COMMENT – T-44

Source: Canadian Environmental Assessment Agency

Summary of Comment

A new figure, Figure 5-11, was recently added to the EIS in Chapter 5 Project Description. Figure 5-11 identifies existing natural watercourses in the vicinity of the process plant site and adjacent to the waste rock stockpile. With the inclusion of the new Figure 5-11 and the comparison to Figure 5-10 it seems that the Intermediate Collection Pond (ICP) will be constructed within the location of a natural watercourse. In the Aquatic Environment TSD, Figure 3-2 identifies this watercourse as API 14 and Table 2-6 identifies the fish species present there.

The use of API 14 for the development of the ICP is not apparent in Chapter 5 of the EIS. Under the MMER, API 14 would have to be added to Schedule 2 in order to allow its use as a storage pond for contact water. The ICP is not discussed in the updated Assessment of Alternatives TSD. A description of this pond and the rationale for the selected location should be included in the Alternatives Assessment for Mine Waste Disposal.

Proposed Action

Provide a description of the Intermediate Collection Pond and the purpose of the ICP in the Alternatives Assessment for Mine Waste Disposal. This description should include the rationale for the site selection of the pond. Alternative siting of the ICP should be assessed.

Reference to EIS

Hammond Reef Gold Project Environmental Impact Statement (EIS)

Chapter 5 Project Description Figure 5-10 Surface Water Drainage Plan, Figure 5-11 Plan View of Process Plant Site

Alternatives Assessment Report TSD

Response

The Alternatives Assessment Report provides a description of WRMF-3, including its associated Intermediate Collection Pond (ICP). As stated, the WRMF-3 footprint is approximately 2.1 km² and is located on top of a ridge sloping down to the west and to the east. Foundation conditions include shallow bedrock underlying thin layer of dense till. Baseline aquatic studies indicate Finescale Dace, Northern Redbelly Dace and Fathead Minnow presence in the pond within the footprint. The haul road length would be approximately 1.8 km.

The Alternatives Assessment Report goes on to evaluate the impacts of each of the WRMF alternatives to the aquatic environment, including impacts to fish bearing lakes and the total area of that impact for each alternative. The Report identifies WRMF-3 as affecting 1 fish bearing lake with a total area of 2.8 ha. The final conclusion is that WRMF-3 is the preferred alternative. Despite the aquatic habitat loss, it proves to be the most feasible alternative when all criteria are considered.

As described in Chapter 5, Project Description, the WRMF will include a runoff collection system, of which the Intermediate Collection Pond (ICP) will be a part. A runoff collection ditch will be excavated around the entire
WRMF, collecting the runoff into pumping stations situated at topographic lows. The selected site of the ICP is the low point located directly between the WRMF and the truck shop. No other alternative sites for the ICP would be feasible.