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August 16, 2010

Melanie Paradis
Director of Lands, Resources and Consultation
Métis Nation of Ontario
75 Sherbourne St., Suite 222
Toronto, ON M5A 2P9

Dear Ms. Paradis:

Re: Comments on Detour Lake Project, Draft Environmental Study Report

We are in receipt of your June 22, 2010 email with comments responding to the Detour Lake Project Draft Environmental Study Report (ESR) that had been prepared in accordance with the Category C process as per the Class Environmental Assessment for the Ministry of Natural Resources Resource Stewardship and facility Development Projects. Thank you for taking the time to review the ESR document and providing your comments.

For ease of review, we have included your comment and our response in the attached table. The Final ESR will be available for review beginning August 17, 2010 and ending September 17, 2010.

We look forward to continuing to actively engage the MNO and the Region 3 Consultation Committee in the Detour Lake Project and trust you will find responses to your comments satisfactory.

If you have any additional comments or questions, please do not hesitate to contact us.

Sincerely,

Derek Teevan
VP Aboriginal and Government Affairs

Cc: Marcel Lafrance, Chair Region 3 Consultation Committee
Jim Robertson, Detour Gold, Director Environment and Sustainability
Sheila Daniel, AMEC Earth & Environmental
David Simms, AMEC Earth & Environmental
Kirk Springett, Ministry of Natural Resources

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SUMMARY OF COMMENTS ON APRIL 2010 DRAFT ENVIRONMENTAL STUDY REPORT

Proposal: Detour Lake Project Open Pit Gold Mine – Environmental Study Report
Proponent: Detour Gold (DG) Canada Corporation

Notes: The "Proposed Revisions" column specifies either:

- Complete (revisions made to final ESR), or
- NR (revisions not required).

The "Status" column indicates whether or not the comment has been addressed including, where applicable, revisions to the final ESR. Responses to all comments are complete.

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
Métis Nation of Ontario Melanie Paradis Director of Lands, Resources and Consultation June 22, 2010	With respect to Section 1.3, which identifies no Provincial Parks, ANSI, PSW, Forest reserves or other provincially protected lands - Do any of the lands within the proposed DLP site development area or its surroundings have the potential to be considered as PSW's or ANSI's in the future? Have all areas already been assessed by the appropriate Ministries and determined not to be significant?	AMEC and Detour Gold are not aware of any areas within or surrounding the proposed DLP site that are being considered for designation as Provincial Parks, ANSIs, or PSW. The only area that has been identified as having particular biological or earth science significance is the immediate area around Sunday Lake where a large concentration of Woodland Caribou (200-300 animals) was observed during the late winter of 1997. No such large aggregations of Caribou have been observed in this area since, but MNR has requested that Detour Gold avoid any disturbance to this immediate area, to provide for future use of the area by Caribou. MNR has not indicated that it intends to confer ANSI status to this particular site, but such a designation at some time in the future would be reasonably possible. Not to our knowledge have all the areas been assessed. There is always the potential for areas to be considered as PSW's or ANSI's.	NR	Complete

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	With respect to Section 1.7 (Traditional Knowledge), this approach is limiting and unacceptable. If more research was completed on cumulative effects of projects across the broader region, Detour may be better able to accurately assess the fluctuations in Woodland Caribou activity. Similarly, if the TK study area boundaries were more regional in scope, the information may help determine the regional effects of the Detour project, and the potential for cumulative effects on the Métis way of life. Therefore, the study area boundaries for the TK data collection must be broadened to be more regional in scope.	Noted. Detour Gold is supporting the preparation of the TK study being led by the Métis. Detour Gold will support a study area that incorporates a broader regional study area if this is deemed appropriate to document project effects on Métis TK and land uses. The study area shown was selected for a First Nation and represents the possible areas of project effects to land uses. The name of the figure will be changed to reflect its origins.	NR	Complete
	With respect to Sections 2 and 3 (overburden, de-watering, waste rock, tailings, etc):			
	1. What will the effects of the overburden stripping be on the biodiversity of the site while it is being stockpiled?	Overburden will be stripped from the open pit area as part of mining, as well as from portions of the plant site area, and from foundations of proposed tailings dam structures. This overburden will be stockpiled in designated areas as per the DLP site plan (Figure 2-1). Natural environments contained within the future open pit footprint would be completely removed for the life of the mine, and until such time as the pit becomes flooded to surface, at which time it would form a pit lake. Other displaced habitats would have a negligible habitat function during the period of mine operations, but would be rehabilitated to productive habitat as part of mine closure as described in Section 2.17 of the ESR.	NR	Complete
	2. During de-watering of the existing pit, how and when will the water discharge be tested and will the PWQO guidelines be used?	The existing open pit water has been tested and will continue to be tested during de-watering in accordance with applicable permits. During the initial pit dewatering phase the pit water will be discharged directly to East Lake, or to East Lake via TMA Cell 1, if suspended solids are other parameters are unacceptably high for direct discharge to East Lake. East lake is currently part of the existing Certificate of Approval (C. of A.) treatment works. PWQO guidelines apply to receiving waters and not to effluent discharges. Detour Gold will comply with all applicable C. of A. conditions.	NR	Complete

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	3. Will any of the water discharging to East Lake at any time exceed PWQO guidelines?	As per the above, PWQO guidelines apply to receiving waters and not to effluents. Mining effluents are subject to O. Reg. 560/94.	NR	Complete
	4. Ammonia, hydrocarbons and heavy metals will all be present in the year-round dewatering. Will all of the discharge go to TMA storage? For how long? Is this facility capable of handling all of the necessary discharge?	The comment presumably relates to pit dewatering. All pit discharge water will be directed to the TMA, with the likely exception of a portion of the existing flooded pit water column, which will be discharged directly to East Lake, pending suitable water quality as per the above.	NR	Complete
	5. There will be approximately 60,000-70,000 tonnes of sulphides removed from the existing pit which will go into the tailings pond and either buried or covered by water. What will happen if the water level drops? What will happen if there is erosion? What is the leaching potential? What is the management plan to handle these possibilities?	The sulphide concentrate tailings in the bottom of the existing flooded open pit (from former DLM operations) will be discharged to TMA Cell 1 during the first phase of mining. These sulphide tailings were deposited directly underwater, at depth, and would not have oxidized to any appreciable extent. These tailings, once deposited in Cell 1 will remain saturated and will be quickly buried with fresh, non-acid generating, tailings, with the daily production of such tailings to start at approximately 12,375 tonnes per day (tpd) and ramping up to approximately 53,075 tpd by the end of the first year of operations, such that by the end of Year 1 of operations the small amount of sulphide tailings would be buried by several millions of tonnes of benign tailings, and would continue thereafter to be buried with several further tens of millions of tonnes of benign tailings. No environmental risks are perceived in association with this plan.	NR	Complete
	6. The existing tailings have been found to be acid generating. What will be done to deal with these tailings?	The existing tailings are potentially acid generating if left to oxidize, but thus far they have not oxidized to the point where an acidic effluent has been produced. The average pH of the existing Cell 1 pond in 2009 (based on monthly samples) was 7.89 with the lowest monthly pH value being 7.47. As the existing tailings are buried with a far larger volume of more benign tailings, which are not potentially acid generating, the acid generating potential of the existing tailings will be complete negated.	NR	Complete
	7. The new tailings are expected to have much less potential for acid generation based on tests. If these tests are inaccurate, what measures will be taken to prevent acid generation?	The tests are considered accurate and representative. No additional measures are required.	NR	Complete

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	8. If the waste rock is found to have the potential for ARD, are the waste rock pads positioned in areas to enable runoff to be diverted to the treatment facilities to avoid negative impacts to the watershed?	Potentially acid generating (PAG) waste rock will be directed to the southern portion of Mine Rock Stockpile #1, where the drainage can be suitably managed as described in Section 2.3.3 of the ESR.	NR	Complete
	9. The mill effluent sludge is predicted to contain cyanide, lime and heavy metals. Will the SO ₂ air processes to recycle the cyanide catch the majority of it leaving the plant? How long will the sludge have to be in the tailings area for the remaining cyanide and heavy metals to settle or break down?	The SO ₂ /Air treatment system is designed to destroy cyanide to low levels (not recycle it) and to render heavy metals in solid phase such they will precipitate out in the tailings cells. Any remaining cyanide not destroyed by the SO ₂ /Air treatment would be expected to degrade in a matter of a few weeks to levels well below those required for discharge. The tailings ponds will provide several months of retention prior to effluent release.	NR	Complete
	10. Will all of the water leaving the site be intercepted and recycled for other DLP site uses? If not, how much will flow into East Lake and subsequently out of East Lake into the watershed?	Effluent recycle and discharge rates relative to the TMA discharge and East Lake are described in Table 2-6 of the ESR.	NR	Complete
	11. How much water can the polishing pond hold and will it be able to accept all runoff and allow sufficient time for the water quality at the East Lake dam to meet PWQO standards? How long would that take?	Water balance data are provided in Table 2-6 of the ESR. Predicted effluent discharge effects on East Lake are shown in Table 6-5 of the ESR. PWQO and/or background concentrations are expected to be met, or approximately met, at the outfall from East Lake, as per Tables 6-4 and 6-5 of the ESR.	NR	Complete
	12. Can the site runoff be managed passively even during closure and even under high flow events?	Yes, with the possible exception of runoff from the south portion of Mine Rock Stockpile #1, which will contain PAG materials. If required, provisions will be made to treat this runoff as described in Section 2.17.1 of the ESR.	NR	Complete
	13. Will the pit and tailings have to be submerged to avoid acid generation, leaching and oxidization of the tailings? What would happen in the event of a drought?	The future tailings are not expected to be potentially acid generating, as described in Section 2.2.4, and will not require a water cover.	NR	Complete
	With respect to Section 4.2.1, the wording in this section makes it seem as though the Métis community is an afterthought to Detour and not equal to the First Nations. This phrasing is continued throughout the ESR and is unacceptable	Noted. It was not the intent of this or other phrasing within the EA. Detour Gold has actively engaged the Metis Nation of Ontario in the Detour Lake Project and recognizes the role of Métis people as right-bearing in this region and as a constitutionally recognized Aboriginal group as outlined in the Canadian Constitution Act (1982). Wording to reflect this sentiment will be strengthened in the final Environmental Study Report.	Complete	Complete

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	With respect to Section 4.3, there is no "regional council". There are four Métis community councils with Charters with the MNO. They include: Timmins Métis Council, Northern Lights Métis Council (Cochrane), Temiskaming Métis Council, and Chapleau Métis Council. Those Councils have signed a Consultation Protocol Agreement which created the James Bay/ Abitibi/ Temiskaming Regional Consultation Protocol Committee, which is mandated to represent the regional rights-bearing Métis community in consultation matters. The Committee is made up of representatives from each of the four Councils, the Captain of the Hunt for the region (ex-officio) and is Chaired by the Regional Councillor.	Noted. This will be revised in the final ESR.		
	With respect to Section 5.1.1, with the exception of the aerial surveys, most surveys were only conducted over a two week period during a single year. This is insufficient for predicting impacts to species for a project that will involve 2 years of construction and 15 to 18 years of operation. Since the project will be operational 24 hours a day, year round for so many years it is important to have long term studies in and around the site to determine what effect the mine will have on the species of interest. Many species have migration patterns that are irregular, seasonal or could take multiple years to return to a specific site; due to this irregularity having surveys done only in one season for a few weeks cannot adequately prove the absence of species of interest at the detour site.	The comment is presumably in response to wildlife surveys. The principal surveys in this regard were those relating to large mammals, birds, and amphibians. Multiple winter aerial surveys of large mammals (Caribou, Moose and Wolves) were carried out, as indicated by the reviewer. MNR also has a wealth of data on Caribou in the area. Breeding bird and amphibian surveys were carried out as per standard protocols as described in Section 5.1.1. All surveys were carried out by trained specialists. Sufficient data, in combination with habitat analysis, and cross correlations with the literature and MNR databases, were obtained to carry out the effects analysis. Additional surveys over longer periods of time would provide additional incremental data, but would be unlikely to materially alter the effects analysis. All of the habitats proposed for development in the DLP site area are commonplace and widespread in the region such that wildlife species and populations associated with these habitats would also expect to be commonplace and widespread in the region, in keeping with the specificities of the individual species.	NR	Complete

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	With respect to Section 5.1.2, this statement makes it seem as though the Métis traditional harvesting area across the James Bay/ Abitibi/ Temiskaming region is not recognized as an 'overlapping traditional territory'. The Métis traditional harvesting area has been recognized by the Ministry of Natural Resources through a Harvesting Agreement. To be clear, the rights-bearing Métis can exercise their Aboriginal right to harvest for food in their traditional territories the same way that First Nation people can harvest in their own territories.	Noted and understood. The wording in the final final ESR has been amended.	Complete	Complete
	With respect to Section 5.1.3, What is meant by "or on behalf of"?	Some Aboriginal groups have decided to hire a third party to complete their TK/TLU studies. In these cases, the studies are being conducted by the third party "on behalf of" the Aboriginal group.	NR	Complete
	With respect to Section 5.4.1, which includes environmental study information pertaining to aquatic and terrestrial environmental effects:			
	What are the cumulative long term effects of the heavy metals, acidification, hydrocarbons, cyanide and ammonia on the aquatic and terrestrial life?	Section 5.4.1 presents baseline data summaries. Related natural environmental effects assessments are presented in Section 6. Significant long-term adverse effects related to the contaminants listed by the reviewer are not anticipated, as all such contaminant releases will be controlled as described in Sections 2 and 6 of the ESR.	NR	Complete
	How will the cumulative effects of all the activities in the area related to a project of this size affect migration routes and species diversity?	As per the above, these aspects are assessed in Section 6 of the ESR. Cumulative effects relating to other defined projects in the DLP site area are assessed in Section 8 of the final ESR.	NR	Complete

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	What effects will there be to the aquatic and terrestrial life from the long term exposure to the chemicals, heavy metals and possible changes in PH that have been associated with mines. What are the potential effects of exposure (through, for example bioaccumulation of substances in plant, animal and/or fish tissues) on the local Métis community who consume the local plants, animals, and fish as part of their traditional way of life? What long term effects would exposure to chemicals and heavy metals have on the community's health and well being? What long term effects would the inability to consume a contaminated plant, animal or plant species for food and/or medicinal purposes have on the community's health and well being?	Appreciable changes in pH that could potentially affect aquatic life in associated site drainages are not expected. With regard to heavy metals, concentrations of the three metals that tend to bioaccumulate in fish and wildlife tissue (namely mercury, cadmium and lead) all occur at very low concentrations in the ore. The principal trace metal of concern at the Detour site is copper, which does not tend to bioaccumulate at the concentrations expected. Further details on these aspects are presented in Table 7-6 of the draft and final ESRs.	NR	Complete
	What is the likelihood that hauling trucks, materials and supplies might carry invasive species? How would an invasive species compete and affect the remote environment around the Detour Mine site?	There is a reasonable probability that trucks and other vehicles using Highway 652 and the mine access road may inadvertently carry seeds of invasive species. This process has been going on in the area since the early 1980's and occurs on public and private roads throughout the country. Seeds of species which can adapt to the local climate, and are able to compete with local species have the potential to become established. Most such potentials have presumably been realized over the past three decades. It should also be noted that most of the traffic to service the DLP will be local, with much of the bulk goods being delivered to Cochrane by rail.	NR	Complete
	What contingency plans are in place to protect aquatic and terrestrial life from possible spills, leaching or the cumulative effects of the mine site? How would Detour gold react in the event of major spill or environmental issues associated with the mine workings? What insurance will Detour have to ensure site remediation in the case of company failure (insolvency) or large scale contamination due to a system failure?	Contingency plans and spill response strategies are described in Section 10 of the ESR. Detour Gold and its suppliers will be responsible for the clean-up of any contaminant releases resulting from accidents and malfunctions, and from normal operations. The Closure Plan (currently being developed and soon to be released) will define commitments related to site restoration following the completion of mining activities at the site. Financial assurances are provided as part of the Closure planning process to ensure that resources are available for site restoration, irrespective of the company's financial status.	NR	Complete

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	With respect to Section 5.4.1, • What is the potential for beaver activity disrupting the mining activities, specifically the water taking and discharge activities? • What would the effects be if beaver activity disrupted the flow of the waterways within the DLP site and caused an overflow or leakage of the tailings pond? • What is the potential for beaver-influenced changes in surface water levels in the area to impact the remediated site in the late stages of the project lifecycle? • How will this be monitored?	Beaver have the potential to block culverts and therefore to temporarily flood site area roadways. A beaver inspection and management program is planned for the site, and has in fact already been set up with the local trapper. This aspect was addressed in Section 9.3 of the ESR. Beaver activity is not relevant to the TMA as all effluents discharged from the TMA will be discharged via pumping systems.	NR	Complete
	With respect to Section 5.4.1, in 2009, caribou, moose and wolves were all noted as being less abundant. What is the biologist's explanation for this phenomena and what is the likely cause? Could this happen again? If so, why?	The reference is to Section 5.4.2. Caribou showed the widest fluctuation in numbers during the March helicopter aerial surveys in the three years, with 55 animals sighted during the 2008 survey; none during the 2009 survey (except two wolf-killed individuals), and 38 animals sighted during the 2010 survey. Evidence of Moose and Wolves also varied from year to year, but not to the same extent as for Caribou. Caribou commonly use different parts of their range at different times of the year, and their use of range also varies from year to year, and this is characteristic of the species. Several factors could account for this generalized behaviour including such aspects as snow cover in the different years. Food resources in the area are not limiting. However, from an evolutionary perspective it would make sense for Caribou exhibit an at least partially randomized (i.e., non-predictable) spatial utilization of their range as an anti-predator strategy, since utilizing their range in more predictable patterns would increase their vulnerability to Wolf predation. AMEC has observed this randomized behaviour at other sites in northern Ontario, as have other researchers, and this randomized range utilization is expected to continue. Exploration activities at the Detour site were similar in all three winters, such that there is no reason to suspect that site activities were responsible for the observed year-to-year variation in site area Caribou numbers.	NR	Complete

