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

COMMENT – T-9

Source: Canadian Environmental Assessment Agency

Summary of Comment

The following observations were noted on the Proponent's assessment of alternatives for waste rock:

- The indicator 'Effects on Wildlife' with the metric 'Distance from mine pits' (page 68) has exactly the same outcome (same scale and score) as the indicator 'Haul Road Distance' with the metric 'Length of haul roads' which was used to assess the noise impacts (page 75).
- Under the indicator 'Impact to bird habitat', the Proponent has assessed the various alternatives using only the area of wetland directly impacted. There is no consideration of the full potential impact on birds or various bird species.
- Distances to water bodies is not defined but rather the term "close" is used frequently to describe location or proximity to water but actual distance is not defined which means that all alternatives score the same.

Clarification of these items will provide confidence on whether or not there would be any changes to the conclusions.

Proposed Action

Clarify the observations noted above.

Reference to EIS

Appendix 4.1 Mine Waste Disposal Alternatives Assessment Version 2, page 68, 75

Response

Comment: The indicator 'Effects on Wildlife' with the metric 'Distance from mine pits' (page 68) has exactly the same outcome (same scale and score) as the indicator 'Haul Road Distance' with the metric 'Length of haul roads' which was used to assess the noise impacts (page 75).

The potential effects on wildlife are considered to be mainly the result of a change to habitat suitability due to additional sensory disturbance (i.e., light, noise, dust, human presence). The area near the mine pits is considered to be the main source of sensory disturbance factors and habitat suitability is considered to increase with distance away from the mine. Therefore, a mine waste disposal area located close to the mine pits is considered to pose less potential incremental impact to wildlife in comparison to more distal locations where the introduction of a WRMF would introduce sensory impacts into an area that is otherwise relatively undisturbed. In addition, the haul road itself will introduce sensory impacts, since a longer haul road would cause sensory disturbance along a longer corridor and would require longer truck cycles. The metric used to evaluate this indicator is distance to the mine pits.

The potential for noise generation (as a component of the physical environment) due to the WRMF is related to the vehicle distance travelled to haul the waste rock to the stockpile. A longer haul road would result in longer truck cycle times which would require that more trucks be in operation. A shorter haul road is therefore considered to generate less noise. For cost considerations, it is preferable to minimize the haul distance from

the pit to the stockpile. (The haul road distance is assumed to be directly related to the distance from the stockpile to the mine pits). The potential for noise generation was not evaluated in the TMF assessment because the TMF is not considered to be a significant noise source.

Comment: Under the indicator 'Impact to bird habitat', the Proponent has assessed the various alternatives using only the area of wetland directly impacted. There is no consideration of the full potential impact on birds or various bird species.

The WRMF and TMF assessments qualitatively evaluated the potential for impact to bird habitat based on an ecologist's interpretation of the following considerations:

- The amount of wetland habitat directly affected (the diversity of available bird habitat, other than wetland habitat, was not considered to vary significantly between alternatives);
- The potential interruption to travel corridors near open water areas due to the high stockpile (considered for the WRMF only); and,
- The potential for sensory disturbance (noise, light, human presence).

Although the presence of wetlands is important to bird habitat, the evaluation considered more than only the area of wetland directly impacted.

Comment: Distances to water bodies is not defined but rather the term "close" is used frequently to describe location or proximity to water but actual distance is not defined which means that all alternatives score the same.

For indicators that use distance a specific water body as the metric, (e.g., the 'distance to Marmion Reservoir' indicator) the distance is provided. For qualitatively evaluated indicators that consider proximity to water bodies as one of several factors (e.g., the 'potential impact to bird habitat' indicator), a qualitative description is provided in the report. Although considered in the evaluation and selection of the scoring selection, the exact distance to nearby water bodies was not the only consideration for these indicators. Additionally, the qualitative descriptions of proximity provided in the report are not always in reference to the same water body, therefore they are not directly comparable without professional interpretation and consideration of the other factors important to each indicator.