Ecology TSD on species or habitats important to trapping, and it was therefore determined that no further assessment or mitigation related to terrestrial environment related effects on tenured trapline areas was required.

In response to comment T(3)-02, the potential effects on the trapline areas identified in the Socio-Economic TSD are described and assessed in more detail the following tables. Figure 2-17 from the Socio-Economic TSD shows the location of the trapline areas and is attached for convenience.

Table 1: Assessment of Potential Impacts to Trapline Area AT032

Trapline Number	Potential Adverse Effect	Assessment Conclusion	Mitigation	Measures of Residual Effect					Significance of Residual Effect
				Extent	Duration	Frequency	Reversibility	Magnitude	
AT032	Loss of access	Access may be restricted to active mining areas for safety effecting small portion of trapline area. Access to trapline cabin not affected.	Confidential Agreement in place with trapline owner. The agreement includes financial accommodation and access protocols.	Area where trapline area and Mine Study Area coincide	Construction, Operations and Closure (during active decommissioning)	Continuous	Reversible upon Closure (post decommissioning)	Low	No residual effect (agreement in place)
	Reduced air quality	Small portion of trapline area may experience temporary periods where concentrations of some compounds exceed ambient air quality criteria		Local Study Area (see frequency above criteria isopleth figures provided in response to T(3)-01)	Construction, Operations and Closure (during active decommissioning)	Continuous	Reversible upon Closure (post decommissioning)	Low	No residual effect (agreement in place)
	Noise disturbance	Small portion of trapline area may experience noise levels that are higher than existing noise levels		Local Study Area (see Figure 4-2 of Atmospheric Environment TSD)	Construction, Operations and Closure (during active decommissioning)	Continuous	Reversible upon Closure (post decommissioning)	Low	No residual effect (agreement in place)
	Wildlife displacement	Wildlife may be displaced from small area where noise levels may exceed existing levels		Local Study Area (see Figure 4-3 of Atmospheric Environment TSD)	Construction, Operations and Closure (during active decommissioning)	Continuous	Reversible upon Closure (post decommissioning)	Low	No residual effect (agreement in place)

**HAMMOND REEF GOLD PROJECT
RESPONSE TO COMMENTS ON FINAL EIS/EA**

Table 2: Assessment of Potential Impacts to Trapline Area AT040

Trapline Number	Potential Adverse Effect	Assessment Conclusion	Mitigation	Measures of Residual Effect					Significance of Residual Effect
				Extent	Duration	Frequency	Reversibility	Magnitude	
AT040	Loss of access	Access may be restricted to active mining areas for safety effecting portion of trapline area.	Confidential agreement in place with trapline owner.	Area where trapline area and Mine Study Area coincide	Construction, Operations and Closure (during active decommissioning)	Continuous	Reversible upon Closure (post decommissioning)	Low	No residual effect (agreement in place)
	Reduced air quality	Small portion of trapline area may experience temporary periods where concentrations of some compound exceed ambient air quality criteria	Trapper will not have their access to the trapline restricted provided that they are accompanied by an authorized CMC representative.	Local Study Area (see frequency above criteria isopleths provided in response to T(3)-01)	Construction, Operations and Closure (during active decommissioning)	Continuous	Reversible upon Closure (post decommissioning)	Low	No residual effect (agreement in place)
	Noise disturbance	Small portion of trapline area may experience noise levels that are higher than existing noise levels	The agreement includes financial compensation, employment opportunities and agreement that CMC will relocate trapline cabins if required.	Local Study Area (see Figure 4-2 of Atmospheric Environment TSD)	Construction, Operations and Closure (during active decommissioning)	Continuous	Reversible upon Closure (post decommissioning)	Low	No residual effect (agreement in place)
	Wildlife displacement	Wildlife may be displaced from small area where noise levels may exceed existing levels		Local Study Area (see Figure 4-3 of Atmospheric Environment TSD)	Construction, Operations and Closure (during active decommissioning)	Continuous	Reversible upon Closure (post decommissioning)	Low	No residual effect (agreement in place)