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	With respect to Section 5.4.1, Will any Woodland Caribou calving sites be disturbed by the DLP? What is Detour doing to ensure that no Woodland Caribou calving sites will be disturbed? How will this be monitored?	Proposed DLP developments do not interfere with any known Caribou calving sites. The available data suggest that Caribou utilize areas within 5 km of the core development area infrequently, such that it is unlikely that Caribou calving areas would be directly displaced by proposed DLP developments. MNR monitors Caribou in the area by radio telemetry. Detour Gold will work with MNR to optimize the protection of local Caribou, recognizing that some level of disturbance is unavoidable for a Project of this type.	NR	Complete
	With respect to Section 5.4.1, What would the effects be on the Woodland Caribou if the over wintering habitats in the Sunday Lake area are disturbed? What is Detour doing to ensure that no Woodland Caribou over wintering habitats will be disturbed? How will this be monitored?	There are no plans to disturb the Sunday lake area over-wintering habitats. Efforts to minimize disturbance to other Caribou over-wintering areas are documented in the draft and final ESRs.	NA	Complete
	With respect to Section 6.10.2, Pond losses are not "unavoidable". The loss of the muskeg pond in question is completely avoidable. It can reasonably be assumed that the proponent has chosen to pursue the option of destroying the lake because it is less expensive than constructing a tailings containment and treatment facility. Can the destruction of this lake be justified as a better option from an environmental perspective than a tailings containment and treatment facility? If so, please provide three (3) Canadian examples that have demonstrated that the destruction of a lake for the purposes of creating a tailings management area is better for the environment than the construction of a tailings containment and treatment facility.	The loss of the muskeg pond is not reasonably avoidable, as there are no other tailings sites that could be reasonably developed, and all such other alternatives would have a greater infringement on other adjacent aquatic habitats, compared with proposed TMA Cell 2. The reviewer's interpretation that use of the muskeg pond somehow avoids construction of a tailings impoundment facility, or is an alternative to construction of a tailings impoundment facility, is incorrect. The muskeg pond in question occupies an area of 0.6 ha, and comprises a tiny fraction (0.15%) of the proposed 390 ha TMA Cell 2 basin, within which the muskeg pond occurs. As such the muskeg pond has no material effect on Cell 2 dam construction requirements.	NR	Complete

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	The proponent is proposing to create an artificial lake to compensate for the destruction of the existing lake for the purposes of expanding their Tailings Management Area (TMA). Has this practice ever been proven to successfully compensate for the destruction of the naturally occurring lake? If so, please provide three (3) Canadian examples that have demonstrated that no-net-loss can truly be accomplished.	Reference to the TMA Cell 2 muskeg pond as a "lake" by the reviewer is arguably a misnomer. Nearly all environmental practitioners would refer to this 0.6 ha feature as a "pond". The 1988 Wetlands of Canada publication defines ponds in this context as "A general term for an open water body of a seasonal to permanent nature, held in an impoundment or natural basin. A pond usually implies a transitional form between a lake and a wetland", which would certainly apply to the TMA Cell 2 pond, which is a classic bog pond. The TMA Cell 2 pond supports a modest Brook Stickleback population. This species is abundant and widespread throughout the province, and has broad habitat tolerances, and is in fact one of the few species which is able to inhabit isolated muskeg ponds. The broad habitat tolerances of this species, and especially its ability to characteristically utilize small ponds, including isolated ponds, virtually guarantees its use of the proposed compensation pond. As an example, Brook Stickleback have been able to readily colonize the existing TMA Cell 1 tailings pond, which provides a rather sterile environment.	NR	Complete
	What ecological restoration plan has been developed to ensure that a sustainable, functioning ecosystem is established in the new pond? Further, at which site will the new pond be created, and what local impact will the new pond have on that site (i.e., What site will be destroyed to make way for a new pond)?	These details are provided in Section 6.10 of the ESR, with the proposed pond location shown in Figure 6-4.	NR	Complete

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	With respect to Section 6.10.3, The destruction of a lake cannot be regarded as being "not significant". Regardless of the creation of an artificial lake, the unnecessary destruction of a naturally occurring, otherwise healthy, fish-bearing body of water is always significant. The creation of a functioning ecosystem in the new pond will take many years of ecological restoration and monitoring. Is there a restoration, monitoring, and management plan in place for this new water body? What is the approval process for such a construction? How will this new aquatic ecosystem integrate into the current landscape (e.g., existing waterways) so that it can provide the benefit suggested by Detour Gold?	AMEC strongly disagrees with the reviewer's comments. The TMA Cell 2 muskeg pond has marginal fisheries values at best, and the only reason that this pond was classed as a VEC, is because of an administrative function involving an MMER Schedule 2 listing because the pond does contain "fish". It is fully expected that Brook Stickleback will be able to fully utilize the proposed compensation muskeg pond within two years of its development. A monitoring plan will be put in place as part of the fish habitat compensation for this pond, to confirm its success. Regarding integration of the proposed compensation pond, the reviewer is referred to Figure 6-4 of the ESR. The new pond will be connected to other area water bodies (in this case Ledum Lake) through a muskeg fen track, in the same manner as the existing TMA Cell 2 muskeg pond is connected to East Creek.	NR	Complete
	The scale of this project may weaken the natural systems and disturb wildlife species that depend on large, intact areas or require the specific habitats in this area to survive. The proposed use of this land may have impacts that significantly affect the area ecosystems.	Proposed site developments have been deliberately clustered around the historic mine site, and are dependent on the existing mine road for access, precisely as a means of minimizing disturbance to large intact habitat areas.	NR	Complete

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	a. What will the impacts to the soil be in the DLP site and surrounding area? i. How will those impacts to the soil affect the ecological and biological systems of the surrounding plant life? ii. How will those impacts to the soil affect the ecological and biological systems of the surrounding animal life? iii. How will those impacts to the soil affect the ecological and biological systems of the surrounding insect life? iv. How will those impacts to the soil affect the ecological and biological systems of the surrounding aquatic life? v. Soil in the areas surrounding the DLP site lacking stabilization after vegetation removal will have the potential to erode into the surrounding waterways, contributing to nutrient loading. What will be the impact on the surrounding waterways and downstream ecosystems? vii. How will those impacts to the soil affect the Métis way of life?	Soil was not defined as a VEC, however, vegetation communities and the wildlife groups that they support ultimately do derive from the soil, and in that sense soil is captured as an ecosystem component. Where overburden is stripped, such as from the open pit area and the plant site, and where mineral stockpiles are developed, the soil ecosystem will be displaced, along with its associated flora and fauna. Habitats bordering and surrounding these areas are not expected to be adversely affected. Soil will be prevented from eroding into adjacent water courses through the use of 120 m minimum width, vegetated buffer zones as described in Sections 2.3.1 and 6. This approach has been used successfully at the Victor Mine site. If erosion and sedimentation does become problematic in any areas bordering the mineral stockpiles, a commitment has been made to remedy the condition through the use of progressive revegetation, the development of runoff / seepage collection ditches, or other appropriate means. Soil related effects are expected to be confined to a small area focused on the former Detour Lake Mine (DLM) site, as per the above. The general mine site area had restricted access during previous operations, and to the knowledge of site personnel, there has been little if any current use of the immediate mine site area by Métis peoples. However, it is possible that Métis members may have used the site prior to development of the original DLM in the late 1970's and early 1980's. TK data from the Métis may shed additional light on this aspect.	NR	Complete

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	b. What will the impacts to mosses and lichens be in the DLP site and surrounding area? How will the loss of populations of moss and lichen species in the DLP site and surrounding area affect other populations of the same species? Are metapopulation dynamics considered? i. How will those impacts to the mosses and lichen affect the ecological and biological systems of the surrounding plant life? ii. How will those impacts to the mosses and lichen affect the ecological and biological systems of the surrounding animal (especially Woodland Caribou) life? iii. How will those impacts to the mosses and lichen affect the ecological and biological systems of the surrounding avian life? iv. How will those impacts to the mosses and lichen affect the ecological and biological systems of the surrounding insect life? v. How will those impacts to the mosses and lichen affect the ecological and biological systems of the surrounding aquatic life? vi. How will those impacts to the mosses and lichen affect the Métis way of life?	Similar to the above, mosses and lichens occurring in areas of proposed DLP developments (e.g., the open pit area, the plant site area, and where mineral stockpiles will be developed) will be displaced. These effects are not expected to adversely affect areas surrounding the development zones. Caribou utilize lichens as a winter food source, however, such food sources are not limiting to Caribou in the local area and the region. So while there may be some displacement of Caribou from the immediate mine site area (see Section 6.13), any displaced Caribou would still be expected to inhabit the general area surrounding the mine site. Also similar to the above, effects on mosses and lichens are expected to be confined to a small area focused on the former Detour Lake Mine (DLM) site, as per the above. The general mine site area had restricted access during previous operations, and to the knowledge of site personnel, there has been little if any current use of the immediate mine site area by Métis peoples. However, it is possible that Métis members may have used the site prior to development of the original DLM in the late 1970's and early 1980's. TK data from the Métis may shed additional light on this aspect.	NR	Complete

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	c. What will the impacts to shrubs (willow, alder, blueberry, red-osier dogwood, honeysuckle, etc.) be in the DLP site and surrounding area? Many shrubs will be riparian species habitat and will be lost during clearing and mining activities. Are these populations of shrubs locally adapted to the specific conditions around the existing DLP site? i. How will those impacts to shrubs affect the ecological and biological systems of the surrounding plant life? What are their roles in the vegetation communities in which they inhabit? Do the shrubs influence the soil conditions (e.g., contribute to nitrogen enrichment via root nodules) which in turn influences other plant life? ii. How will those impacts to shrubs affect the ecological and biological systems of the surrounding animal life? Are they used for food, shelter, nesting, and reproduction (e.g., insect galls)? iii. How will those impacts to shrubs affect the ecological and biological systems of the surrounding avian life? What is the role of the shrubs in providing habitat for birds (e.g., nesting, shelter, food through the production of seeds and berries)? iv. How will those impacts to shrubs affect the ecological and biological systems of the surrounding insect life? Are they important for gall-forming insects or pollinators? v. How will those impacts to shrubs affect the Métis way of life?	Similar to the above, shrub communities occurring in areas of proposed DLP developments (e.g., the open pit area, the plant site area, and where mineral stockpiles will be developed) will be displaced. These effects are not expected to adversely affect areas surrounding the development zones. Riparian zones will be protected by virtue of the minimum 120 m buffer zone bordering all water courses that has been set as a Project design criteria. Also similar to the above, effects on shrub lands are expected to be confined to a small area focused on the former Detour Lake Mine (DLM) site, as per the above. The general mine site area had restricted access during previous operations, and to the knowledge of site personnel, there has been little if any current use of the immediate mine site area by Métis peoples. However, it is possible that Métis members may have used the site prior to development of the original DLM in the late 1970's and early 1980's. TK data from the Métis may shed additional light on this aspect.	NR	Complete

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	d. What will the impacts to deciduous trees be in the DLP site and surrounding area? i. How will those impacts to the deciduous trees affect the ecological and biological systems of the surrounding plant life? ii. How will those impacts to the deciduous trees affect the ecological and biological systems of the surrounding animal life? iii. How will those impacts to the deciduous trees affect the ecological and biological systems of the surrounding avian life? iv. How will those impacts to the deciduous trees affect the ecological and biological systems of the surrounding insect life? v. How will those impacts to the deciduous trees affect the Métis way of life?	Similar to the above, deciduous trees and deciduous tree communities occurring in areas of proposed DLP developments (e.g., the open pit area, the plant site area, and where mineral stockpiles will be developed) will be displaced. These effects are not expected to adversely affect areas surrounding the development zones. Also similar to the above, the direct displacement of deciduous trees and deciduous tree communities is expected to be confined to a small area focused on the former Detour Lake Mine (DLM) site, as per the above. The general mine site area had restricted access during previous operations, and to the knowledge of site personnel, there has been little if any current use of the immediate mine site area by Métis peoples. However, it is possible that Métis members may have used the site prior to development of the original DLM in the late 1970's and early 1980's. TK data from the Métis may shed additional light on this aspect.	NR	Complete
	e. What will the impacts to coniferous trees be in the DLP site and surrounding area? i. How will those impacts to the coniferous trees affect the ecological and biological systems of the surrounding plant life? ii. How will those impacts to the coniferous trees affect the ecological and biological systems of the surrounding animal life? iii. How will those impacts to the coniferous trees affect the ecological and biological systems of the surrounding avian life? iv. How will those impacts to the coniferous trees affect the ecological and biological systems of the surrounding insect life? v. How will those impacts to coniferous trees affect the Métis way of life?	Same as response above involving deciduous trees	NR	Complete

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	f. What will the impacts to wetlands (bogs, fens, marshes) be in the DLP site and surrounding area? i. How will those impacts to the wetlands affect the ecological and biological systems of the surrounding plant life? Do they serve as important source populations for other areas? ii. How will those impacts to the wetlands affect the ecological and biological systems of the surrounding animal life? Are they used for feeding and cover? iii. How will those impacts to the wetlands affect the ecological and biological systems of the surrounding avian life? Are they used for feeding and nesting? iv. How will those impacts to the wetlands affect the ecological and biological systems of the surrounding insect life? Are they used as sources of food (pollinators), cover, and/or reproduction? v. How will those impacts to the wetlands affect the ecological and biological systems of the surrounding aquatic life? Do they serve important roles in reducing run-off, soil erosion, water filtration, and nutrient loading? vi. How will those impacts to the wetlands affect the Métis way of life?	Similar to the above, wetland communities occurring in areas of proposed DLP developments (e.g., the open pit area, the plant site area, and where mineral stockpiles will be developed) will be displaced. All of these wetlands (principally open and treed bogs) are widespread and commonplace throughout the area. These effects are generally not expected to adversely affect wetlands in the surrounding areas, although in some instances there could be some alteration of runoff characteristics to immediately adjacent wetlands, with runoff rates being slightly increased or slightly decreased. Generally, the mineral stockpiles would tend to promote increased precipitation infiltration, thereby smoothing out the runoff regime. Wetlands occurring within the 120 m buffer zone bordering all water courses would be protected, as per the Project design criteria. Also similar to the above, effects on wetlands are expected to be confined to a small area focused on the former Detour Lake Mine (DLM) site, as per the above. The general mine site area had restricted access during previous operations, and to the knowledge of site personnel, there has been little if any current use of the immediate mine site area by Métis peoples. However, it is possible that Métis members may have used the site prior to development of the original DLM in the late 1970's and early 1980's. TK data from the Métis may shed additional light on this aspect.	NR	Complete

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	g. What will the impacts to insects be in the DLP site and surrounding area? i. How will those impacts to insects affect the ecological and biological systems of the surrounding plant life (loss of pollinators and decomposers)? ii. How will those impacts to insects affect the ecological and biological systems of the surrounding animal life (loss of important food source)? iii. How will those impacts to insects affect the ecological and biological systems of the surrounding aquatic life (loss of important food source)? iv. How will those impacts to insects affect the ecological and biological systems of the surrounding avian life (loss of important food source)? v. How will those impacts to insects affect the Métis way of life?	Similar to the above, insect communities inhabiting areas that will be directly displaced by proposed DLP developments (e.g., the open pit area, the plant site area, and where mineral stockpiles will be developed), will themselves be directly displaced. Some of the more mobile species may be able to avoid physical harm. Other less mobile species are likely to be destroyed. The displacement of insects and insect communities is expected to be confined to a small area focused on the former Detour Lake Mine (DLM) site, as per the above. The general mine site area had restricted access during previous operations, and to the knowledge of site personnel, there has been little if any current use of the immediate mine site area by Métis peoples. However, it is possible that Métis members may have used the site prior to development of the original DLM in the late 1970's and early 1980's. TK data from the Métis may shed additional light on this aspect.	NR	Complete
	h. What will the impacts to avian life (birds and bats) be in the DLP site and surrounding area? i. How will those impacts to avian life affect the ecological and biological systems of the surrounding plant life? ii. How will those impacts to avian life affect the ecological and biological systems of the surrounding animal life? iii. How will those impacts to avian life affect the ecological and biological systems of the surrounding aquatic life? For example, is there top-down control of some insect populations by avian insectivores? iv. How will those impacts to avian life affect the ecological and biological systems of the surrounding insect life? v. How will those impacts to avian life affect the Métis way of life?	Trees will have to be cleared from all proposed development areas at the DLP site, with such tree clearing to be undertaken outside of the bird nesting season to minimize potential adverse effects to bird species. Otherwise habitats previously available to bird species and bats within proposed development zones would be displaced by proposed mine developments, as per Section 6 of the ESR. These effects are not expected to adversely affect areas surrounding the development zones. Effects on birds and bats are expected to be confined to a small area focused on the former Detour Lake Mine (DLM) site, as per the above. The general mine site area had restricted access during previous operations, and to the knowledge of site personnel, there has been little if any current use of the immediate mine site area by Métis peoples. However, it is possible that Métis members may have used the site prior to development of the original DLM in the late 1970's and early 1980's. TK data from the Métis may shed additional light on this aspect.	NR	Complete

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	i. What will the impacts to reptiles and amphibians be in the DLP site and surrounding area? i. How will those impacts to reptiles and amphibians affect the ecological and biological systems of the surrounding plant life? ii. How will those impacts to reptiles and amphibians affect the ecological and biological systems of the surrounding animal life? iii. How will those impacts to reptiles and amphibians affect the ecological and biological systems of the surrounding aquatic life? iv. How will those impacts to reptiles and amphibians affect the ecological and biological systems of the surrounding insect life? v. How will those impacts to reptiles and amphibians affect the Métis way of life?	Effects on reptiles and amphibians would be similar to effects described above for other ecosystem components. Any reptiles and amphibians occurring within development zones would be displaced or destroyed. Any such effects would not be expected to extend to areas surrounding proposed development zones. The displacement of reptile and amphibian populations is expected to be confined to a small area focused on the former Detour Lake Mine (DLM) site, as per the above. The general mine site area had restricted access during previous operations, and to the knowledge of site personnel, there has been little if any current use of the immediate mine site area by Métis peoples. However, it is possible that Métis members may have used the site prior to development of the original DLM in the late 1970's and early 1980's. TK data from the Métis may shed additional light on this aspect.	NR	Complete

