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

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### COMMENT – T(3)-10

**Source:** Canadian Environmental Assessment Agency

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#### Summary of Comment

Figure 5-1 of the EIS does not reflect the current proposed layout of the project components. For example, the responses to previous comments and information requests indicate the accommodation camp site was relocated.

An updated version of Figure 5-1 as an unlocked PDF file is needed.

This information is needed by the Agency, pursuant to sections 3.3, 5.2 and 5.3 of the EIS Guidelines, to reflect the current project description and setting.

#### Proposed Action

1. Provide an updated version of the site layout map (Figure 5-1) to reflect the current proposed location and orientation of project components, including the accommodation camp site and the locations of the camp water supply intake and effluent discharge. Submit the updated Figure 5-1 in an unlocked PDF format.
2. Describe any changes or new potential adverse effects the revised project layout may have on the environment, and any additions or changes to the proposed mitigation measures; predicted residual effects; 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); and follow-up measures.

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#### Response

In response to comments received from the Government Review Team (GRT) following submission of the EIS/EA report, the accommodation camp and the accommodation camp fresh water intake and effluent discharge were relocated. A revised version of the site layout map (Figure 5-1) is attached and is available to the GRT in an unsecured .pdf format upon request.

#### Location of Accommodation Camp

The main concerns regarding the original location of the on-site accommodation camp (i.e., the location of the previous exploration camp) were:

- Its proximity to Sawbill Bay (i.e., partially within a 120 m 'Area of Concern' or 'non-discretionary buffer zone' from the shoreline); and,
- That the site was selected without assessment of alternative locations.

In response to these concerns, an alternatives assessment of camp site locations was completed (see Part V of the Addendum to the Final EIS/EA Report, June 2015) and a new location was selected. The new location is north of the original location, across the mine site road and outside of the 120 m 'non-discretionary buffer zone' from the shoreline.

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The accommodation camp at the revised location will have the same capacity, will occupy the same footprint area and will require a similar length of access road compared to the original location that was assessed in the EIS/EA. It has been relocated outside of the 120 m 'non-discretionary buffer zone' and, due to its closer proximity to the TMF, allows for the potential to combine the camp and mine effluent for discharge at a single location, rather than two separate discharge locations as presently proposed (Note: This is identified as a potential optimization for consideration during future stages of engineering design and is not proposed as part of the current Project Description). This is considered to be a minor change that will not result in new impacts or an increase to the impacts predicted in the EIS/EA. In fact, because the new location respects the 120 m buffer zone from the Marmion shoreline and allows for a potential combined camp and mine water effluent discharge, the potential for effects to the aquatic environment are considered to be reduced compared to the location originally assessed in the EIS/EA.

For this change in accommodation camp location there is no change to the previously described magnitude, geographic extent, duration, frequency, reversibility, ecological/social/cultural context. There are no follow-up measures arising from this change as part of the EIS/EA process, however additional detailed design engineering will be completed in future project stages.

### **Camp Intake and Treated Effluent Discharge Locations**

Concerns were also raised by the Ministry of Natural Resources and Forestry (MNR) regarding the originally proposed camp treated effluent discharge location. It was requested by the MNR that the discharge location be moved due to the presence of known critical fish habitat, (walleye spawning and nursery habitat) in the area of the originally proposed location. Although no impacts were predicted at that location, in response to this request, and in deference to potential negative public perception, the location of the treated effluent discharge was relocated to an area where there is no perceived influence on the spawning habitat or other environmental impacts. To accommodate this move, the intake location was also moved to a location where it is upstream from the effluent discharge location (relative to a local inflowing creek).

The changes to the discharge and intake locations will have no effect of the discharge and intake flow rates. Regardless of location, effluent dilution will be enhanced through the construction and operation of an effluent diffuser such that water quality objectives are met within a short distance from the diffuser. Furthermore, as the new discharge location is located within the same general area as the originally proposed location (i.e., Basin 7c of the basin-wide mixing model; see Section 3.0 of the Lake Water Quality TSD), the baseline water quality and mixing capacity of the basin at both locations are expected to be similar. The new locations for the camp treated effluent discharge and fresh water intake do not result in new impacts or an increase to the impacts predicted in the EIS/EA. Additional baseline data will be collected at the final locations as part of the Environmental Effects Monitoring (EEM) program prior to constructions and operations.

For this change in intake and discharge locations there is no change to the previously described magnitude, geographic extent, duration, frequency, reversibility, ecological/social/cultural context. There are no follow-up measures arising from this change as part of the EIS/EA process, however additional detailed design engineering will be completed on intake and discharge structures in future project stages.