Table 3: Assessment of Potential Impacts to Trapline Area AT041

Trapline Number	Potential Adverse Effect	Assessment Conclusion	Mitigation	Measures of Residual Effect					Significance of Residual Effect
				Extent	Duration	Frequency	Reversibility	Magnitude	
AT041	Loss of access	Access will not be restricted	None required	n/a	n/a	n/a	n/a	n/a	No residual effect
	Reduced air quality	All compounds are predicted to be at concentrations below ambient air quality criteria, with the exception of 24-hr TSP, which may exceed less than 0.5% of the time in a small area along the western limit of the trapline area. TSP does not pose potential risk to human health (see response to T(3)-01).	None required	Less than 1% of trapline area	Operations	Less than 0.5% of the time	Reversible at end of Operations	Low	No residual effect
	Noise disturbance	Noise levels within trapline area not predicted to exceed existing noise levels	None required	n/a	n/a	n/a	n/a	n/a	No residual effect
	Wildlife displacement	Noise levels within trapline area are not predicted to exceed existing noise levels, therefore no wildlife displacement predicted	None required	n/a	n/a	n/a	n/a	n/a	No residual effect

**HAMMOND REEF GOLD PROJECT
RESPONSE TO COMMENTS ON FINAL EIS/EA**

Table 4: Assessment of Potential Impacts to Trapline Area AT039

Trapline Number	Potential Adverse Effect	Assessment Conclusion	Mitigation	Measures of Residual Effect					Significance of Residual Effect
				Extent	Duration	Frequency	Reversibility	Magnitude	
AT039	Loss of access	Access will not be restricted	None required	n/a	n/a	n/a	n/a	n/a	No residual effect
	Reduced air quality	Concentrations of some compounds (TSP, PM10, SO2 and Acrolein) may exceed ambient air quality criteria in small area along eastern limit of trapline. Predicted concentrations within the trapline area are below the maximum predicted concentrations. The potential risk to human health was evaluated for recreational receptors at the locations where the maximum concentrations occur and no adverse health effects were predicted (see response to T(3)-01). No adverse health effects predicted for trapline area.	None required	Less than 5% of trapline area	Operations	Less than 10% of the time	Reversible at end of Operations	Low	No residual effect
	Noise disturbance	Potential noise disturbance near access road. Access road follows alignment of existing active road, therefore, noise disturbance already exists.	None required	n/a	n/a	n/a	n/a	n/a	No residual effect
	Wildlife displacement	The trapline area is currently bisected by a forestry access road that will be upgraded to become the access road for the project. It is not anticipated that the upgrading of the access road and the increase in traffic associated with the mine will affect the population and distribution of mammalian species that are trapped on a regular basis in the area. The wildlife populations in these areas have already adapted to the presence of and noise levels associated with the roadway through this area. It is common for some wildlife to become habituated to the newly created edges and openings in the forest associated with road building as well as the levels of traffic noise (USDOT 2004). The mammals that are regularly trapped within these trap lines are not expected to show avoidance of roadways and its associated traffic noise. As such, trapping success is not expected to change as the populations and distributions of the trapped wildlife species are not expected to change due to the access road development and operation.	None required	n/a	n/a	n/a	n/a	n/a	No residual effect

**HAMMOND REEF GOLD PROJECT
RESPONSE TO COMMENTS ON FINAL EIS/EA**

Table 5: Assessment of Potential Impacts to Trapline Area AT025

Trapline Number	Potential Adverse Effect	Assessment Conclusion	Mitigation	Measures of Residual Effect					Significance of Residual Effect
				Extent	Duration	Frequency	Reversibility	Magnitude	
AT025	Loss of access	Access will not be restricted	None required	n/a	n/a	n/a	n/a	n/a	No residual effect
	Reduced air quality	All parameters are predicted to be at concentrations below ambient air quality criteria within trapline area	None required	n/a	n/a	n/a	n/a	n/a	No residual effect
	Noise disturbance	Potential noise disturbance near access road. Access road follows alignment of existing active road therefore noise disturbance already exists.	None required	n/a	n/a	n/a	n/a	n/a	No residual effect
	Wildlife displacement	The trapline area is currently bisected by a forestry access road that will be upgraded to become the access road for the project. It is not anticipated that the upgrading of the access road and the increase in traffic associated with the mine will affect the population and distribution of mammalian species that are trapped on a regular basis in the area. The wildlife populations in these areas have already adapted to the presence of and noise levels associated with the roadway through this area. It is common for some wildlife to become habituated to the newly created edges and openings in the forest associated with road building as well as the levels of traffic noise (USDOT 2004). The mammals that are regularly trapped within these trap lines are not expected to show avoidance of roadways and its associated traffic noise. As such, trapping success is not expected to change as the populations and distributions of the trapped wildlife species are not expected to change due to the access road development and operation.	None required	n/a	n/a	n/a	n/a	n/a	No residual effect