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	j. What will the impacts to mammalian herbivores be in the DLP site and surrounding area? i. How will those impacts to mammalian herbivores affect the ecological and biological systems of the surrounding plant life? ii. How will those impacts to mammalian herbivores affect the ecological and biological systems of the surrounding mammalian predator life? iii. How will those impacts to mammalian herbivores affect the ecological and biological systems of the surrounding aquatic life? iv. How will those impacts to mammalian herbivores affect the ecological and biological systems of the surrounding insect life? v. How will those impacts to mammalian herbivores affect the Métis way of life?	Effects to mammalian herbivores, principally Caribou and Moose, are described in Section 6.13. Related effects to mammalian predators, mainly Wolves, are described in Section 6.14. Caribou and Moose use of directly displaced habitats at the DLP site will cease. Herbivore use of the immediate surrounding area, to distance as much as 5 to 10 km, may also diminish, as Caribou in particular are known show at least some level of avoidance of industrial sites and roads, as described in Section 6.13. Wolf use of the immediate surrounding area would adjust to prey availability. Aquatic and insect life are functionally unrelated to herbivore activities. The displacement of herbivore populations is expected to be confined to a small area focused on the former Detour Lake Mine (DLM) site, as well as possibly to a broader buffer zone in the case of Caribou. The general mine site area had restricted access during previous operations, and to the knowledge of site personnel, there has been little if any current use of the immediate mine site area by Métis peoples. However, it is possible that Métis members may have used the site prior to development of the original DLM in the late 1970's and early 1980's. TK data from the Métis may shed additional light on this aspect.	NR	Complete

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	k. What will the impacts to mammalian predators be in the DLP site and surrounding area? i. How will those impacts to mammalian predators affect the ecological and biological systems of the surrounding plant life? For example, if predators behavior or presence changes, how will browsing habits of herbivores be altered? ii. How will those impacts to mammalian predators affect the ecological and biological systems of the surrounding mammalian herbivore life? iii. How will those impacts to mammalian predators affect the ecological and biological systems of the surrounding aquatic life? iv. How will those impacts to mammalian predators affect the Métis way of life?	The reviewer is referred to Section 6.14 of the draft ESR. It is expected that smaller and medium sized mammalian predators such as Marten, Red Fox, Mink, Otter, etc., will continue to utilize all surrounding areas essentially as they do in the baseline condition, as such predators are typically not unduly responsive to human activity, so long as they are not harassed, and so long as food wastes are properly managed so as not to unduly attract scavenging. Wolves, like Caribou, may tend to avoid work areas and areas close to work areas, but they will essentially go where prey (Caribou and Moose) are available. Mammalian predator use of surrounding aquatic system is not expected to be affected by DLP developments. The displacement of mammalian predator populations is expected to be confined to a small area focused on the former Detour Lake Mine (DLM) site, as well as possibly to a broader buffer zone in the case of Wolves. The general mine site area had restricted access during previous operations, and to the knowledge of site personnel, there has been little if any current use of the immediate mine site area by Métis peoples. However, it is possible that Métis members may have used the site prior to development of the original DLM in the late 1970's and early 1980's. TK data from the Métis may shed additional light on this aspect. Local trapline CC194, which encompasses the DLP site, is held by members of the MCFN.		

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	i. What will the impacts to aquatic life be in the DLP site and surrounding area? ii. How will those impacts to aquatic life affect the ecological and biological systems of the surrounding plant life? iii. How will those impacts to aquatic life affect the ecological and biological systems of the surrounding mammalian predator life? iv. How will those impacts to aquatic life affect the ecological and biological systems of the surrounding aquatic life? v. How will those impacts to aquatic life affect the Métis way of life?	i. Impacts to aquatic life in the DLP site and surrounding area will be minimal and may include those listed in Section 6.0 of the Environmental Assessment Document. ii. Ecological and biological systems of surrounding plant life are not expected to be impacted other than in locations where the mine footprint will overlay existing plant life. iii. Mammalian predator life is not expected to be affected by impacts to the aquatic life as accessibility and abundances are not expected to be affected. iv. Impacts to aquatic life are listed in the Environmental Assessment Document under Section 6.0. Impacts to aquatic life are not expected to be appreciable in the majority of lake and river systems. Effects to Brook Trout habitat in Karel Creek will be mitigated with affective compensation measures to provide increases in important spawning and over-wintering habitats. Changes in flow and sediment composition may cause shifts in benthic invertebrate communities, but changes are expected to minimal and compensation will afford for healthy invertebrate communities for fish forage bases. v. Affects to the insect community are expected to be minimal. An increase in the total surface area of lake and standing water habitats resulting from the construction of the TMA may increase the habitat for certain life stages of insects. vi. Since affects to aquatic life are expected to be very minor, any related effects to the Métis way of life would also be expected to be minor, but ongoing TK work may shed more light on this aspect.	NR	Complete
	Many species in boreal lakes are near their thermal limits in normal conditions. More warming could cause decline or disappearance of aquatic species.			

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	a. What are the impacts to water temperature in the watershed surrounding the DLP site as a result of the proposed undertakings? i. Will varying geology in the area of the proposed project contribute to potential temperature change in the surrounding watershed? ii. How will potential temperature change in the surrounding watershed affect the ecological and biological systems of the surrounding watershed? iii. Will a potential temperature change influence the primary productivity of the surrounding watershed? iv. Will a potential temperature change influence the oxygen levels in the surrounding watershed? v. How will potential temperature change in the surrounding watershed affect the ecological and biological systems downstream? vi. How will potential temperature change in the surrounding watershed affect the ecological and biological systems of the surrounding plant life? vii. How will potential temperature change in the surrounding watershed affect the ecological and biological systems of the surrounding animal life? viii. How will potential temperature change in the surrounding watershed affect the Métis way of life?	This statement bears similarity to that observed on the following website: Hinterland Whos Who. Issues and Topics: Canada's Boreal Forest (http://www.hww.ca/hww2.asp?id=354), 2003 Canadian Wildlife Service & Canadian Wildlife Federation. <i>"In western Canada, many of the species found in boreal lakes are near their thermal limits in normal conditions; a few degrees of warming could cause them to decline or disappear".</i> This statement is western Canadian boreal lakes and species inhabiting them which are less tolerant to variable thermal regimes. Most of the species of fish which inhabit boreal lakes and rivers within the DLP area and surrounding watersheds are warm to cool water inhabitants with a relatively large range of thermal tolerance. These species subsist in abundance in more southerly climates as well as at boreal latitudes. Some of these species may in fact show some positive effects of long-term and slight increases in water temperature including increased growth rates. The temperature regime in the surrounding watersheds is not expected to be appreciably affected by proposed site developments.	NR	Complete

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		a. Long-term changes to water temperature regimes are not expected as a result of the DLP undertakings. Changes i. Varying geology is not expected to contribute to temperature change in the surrounding watershed and in stream mitigation and compensation measures will serve to facilitate increased occurrence of thermal and physical refuge for aquatic biota. ii. Appreciable temperature change in the surrounding watershed is not expected and therefore affects to the ecological and biological systems of the watershed are not expected. iii. An appreciable change in primary productivity is not expected. iv. An appreciable change in oxygen levels is not expected. Mitigation and compensation for Karel Creek is expected to provide increased rates of oxygenation and reduced anoxia. v. No appreciable effect to downstream biological systems is expected. vi. Ecological and biological systems of surrounding plant life are not expected to be impacted. b. No appreciable effect to animal life is expected. c. There are no expected affects to the Métis way of life.		
	There does not appear to be any modeling available for a storm surge or 100-year flood scenario.			

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	a. What is the worst case scenario for flooding in this area?	Flood risks are described in Section 9.3 of the ESR. The TMA system is designed to accommodate the probable maximum flood (PMF), except for short periods during the construction and operations sequence when only the 1,000-yr return period event could be contained, before the spillways become activated, as per Section 2.5.2 of the ESR. Pumping systems for the open pit will be sized to manage the 100-yr return period storm event, as per Section 9.3 of the ESR. On-site roads which are at less risk will be designed to manage the 25 to 100 year return period flood event, depending on specific risks. Areas where flood risk	NR	Complete
	b. What is the flooding model for the annual melt?	Atmospheric Environment Service (AES) rain on snow melt model data for the 100-yr return period, 30-d duration were used for TMA water balance calculations.	NR	Complete
	c. How will annual and worst case floods impact the ecological and biological systems of the surrounding watershed?	Annual floods would not be expected to adversely affect ecological and biological systems of the surrounding watershed. Worst case floods would increase sediment loadings to area water courses, but during such events, natural sediment loadings would also be very high.	NR	Complete
	d. How will annual and worst case floods impact the ecological and biological systems downstream?	Please see response immediately above.	NR	Complete
	e. How will annual and worst case floods impact the ecological and biological systems of soil in the surrounding area?	Please see responses above.	NR	Complete
	f. How will annual and worst case floods impact the ecological and biological systems of insects in the surrounding area?	Effects would be the same, or very similar to those which already occur in the natural condition. The TMA and mine rock stockpiles would tend to attenuate (improve) flooding conditions.	NR	Complete
	g. How will annual and worst case floods impact the ecological and biological systems of mosses and lichen in the surrounding area?	See response immediately above	NR	Complete
	h. How will annual and worst case floods impact the ecological and biological systems of shrubs in the surrounding area?	See response above.	NR	Complete

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	i. How will annual and worst case floods impact the ecological and biological systems of deciduous trees in the surrounding area?	See response above.	NR	Complete
	j. How will annual and worst case floods impact the ecological and biological systems of coniferous trees in the surrounding area?	See response above.	NR	Complete
	k. How will annual and worst case floods impact the ecological and biological systems of mammalian herbivores in the surrounding area?	See response above.	NR	Complete
	l. How will annual and worst case floods impact the ecological and biological systems of mammalian predators in the surrounding area?	See response above.	NR	Complete
	m. How will annual and worst case floods impact the ecological and biological systems of reptiles and amphibians in the surrounding area?	See response above.	NR	Complete
	n. How will annual and worst case floods impact the ecological and biological systems of avian life in the surrounding area?	See response above.	NR	Complete
	o. How will annual and worst case floods impact the Métis way of life?	See response above.	NR	Complete
	There is a potential for negative impacts to Woodland Caribou, a species of interest to the Métis.			

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	a. Woodland Caribou require enormous areas of undisturbed land. They are extremely sensitive to disruptions to their habitat and migratory routes. Recent studies have shown that Woodland Caribou have much larger migratory ranges than originally thought, and subsequently impacts to Woodland Caribou in the James Bay/ Abitibi/ Temiskaming area could affect herds across Northern Ontario, from the Manitoba boarder to the Quebec boarder, and perhaps even further. i. What studies have been conducted to determine how such a large project could affect Woodland Caribou? ii. Woodland Caribou like to calve on islands and in wetlands to avoid predation. How will impacts to area wetlands affect Woodland Caribou? iii. Any destruction to Woodland Caribou habitat requires that habitat creation be conducted to off-set impacts. What, if anything, does Detour Gold plan to do to ensure no net loss to important Woodland Caribou habitat? iv. What would the impact be of disruption to Woodland Caribou habitat to the Métis way of life?	Studies on Caribou in relation to industrial sites of the type proposed from the DLP site indicate that Caribou may tend to avoid areas (to a variable extent) within 5 to 10 km of active work areas (i.e., core mine site areas). Such an area is small in comparison to the very large areas regularly utilized by this species. Some wetland areas would be directly displaced by proposed DLP developments as described above. Caribou use of wetlands within 5 to 10 km of the core mine site area could diminish as described above. At mine closure Detour Gold has committed to working with MNR and others to redevelop habitats that would be attractive to Caribou. This work will include research studies into the potential for encouraging lichen growth on mineral stockpiles. The general mine site area had restricted access during previous operations, and to the knowledge of site personnel, there has been little if any current use of the immediate mine site area by Métis peoples. However, it is possible that Métis members may have used the site prior to development of the original DLM in the late 1970's and early 1980's. TK data from the Métis may shed additional light on this aspect.	NR	Complete
	The Project will result in a large mine site, access roads, transmission corridors, tailings pond, waste rock piles, a new air strip, power generation, and clearings for access, work and operations. These activities will result in fragmentation of habitat at both the terrestrial and aquatic levels.			

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	a. What will be the impact of such fragmentation on terrestrial and aquatic species, particularly i. species that use waterways for travel, dispersal, and habitat (e.g., otter, mink, beaver) ii. species that have large home ranges (e.g., wolves, wolverines) or significant migrations (e.g., caribou) iii. What is the potential for isolation of aquatic species along the waterway, and what is the potential long-term (e.g., genetic) impacts of such isolation?	Proposed developments at the DLP site are focused on the former DLM site core, with the specific intent of developing a compact mine site so as to avoid habitat fragmentation. Similarly, by using the existing Highway 652 and DLM access road, any potential habitat fragmentation due to new road construction will also be avoided. Species isolation due to habitat fragmentation is therefore not expected to occur to any meaningful extent.	NR	Complete
	There is a potential for negative impacts to plants harvested for medicinal and traditional uses by the Métis. a. What medicinal and traditional use plants could be impacted by the DLP activities? b. What medicinal and traditional use plants have been surveyed and how have those surveys been conducted to ensure all plants were identified? c. What would the impact to the loss of medicinal and traditional use plants be to the Métis way of life?	The general mine site area had restricted access during previous operations, and to the knowledge of site personnel, there has been little if any current use of the immediate mine site area by Métis peoples. However, it is possible that Métis members may have used the site prior to development of the original DLM in the late 1970's and early 1980's. TK data from the Métis may shed additional light on this aspect Beyond the above generalization, any data specific to the collection and use of medicinal plants by Métis peoples awaits results of the TK studies. Detour Gold has been working with the Métis community to prepare such studies. Detour Gold will continue to support the preparation of these studies and include the resulting information in Project planning.	NR	Complete

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	Restricted access for Métis harvesters on project sites may impact Métis way of life in the area. a. How will access be restricted to Métis harvesters in the area of the proposed Detour transmission project? b. How will loss of access impact the Métis way of life?	Access to the DLP site area will be restricted to protect public safety, as the site will include considerable heavy equipment use. To achieve this restriction a gatehouse will be set up on the mine access road near Little Hopper Lake. Only persons having legitimate business and with proper safety training will be allowed on the site. There will be no restrictions to persons who wish to use the transmission line rights-of-way outside of the general mine site area. The general mine site area had restricted access during previous operations, and to the knowledge of site personnel, there has been little if any current use of the immediate mine site area by Métis peoples. However, it is possible that Métis members may have used the site prior to development of the original DLM in the late 1970's and early 1980's. TK data from the Métis may shed additional light on this aspect.	NR	Complete
	Restricted access for species of interest to the Métis to the project sites and surrounding areas may impact Métis way of life in the area.			
	a. What are the migratory species whose patterns may bring them near or on the site area?	The list includes all migratory birds that utilize the DLP site area, as well as Caribou, which are not strictly migratory, but which do exhibit seasonal and year to year movement patterns.	NR	Complete
	b. How will restrictions to access of the project area impact migratory species whose patterns may bring them near or on the site area?	The question is unclear, but in general the same answer would apply to similar questions in the sense that migratory species which typically use areas proposed for site developments would be displaced, or prevented from using, such areas. Limited if any such impacts would apply to the surrounding area.	NR	Complete
	c. What are the local species who rely on the ecosystems near or on the site area?	There are countless numbers of local species that are expected to utilize the DLP site area, including organisms of the simplest complexity, such as bacteria, to much more advanced forms of plant and animal life.	NR	Complete
	d. How will restrictions to access of the project area impact local species that rely on the ecosystems near or on the site area?	The displacement of most species is expected to be confined to a small area focused on the former Detour Lake Mine (DLM) site. Very limited effects would be expected to species inhabiting surrounding areas that are not directly displaced by site developments.	NR	Complete

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	Disruption to ecological interactions and processes (e.g., migratory patterns, reproduction, or feeding) of species of interest to the Métis because of project-related activities may impact Métis way of life in the area. a. What impact could loud equipment and construction-related activities (blasting, dredging, grubbing, helicopters, etc.) have on species in the surrounding area?	The effect would vary with the species involved and the distances from the site. Certain species which are known to be sensitive to general disturbances such as Caribou may tend to avoid areas in close proximity (5-10 km) to active work areas, until such time as they become acclimatized to the disturbance.	NR	Complete
	b. What is the total range of influence for such audible activities on sensitive species such as Woodland Caribou?	Noise modeling suggests that background or near background noise levels would be reached within 5 to 10 km from the core mine site area. This information has been added to the final ESR.	Complete	Complete
	c. What are the migratory patterns of species in this area?	Migratory birds tend to follow a north-south migratory pattern. Caribou use of the area varies seasonally and from year to year, but is not migratory in the strict sense of the word.	NR	Complete
	d. How could those migratory patterns be disrupted by construction related activities?	The migratory patterns of birds are unlikely to be disrupted by developments at the DLP site, other than that final choices of nesting and feeding sites would be altered at the mine site itself because of direct habitat displacement. Caribou, as mentioned, may tend to avoid areas in closer proximity to work areas. The ESR acknowledges that reduced use of areas within 5 to 10 km of the mine core area may occur based on literature reviews and experience at similar sites.	NR	Complete
	e. Are there winter, breeding, calving or feeding locations of species important to Métis way of life that will be impacted by the construction activities?	The answer to this question is undoubtedly - yes. But whether or not the Métis are actively harvesting or otherwise utilizing these species in the local environment is a different question.	NR	Complete
	The lake that is to be "scheduled" by CEAA/DFO is not covered explicitly in the ESR. While the lake is to be scoped into the federal level review, given that all of the other potentially effected waterways were assessed in the ESR, it would have been useful for the potentially scheduled lake to be included in this report. When will information pertaining to the scheduled lake be made available?	Environmental effects involving the TMA Cell 2 muskeg pond are addressed in Section 6.10 of the ESR.	NR	Complete

DOCUMENT INFO

Name: Dlp Mnr Ea Response To Ttn Aecom Comments Of June
15 2010.tif

Size: 38KB (37,954 bytes)

Modified: Tuesday, Oct 05, 2010 12:00:22 PM

DOCUMENT INFO



August 16, 2010

Vince Deschamps
Senior Environmental Planner
AECOM
2-512 Woolwich Street
Guelph, ON N1H 3X7

Dear Mr. Deschamps:

Re: Comments on Detour Lake Project, Draft Environmental Study Report

We are in receipt of your June 15, 2010 comments responding to the Detour Lake Project Draft Environmental Study Report (ESR) on behalf of the Coral Rapids Power Limited Partnership who are working on behalf of the Taykwa Tagamou Nation. The ESR had been prepared in accordance with the Category C process as per the Class Environmental Assessment for the Ministry of Natural Resources Resource Stewardship and facility Development Projects. Thank you for taking the time to review the ESR document and providing your comments.

