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

COMMENT – T(3)-03

Source: Canadian Environmental Assessment Agency

Summary of Comment

The T(2)-14 response does not allow for an analysis of the effects on navigation and transportation routes due to the Project or project activities. All transportation routes in any of the study areas should be included in the effects assessment. The potential effects may include, but may not be limited to, any changes in the environment (e.g. air quality, noise, water levels, aesthetic landscape changes etc.) and restricted access to areas that may be used for traditional purposes.

The information submitted to date does not fully address subsection 9.2.1 of the EIS Guidelines, which states that traditional land use may include areas where traditional activities such as camping, travel on traditional routes and gathering of country foods (hunting, fishing, trapping, plant harvesting) are conducted. Additionally, subsections 9.2.2 and 10.3.1 of the EIS Guidelines require the EIS to provide information on the effects that may affect waterways, water bodies and portage routes and/or limit access to those resources.

For the transportation routes that may be affected by the effects due to the Project or project activities, Subsections 10.3.1 and 13.1.2 of the EIS Guidelines require descriptions of mitigation, accommodation and follow-up for the effects in sufficient detail such that it is clear how these measures will address the specific effects for all affected routes.

Proposed Action

1. State whether there are any transportation routes that may be potentially affected by the Project or project activities and provide a general description of the routes and their value to and use by Aboriginal groups.
 2. Where potential effects on transportation routes are predicted, describe the adverse effects on navigation due to the Project or project activities, prior to mitigation. Consideration of effects will include the extent to which routes will be completely or partially lost and any change in experience along the route due to viewscape alteration, decreased air quality or other sensory disturbances (e.g. noise).
 3. For potential effects on navigation or transportation routes, describe the mitigation, accommodation, and follow-up measures proposed and how these measures will address the adverse effects described in item 2.
 4. Describe the residual effects on navigation and transportation identified in Item 2 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).
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Response

CMC has been informed of traditional land uses and transportation routes by the Aboriginal communities, but at the request of the Aboriginal communities, the locations of traditional transportation routes and land use areas cannot be disclosed in the Project EIS/EA. The cover page of a traditional knowledge and land use study submitted to CMC is attached as an example of these precedent consultation activities. Agreements with existing land users and with the Métis Nation of Ontario are in place.

Access by the general public to the mine site area will be restricted for safety and security reasons. However, agreements are in place such that Aboriginal community members who have traditionally used the areas where access will be restricted to the public will continue to have access if accompanied by an authorized CMC representative.

Aboriginal community members and the general public will continue to have access to all areas outside the active mine site. Noise levels will be elevated compared to existing conditions in the immediate vicinity of the mine site, but outside of the active mine area, noise levels are below Health Canada recommended threshold at which mitigation should be proposed. Within the LSA, project emissions may result in the concentrations of some compounds above ambient air quality criteria in areas near the mine site. However, a human health risk assessment has been completed assuming recreational receptor use of locations where the predicted maximum concentrations occur and concluded that potential effects to human health would be negligible for recreational or transient use of the areas surrounding the mine site (see response to T(3)-01). Therefore, there are no anticipated health risks associated with recreational or transient use of the areas surrounding the mine site.

An assessment of 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) is provided in the following table.

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Table 1: Assessment of Potential Impacts to Transportation Routes

Potential Adverse Effect	Assessment Conclusion	Mitigation	Measures of Residual Effect					Significance of Residual Effect
			Extent	Duration	Frequency	Reversibility	Magnitude	
Loss of access	Access to active mining areas will be restricted for safety and security reasons.	Agreements are in place such that Aboriginal community members who have traditionally used the areas where access will be restricted to the public will continue to have access if accompanied by an authorized CMC representative	Mine Study Area	Construction, Operations and Closure (during active decommissioning)	Continuous	Reversible upon Closure (post decommissioning)	Low	No residual effect (agreements in place)
Reduced air quality	Concentrations of some compounds above ambient air quality criteria in areas near the mine site. A human health risk assessment has been completed assuming recreational receptor use of locations where the predicted maximum concentrations occur and concluded that potential effects to human health would be negligible for the recreational user (see response to T(3)-01).	None required	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
Noise disturbance	Noise levels will be elevated compared to existing conditions in the immediate vicinity of the mine site, but outside of the active mine area, noise levels are below Health Canada recommended threshold at which mitigation should be proposed.	None 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

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GRT Review Findings and Comments on above Responses

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

The response states that CMC has been informed of traditional land uses and transportation routes by the Indigenous communities, but at the request of the Indigenous communities, the locations of traditional transportation routes and land use areas cannot be disclosed in the Project EIS/EA document. Further, the response states that agreements are in place such that Indigenous community members who have traditionally used the areas where access would be restricted to the public would continue to have access if accompanied by an authorized CMC representative.

Recognizing that CMC has been working with the Indigenous communities to identify navigational routes and have developed agreements to address any impacts to preferred navigational routes, and that the Indigenous communities have requested to not disclose the specific locations of the navigational routes, the Agency would like to understand the severity of the potential impacts in order to come to a conclusion of significance. As such, we have several areas where clarification is required

- a) Of the navigational routes being used by the Indigenous communities, how many routes will be lost and how many will be altered.
- b) Regardless of whether the navigational routes are preferred or altered, how will the project impact the experience (i.e., traditional activities associated with using the navigational route) from such changes as noise levels, water quality, air quality, etc.

CMC Response

Part a)

Indigenous communities access the project site and surrounding area by boat via Marmion Reservoir and/or Lizard Lake and by motorized vehicle (e.g., ATV, automobile) via the existing forestry access roads. These modes of transportation and the use of the existing forestry access road will not be impacted by the Project. CMC has not been informed by the Indigenous communities and is not aware of other navigational or traditional transportation routes in the vicinity of the Project that may be impacted by the Project.

Part b)

See response to Part a)

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 is not aware of any traditional routes for navigation or transportation in the LSA that may be affected by the Project. Given the spatial boundary of the Air Quality LSA,

- a) Clarify whether any navigational or transportation routes used by Indigenous groups are located within the LSA.

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- b) For each Indigenous group, describe how the Project's predicted effects on air quality, noise and visual aesthetics would affect the practice and experience of using the navigational or transportation routes. Describe the mitigation measures developed with input from the Indigenous groups to address those effects on the use of the routes. Ensure these measures are included in the Commitments Registry.

CMC Response

Part a)

Two portage trails are located within the Air Quality LSA that have been traditionally used by the Metis Nation of Ontario (MNO). The trails are located more than 10 km to the east of the proposed mine site and have historically been used for fishing access (additional information regarding location cannot be disclosed at the request of the MNO). With improved access to productive fishing lakes such as Upper Marmion Reservoir, these remote portage trails experience very little, if any, use (Pers. Comm., Bud Dickson, Aug. 2, 2017). Regardless of frequency of use, the experience of using the trails will not be effected by the project as access will not be effected, the mine site will not be visible from the trails, noise levels are not predicted to be elevated compared to existing conditions and water quality of the lakes to which the provide access will not be effected. No mitigation measures are necessary.

There are no other known traditional navigational or transportation routes used by Indigenous groups within the Air Quality LSA.

**Métis Nation of Ontario's Traditional Knowledge and Land Use Study for the
Treaty #3, Lake of the Woods/Lac Seul, and Rainy Lake/Rainy River
Traditional Territories: Hammond Reef**

Submitted
to
Osisko Mining Corporation
for the
Hammond Reef Project

