

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-3	Access Roads		<p>Alternatives brought forward to the EA were not assessed and considered adequately or equally.</p> <p>The current study area is not realistic, as there is high probability the location will need to be modified. There is no flexibility for adjustment without a defined buffer for a study area. If the project deviates from the current plan as identified, MNR is likely to request additional information and further planning before approval. The transmission line does not line up with the road. At sections, the road and the transmission line appear to be out of alignment by 500m or more. As well there is approximately 4km of new line.</p> <p>The EA requires a section that provides detailed descriptions and illustrations for all linear corridor components, together. This should include: 1) Figures 1-3 and 2-1 with study areas for linear infrastructure with buffers. 2) a clear description if the plan is to align the fibre optic line/auxiliary line with the transmission line, this should be shown on a map and a described. I.e. the transmission line at 60m ROW, fibre optic line 5m. etc. 3) a description of the plans for widening/improvements to the road i.e., ROW for the upgraded road, how the culverts will be extended, improvements to roadbed etc. 3) a section in the EA that addresses mitigation measures for the transmission line such as avoidance of stream crossings, any right of way access, installation of water crossings during low flow periods, use of sediment traps in streams, working in water time restrictions, no spraying of herbicides within 3 m of surface water etc. 4) clarity that the pipeline study area and the mine site road buffer area are the same.</p> <p>MNR did not want a revised Fig 4-5. We wanted clarification of the schematic and the rest of the picture. Meaning that the EA should show a corridor like this of potential lines for ALL linear components such as the widened Hardtack/Sawbill road and the transmission/fibre optic line. Then a rationale of why the preferred line within the corridor has been selected. For example, why the selected mine site road, does not simply include a widening of the existing road. Also, the reader should not need to rely on the No Net Loss Plan to review the impacts of the water crossings. This all should be in the EA.</p> <p>It is not clear to what degree road upgrades are being planned for both the Raft Lake and the Hardtack/Sawbill roads. That is, there is no description of when and how the right of way (ROW) will expand, when and how the road bed will need to be upgraded, how the existing water crossings will need to be 'extended', and what would be needed for the new crossings.</p> <p>The EA does not make detailed comparisons between Hardtack/Sawbill Road and the Raft Lake Road which also already exists.</p> <p>The EA states there will be less terrestrial habitat disturbance on the Hardtack/Sawbill road compared with the Raft Lake road but it is not demonstrated why this is so.</p>	<p><i>"An extensive evaluation of access road alternatives was conducted, and the most suitable option was chosen to move forward with the Project. We are confident in the preferred alternative selected.</i></p> <p><i>The main rationale for selecting the Hardtack/Sawbill Road is the limited amount of upgrading that would be required, which implies limited incremental terrestrial and aquatic impacts. Further clarification on this has been provided in response to Information Requests MNR-66 and MNR-67 on the Draft EIS/EA. Upgrading of the Hardtack/Sawbill Road has already been done as part of the exploration project. The Hardtack/Sawbill Road has been used and maintained over the past five years and continues to be used by others, including forestry companies. The Raft Lake Road is not well used and would require much more upgrading and the construction of new road sections and new water crossings.</i></p> <p><i>Canadian Malartic acknowledges that additional information may be required for MNR approval of construction activities within the linear corridor, such as watercourse crossings.</i></p> <p><i>Linear corridor components were described in Chapters 4 and 5 of the Final EIS/EA Report, including figures. Study Area figures for each component are provided in Chapter 2. The fibre optic line and auxiliary power line have been removed and are no longer part of the Project description. The transmission line does not follow the road exactly. This is due to engineering and topographical considerations.</i></p> <p><i>The existing Hardtack/Sawbill road will require some widening and realignment to provide safe travel conditions. Feasibility design of the road is currently underway.</i></p> <p><i>Horizontal realignment will be required in some locations to provide safe turning radii and to eliminate blind corners. Based on current feasibility design alignment:</i></p> <ul style="list-style-type: none"> ■ <i>There are 11 road sections that will require horizontal realignment greater than 10 m in extent (see Figure MNR-1 in Attachment 5 of this Addendum); and,</i> ■ <i>The maximum horizontal deviation is about 125 m from the existing road alignment</i> <p><i>Vertical realignment will be required at locations where the existing grade is too steep for safe travel. Widening is required to provide safe riding surface and shoulder widths. The change in footprint area associated with widening and vertical realignment will be minor compared to sections where horizontal realignment is occurring. Road widening activities may require culvert extension at water course</i></p>	<p>MNR-3</p>

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			<p>The EA states there will be minor effects on water quality on the stream crossings on the Hardtack/Sawbill road, but does not describe how. There are many stream crossing (13) and the EA identifies they will need to be upgraded (extended).</p> <p>The EA states that the Raft Lake road will require considerable upgrades and new sections will require new construction, and there will be new water crossings. But it does not describe why the upgrades are considerable, where the sections requiring construction are, and details about the new water crossings.</p> <p>It needs to be understood that the Hardtack/Sawbill and Reef and Pit Access roads are currently held under a Memorandum of Understanding with MNR. If implementation of the project does not proceed, and the responsibility of the road is transferred to MNR, MNR does not commit to maintaining the road and may require the proponent to decommission the road.</p> <p>The EA study area for linear infrastructure did not include the Raft Lake road access corridor and consequently no assessment was undertaken. It needs to be clearly understood that should the Raft Lake road be chosen moving forward with the project, the current base line data will be considered deficient and further data will be required. A description of the road widening needs to be included in the report and details provided. I.e. what is the current running surface? Where will widening be required? Where will culverts need to be replaced? What is involved in 'lengthening existing culverts? This level of detailed information as well as good maps needs to be provided in the alternatives assessment and included in the contrast of the other Sawbill road and Raft Lake road options. (see also comments on linear corridors)</p>	<p><i>crossings. Culvert design descriptions will be developed in consultation with MNR throughout the permitting process.</i></p> <p><i>Chapter 6 provides a summary of mitigation measures for the physical, biological and social environment. Chapter 8 outlines planned management and mitigation measures based on Project aspect (e.g., Table 8-8 provides a commitment to selectively clear transmission line pathway without grading or stripping of topsoil).</i></p> <p><i>Terrestrial and Aquatic Local Study Areas considered a width of 1 km along the access road; therefore, the area of potential disturbance has been included in the baseline study area. Habitat losses due to access road water crossings have been included in the No Net Loss Plan (NNLP) which DFO (Fisheries and Oceans Canada) has accepted in principle. Any additional Harmful Alteration, Disruption or Destruction (HADD) of fish habitat due to road upgrade will be included in the Final NNLP. The NNLP states (pp. 48): "Potential for HADDs at each crossing will be assessed once culvert design specifications are developed"</i></p> <p><i>The Raft Lake Road is not currently planned to be used as an access road for the Project. In the event that use of Raft Lake Road is required for the Project, additional data collection will be undertaken, as required, to support regulatory approvals and required permitting for upgrades and use of the Raft Lake Road.</i></p> <p>Attachment: <i>Figure MNR-1: Access Road Proposed Re-Alignment"</i></p>	