For ease of review, we have included your comment and our response in the attached table. The Final ESR will be available for review beginning August 17, 2010 and ending September 17, 2010.

We look forward to continuing to actively engage you in the Detour Lake Project and trust you will find responses to your comments satisfactory.

If you have any additional comments or questions, please do not hesitate to contact us.

Sincerely,

Derek Teevan
VP Aboriginal and Government Affairs

Cc: Chief Linda Archibald, Peter Archibald, Tina Gagnon, Taykwa Tagamou Nation
Merv McLeod, Sue Hartwig, Coral Rapids Power Limited Partnership representing
Taykwa Tagamou Nation
Jim Robertson, Detour Gold, Director Environment and Sustainability
Sheila Daniel, AMEC Earth & Environmental
David Simms, AMEC Earth & Environmental
Kirk Springett, Ministry of Natural Resources

DOCUMENT INFO

Name: Dlp Mnr Ea Response To Ttn Aecom Comments Of June
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Size: 184KB (188,242 bytes)

Modified: Tuesday, Oct 05, 2010 12:00:27 PM

DOCUMENT INFO

SUMMARY OF COMMENTS ON APRIL 2010 DRAFT ENVIRONMENTAL STUDY REPORT

Proposal: Detour Lake Project Open Pit Gold Mine – Environmental Study Report
Proponent: Detour Gold (DG) Canada Corporation

Notes: The "Proposed Revisions" column specifies either:

- Complete (revisions made to final ESR), or
- NR (revisions not required).

The "Status" column indicates whether or not the comment has been addressed including, where applicable, revisions to the final ESR. Responses to all comments are complete.

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
Vince Deschamps, AECOM retained by Coral Rapids Power Limited Partnership on behalf of Taykwa Tagamou Nation June 15, 2010	We feel that conducting a comprehensive review of the ESR at this point is premature, as the document is still in draft format and many of the sections remain incomplete	Comment noted.	NR	Complete
	We would also note that Section 1.4 should be updated to reflect recent (May 19, 2010) determination to conduct a Comprehensive Study under CEAA.	The requirement to conduct a Comprehensive Study level of assessment under CEAA is already stated in Section 1.4, under the bolded heading "Federal Environmental Assessment Requirements".	NR	Complete
	Terrestrial wildlife: MNR provided a high rating for impacts on terrestrial wildlife, in particular with regards to Caribou. The final ESR needs to clearly define and assess effects on caribou populations and habitats and long-term (post-closure) impacts on other terrestrial wildlife that are of concern to TTN members (e.g., furbearers, small game, etc.).	Comment noted. The ESR contains the information to address this comment.	NR	Complete

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	Fish and aquatic species, communities and habitats: MNR provided a high rating for impacts on area creeks, particularly Karel Creek (Brook trout). The final ESR needs to clearly define and assess effects on aquatic habitats, including fisheries, in and downstream of the DLP.	Comment noted. The ESR contains the information to address this comment.	NR	Complete
	Groundwater quality/quantity: MNR provided a medium rating for impacts on groundwater sources that supply area creeks. The final ESR needs to clearly define and assess effects on groundwater resources and their potential direct/indirect effects on surface water features. In particular we request that a comprehensive water balance be prepared for the site, which would include any areas affected by pumping. The final ESR should also include details of hydro-geological testing, including pump tests.	Comment noted. The ESR contains the information to address this comment.	NR	Complete
	Release of contaminants in soils, sediments and aquatic systems: MNR stated that there will be some contamination entering the aquatic system through East Lake, and that there is a possibility of contamination from the waste rock and tailings areas. The final ESR needs to clearly define and assess effects of these contaminants, particularly in relation to ARD, cyanide and other metals in soils and aquatic systems from proposed mining activities. The final ESR should also clearly explain who is responsible for potential existing contamination, and who would be liable in the event of environmental impacts and degradation resulting from historic mining activities. Specific concerns that were expressed by TTN representatives during the May 4 site visit included concerns over clean-up and dredging activities in and adjacent to East Lake and contaminant levels in local fish and wildlife.	The draft ESR addresses issues of contamination and potential contamination associated with East Lake, the TMA and mine rock stockpiles. The final ESR also addresses these aspects. With respect to existing site contamination relating to past mining activities at the site, Detour Gold accepted responsibility for any such contamination when it acquired all rights to the property. The existing Closure Plan covers these liabilities. Liabilities inherent in the existing Closure Plan will be carried over to the new Closure Plan being prepared for the DLP site.	NR	Complete
	It should be noted that Appendix B: DLP Geochemical Test Work Reports and Memos, was not included on the CD provided by Detour Gold nor was it available on the Detour Gold website as of June 10.	The geochemical report in its final format is too large to be submitted as an appendix to the final ESR, and will be made available separately. Reference to this report as an appendix to the ESR has been removed.	Complete	Complete

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	Section 8.0 (Cumulative Effects) has been left blank. As such, it is not possible to comment on the potential effects of the DLP as a whole, and the reader is left to "join the dots" between forecasted effects described in Section 6 (Environmental Effects Analysis – Natural Environment) and Section 7 (Environmental Effects Analysis – Socio-economic Environment). Given the high potential for cumulative effects of the DLP on and between natural and socio-economic environments, and in concert with external sources of potential effects (e.g., forestry), we feel that the total effects of the DLP have not been sufficiently described in the draft ESR.	Section 8 has been completed for the final ESR. Cumulative effects defined in the MNR Class EA document (Section 3.4.2), as well as in CEAA, refer to the effects of the Project in concert with other planned projects, and not to the aggregation of all effects resulting from a single Project on all systems. Relative to the merits of the entire Project in terms of both natural and socio-economic effects, it is the place of the responsible government agencies (in this MNR) to make the final determination as to the acceptability of the entire Project.	Complete	Complete
	Much of the socio-economic information is very general in nature, and is dependent upon secondary sources (e.g., Statistics Canada population census). These sources are not particularly current, and do not accurately capture conditions in Aboriginal communities. Information provided in sections relating to TTN (e.g., Sections 5.6 and 7.4) are either incomplete or unconfirmed. We would recommend that Detour Gold work closely with TTN, and other Aboriginal communities, to develop more accurate and relevant community profiles for the final ESR. This would include the integration of the Traditional Knowledge studies, which have not yet been completed or included in the draft ESR. Without a full understanding of local Traditional Knowledge, and how it is applied, it will not be possible to undertake a meaningful assessment of potential socio-economic effects of the DLP on TTN and other Aboriginal communities (i.e., the identification of VECs and VSECs). It is our understanding that TTN is working with Detour Gold to finalize the Traditional Knowledge studies, including agreeing upon appropriate information for release in the final ESR.	Correct, Detour Gold have been working to finalize the Traditional Knowledge studies conducted by the Muskegowuk Environmental Research Centre (MERC). Detour Gold will continue to support the preparation of these studies and include the resulting information in project planning including environmental assessments and permits if they are available at the time of submission. Aboriginal communities are aware of and supportive of this approach and of Detour Gold's commitment to identifying, and if appropriate, mitigating or avoiding any negative effects on traditional land uses and cultural values in the study area.	Complete	Complete

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	Similarly, from a benefits perspective, the ESR needs to identify specific business and training opportunities for TTN and its members. It also needs to clearly illustrate how these opportunities will provide benefit for the host communities (e.g. through references to Impact Benefits Agreements, Joint Ventures and hiring principles for contractors, etc.).	Detour Gold is negotiating an Impact Benefits Agreement with TTN where information on specific business and training commitments will be identified. We do not agree that this confidential information should appear in the final ESR. In the final Environmental Study Report, there will be a statement that these types of agreements are being negotiated with local Aboriginal groups to ensure benefits are realized.	Complete	Complete
	Appendix C provides a list of the consultation activities that have been undertaken, with the most recent entries dated January 13, 2010. Section 4.4 and 4.5 indicate that additional consultation activities were undertaken in March and April 2010, although these are not reflected in Appendix C. No mention is made of the Consultation Protocol being developed by TTN, which was discussed with Detour Gold at our meetings in Timmins on March 15 and April 29 and which they should be aware. Furthermore, Appendix E: Consultation Notices was not included on the CD provided by Detour Gold, nor was it available on the Detour Gold website as of June 10.	Comment noted. These materials have been included in the final ESR.	Complete	Complete
	With respect to consultation activities undertaken with TTN, the final ESR needs to append all meeting notes, records and minutes when TTN concerns are referenced (e.g., Section 4.5.1, pages 4-10 and 4-11). These sections include vague statements such as "TTN representatives stated that training in mining and technology will promote a positive community response to the project", but do not provide reference as to who made the statements, when the statements were made or whether the statements were being made in an official consultation "capacity" (i.e., whether the statements being made reflected the views of TTN or an individual).	All meeting minutes involving the TTN have been provided to the TTN. The final CSR provides summaries of issues and concerns raised in relation to TTN and others, but does not include details confidential information items such as those relating to the development of "agreements".	Complete	Complete
	As such, it would appear that the consultation process has not been accurately, or consistently, documented in the draft ESR. Given the high level of scrutiny that the DLP is likely to be under, we would strongly recommend that all consultation meeting notes, comments, minutes, etc. need to be included in an appropriate appendix.	Comment noted. See response to the above.	Complete	Complete

DOCUMENT INFO

Name: Dlpp Ea Response To Mcfn Comments And Responses
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Size: 309KB (316,314 bytes)

Modified: Tuesday, Oct 05, 2010 12:00:33 PM

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Comment:

"one would expect the Traditional Knowledge (TK) obtained through this collaborative work would be included in the EA and identified as such. However, there is no evidence of TK having been used in the describing the environment in this EA."

"the proponent should describe how Traditional Knowledge will be considered going forward and should ascertain that the approach is satisfactory to the First Nation."

Response:

TK study results available at the time of writing the DLPP EA from both the Taykwa Tagamou Nation and from the Wahgoshig First Nation had not yet been vetted with communities or field verified. As such, Detour Gold was not in a position to include this TK information without the approval of the communities from which the information was gathered as specified in signed TEK/Data Sharing agreements. With respect to TK Studies for the MCFN, until very recently, the MCFN leadership did not allow access to the community for participation in TK studies pending Impact Benefit Agreement negotiations.

A Traditional knowledge (TK) and land use study of the Detour Lake Project study area has since been initiated with the MCFN. To facilitate this study, a MCFN TK Steering Committee has been struck with a mandate to guide all aspects of the TK study. The Steering Committee, includes representation from MCFN, Woodland Heritage Services and AMEC Earth & Environmental. The Data Sharing Agreement signed by both the MCFN and Detour Gold will ensure that the TK study results are used only for the purposes of the Detour Lake Project and only with the permission of the community with an understanding that the knowledge is held individually by the knowledge holder, and also collectively by the MCFN community.

The TK study for the MCFN is being led by the MCFN with Band members employed to conduct interviews with up to 20 knowledge holders from the community. MCFN Land and Resources is responsible for holding the knowledge gathered through the interviews and preparing maps. Information being collected includes traditional knowledge and land uses pertaining to:

- Hunting;
- Fishing;
- Trapping and snaring;
- Cabins and camps;
- Trails and travel routes;
- Plant harvesting and use; and
- Ceremonial or other culturally significant sites.

Traditional land use information will be collected and verified for the region, and discussions will be ongoing regarding mitigation and avoidance of effects on traditional and cultural values within the TK study area. MCFN representatives on the MCFN TK Steering Committee are

aware that Detour Gold will use the knowledge from the TK study to inform planning, design and policy development pertaining to the Detour Lake Project at the detailed design stage.

Comment:

"According to the EA, Section 6.6.6, traditional land use studies are currently being conducted by several First Nation communities. The section refers to Table 6-18 for the status of each traditional land use study. However, Table 6-18 provides the status of Traditional Knowledge (TK) studies – which are not synonymous with traditional land use studies. It is therefore not clear whether these communities have been conducting traditional land use studies or TK studies."

Response:

AMEC has used the term TK broadly to include traditional land uses. Detour Gold has encouraged documentation of both traditional knowledge and traditional land uses in the TK studies; however, Aboriginal communities will make decisions about the appropriate level of detail and the focus of questions. Therefore, while Detour Gold and AMEC Earth & Environmental provide guidance on the types of questions to ask (so that both traditional knowledge and traditional land uses are documented), these are included at the discretion of the Aboriginal group involved.

Comment:

“...a one-kilometre potential zone of impact be applied to any access roads or ancillary developments; to which the proponent replied that the point would be addressed in the EA document. However, there is no evidence in the EA that the point has even been considered.”

Response:

As indicated in the DLPP EA document, “a limited number of minor access ways onto the ROW may be needed from existing primary access points, such as to reduce the number of water crossings.” To date no such areas or ancillary developments have been identified and for this reason, they were not considered in the EA document.

Should any new access roads or ancillary developments be determined to be required during the detailed engineering / environmental approvals stage for the DLPP; the environmental approval application(s) will include a description of the environment and potential environmental effects within a one-kilometre potential zone of impact, as requested.

Comment:

“The EA includes statistics on employment characteristics, median personal and household incomes for non-Aboriginal communities, but not the same information on Aboriginal communities (which the proponent states are not available). However, there is no evidence that the proponent made any effort to obtain this important Aboriginal socio-economic data.”

Response:

The proponent is aware that MCFN has Human Resource Inventories (HRI). These HRIs were not made available as negotiations were on-going. It is the intent of MCFN and Detour Gold to utilize the HRIs in future training and employment activities. As a result, the collection of community specific socio-economic data was necessarily focused mainly on secondary data sources (such as Statistics Canada and Indian and Northern Affairs Canada, and community websites), with primary data collection focused principally on biophysically-linked elements such as potable water, land use information, and traditional knowledge.

Comment:

“While the EA identifies trapping as a First Nation traditional activity, it does not state whether or not hunting, fishing, or harvesting plants (for various possible purposes) are practiced by First Nations within the study area. In absence of even mention of these activities, it cannot be determined whether the proponent has adequately determined the extent of traditional activities within the DLPP study area.”

“If the proponent has determined that no traditional activities other than trapping are conducted by First Nations in the study area, this should be clearly stated in Section 6.6.5 of the EA document.”

Response:

Section 6.6.6 of the DLPP EA addresses Aboriginal traditional land uses, which are commonly understood to include hunting, fishing, trapping, plant gathering, travel routes, and other such uses. The suggested scope of work provided by Detour Gold to Aboriginal communities as a guide for conducting land use and TK studies specifically identified hunting, fishing, trapping and snaring, cabins and camps, trails and travel routes, plant harvesting and use, and ceremonial or other culturally significant sites, as per the response to the first DPRA comment above. Detour Gold is actively working with regional Aboriginal groups to ensure that these uses and sites are documented and appropriate mitigation measures are put in place to avoid or mitigate any negative effects as a result of the DLPP.

Comment:

"The MCFN's report on the Draft TOR stated that none of the screening criteria for the project or the considerations that may over-ride the screening criteria directly address First Nation concerns. In response, the proponent had stated that this point will be addressed in the EA document. However, there is no evidence that the point has been addressed in the EA document."

Response:

Detour Gold has made repeated attempts to engage the MCFN in the preparation of the DLPP EA. Until very recently, the MCFN leadership did not allow access to the community pending Impact Benefit Agreement negotiations. During the development of the draft Terms of Reference Detour Gold was optimistic that issues scoping would occur with MCFN, hence the reference to this being addressed in the environmental assessment. As a result, screening criteria were selected that were consistent with industry standards, and those that were identified in the ToR resulting from best practices and from any feedback received from stakeholder and Aboriginal feedback, rather than being specific to MCFN requirements.

Comment:

"The Draft TOR, Section 6, p. 18 (Effects on the Natural Environment) stated that "primary considerations are in regard to Valued Ecosystem Components." However, nowhere in the EA document itself are Valued Ecosystem Components either referred to or identified. Valued Ecosystem Components (VECs) are an important component of Environmental Assessment methodology; in their absence, all ecosystem components may be treated "equally" although from an ecosystemic perspective some components are more significant than others."

Response:

The final TOR indicated that the environmental effects to be assessed within the DLPP EA were to include those pertaining to the following environmental components (rather than utilizing a VEC methodology): atmospheric environment, aquatic environment, terrestrial environment and socio-cultural aspects. This holistic approach considered all environmental components having the potential to be impacted, with the importance weighed according to whether the component was valued (Section 8.19.1).

This approach was determined to be more consistent with other recent Provincial Individual EAs and the *Guide to Environmental Assessment Requirements for Electricity Projects* (MOE 2001), rather than the initially envisioned use of VECs as is common with Federal EA processes.

Comment:

"Section 8.19.1 of the EA (Assessment of Effects – Methodology) describes the six attributes and level of effects, but does not provide any temporal measure (timespans) for Levels I through III as they apply to the attribute of "Duration". Similarly, the descriptions of "Duration" Level I as being "short term; does not occur beyond construction phase" and Level III as being "long term; occurs beyond decommissioning phase" are too vague for an EA process to provide a meaningful level of detail and therefore to be deemed "rigorous".