Table 6: Assessment of Potential Impacts to Trapline Area AT044

Trapline Number	Potential Adverse Effect	Assessment Conclusion	Mitigation	Measures of Residual Effect					Significance of Residual Effect
				Extent	Duration	Frequency	Reversibility	Magnitude	
AT044	Loss of access	Access will not be restricted	None required	n/a	n/a	n/a	n/a	n/a	No residual effect
	Reduced air quality	All compounds are predicted to be at concentrations below ambient air quality criteria within trapline area	None required	n/a	n/a	n/a	n/a	n/a	No residual effect
	Noise disturbance	Noise levels within trapline area not predicted to exceed existing noise levels	None required	n/a	n/a	n/a	n/a	n/a	No residual effect
	Wildlife displacement	Noise levels within trapline area are not predicted to exceed existing noise levels, therefore no wildlife displacement predicted	None required	n/a	n/a	n/a	n/a	n/a	No residual effect

Reference:

United States Department of Transportation-Federal Highway Administration. September 2004. SYNTHESIS OF NOISE EFFECTS ON WILDLIFE POPULATIONS. Publication No.: FHWA-HEP-06-016

HAMMOND REEF GOLD PROJECT RESPONSE TO COMMENTS ON FINAL EIS/EA

GRT Review Findings and Comments on above Responses

(Provided in letter to proponent dated March 15, 2017)

Information Request T(3)-02 requested consideration of effects that would include the extent to which traplines would be completely or partially lost. The response provides a description of the adverse effects on the traplines, however does not include the extent to which the traplines will be lost. Further, it is stated that agreements are in place with the trapline holders that will be directly affected by the Project; however it is not clear if the trapline holders are members of the Indigenous groups potentially affected by the Project. Section 8 of the Aboriginal Interest Technical Supporting Document indicates that there are three agreements in place, however the response to Information Request T93)-02 suggests there are two agreements.

- a) Clarify the extent to which traplines would be completely or partially lost (i.e. estimated area size) due to the project.
- b) Clarify the number of agreements that are in place.
- c) Clarify whether the agreements that are in place, or will be, for any trapline holders that are members of the Indigenous groups potentially affected by the Project.
- d) Clarify whether the agreements apply to or affect non-Indigenous trapline holders.

CMC Response

Part a)

Areas of traplines AT040 and AT032 will be temporarily partially lost during the active phases of the project (i.e., construction, operation and closure). The estimated area of partially lost trapline are:

AT040: 1705 ha

AT032: 358 ha

At post-closure and after safety concerns have been mitigated, these areas will have no access limitations. Traplines that are bisected by the existing forestry road that will be upgraded to become the main access road will continue to have access to their trapline areas (i.e., no area lost) and upgrading of the road is not expected to impact trapping success.

Part b)

Two agreements are in place with the owners of the traplines that will be impacted by the project (i.e., traplines AT040 and AT032). A third agreement is in place with a commercial bait fisherman that will be potentially impacted by the project, but this agreement is not related to potential impacts to traplines.

Parts c) and d)

Of the two impacted traplines, one is owned by a member of an Indigenous group potentially affected by the Project. One agreement is in place with the aboriginal trapline owner (AT040, see attached cover sheet and signature page). One agreement is in place with a non-aboriginal trapline owner (AT032).

HAMMOND REEF GOLD PROJECT RESPONSE TO COMMENTS ON FINAL EIS/EA

GRT Review Findings and Comments on above Responses

(Provided in letter to proponent dated June 28, 2017)

The Agency understands from the response that CMC has an agreement in place with the registered licence holder for trapline area 040, a member of Lac des Mille Lacs First Nation. The Agency also understands from information within the Aboriginal Interests Technical Support Document that a band member of Seine River First Nation has a trapline in the LSA. This discrepancy requires clarification.

- a) Explain the discrepancy between the information about which Indigenous groups have traplines in the LSA.
- b) Provide the information (location, project effects on the practice and experience of trapping, as well as mitigation for effects on trapping) for those Indigenous groups, other than Lac des Mille Lacs First Nation, whose members have traplines in the LSA.

CMC Response

Part a)

The holder of trapline area AT040 is a member of the Seine River First Nation. The holder of trapline area AT041 is a member of Lac des Mille Lacs First Nation. There are no other Aboriginal trapline holders within the Air Quality Local Study Area.

