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

COMMENT – T-54

Source: Canadian Environment Assessment Agency

Summary of Comment

With respect to the potential effects of “Loss of Vegetation”, “Changes to upland forest and wetland habitat”, and “Changes to wildlife and plant communities”, one of the mitigation measures listed is, “Where feasible, native plant species will be used for reclamation”. It is further stated that, “At closure, developed areas will be re-vegetated to the extent practical (regraded, replanted, reseeded, etc.)...”, and, “Native species of trees, shrubs and other vascular plants will be used for re-vegetation at closure.” (EIS Sec. 6.2.1.1.2, p. 6-118; EIS Sec. 12, Table 9-1, p. 9-2, Com. No. 17). This suggests that there will be plantings of native species during reclamation, but the Proponent’s response to IR EC-56 is consistent with their position stated during meetings with the government review team as it is accurately stated that, “There will not be specific plantings during the re-vegetation of the site”.

The Proponent’s response to IR EC-55, stated, “Tailings surfaces will be amended with fertilizer to promote revegetation in order to reduce erosion, and waste rock will neither have a topsoil cover, nor will it be amended since the surface will not be expected to erode. It is expected that successional ecological processes will lead to the establishment of a community of colonizing species, such as Labrador-tea, white birch and trembling aspen.” Labrador Tea, which almost always occurs in wetlands, is not a colonizing species like white birch and trembling aspen.

Proposed Action

Provide clarification on the proposed hydroseeding of the TMF as it has been noted in the Proponent’s response to IR EC-56, that the TMF will be left to “naturally re-vegetate”, yet the Proponent’s response to IR EC-57 states, “... the tailings will be directly re-vegetated by placing organic mulch, fertilizer and seeding”.

Reference to EIS

EIS Section 8.2.3, Table 8-8, Page 8-37

EIS Section 12, Figure 12-1, Page 12-7

Response

The proposed closure plan for the TMF is to re-vegetate the tailings surface directly, without the requirement to place a layer of topsoil, by seeding with a mixture of grasses. During mining operations, the tailings surfaces will be tested to determine if nutrients are lacking and the need for the addition of organic mulch, such as pulp mill sludge, will be evaluated. Specific details of the re-vegetation (i.e., seed mixture, fertilizer, mulch) will be verified prior to closure using test plots on inactive parts of the TMF surface. At closure, the entire exposed tailings surfaces will be re-vegetated following the developed procedures. It is not intended to plant trees on the tailings surface; however, trees will be allowed to invade naturally and will not be removed.