Response:

This methodology was chosen as it was anticipated to be easier to understand based on the discussions held through the public consultation process; and that it allowed impacts to be assessed for the three Project phases, rather than just the Project overall (ie. allowed a higher level of detail to be provided). This was deemed appropriate since the impacts were different for each phase of development rather than related to the length of time alone; impacts during two years of construction are different than the impacts during two years of operation. Nonetheless, a quantitative temporal measure can be assigned as follows:

Attribute	Attribute Level		
	Level I	Level II	Level III
Duration - qualitative	Short term; effect does not occur beyond the individual phase.	Medium term; effect does not extend beyond decommissioning phase.	Long term; effect occurs beyond decommissioning phase.
- quantitative	< 2.5 years (construction phase) < 16 years (operations phase) < 3 year (decommissioning phase)	< 20 years	> 20 years

Comment:

"Section 9 of the EA document does not mention whether or not any materials used in the various consultation activities with Aboriginal groups were produced in Aboriginal languages."

Response:

Detour Gold respects the importance of Aboriginal languages and did inquire as part of the consultation strategy whether translation of documents or at meetings was required. Aboriginal

languages were not used in any of the materials used for engaging Aboriginal communities, as First Nation community representatives have consistently indicated that this was not required. Individuals conducting Traditional Knowledge Study however were able to communicate in Cree with other Cree speakers.

Comment:

"Wildlife is an aspect of the environment that could be conceivably impacted by the project. However, the list of aspects of the environment that will be inspected as part of environmental monitoring does not include wildlife monitoring. Also, Section 12.2 of the EA document states that Detour Gold will engage stakeholders, Aboriginal people and local communities in discussions on an ongoing basis to "help monitor any effects to the socio-cultural environment and identify mutually satisfactory ways to mitigate negative or enhance positive effects". However, no protocol for monitoring wildlife or socio-economic impacts on First Nations – which is much stronger than a vague commitment to ongoing discussions -- is identified in the EA document."

Response:

There is no proposed wildlife monitoring for the DLPP as right-of-ways are currently present along almost the entire proposed route and most local wildlife would be expected to have adapted to the local setting. The DLPP EA determined that there was unlikely to be a significant net effect on wildlife and birds during the construction, operation or decommissioning phases of the DLPP, and that measurable environmental effects would be expected to be restricted to study area.

Nonetheless, Detour Gold has committed to putting in place (and auditing effectiveness of) measures to ensure that harassment of wildlife does not occur and that construction / decommissioning methods will be modified if necessary to ensure direct mortalities (such as through vehicle collisions) are reduced as much as practical during these phases. This being said, if the MCFN has any specific suggestions regarding possible wildlife monitoring programs in connection with the DLPP, Detour Gold would be pleased to discuss the merits and implementation of any such programs.

Regarding monitoring of socio-economic effects, Detour Gold is committed to monitoring effects over which they have direct control in collaboration with local and regional communities. It is anticipated that a regional environmental monitoring body will be developed in partnership with the Aboriginal communities. Specific protocols regarding on-going monitoring, reporting and evaluation will be developed with the parties. The IBA(s) speak specifically to how environmental assessments, permits and monitoring is to occur. Further, through the IBA process, the community acknowledges that consultation and accommodation has occurred. Details about the protocols used for this monitoring are being determined through IBAs and were therefore not included in the DLPP EA.

Comment:

"Section 12.2 commits Detour Gold to a formal complaints procedure to provide "Aboriginal communities a voice during the construction, operation and decommissioning phase of the DLPP". While this commitment is satisfactory, a clear protocol with timeframes and a dispute resolution mechanism would strengthen the proponent's commitment."

Response:

Through community specific agreements there are mechanisms for environmental review and dispute resolution.

DOCUMENT INFO

Name: Dlpp Ea Response To Mcfn Comments Of July 9 2010
Final A .tif

Size: 338KB (345,629 bytes)

Modified: Tuesday, Oct 05, 2010 12:00:44 PM

DOCUMENT INFO



July 23, 2010

Chief Norm Hardisty, Jr.
Moose Cree First Nation
P.O. Box 190
Moose Factory, ON
P0L 1W0

Dear Chief Hardisty:

Re: Comments on Detour Lake Power Project, Individual Environmental Assessment

We are in receipt of DRPA's review and comments on behalf of the Moose Cree First Nation, responding to the Detour Lake Power Project (DLPP) Individual Environmental Assessment (EA). Thank you for taking the time to review the EA and providing your comments. While the comments were received after the initial comment period, we have endeavoured to provide complete responses below.

Comment:

"one would expect the Traditional Knowledge (TK) obtained through this collaborative work would be included in the EA and identified as such. However, there is no evidence of TK having been used in the describing the environment in this EA."

"the proponent should describe how Traditional Knowledge will be considered going forward and should ascertain that the approach is satisfactory to the First Nation."

Response:

TK study results available at the time of writing the DLPP EA from both the Taykwa Tagamou Nation and from the Wahgoshig First Nation had not yet been vetted with communities or field verified. As such, Detour Gold was not in a position to include this TK information without the approval of the communities from which the information was gathered as specified in signed TEK/Data Sharing agreements. With respect to TK Studies for the MCFN, until very recently, the MCFN leadership did not allow access to the community for participation in TK studies pending Impact Benefit Agreement negotiations.

A Traditional knowledge (TK) and land use study of the Detour Lake Project study area has since been initiated with the MCFN. To facilitate this study, a MCFN TK Steering Committee has been struck with a mandate to guide all aspects of the TK study. The Steering Committee, includes representation from MCFN, Woodland Heritage Services and AMEC Earth & Environmental. The Data Sharing Agreement signed by both the MCFN and Detour Gold will



ensure that the TK study results are used only for the purposes of the Detour Lake Project and only with the permission of the community with an understanding that the knowledge is held individually by the knowledge holder, and also collectively by the MCFN community.

The TK study for the MCFN is being led by the MCFN with Band members employed to conduct interviews with up to 20 knowledge holders from the community. MCFN Land and Resources is responsible for holding the knowledge gathered through the interviews and preparing maps. Information being collected includes traditional knowledge and land uses pertaining to:

- Hunting;
- Fishing;
- Trapping and snaring;
- Cabins and camps;
- Trails and travel routes;
- Plant harvesting and use; and
- Ceremonial or other culturally significant sites.

Traditional land use information will be collected and verified for the region, and discussions will be ongoing regarding mitigation and avoidance of effects on traditional and cultural values within the TK study area. MCFN representatives on the MCFN TK Steering Committee are aware that Detour Gold will use the knowledge from the TK study to inform planning, design and policy development pertaining to the Detour Lake Project at the detailed design stage.

Comment:

"According to the EA, Section 6.6.6, traditional land use studies are currently being conducted by several First Nation communities. The section refers to Table 6-18 for the status of each traditional land use study. However, Table 6-18 provides the status of Traditional Knowledge (TK) studies – which are not synonymous with traditional land use studies. It is therefore not clear whether these communities have been conducting traditional land use studies or TK studies."

Response:

AMEC has used the term TK broadly to include traditional land uses. Detour Gold has encouraged documentation of both traditional knowledge and traditional land uses in the TK studies; however, Aboriginal communities will make decisions about the appropriate level of detail and the focus of questions. Therefore, while Detour Gold and AMEC Earth & Environmental provide guidance on the types of questions to ask (so that both traditional knowledge and traditional land uses are documented), these are included at the discretion of the Aboriginal group involved.



Comment:

"...a one-kilometre potential zone of impact be applied to any access roads or ancillary developments; to which the proponent replied that the point would be addressed in the EA document. However, there is no evidence in the EA that the point has even been considered."

Response:

As indicated in the DLPP EA document, "a limited number of minor access ways onto the ROW may be needed from existing primary access points, such as to reduce the number of water crossings." To date no such areas or ancillary developments have been identified and for this reason, they were not considered in the EA document.

Should any new access roads or ancillary developments be determined to be required during the detailed engineering / environmental approvals stage for the DLPP; the environmental approval application(s) will include a description of the environment and potential environmental effects within a one-kilometre potential zone of impact, as requested.

Comment:

"The EA includes statistics on employment characteristics, median personal and household incomes for non-Aboriginal communities, but not the same information on Aboriginal communities (which the proponent states are not available). However, there is no evidence that the proponent made any effort to obtain this important Aboriginal socio-economic data."

Response:

The proponent is aware that MCFN has Human Resource Inventories (HRI). These HRIs were not made available as negotiations were on-going. It is the intent of MCFN and Detour Gold to utilize the HRIs in future training and employment activities. As a result, the collection of community specific socio-economic data was necessarily focused mainly on secondary data sources (such as Statistics Canada and Indian and Northern Affairs Canada, and community websites), with primary data collection focused principally on biophysically-linked elements such as potable water, land use information, and traditional knowledge.

Comment:

"While the EA identifies trapping as a First Nation traditional activity, it does not state whether or not hunting, fishing, or harvesting plants (for various possible purposes) are practiced by First Nations within the study area. In absence of even mention of these activities, it cannot be determined whether the proponent has adequately determined the extent of traditional activities within the DLPP study area."

"If the proponent has determined that no traditional activities other than trapping are conducted by First Nations in the study area, this should be clearly stated in Section 6.6.5 of the EA document."



Response:

Section 6.6.6 of the DLPP EA addresses Aboriginal traditional land uses, which are commonly understood to include hunting, fishing, trapping, plant gathering, travel routes, and other such uses. The suggested scope of work provided by Detour Gold to Aboriginal communities as a guide for conducting land use and TK studies specifically identified hunting, fishing, trapping and snaring, cabins and camps, trails and travel routes, plant harvesting and use, and ceremonial or other culturally significant sites, as per the response to the first DPRA comment above. Detour Gold is actively working with regional Aboriginal groups to ensure that these uses and sites are documented and appropriate mitigation measures are put in place to avoid or mitigate any negative effects as a result of the DLPP.

Comment:

"The MCFN's report on the Draft TOR stated that none of the screening criteria for the project or the considerations that may over-ride the screening criteria directly address First Nation concerns. In response, the proponent had stated that this point will be addressed in the EA document. However, there is no evidence that the point has been addressed in the EA document."

Response:

Detour Gold has made repeated attempts to engage the MCFN in the preparation of the DLPP EA. Until very recently, the MCFN leadership did not allow access to the community pending Impact Benefit Agreement negotiations. During the development of the draft Terms of Reference Detour Gold was optimistic that issues scoping would occur with MCFN, hence the reference to this being addressed in the environmental assessment. As a result, screening criteria were selected that were consistent with industry standards, and those that were identified in the ToR resulting from best practices and from any feedback received from stakeholder and Aboriginal feedback, rather than being specific to MCFN requirements.

Comment:

"The Draft TOR, Section 6, p. 18 (Effects on the Natural Environment) stated that "primary considerations are in regard to Valued Ecosystem Components." However, nowhere in the EA document itself are Valued Ecosystem Components either referred to or identified. Valued Ecosystem Components (VECs) are an important component of Environmental Assessment methodology; in their absence, all ecosystem components may be treated "equally" although from an ecosystemic perspective some components are more significant than others."

Response:

The final TOR indicated that the environmental effects to be assessed within the DLPP EA were to include those pertaining to the following environmental components (rather than utilizing a VEC methodology): atmospheric environment, aquatic environment, terrestrial environment and socio-cultural aspects. This holistic approach considered all environmental components having the potential to be impacted, with the importance weighed according to whether the component was valued (Section 8.19.1).



This approach was determined to be more consistent with other recent Provincial Individual EAs and the *Guide to Environmental Assessment Requirements for Electricity Projects* (MOE 2001), rather than the initially envisioned use of VECs as is common with Federal EA processes.

Comment:

"Section 8.19.1 of the EA (Assessment of Effects – Methodology) describes the six attributes and level of effects, but does not provide any temporal measure (timespans) for Levels I through III as they apply to the attribute of "Duration". Similarly, the descriptions of "Duration" Level I as being "short term; does not occur beyond construction phase" and Level III as being "long term; occurs beyond decommissioning phase" are too vague for an EA process to provide a meaningful level of detail and therefore to be deemed "rigorous".

Response:

This methodology was chosen as it was anticipated to be easier to understand based on the discussions held through the public consultation process; and that it allowed impacts to be assessed for the three Project phases, rather than just the Project overall (ie. allowed a higher level of detail to be provided). This was deemed appropriate since the impacts were different for each phase of development rather than related to the length of time alone; impacts during two years of construction are different than the impacts during two years of operation. Nonetheless, a quantitative temporal measure can be assigned as follows:

Attribute	Attribute Level		
	Level I	Level II	Level III
Duration - qualitative	Short term; effect does not occur beyond the individual phase.	Medium term; effect does not extend beyond decommissioning phase.	Long term; effect occurs beyond decommissioning phase.
- quantitative	< 2.5 years (construction phase) < 16 years (operations phase) < 3 year (decommissioning phase)	< 20 years	> 20 years

Comment:

"Section 9 of the EA document does not mention whether or not any materials used in the various consultation activities with Aboriginal groups were produced in Aboriginal languages."

Response:

Detour Gold respects the importance of Aboriginal languages and did inquire as part of the consultation strategy whether translation of documents or at meetings was required. Aboriginal



languages were not used in any of the materials used for engaging Aboriginal communities, as First Nation community representatives have consistently indicated that this was not required. Individuals conducting Traditional Knowledge Study however were able to communicate in Cree with other Cree speakers.

Comment:

"Wildlife is an aspect of the environment that could be conceivably impacted by the project. However, the list of aspects of the environment that will be inspected as part of environmental monitoring does not include wildlife monitoring. Also, Section 12.2 of the EA document states that Detour Gold will engage stakeholders, Aboriginal people and local communities in discussions on an ongoing basis to "help monitor any effects to the socio-cultural environment and identify mutually satisfactory ways to mitigate negative or enhance positive effects". However, no protocol for monitoring wildlife or socio-economic impacts on First Nations – which is much stronger than a vague commitment to ongoing discussions -- is identified in the EA document."

Response:

There is no proposed wildlife monitoring for the DLPP as right-of-ways are currently present along almost the entire proposed route and most local wildlife would be expected to have adapted to the local setting. The DLPP EA determined that there was unlikely to be a significant net effect on wildlife and birds during the construction, operation or decommissioning phases of the DLPP, and that measurable environmental effects would be expected to be restricted to study area.

Nonetheless, Detour Gold has committed to putting in place (and auditing effectiveness of) measures to ensure that harassment of wildlife does not occur and that construction / decommissioning methods will be modified if necessary to ensure direct mortalities (such as through vehicle collisions) are reduced as much as practical during these phases. This being said, if the MCFN has any specific suggestions regarding possible wildlife monitoring programs in connection with the DLPP, Detour Gold would be pleased to discuss the merits and implementation of any such programs.

Regarding monitoring of socio-economic effects, Detour Gold is committed to monitoring effects over which they have direct control in collaboration with local and regional communities. It is anticipated that a regional environmental monitoring body will be developed in partnership with the Aboriginal communities. Specific protocols regarding on-going monitoring, reporting and evaluation will be developed with the parties. The IBA(s) speak specifically to how environmental assessments, permits and monitoring is to occur. Further, through the IBA process, the community acknowledges that consultation and accommodation has occurred. Details about the protocols used for this monitoring are being determined through IBAs and were therefore not included in the DLPP EA.



Comment:

"Section 12.2 commits Detour Gold to a formal complaints procedure to provide "Aboriginal communities a voice during the construction, operation and decommissioning phase of the DLPP". While this commitment is satisfactory, a clear protocol with timeframes and a dispute resolution mechanism would strengthen the proponent's commitment."

Response:

Through community specific agreements there are mechanisms for environmental review and dispute resolution.

We look forward to continuing to actively engage you in the Detour Lake Power Project and trust you will find responses to your comments satisfactory.

If you have any additional comments or questions, please don't hesitate to contact us.

Sincerely,

Derek Teevan
VP Aboriginal and Government Affairs

Cc: Jim Robertson, Detour Gold, Director Environment and Sustainability
Sheila Daniel, AMEC Earth & Environmental
Alex Blasko, Ontario Ministry of Environment

DOCUMENT INFO

Name: Dlpp Ea Response To Mcfn Comments Of July 9 2010
Final.tif

Size: 1,326KB (1,357,077 bytes)

Modified: Tuesday, Oct 05, 2010 12:17:54 PM

DOCUMENT INFO



July 23, 2010

Chief Norm Hardisty, Jr.
Moose Cree First Nation
P.O. Box 190
Moose Factory, ON
P0L 1W0

Dear Chief Hardisty:

Re: Comments on Detour Lake Power Project, Individual Environmental Assessment

We are in receipt of DRPA's review and comments on behalf of the Moose Cree First Nation, responding to the Detour Lake Power Project (DLPP) Individual Environmental Assessment (EA). Thank you for taking the time to review the EA and providing your comments. While the comments were received after the initial comment period, we have endeavoured to provide complete responses below.

Comment:

"one would expect the Traditional Knowledge (TK) obtained through this collaborative work would be included in the EA and identified as such. However, there is no evidence of TK having been used in the describing the environment in this EA."

"the proponent should describe how Traditional Knowledge will be considered going forward and should ascertain that the approach is satisfactory to the First Nation."

Response:

TK study results available at the time of writing the DLPP EA from both the Taykwa Tagamou Nation and from the Wahgoshig First Nation had not yet been vetted with communities or field verified. As such, Detour Gold was not in a position to include this TK information without the approval of the communities from which the information was gathered as specified in signed TEK/Data Sharing agreements. With respect to TK Studies for the MCFN, until very recently, the MCFN leadership did not allow access to the community for participation in TK studies pending Impact Benefit Agreement negotiations.