Part b)

Personal communication between CMC's local representative and the holders of traplines AT040 and AT041 have indicated the following with respect to frequency and duration of use (Pers. Comm., Bud Dickson, Aug. 2, 2017):

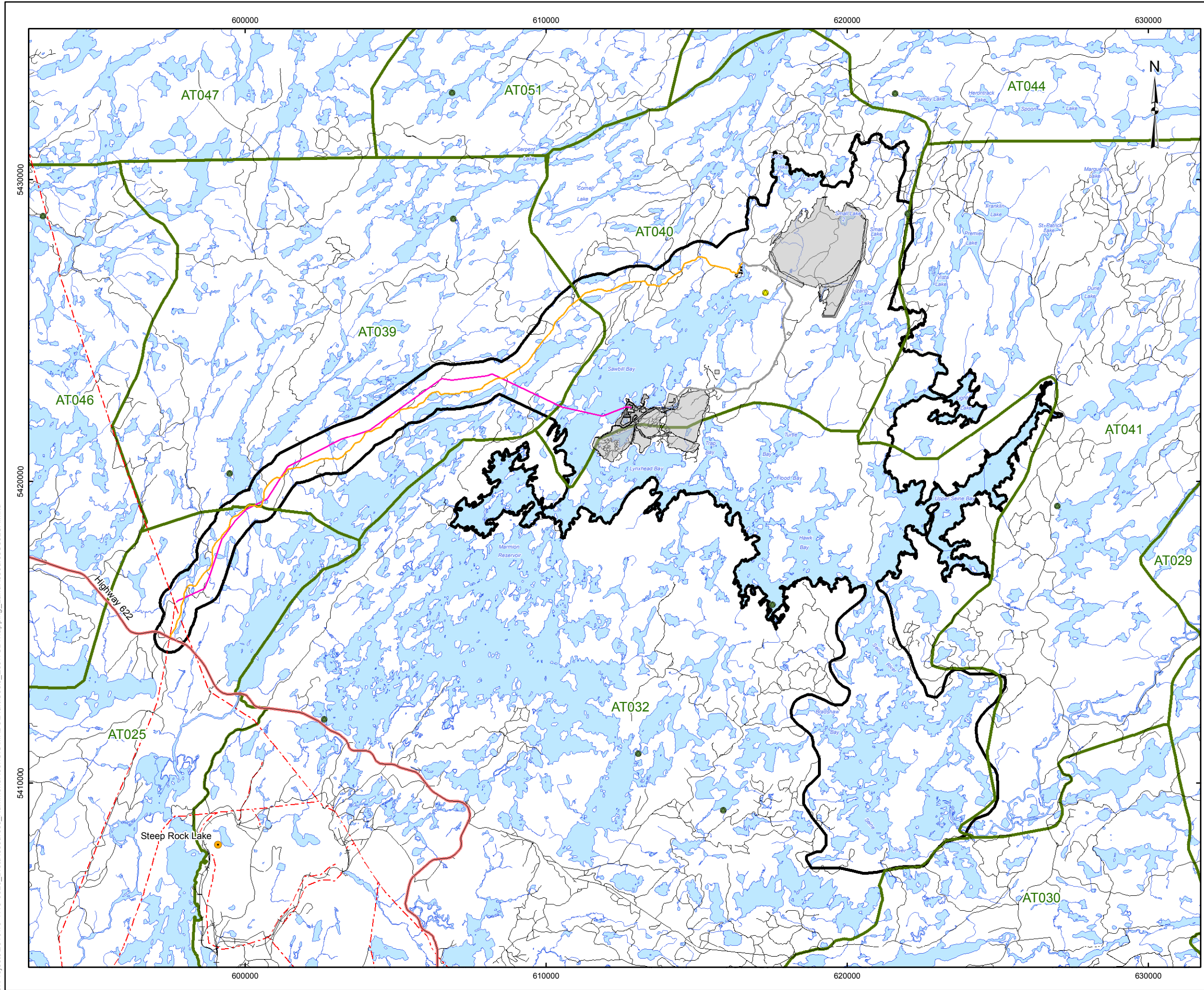
- AT040 – on average approximately 3 day visits per month during trapping season; equivalent to an annual average of 21 visits per year. The trapline holder has overnighted within the trapline area twice a year since the access road was upgraded in 2009.
- AT041 - on average approximately 3 day visits per month during trapping season; equivalent to an annual average of 21 visits per year. No known overnight use

Traplines holders have communicated that the travel distance and associated travel costs are deterrents to frequent use. It has also been communicated that the improved access as a result of project exploration and access road upgrades have provided a convenience and benefit to the experience of trapping.

The potential impacts to traplines AT040 and AT041 have been assessed in Tables 2 and 3 above.