A Traditional knowledge (TK) and land use study of the Detour Lake Project study area has since been initiated with the MCFN. To facilitate this study, a MCFN TK Steering Committee has been struck with a mandate to guide all aspects of the TK study. The Steering Committee, includes representation from MCFN, Woodland Heritage Services and AMEC Earth & Environmental. The Data Sharing Agreement signed by both the MCFN and Detour Gold will

Detour Gold Corporation, Royal Bank Plaza, South Tower
200 Bay Street, Suite 2200, Box #23, Toronto, Ontario, M5J 2J1
Phone: 416-304-0800 | Fax: 416-304-0184



ensure that the TK study results are used only for the purposes of the Detour Lake Project and only with the permission of the community with an understanding that the knowledge is held individually by the knowledge holder, and also collectively by the MCFN community.

The TK study for the MCFN is being led by the MCFN with Band members employed to conduct interviews with up to 20 knowledge holders from the community. MCFN Land and Resources is responsible for holding the knowledge gathered through the interviews and preparing maps. Information being collected includes traditional knowledge and land uses pertaining to:

- Hunting;
- Fishing;
- Trapping and snaring;
- Cabins and camps;
- Trails and travel routes;
- Plant harvesting and use; and
- Ceremonial or other culturally significant sites.

Traditional land use information will be collected and verified for the region, and discussions will be ongoing regarding mitigation and avoidance of effects on traditional and cultural values within the TK study area. MCFN representatives on the MCFN TK Steering Committee are aware that Detour Gold will use the knowledge from the TK study to inform planning, design and policy development pertaining to the Detour Lake Project at the detailed design stage.

Comment:

"According to the EA, Section 6.6.6, traditional land use studies are currently being conducted by several First Nation communities. The section refers to Table 6-18 for the status of each traditional land use study. However, Table 6-18 provides the status of Traditional Knowledge (TK) studies – which are not synonymous with traditional land use studies. It is therefore not clear whether these communities have been conducting traditional land use studies or TK studies."

Response:

AMEC has used the term TK broadly to include traditional land uses. Detour Gold has encouraged documentation of both traditional knowledge and traditional land uses in the TK studies; however, Aboriginal communities will make decisions about the appropriate level of detail and the focus of questions. Therefore, while Detour Gold and AMEC Earth & Environmental provide guidance on the types of questions to ask (so that both traditional knowledge and traditional land uses are documented), these are included at the discretion of the Aboriginal group involved.



Comment:

"...a one-kilometre potential zone of impact be applied to any access roads or ancillary developments; to which the proponent replied that the point would be addressed in the EA document. However, there is no evidence in the EA that the point has even been considered."

Response:

As indicated in the DLPP EA document, "a limited number of minor access ways onto the ROW may be needed from existing primary access points, such as to reduce the number of water crossings." To date no such areas or ancillary developments have been identified and for this reason, they were not considered in the EA document.

Should any new access roads or ancillary developments be determined to be required during the detailed engineering / environmental approvals stage for the DLPP; the environmental approval application(s) will include a description of the environment and potential environmental effects within a one-kilometre potential zone of impact, as requested.

Comment:

"The EA includes statistics on employment characteristics, median personal and household incomes for non-Aboriginal communities, but not the same information on Aboriginal communities (which the proponent states are not available). However, there is no evidence that the proponent made any effort to obtain this important Aboriginal socio-economic data."

Response:

The proponent is aware that MCFN has Human Resource Inventories (HRI). These HRIs were not made available as negotiations were on-going. It is the intent of MCFN and Detour Gold to utilize the HRIs in future training and employment activities. As a result, the collection of community specific socio-economic data was necessarily focused mainly on secondary data sources (such as Statistics Canada and Indian and Northern Affairs Canada, and community websites), with primary data collection focused principally on biophysically-linked elements such as potable water, land use information, and traditional knowledge.

Comment [MSOffice1]: Need to keep the biophysical link

Comment:

"While the EA identifies trapping as a First Nation traditional activity, it does not state whether or not hunting, fishing, or harvesting plants (for various possible purposes) are practiced by First Nations within the study area. In absence of even mention of these activities, it cannot be determined whether the proponent has adequately determined the extent of traditional activities within the DLPP study area."

"If the proponent has determined that no traditional activities other than trapping are conducted by First Nations in the study area, this should be clearly stated in Section 6.6.5 of the EA document."



Response:

Section 6.6.6 of the DLPP EA addresses Aboriginal traditional land uses, which are commonly understood to include hunting, fishing, trapping, plant gathering, travel routes, and other such uses. The suggested scope of work provided by Detour Gold to Aboriginal communities as a guide for conducting land use and TK studies specifically identified hunting, fishing, trapping and snaring, cabins and camps, trails and travel routes, plant harvesting and use, and ceremonial or other culturally significant sites, as per the response to the first DPRA comment above. Detour Gold is actively working with regional Aboriginal groups to ensure that these uses and sites are documented and appropriate mitigation measures are put in place to avoid or mitigate any negative effects as a result of the DLPP.

Comment:

"The MCFN's report on the Draft TOR stated that none of the screening criteria for the project or the considerations that may over-ride the screening criteria directly address First Nation concerns. In response, the proponent had stated that this point will be addressed in the EA document. However, there is no evidence that the point has been addressed in the EA document."

Response:

Detour Gold has made repeated attempts to engage the MCFN in the preparation of the DLPP EA. Until very recently, the MCFN leadership did not allow access to the community pending Impact Benefit Agreement negotiations. During the development of the draft Terms of Reference Detour Gold was optimistic that issues scoping would occur with MCFN, hence the reference to this being addressed in the environmental assessment. As a result, screening criteria were selected that were consistent with industry standards, and those that were identified in the ToR resulting from best practices and from any feedback received from stakeholder and Aboriginal feedback, rather than being specific to MCFN requirements.

Comment:

"The Draft TOR, Section 6, p. 18 (Effects on the Natural Environment) stated that "primary considerations are in regard to Valued Ecosystem Components." However, nowhere in the EA document itself are Valued Ecosystem Components either referred to or identified. Valued Ecosystem Components (VECs) are an important component of Environmental Assessment methodology; in their absence, all ecosystem components may be treated "equally" although from an ecosystemic perspective some components are more significant than others."

Response:

The final TOR indicated that the environmental effects to be assessed within the DLPP EA were to include those pertaining to the following environmental components (rather than utilizing a VEC methodology): atmospheric environment, aquatic environment, terrestrial environment and socio-cultural aspects. This holistic approach considered all environmental components having the potential to be impacted, with the importance weighed according to whether the component was valued (Section 8.19.1).



This approach was determined to be more consistent with other recent Provincial Individual EAs and the *Guide to Environmental Assessment Requirements for Electricity Projects* (MOE 2001), rather than the initially envisioned use of VECs as is common with Federal EA processes.

Comment:

"Section 8.19.1 of the EA (Assessment of Effects – Methodology) describes the six attributes and level of effects, but does not provide any temporal measure (timespans) for Levels I through III as they apply to the attribute of "Duration". Similarly, the descriptions of "Duration" Level I as being "short term; does not occur beyond construction phase" and Level III as being "long term; occurs beyond decommissioning phase" are too vague for an EA process to provide a meaningful level of detail and therefore to be deemed "rigorous".

Response:

This methodology was chosen as it was anticipated to be easier to understand based on the discussions held through the public consultation process; and that it allowed impacts to be assessed for the three Project phases, rather than just the Project overall (ie. allowed a higher level of detail to be provided). This was deemed appropriate since the impacts were different for each phase of development rather than related to the length of time alone; impacts during two years of construction are different than the impacts during two years of operation. Nonetheless, a quantitative temporal measure can be assigned as follows:

Attribute	Attribute Level		
	Level I	Level II	Level III
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- quantitative	< 2.5 years (construction phase) < 16 years (operations phase) < 3 year (decommissioning phase)	< 20 years	> 20 years

Comment:

"Section 9 of the EA document does not mention whether or not any materials used in the various consultation activities with Aboriginal groups were produced in Aboriginal languages."

Response:

Detour Gold respects the importance of Aboriginal languages and did inquire as part of the consultation strategy whether translation of documents or at meetings was required. Aboriginal



languages were not used in any of the materials used for engaging Aboriginal communities, as First Nation community representatives have consistently indicated that this was not required. Individuals conducting Traditional Knowledge Study however were able to communicate in Cree with other Cree speakers.

Comment [SD2]: Derek -- please confirm / re-state.

Comment:

"Wildlife is an aspect of the environment that could be conceivably impacted by the project. However, the list of aspects of the environment that will be inspected as part of environmental monitoring does not include wildlife monitoring. Also, Section 12.2 of the EA document states that Detour Gold will engage stakeholders, Aboriginal people and local communities in discussions on an ongoing basis to "help monitor any effects to the socio-cultural environment and identify mutually satisfactory ways to mitigate negative or enhance positive effects". However, no protocol for monitoring wildlife or socio-economic impacts on First Nations – which is much stronger than a vague commitment to ongoing discussions -- is identified in the EA document."

Response:

There is no proposed wildlife monitoring for the DLPP as right-of-ways are currently present along almost the entire proposed route and most local wildlife would be expected to have adapted to the local setting. The DLPP EA determined that there was unlikely to be a significant net effect on wildlife and birds during the construction, operation or decommissioning phases of the DLPP, and that measurable environmental effects would be expected to be restricted to study area.

Nonetheless, Detour Gold has committed to putting in place (and auditing effectiveness of) measures to ensure that harassment of wildlife does not occur and that construction / decommissioning methods will be modified if necessary to ensure direct mortalities (such as through vehicle collisions) are reduced as much as practical during these phases. This being said, if the MCFN has any specific suggestions regarding possible wildlife monitoring programs in connection with the DLPP, Detour Gold would be pleased to discuss the merits and implementation of any such programs.

Regarding monitoring of socio-economic effects, Detour Gold is committed to monitoring effects over which they have direct control in collaboration with local and regional communities. It is anticipated that a regional environmental monitoring body will be developed in partnership with the Aboriginal communities. Specific protocols regarding on-going monitoring, reporting and evaluation will be developed with the parties. The IBA(s) speak specifically to how environmental assessments, permits and monitoring is to occur. Further, through the IBA process, the community acknowledges that consultation and accommodation has occurred. Details about the protocols used for this monitoring are being determined through IBAs and were therefore not included in the DLPP EA.



Comment:

"Section 12.2 commits Detour Gold to a formal complaints procedure to provide "Aboriginal communities a voice during the construction, operation and decommissioning phase of the DLPP". While this commitment is satisfactory, a clear protocol with timeframes and a dispute resolution mechanism would strengthen the proponent's commitment."

Response:

Through community specific agreements there are mechanisms for environmental review and dispute resolution.

We look forward to continuing to actively engage you in the Detour Lake Power Project and trust you will find responses to your comments satisfactory.

If you have any additional comments or questions, please don't hesitate to contact us.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Derek Teevan'.

Derek Teevan
VP Aboriginal and Government Affairs

Cc: Jim Robertson, Detour Gold, Director Environment and Sustainability
Sheila Daniel, AMEC Earth & Environmental
Alex Blasko, Ontario Ministry of Environment

DOCUMENT INFO

Name: Dlpp Ea Response To Wahgoshig Env Committee
Comments Of May.tif

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Modified: Tuesday, Oct 05, 2010 12:18:03 PM

DOCUMENT INFO



June 25, 2010

Cheryl Tremblay
Wahgoshig Environmental Committee
R.R. #3,
Matheson, ON
P0K 1N0

Dear Ms Tremblay:

Re: Comments on Detour Lake Power Project

Thank you for your comments of May 31, 2010 regarding the Detour Lake Power Project (transmission line). We have provided a response below to each of your questions. For your ease of review, your question has been provided first, followed by our response.

Question:

1. Fuel Handling

The DLPP EA document refers to following "regulations and industry best practices" with regard to fuel procedures. The WEC would like the opportunity to review Detour's fuel management procedures or programs (for storage and handling of fuel), in particular with respect to fuel management near bodies of water. As a minimum, the following information is requested:

- Outline of spill prevention methods;
- Operating practices with respect to fuelling equipment;
- Engineering standards for portable fuel tanks; and
- Spill response contingency plans (including minimum standards regarding spill response equipment).

Response:

Detour Gold is in the process of developing an Environmental Management System that will include procedures related to fuelling and fuel storage, as well as spill prevention methods and contingency plans. These (and other) procedures / documents are not prepared as yet, but we have committed to having this information available in advance of any construction.

Question:

2. Ice Bridges/Stream Crossings

The DLPP EA discusses the use of ice bridges for crossing of streams and bodies of water during winter months. Due to the concerns related to erosion and sedimentation during spring



melt, the WEC would like to review Detour's documentation that outline specific practices related to the following:

- Erosion protection plans (particularly during spring melt/freshet);
- Re-vegetation plans;
- Erosion/sedimentation monitoring plans; and
- Contingency plans related to sedimentation, should this occur (including minimum requirements related to emergency response supplies on hand and reporting protocols.)

Response:

The use of ice roads and ice bridges in northern Ontario and Canada is a well-established practice. Both the Department of Fisheries and Oceans Canada and Transport Canada have determined that the construction and utilization of these temporary structures are acceptable providing general mitigative measures are followed.

Crossings will include strategic placement of snow over the existing ground surface / creation of an ice crossing by flooding in place and will not include cutting into existing stream banks etc. to expose soil. Should soil become exposed / excessive rutting that damages the underlying frozen ground be found to occur, the winter road usage will be discontinued immediately and the travelway relocated to another portion of the right-of-way. Repair and monitoring of damage (if any) will occur thereafter.

Question:

3. Contractor Management Programs

Since the majority of the work outlined in the Detour Lake Power Project will be conducted by construction contractor(s), the WEC would like to review Detour's contractor management program(s) that will ensure that the contractors will adhere to the environmental commitments made by Detour to WFN.

Response:

Comment noted. Contractors will be required to comply with all applicable regulatory requirements as well as commitments made by Detour Gold through the Environmental Assessment and other processes.



We look forward to continuing to actively engage you in the Detour Lake Power Project and trust you will find responses to your comments satisfactory. Further detail will be available as the engineering design, tendering and permitting processes progress.

Sincerely,

A handwritten signature in black ink, appearing to read "Derek Teevan".

Derek Teevan
VP Aboriginal and Government Affairs

Cc: Sheila Daniel, AMEC Earth & Environmental
Alex Blasko, Ontario Ministry of Environment

DOCUMENT INFO

Name: Dlpp Ea Table - Mno Summary Of Comments And Responses Final.tif
Size: 470KB (480,497 bytes)
Modified: Tuesday, Oct 05, 2010 12:00:51 PM

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SUMMARY OF COMMENTS ON ENVIRONMENTAL ASSESSMENT DOCUMENT

Proposal: Individual EA Detour Lake Power Project (DLPP)

Proponent: Detour Gold (DG) Canada Corporation

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	Melanie Paradis Métis Nation of Ontario June 22, 2010	Figures 6-8 and 6-9 illustrate the habitat areas of moose, caribou and wolves. What will the impact of such construction be on important caribou and moose wintering habitat? What will the impact be on wolf activity in the area?	Calving and rutting areas for caribou and over-wintering areas for caribou moose occur within the study area and the proposed transmission line route will transverse some of these habitats. Wolves have also been recorded along the existing right-of-way (ROW). Despite efforts to maintain as compact a ROW as practical based on historic / existing ROWs, an estimated 218.7 ha of additional Black Spruce / Jack Pine forest / treed bog habitat is expected to be disturbed as a result of the DLPP. This is equivalent to 0.0005% of the home range of a caribou. Though this is a small proportion of caribou range, studies have illustrated that linear features can adversely affect Caribou populations. Wolves in particular are known to utilize linear corridors to better access Caribou and improve their hunting success. As the DLPP proposes to utilize / expand existing ROWs along almost the entire alignment, significantly increased predation on local caribou due to improved Wolf access is not expected. Moose will likely benefit from the additional clearance along the ROW as it will create additional foraging opportunities during the winter through increased access to woody browse species.	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Section 6.6.6 states: "The status of the various traditional land use studies and who is responsible for the studies is documented in Table 6-18. These studies are now underway with the MCFN, TTN (Interim Final Report completed) and MNO (Region 3)." This statement is incorrect. No traditional land use study is currently underway as MNO and Detour Gold have not yet come to an agreement regarding work plan and budget for such a study.	The statement could more correctly have been stated as follows: These studies are now underway with the MCFN, TTN (Interim Final Report completed) and <i>discussions with</i> MNO (Region 3) <i>are underway to initiate a similar study.</i>"	None	Complete.
		a) What is the potential effect if the ice bridges are not constructed as proposed? b) What is the effect of plowing and tamping snow, ice and permafrost on the soil and surrounding environment along the ice road? c) Detour Gold is proposing to undertake 108 water crossings along the ROW for the transmission line. What is the cumulative impact of all of these water crossings on the regional environment? d) What will be the impact from small spills (oil, fuel and other fluid leaks) from equipment during construction and use of the ROW?	a) If the ice bridges are not constructed according to standard industry practices as proposed in the EA document: i) it will not be possible to obtain environmental approvals and/or the bridges will not comply with regulatory requirements; and further, ii) the bridges will not provide a safe means of access for vehicles to the right-of-way. In either instance, the ice bridges will not be operated. Detour Gold will not allow contractors to operate sub-standard ice bridges without appropriate regulatory approval(s). b) The use of ice roads and ice bridges in northern Ontario and Canada as a whole is a well-established practice. If properly developed, operated and maintained, the effect is minor. As indicated in the DLPP EA, in order to ensure that the soil and surrounding environment is not impacted by winter road use, the travelway and/or winter roads will not be allowed to continue if rutting occurs. It should also be noted there is no permafrost along the ROW.	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		continued	c) No cumulative impact is expected. Construction of ice bridges will follow the Fisheries and Oceans Canada Ontario Operations Statement "Ice Bridges and Snow Fills" (Version 3 or later) and other applicable regulatory instruments. Both the Fisheries and Oceans Canada and Transport Canada have determined that the construction and utilization of these temporary structures are acceptable providing general mitigative measures are followed (and as proposed in the DLPP EA). As indicated in the DLPP EA, there will be no disturbance to stream bed or banks (or re-shaping of the stream morphology etc.). d) Detour Gold will require that all equipment used be in good working order / maintained properly; and any and all spills will be required to be cleaned up immediately no matter the size. As a result, no impact is expected.		
		Section 8.9.1 states: "In total, the DLPP will displace an estimated 278.5 ha of natural vegetation communities as well as 433.5 ha of previously disturbed lands (cultural vegetation communities)." The word "displace" suggests that Detour Gold intends to move or relocate the natural vegetation communities. That is not the likely intention. A more accurate word choice would be "destroy".	The use "displace" was utilized as the vegetation will be cut down, but root masses will be left intact. The vegetation is expected to regrow, but in some instances, the existing vegetation may be displaced by other native species.	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Section 8.9.2 states: "It is anticipated that periodic clearing of woody vegetation will be required to ensure adequate clearance below the conductors. This clearing could be completed mechanically, manually, or through herbicide application, depending on the individual location and consultation activities." The MNO Consultation Committee representing the James Bay/Abitibi/Temiscamingue region is strongly opposed to the use of any and all chemical sprays on the transmission line and will not be satisfied until that option is completely removed from the EA.	Noted. Chemical, mechanical and manual tending are currently approved and commonly utilized approaches to vegetation management for transmission lines in Ontario.	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Section 8.10.1 states: "It is also expected that the current ROW is likely used by some species as a movement corridor. During the construction phase, such movement may be temporarily disrupted; however, wildlife will still be able to use the existing ROW during the night-time, are also likely to be able to use alternative areas for movement and are likely to return to using the ROW once construction has ceased." How will construction activities impact Woodland Caribou and other species that are sensitive to disruptions?	Sensitive wildlife and birds may be temporarily affected by noise effects and other disturbance related to construction activities, as well as direct vegetation / habitat loss. Construction activities may cause a local displacement of sensitive wildlife and migratory birds that are likely to return after construction activities cease. It is not believed that this would appreciably stress the wildlife or cause increased wildlife disease and is considered a temporary effect. Most species will be able to avoid these effects by moving to adjacent areas of similar habitat and will not be affected appreciably by construction of the DLPP. Vegetation clearing is expected to be largely undertaken in the winter which reduces potential impacts to migratory bird species. Woodland Caribou occur within the Project site for over-wintering, calving and rutting and may be affected by the noise. Caribou can be most sensitive to noise during the calving season, which occurs in May and June. During these months it is not anticipated that construction activities will be overly disruptive as vegetation clearing is being undertaken in the winter. The noise will be restricted to the construction period of the transmission line and thus is considered a short-term effect.	None.	Complete.
		Section 8.16 and 8.17 outline the potential effects to Aboriginal Traditional Land Uses. To date, no work has been undertaken by Detour Gold and MNO to determine potential effects to the Métis Way of Life and Traditional Land Uses	Noted.	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Section 8.21.2 states: "At closure, all disturbed areas will be eventually become productive forest habitat." What is the timeline for "eventually"?	Regrowth of the ROW will occur immediately following construction. Based on experience in the area and the regrowth seen within the previous transmission line ROW, early successional thickets of Balsam Poplar and Trembling Aspen can be expected to occur within the ROW within a decade of decommissioning the ROW. Late successional, more mature mixed and coniferous forest communities comprised of species such as Black Spruce, White Spruce, Balsam Fir and Jack Pine can be expected to occur within 30 to 40 years after decommissioning of the ROW.	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Section 8.21.2 states: "...The resulting cumulative effects from DLPP forest clearing actions, in combination with forest clearing associated with Detour Lake Project mine site area activities, are therefore regarded as being not significant." The project proposes to remove 23 26 square kilometers (20 sq. km. for mine site and 3 26 sq. km. for transmission line) of undisturbed forest. How is it that this was determined to be "not significant"? What is meant by "reversible in the longer-term at closure"? Does the proponent expect that over time the entire ROW will regenerate naturally, or do they expect to replant?	The methodology for determination of effects is provided 8.19.1 and is as proposed in the approved Terms of Reference. Similar methodologies were used to assess effects for the Detour Lake Project within the MNR Class EA for the Detour Lake Project. For the larger effect (i.e., for the removal of forest habitat in association with the Detour Lake Project) the effect was considered to be not significant because forest communities to be removed were commonplace, located adjacent to existing disturbed areas, and would be rehabilitated at closure. Additional clearing associated with widening of existing transmission line ROWs in association with the DLPP was considered to be minor, and not likely to contribute to an overall significant impact, taking into account proposed mitigation measures. Disturbance to vegetation along the transmission line ROW is considered reversible in the long-term, as over time the ROW will naturally regenerate, to be consistent in habitat and species to the surrounding environment. More specifically, ground cover, including grasses, sedges, mosses, low herbaceous plants, low shrubs and tree seedlings, along the transmission line ROW will remain essentially intact, and will provide a base for vegetation regrowth following removal of the transmission line. As such there are no plans to re-plant the transmission line ROW following transmission line removal. Conditions at the mine site would be different. Here there will be direct displacement of existing forest and ground cover by the development of buildings, roads, other infrastructure, mineral stockpiles, and the tailings area. Restoration of these areas at closure will require the removal of buildings, contouring stockpiles, placement of overburden / soil covers, and active seeding and planting of prepared areas. By implementing such measures, forest communities will eventually become re-established, but due to changes in topography and drainage, the newly developed forest communities will be different from the initial communities, but will still consist of native species assemblages.	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Section 8.21.2 states: "Wildlife associated with cleared forest and bog areas will be displaced into the surrounding landscape, ... Therefore, as per discussions involving effects to vegetation communities, cumulative effects to local wildlife populations are regarded as being not significant." What studies have been conducted that indicate wildlife will "adjust" to ensure cumulative effects are "not significant"? While some larger, more mobile animals might be able to move away from disturbed areas, insects, soil fauna, and small animals will not be able to do so. In the case of a bog, for example, disturbance of the bog will not result in "displacement", which suggests movement to another location, but severe impact, if not complete destruction, of the bog community except for a few larger animal species.	The considerations raised by the reviewer apply more to mine site development, rather than to transmission line construction, where the ground cover would remain essentially intact, and work would be undertaken mainly in the winter. Large and moderate sized mammals, birds, and some smaller animals (including many insects) will be able to move away from cleared forest and bog areas, as noted by the reviewer. However, also as noted by the reviewer, less mobile, generally smaller animal species may not be able to actively relocate and may be destroyed depending on the species and the specific circumstance. Specific studies were not conducted relative to the dispersal potential of different animal species; nor does AMEC consider it necessary to conduct such studies as the dispersal / mobility capacity of most species groups is evident from the morphology, and when one starts to include insects and soil fauna, there are multitudes of species involved. It is sufficient to acknowledge that some species of animals will be capable of moving away from disturbance, and other mostly smaller, less mobile forms will not. Some level of environmental impact is unavoidable, and the goal is to minimize adverse environmental effects to a reasonable and acceptable level, within the context of overall project benefits, as well as to actively restore the mine site area to productive habitat.	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Section 8.21.2 includes a section (on page 159) which discusses Woodland Caribou and crude statistics to justify an argument that the cumulative effects of the project on caribou habitat would be "limited, and not significant", because the combined area of the transmission line and the Detour Lake gold mine would only "be capable of supporting an estimated 0.25 individual caribou, and would be equivalent to 0.5% of the home range of a single animal.".... What research was done on the potential effects of linear openings (roadways and transmission corridors) on Woodland Caribou?	The estimate of the proportion of home-range removed by the additional vegetation clearance was included to give a relative idea of size. This section then discusses the issues relative to linear features and caribou, which are considered to be more important. Caribou studies in this region have found that caribou utilize habitats adjacent to the existing ROW year-round (see Figure 6-9) for calving, rutting and over-wintering, and all of these areas have been included in the overall estimate of home-range size. Most areas of an animals' home-range are important to the life-cycle of the animal, which is why such areas are included in their home-range in the first place. Therefore this estimate of 0.5% includes the assumption that this proportion of home-range habitat could be important to a given local individual caribou. Attempts have been made for both the transmission line and the mine site area to reduce disturbance to the smallest areas practicable, and to focus such disturbance in the immediate vicinity of previously disturbed areas, rather than to open up new areas. Research has been undertaken to assess the effects of linear corridors on Caribou and other wildlife species. These studies were reviewed and incorporated into the EA. These studies have illustrated that linear features can adversely affect Caribou populations, through increased access by Wolves (who are known to utilize linear features as movement corridors increasing their hunting efficiency). As the DLPP proposes to utilize / expand on existing ROWs along almost the entire alignment, significantly increased predation on local Caribou due to improved Wolf access is therefore not expected. Baseline information and monitoring studies using winter aerial surveys of both caribou and wolves were initiated in 2008 and were continued in 2009 and 2010. MNR also continues to gather data on caribou in the Detour region. In the winter of 2009, MNR collared; six animals north of the Detour Lake Project site and an additional four animals in the general region of Otter Rapids and Smooth Rock Falls.	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		continued	These 10 animals all appear to have ranges that encompass parts of the DLPP study area. In March 2010, 29 animals were collared in the general region of Detour Lake Project; four northwest of Smooth Rock Falls, three north of Otter Rapids between the Mattagami and Abitibi Rivers, six west and north of Kesagami River and 16 south and west of the Detour Mine site area. Previous to these efforts, the MNR collared 30 animals in the Detour Lake area from 1998 to 2001. Thus baseline data on local caribou populations exists and continues to improve with the continued efforts of MNR to collar animals (as well as investigations supported by Detour Gold)		
		Section 12.2 outlines the proposed monitoring. The MNO requests a role as an environmental monitor. It is recommended that a committee similar to the Mattagami Extensions Coordinating Committee be established to ensure Métis and First Nations environmental concerns are effectively monitored and mitigated during construction, operations, and closure.	Noted: Detour Gold will hold discussions with the MNO regarding this request.	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		The Woodland Caribou studies completed to date are insufficient. There has been no assessment of the findings regarding the complete absence of caribou presence during 2009. There is no explanation given regarding their absence, as well as the absence of wolves and wolverines. Additional work must be done by Detour Gold to determine definitively where the caribou were during that year and why they were not present in the area of the site. It is not enough to simply say that the caribou were not present. It is imperative that we know why the caribou were not there. It is possible that the caribou were not present because of disruptive activities in the surrounding area. In order to understand the cumulative effects on the regional caribou population, the cause of the absence of the caribou population must be determined.	Baseline information and monitoring studies using winter aerial surveys of both caribou and wolves were initiated in 2008 and were continued in 2009 and 2010. MNR also continues to gather data on caribou in the Detour region through GPS collar monitoring that was initiated in 1998 and continues to date which they have provided to Detour Gold and its consultants. Results from the aerial surveys conducted by AMEC on behalf of Detour Gold, indicate that Caribou using over-wintering areas around Detour site have exhibited some level of variability in their distribution and abundance from 2008 to 2010. In 2010, a total of 38 animals were sighted, largely northeast and east of the mine site during the aerial survey with group sizes ranging from 3 to 15 individuals. In 2008, 55 Caribou were sighted and Caribou were spotted largely west and north-east of the mine site with observed group sizes varying from 2 to 17 individuals. In 2009 however, no live individuals were observed, although two dead Caribou were recorded (apparent animal kills), and the abundance and density of tracks observed across the study area was reduced. The 2010 early and late winter surveys had similar distributions in the locations of where Caribou were observed, the main difference was in the abundance of Caribou. In January, Caribou were more abundant in the study area, particularly northeast of the mine, tracks and animals were observed frequently. In March, Caribou occurrence was largely confined to the eastern side of the study area; however, tracks and animals were not as frequent and most tracks seemed to be heading farther east outside of the study area boundary. Whether this pattern of abundance from early to late winter continues will have to be assessed after additional early winter surveys are undertaken.	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		continued	This variability in the number of Caribou and Caribou tracks observed in the Detour Lake Project site study area between 2008 and 2010 should not be considered unusual. Caribou winter ranges can be quite large (856 km² and 711.4 km²; Metsaranta and Mallory 2007, Stuart-Smith et al. 1997) and animals will use different areas from year to year depending on factors such as food availability, predator avoidance and snow accumulation (Gustine and Parker 2008; Metsaranta and Mallory 2007; Stuart-Smith et al. 1997). Various studies (AMEC 2006; AMEC 2008; Schafer et al. 2000) have found that Caribou do not exhibit the same level of site fidelity to wintering areas as they do calving areas. Thus, it can be continued to be expected that variability in local habitat use by Caribou in winter will continue in the future. The distribution of Wolves has changed with general abundance of Moose and Caribou. In 2008, Wolves were observed in many areas in close proximity to Caribou and a Caribou kill by Wolves was recorded northwest of the Mine site. In 2009, when both Caribou and Moose were not as abundant, Wolf tracks were not observed as frequently. In 2010, Wolf tracks were often observed in the southwest corner of the study area where Moose abundance was high. It can be expected that the distribution and abundance of Wolves using the study area will continue to mirror that of Caribou and Moose. Wolverines do not currently occur in the Detour region. Historically, they have occurred in the Detour Lake area (Dawson 2000), however currently their range is largely confined to the northwestern portion of Ontario. There is evidence that Wolverines are moving further east expanding their range (Ray 2010). It is considered unlikely that they are within the DLPP study area at the present time, but should they continue to expand their range east, they may be present in the future.		

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		The construction of the transmission line is anticipated to take place during the winter. What impact will these activities have on wintering habitat of Woodland Caribou, moose, and other species of interest to the Métis?	Woodland Caribou occur within the Project site for over-wintering, calving and rutting and may be affected by the noise. Caribou can be most sensitive to noise during the calving season, which occurs in May and June. During these months it is not anticipated that construction activities will be overly disruptive as vegetation clearing is being undertaken in the winter. The noise will be restricted to the construction period of the transmission line and thus is considered a short-term effect. Moose are not generally considered sensitive to noise or human disturbance. Additional clearing within the ROW will result in an increase in foraging habitat for moose. The noise and disturbance will be restricted to the construction period of the transmission line and thus is considered a short-term effect.	None.	Complete.
		There are numerous impacts for which mitigation measures will not compensate for the impact – specifically the impacts to Woodland Caribou and other species. How can it be that Detour Gold has concluded that there will be "no net effects"?	The methodology for determination of effects is provided 8.19.1 and is as proposed in the approved Terms of Reference. Significance and net effects have been defined accordingly on consideration of proposed mitigation.	None.	Complete.
		With respect to environmental issues, Detour Gold and MNO would both benefit from arriving at a mutually agreeable Protocol to set out and guide their relationship throughout the Project's duration and to set out the participation of the potentially affected Métis community in the planning, design, and implementation of construction programs, monitoring, mitigation, and biodiversity programs and plans.....	Noted: Detour Gold will hold discussions with MNO in this regard.	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Detour Gold, MNO, the Province of Ontario, and the Government of Canada would all benefit from the creation of a Detour Environmental Coordinating Committee which would consist of equal representation from Métis and First Nations communities, Provincial and Federal regulatory authorities, and the proponent of the Detour Gold mine (Detour Gold or any future owner/operator of the site) with the mandate of coordinating all environmental monitoring and mitigation activities	Noted: Detour Gold will hold discussions with MNO and regulatory agencies in this regard.	None.	Complete.
		Detour Gold and MNO would both benefit from a commitment to provide immediate capacity for MNO to hire a Project Coordinator (to be based in Timmins or Cochrane) to be a point-of-contact between MNO, the regional rights-bearing Métis community and Detour Gold.	Noted: Detour Gold will hold discussions with MNO in this regard.	None.	Complete.
		Detour Gold and MNO would both benefit from the creation of a list of species of interest to the Métis to be developed through a regional Métis Traditional Knowledge study	Noted: Detour Gold will hold discussions with MNO in this regard in associated with discussions regarding Traditional Knowledge Study.	None.	Complete.