The practice and experience of trapping within AT040 will be effected due to the active mining operations. There will be areas that the trapline holder will not be able to access due to safety protocols and noise levels will be elevated compared to existing conditions. These effects have been mitigated through agreement with the trapline holder, which includes provisions for continued access and financial compensation.

The practice and experience of trapping within AT041 will not be effected. The mine site will not be visible from the trapline area, noise levels will not be elevated compared to existing conditions and wildlife displacement is not predicted. No mitigation is necessary and no residual effects are predicted.



LEGEND

- Small Community
- Provincial Highway
- Road
- Existing Railway
- - - Power Transmission Line
- River/Stream
- Lake
- Trapper Cabin
- Former Trapper Cabin
- Former Trapper Cabin
- Trapline Area
- Mine Site Road
- Access Road (Hardtack / Sawbill)
- Project Transmission Line
- Project Facilities
- Local Study Area

REFERENCE

Base Data - Provided by OSISKO Hammond Reef Gold Project Ltd
 Base Data - MNR NRVIS, obtained 2004
 Produced by Golder Associates Ltd under licence from
 Ontario Ministry of Natural Resources, © Queens Printer 2008
 Projection: Transverse Mercator Datum: NAD 83 Coordinate System: UTM Zone 15N



PROJECT		HAMMOND REEF GOLD PROJECT ATIKOKAN, ONTARIO, CANADA	
TITLE		TRAPPING IN THE LOCAL STUDY AREA	
<p>Golder Associates Mississauga, Ontario</p>	PROJECT NO. 10-1118-0020	SCALE AS SHOWN	VERSION 1
	DESIGN	CGE	8 Jan. 2013
	GIS	JO	8 Feb. 2013
	CHECK	PB	8 Feb. 2013
	REVIEW	PB	8 Feb. 2013

FIGURE: 2-17

G:\Projects\2010\10-1118-0020_BrettResources_HammondReef\GIS\MXDs\DraftSocio_Eco\TSD\Trapping_LandResourceUse\LSA.mxd

THIS AGREEMENT RESPECTING TRAPPING LICENCE – TRAPLINE No. AT 40 made this 10TH day of December, 2010 with effect as of the same date.

BETWEEN:

OSISKO HAMMOND REEF GOLD LTD.

("Osisko")

AND

JOHN SPOON, Sr.

("John Spoon Sr.")

AND

JOANIE SPOON, in her capacity as helper trapper;

("Joanie Spoon")

In recognition of John Spoon Sr., being the holder of the trapping licence Trapline No. AT 40 ("**Spoon Trapline**"), which is overlapping with part of the mineral and mining rights of Osisko to its Hammond Reef property ("**Osisko Property**"), the parties hereto desire to confirm their agreement to mutually share the area of overlap between the Spoon Trapline and the Osisko Property on the following terms and conditions:

1. The area comprising the Spoon Trapline licensed to John Spoon Sr. (Trapline No. AT 40) is described in Schedule A.
2. The Osisko Property is described in Schedule A.
3. The parties agree that this Agreement applies to the portion of the Spoon Trapline which overlaps the Osisko Property ("**Overlapping Portion**"), as described in Schedule A;
4. Osisko acknowledges that John Spoon Sr. and Joanie Spoon have the right to trap on the Spoon Trapline subject at all times to the following in connection with the Overlapping Portion:
 - a. John Spoon Sr. and Joanie Spoon acknowledge that Osisko is engaged in mineral exploration, development and mining operations ("**Mining Activities**") and that the Osisko Property, including the Overlapping Portion, will be subject to extensive drilling, blasting, construction and related mining operations;
 - b. John Spoon Sr. and Joanie Spoon consent to Osisko carrying on Mining Activities on the Osisko Property and acknowledges that the same may adversely affect and interfere with their rights under the Spoon Trapline;

analyze it and were encouraged to seek legal advice with respect to its terms. John Spoon Sr. and Joanie Spoon further represent and warrant that they had the opportunity to consult with an attorney of their choosing and received legal advice prior to executing this Agreement.

SIGNED, SEALED AND DELIVERED

In the presence of

<Original signed by>

Witness

<Original signed by>

<Original signed by>

John Spoon, Sr.

DATE OF BIRTH: _____

<Original signed by>

Joanie Spoon

DATE OF BIRTH: Jan 2/80

OSISKO/HAMMOND REEF GOLD LTD.

per <Original signed by>

Name: ANDRE LE BEL

Title: ASSISTANT CORPORATE SECRETARY

I have the authority to bind the Corporation