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SUMMARY OF COMMENTS ON ENVIRONMENTAL ASSESSMENT DOCUMENT

Proposal: Individual EA Detour Lake Power Project (DLPP)

Proponent: Detour Gold (DG) Canada Corporation

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
1.	Vince Deschamps, AECOM retained by Coral Rapids Power Limited Partnership on behalf of Taykwa Tagamou Nation June 17, 2010	Section 2.1 Air Quality: It would be beneficial to include the <i>Climate and Air Quality Baseline Study</i> in the appendices of the report. the information provided in the report is adequate.	Noted. A summary is presented in the Environmental Assessment (EA) Document. In the interest of document length, the baseline documents were not provide in their entirety as they were not necessary to assess environmental impacts, but they are available. A copy of the Climate and Air Quality Baseline Study is available on request.	None.	Complete.
		Section 2.2 Noise: Expand discussion on the types of impacts to wildlife and bird species as a result of construction noise (e.g., Woodland Caribou). there have been Woodland Caribou studies carried out,.... they should be included in the DLPP EA.	As is discussed in Section 8.10, construction activities may cause local displacement of wildlife and migratory birds that are likely to return after construction activities cease. It is not believed that this would appreciably stress the wildlife or cause increased wildlife disease. Vegetation clearing will largely be undertaken in the winter which reduces impacts to migratory bird species. Woodland Caribou occur within the DLPP ROW during the winter and may be affected by the noise. The noise will be restricted to the construction period of the transmission line and thus is considered a short-term effect. The Ontario Ministry of Natural Resources (MNR) was very helpful in providing open access to their information regarding Woodland Caribou studies. This information along with field studies completed by AMEC, was the primary basis for the Woodland Caribou discussion with the DLPP EA.	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Section 2.3 Climate: Include in the existing climate conditions section total annual snowfall, average length of the frost free period and when frozen ground conditions occur. There should be more historical data presented for the study area.	Detour Gold recognizes that an atypical winter may pose construction constraints and scheduling difficulties for the DLPP. Other transmission lines have been constructed in the region using only winter road access. Nonetheless, this information is included below and in Table 1 and Figure 1 attached. Mean annual snowfall information was obtained from the weather stations located in Kapuskasing, Ontario and Matagami, Quebec. Using Environment Canada data compiled from 1971 to 2000 the mean annual snowfall was calculated to be 313 cm and 313.8 cm for Kapuskasing, Ontario and Matagami, Quebec respectively. The mean annual snowfall for the Detour Lake Project is estimated at 313.4 cm, as presented in Table 1. The frost free period for the Detour Lake Project was selected based on the map provided in the attached Figure 1 from the National Atlas of Canada (Natural Resources Canada 2010). Figure 1 illustrates that the approximate frost free period for the Detour Lake Project ranges from 80 to 100 days. The remoteness of the site dictates the availability of historical data.	None	Complete

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Section 2.4 Hydrology: A lengthy description was provided regarding suggested best management practices regarding ice bridges. • Indicate that the water used will be clean (e.g., free of sediments, vegetative materials, gravel); • Water taken from a creek should not exceed 10% of instantaneous flow (as per the Department of Fisheries and Oceans); • A water monitor should be at the crossings where a PTTW is required; • Describe type of machinery that would be used to pump water and how steps would be taken to prevent fish mortality; • State the operational guidelines concerning the development of the approach (to the ice bridge construction); • Clarify the width of the bridge, single span is preferred; • Identify the operation guidelines concerning ice thickness for safe passage of vehicles; • Provide information about erosion prevention guidelines that will be followed;	Ice bridges will be developed following standard industry practices and in keeping with all regulatory requirements. Construction of ice bridges will follow the Fisheries and Oceans Canada Ontario Operations Statement "Ice Bridges and Snow Fills" (Version 3 or later) and other applicable regulatory instruments. Construction details will be provided and reviewed through the environmental approvals process. In addition for clarity, per standard operating practices: • any water used will be in a natural condition (free of sediments, vegetative materials, gravel etc.); • water takings will not exceed 10% of instantaneous flow or as otherwise defined through the environmental approvals process for taking water; • water taking(s) will be monitored per environmental approvals and standard operating practices (see Section 5.4.2); • water taking methodologies will follow standard industry practices and will be detailed through the environmental approvals process, including types of machinery (typically portable pumps) and means to prevent fish mortality (typically screens on intakes); • narrow (single lane) bridges are not generally preferred, as they are more susceptible to rutting / damage. As indicated in the DLPP EA, there will be no disturbance to stream bed or banks (or re-shaping of the stream morphology etc.). No other types of crossings (including fording), are proposed at this time; however, if they are necessary, construction details will be provided and reviewed through the environmental approvals process.	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Section 2.4 Hydrology Ice Bridge comments (continued): • Detail how the crossings will be built for the largest watercourses (5.0 – 14.5 m and 15 – 49.5 m in width); • Construction of ice bridges should be considered in-water work and addressed. More detail should be provided concerning Best Management Practices for temporary crossings and fording. (Section 2.5 Water Quality); • Provide details of other types of temporary crossings that may be used	See above.		
		Section 2.4 Hydrology: The poles should be sited to avoid problems with erosion and the collapse of lines, and the subsequent operations to identify any problems.	It is in Detour Gold's interest to ensure that all poles are sited to avoid problems with erosion and collapse of the lines as without power the Detour Lake Project will not be able to operate and will be shut down. These aspects will be considered fully during the detailed design and pole placement for the transmission line.	None.	Complete.
		Section 2.4 Hydrology: Mapping indicates that beaver dams may have to be crossed.	Poles will be located to avoid existing beaver dams. Removal of beaver dams if any, will follow regulatory requirements, and will occur in consultation with the MNR and the trapline holder.	None.	Complete.
		Section 2.4 Hydrology: This report references the MNR' Environmental Guidelines for Access Roads and Water Crossings as being published in 1995. This is incorrect; the guidelines were last revised in 1990.	Agreed.	None.	Complete.
		Section 2.5 Water Quality: construction of ice bridges should be considered in-water work	Ice bridges will be developed following standard industry practices and in keeping with all regulatory requirements. Construction of ice bridges will follow the Fisheries and Oceans Canada Ontario Operations Statement "Ice Bridges and Snow Fills" (Version 3 or later) and other applicable regulatory instruments.	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Section 2.5 Water Quality: Removal of vegetation (from riparian zone) can reduce habitat quality (e.g., increased sedimentation and water temperatures) for fish and other aquatic species, and needs to be addressed.	Per Section 5.4.1: riparian vegetation that does not have the potential to interfere with the conductors (i.e., cannot reasonably be expected to grow to sufficient height) will be left intact. Trees may be trimmed (or topped) to ensure clearance requirements. In cases where trees are felled, the stumps and root mat will be retained to protect the banks from erosion and encourage the growth or re-growth of riparian vegetation.	None.	Complete.
		Section 2.5 Water Quality: How construction and sanitary wastewater from work sites will be disposed of should be addressed	All wastes associated with construction activities will be disposed of according to regulatory requirements. Construction (with the exception of wood waste from vegetation clearing) and sanitary waste will not be disposed of at the work sites.	None.	Complete.
		Section 2.5 Water Quality: The DLPP EA should state all vehicles and machinery will be cleaned prior to arriving to the work site.	The DLPP EA indicates that vehicles and machinery must be maintained in good working order. This would include presence of any contamination on the vehicle body.	None.	Complete.
		Section 2.6 Fisheries and Aquatic Habitat: Extreme weather events may hinder the stability and functionality of the ice bridges. There should be mention of a monitoring and mitigation plan to address this.	Ice bridges will be developed and monitored according to standard industry practices and in keeping with all regulatory requirements. There will be no use of ice bridges that are not fully functional and meet regulatory requirements, both for the safety of workers as well as the environment.	None.	Complete.
		Section 2.6 Fisheries and Aquatic Habitat: Mention the ice bridges will be monitored for incidents such as debris jams or scouring of bed and banks.	As indicated in the DLPP EA (Section 8.1), ice bridges will be monitored during spring thaw for incidents such as debris jams or scouring of bed and banks and mitigation implemented as necessary.	None.	Complete.
		Section 2.6 Fisheries and Aquatic Habitat: Identify alternative methods that may be used and potential negative effects on fish and aquatic habitat.	No other types of crossings are proposed at this time; however, if they are necessary, construction details will be provided and reviewed through the environmental approvals process.	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Section 2.6 Fisheries and Aquatic Habitat. Identify the winter movement patterns of fish.	The use of ice roads and ice bridges in northern Ontario and Canada as a whole is a well-established practice considered to have little potential for negative, long terms effects to fish habitat. Both the Fisheries and Oceans Canada and Transport Canada have determined that the construction and utilization of these temporary structures are acceptable providing general mitigative measures are followed. In addition, fish in northern Ontario generally become reliant on refuge pools or other habitats where suitable water depths provide protection from frazzle and anchor ice formations, or in the case of small intermittent streams, from complete freezing of the creek cross section. These refuge pool areas are typically associated with meander pools or beaver impoundments which are widespread and common in the small to medium sized creeks of northern Ontario, and expected to be present and available to fish both upstream and downstream of the proposed crossings. Fish generally move to overwintering areas in the fall prior to significant ice formation, and as such should not be prevented from reaching established refuge areas by ice bridge creation (although it is possible that localized movement of resident fish in the early spring may be temporarily restricted by ice bridges)	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Section 2.6 Fisheries and Aquatic Habitat: A buffer should be maintained between the ROW and water features.	Per Section 5.4.1, equipment will generally not be positioned closer than 5 m to watercourses during clearing activities except when unavoidable (such as at crossings). The equipment's boom reach will be used to complete brushing within this 5 m buffer strip, or it will be cleared by hand or as directed by environmental permits. The goal of the clearing is to facilitate safe temporary access, as well to ensure that vegetative cover is compatible with overhead conductors and allows the safe operation of the transmission line. Clearing will be conducted in accordance with the requirements stipulated in environmental permits. Depending on the vegetation currently present, this may require complete clearing (heavy forest cover) or minimal disturbance (herb and shrub areas). Ground vegetation and root masses are intended to remain intact as grubbing is not required. Existing treed buffer zones will be retained on shorelines wherever possible, unless they interfere with the minimal clearance requirements for the conductors and/or as required for access. Riparian vegetation that does not have the potential to interfere with the conductors (i.e., cannot reasonably be expected to grow to sufficient height) will be left intact. Trees may be trimmed (or topped) to ensure clearance requirements. In cases where trees are felled, the stumps and root mat will be retained to protect the banks from erosion and encourage the growth or re-growth of riparian vegetation.	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Section 2.7 Terrestrial Habitat/Vegetation: In general, terrestrial investigations have used adequate methods and covered sufficient area to collect the information needed to complete an Individual EA. Additional mapping is needed to show the ELC communities, preferably superimposed on an air photo.	The vegetation community classifications were superimposed on satellite imagery are provided in Appendix F (19 maps). Air photos were not utilized as SPOT5 imagery was available and deemed a reasonable means of delineating habitat features and vegetation communities. ELC mapping is not appropriate for northeastern Ontario as it is specific to (and was developed for) southern Ontario vegetation communities. As discussed in the text, the Field Guide to Forest Ecosystems of Northeastern Ontario (FENO) classification system (Taylor et al. 2000) was used to classify the vegetation along and adjacent to the ROW and is the appropriate classification system for this part of Ontario. The figures contained in Appendix F depict the spatial extent and location of each distinct community. ELC is only used to describe the old field meadow community that occurs along the disturbed (cleared) area of the existing ROW (and whose distribution is included in App-F-1 vegetation figure), as this community type is not included in the FENO system.	None.	Complete.
		Section 2.7 Terrestrial Habitat/Vegetation: Additional information should be added supporting the rejection of alternative routing options avoiding three Natural Heritage features.	Through the development, consultation and approval of the ToR for the DLPP, the framework for the EA development was narrowed to a limited but justified number of alternatives to be considered within the EA document. The proposed approximately 180 km routing was defined through the ToR process as: using and expanding on the routing of the former transmission line ROW from the Detour Lake site to Island Falls; and expanding the existing transmission line ROW from Island Falls north to the Pinard Transformer Station.	None.	Complete.
		Section 2.7 Terrestrial Habitat/Vegetation: Transects used for terrestrial community description and delineation should be labelled on all vegetation cover type maps for a visual of the area covered during investigations.	Vegetation community type delineations were estimated using SPOT 5 satellite imagery, aerial survey field observations and MNR, Forest Resource Inventory forest stand species composition data provided by the Cochrane MNR District (2008). The entire alignment including transects covering up to 500 on either side of the ROW, was flown four times to ensure a complete coverage of the ROW and the adjacent habitats.	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Section 2.7 Terrestrial Habitat/Vegetation: Identified Natural Heritage Features, the North French River Conservation Reserve, the Little Abitibi Provincial Park, and the Fraserdale Wetland Complex Conservation Reserve should also be labelled on the vegetation cover type maps in order to see where the ROW crosses each of these features.	The locations of these features can be identified using the coordinate systems present on all the maps. The outlines were not included on the vegetation cover maps due to the necessary complexity of the figures to show the habitat types. For completeness, figures are attached with the overlay requested.	None.	Complete.
		Section 2.7 Terrestrial Habitat/Vegetation: Clarification is needed in regards to the location of the ROW, should the sites be north of Little Abitibi Provincial Park and within North French River Conservation Reserve? (re: Section 8.1 bullet 3)	The proposed ROW locations relative to the Little Abitibi Provincial Park and within North French River Conservation Reserve are described in Section 7.4.1.	None.	Complete.
		Section 2.7 Terrestrial Habitat/Vegetation: Given the amount of wetland (up to 153.8 ha) being affected by the construction of the proposed transmission line, more detail should be given in the description of these wetlands and their associated plant communities (re: Table 6-9).	The wetlands present are largely open and treed bog habitat types as well as alder thickets and Black Spruce Swamps, all of which are common in northeastern Ontario. Figure App F-1 provides the location and spatial extent of each of these communities within the study area and the text describes the most frequently occurring species that make up the canopy, shrub and herb layers. Additional detail on species composition will not change the effects assessment or mitigation employed to minimize impacts to these wetlands.	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Section 2.7 Terrestrial Habitat/Vegetation: Herbicides should not be used for ROW maintenance; therefore a "no spray policy" should be adopted. Manual clearing methods should only be used, and this also has the advantage of providing employment opportunities.	As indicated in Section 7.4.3, herbicide is the preferred method for periodic vegetation control. Detour Gold will ensure that all contractors meet regulatory requirements at the time of clearing, in regards to chemical, mechanical or manual tending as well as other commitments made within the DLPP EA. Chemical, mechanical and manual tending are currently approved approaches to vegetation management for transmission lines. Selective vegetation clearing is expected to be required in the order of every five to ten years, depending on the location and species present While Detour Gold recognizes that manual clearing would provide employment opportunities, the logistics of manual clearing of the entire line rather than focussing on sensitive area(s), including: transport of personnel to/from camps, waste handling etc. over the extended period of time that would be required for manual clearing, make this approach undesirable, in addition to the efficiency / cost aspect.	None	Complete.
		Section 2.7 Terrestrial Habitat/Vegetation: There should be clarification on what is meant by "Industry standards" that will be used for clearing and maintenance activities.	Information regarding these aspects are provided in Section 5.4.1. Industry standards utilized by transmission line contractors / operators include: • Control of Woody Vegetation, Document Number FP 113 R4, Hydro One Networks Inc, 2005 • Safe Practices When Applying Pesticides, Document Number FP 106 R3, Hydro One Networks Inc, 2006 • Environmental Guidelines for the Construction and Maintenance of Transmission Facilities. Hydro One Networks Inc. 2008	None.	Complete

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Section 2.8 Wildlife and Birds: The wildlife species lists for birds and mammals should be as thorough as the reptiles and amphibians lists, and include species not observed but potentially occurring on site; this would include up to another 20 species of mammals, including bats, and several more bird species.	The bird list is based on detailed breeding bird surveys of the Detour study area undertaken in 2008 (and in 2009). The mammal list was generated from spring and summer incidental observations as well as winter aerial track surveys that were initiated in 2008. Additional bird and mammal species were included from the original baseline survey undertaken in 1983 (Ecological Applications 1983). These baseline surveys were comprehensive and provide a good understanding of the bird and mammal species assemblages using the region. The wildlife communities recorded in the study area for the baseline work are characteristic of what is typically observed in northeastern Ontario. The habitats within the Detour Lake Project study area are comparable to those found along the transmission line route and it is reasonable to expect that the species assemblages would be similar. In the current list, main groups are all represented: raptors, waterfowl, warblers etc. as well as forest, wetland, shrubby and/or forest dependent species and considered with respect to effects and mitigation. This level of understanding is appropriate for the EA stage of the Project. One of the main concerns is to ensure that appropriate mitigation strategies are in place and sensitivities are accounted for, which has been completed. Addition of a few avian species (good bat data is not available for this area) will not alter the scope of the effects assessment or the proposed mitigation strategies. Nonetheless, revised lists have been prepared as requested and are attached to this response.	None.	Complete.
		Section 2.8 Wildlife and Birds: The methods employed to conduct the aerial surveys are well documented. However the methods used to survey for the amphibians and birds are not detailed or explained.	Detailed survey methods are presented in the baseline reports referenced in the DLPP EA. These studies are available on request.	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Section 2.8 Wildlife and Birds: The reptile and amphibian species list includes species observed during surveys, as well as species potentially occurring on site (although it is not clear how these species were identified as being "potentially" in the area). However, there was no inclusion of species not observed but potentially occurring on site within the lists of birds, mammals or invertebrates.	The Ontario herpetological atlas breaks up the Province into squares, one of these squares encompasses the region of the Project site, species whose presence was recorded in the square around the Project site were deemed as "potentially" in the area. There is only one reptile that occurs this far north in Ontario, Eastern Gartersnake. This species was observed during the baseline surveys as well as being recorded in the region from the Ontario herpetological atlas. Amphibian lists were augmented with data from the Ontario herpetological atlas as surveys in 2008 found few species and it was felt that this may not be representative of the region. Salamanders were also taken from the atlas as they are notoriously hard to detect in the field and presence can be easily missed. Based on the level of effort to undertake wildlife surveys for both birds and mammals in the Detour site study area as well as along the transmission line, it was not felt that these lists required additional augmentation from Provincial databases. See above comment for more detail.	None.	Complete.
		Section 2.8 Wildlife and Birds: (raptor nest) It is not clear where or not nest observed by the MNR within 200 m of the ROW were confirmed present or absent by the AMEC field studies.	These stick nests recorded by MNR in 1995 and 2005 were not observed by AMEC biologists during any of the fall or winter aerial surveys.	None.	Complete.

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		Section 2.8 Wildlife and Birds: Areas should be set aside for Woodland Caribou for life processes such as breeding and wintering.	Calving, rutting and over-wintering areas for caribou have been identified. The ROW as defined in the approved ToR, passes through these identified areas. Despite efforts to maintain as compact a ROW as practical based on historic / existing ROWs, an estimated 218.7 ha of additional Black Spruce / Jack Pine forest / treed bog habitat is expected to be disturbed as a result of the DLPP. This is equivalent to 0.0005% of the home range of a single animal. Data in the literature suggest that linear features can adversely affect Caribou populations. Wolves in particular are known to utilize linear corridors to better access Caribou populations. As the DLPP proposes to utilize / expand on existing ROWs along almost the entire alignment, significantly increased predation due to improved Wolf access is not expected.	None	Complete.
		Section 2.8 Wildlife and Birds: Concerning bird nests built on the hydro poles, the DLPP EA needs to detail how they will be dealt with.	Nests (if any) will be considered on a case by case basis in association with the MNR. In general, they will be left in place unless there is potential to affect the reliability of the transmission line or Detour Gold are directed otherwise.	None.	Complete.
		Section 2.8 Wildlife and Birds: Table 12.1 should include a commitment to conduct clearing outside the bird breeding season.	See Section 5.4.1: Clearing will be conducted in accordance with the requirements stipulated in environmental permits (such as work permits and forestry licenses) as well as other regulatory requirements. For example, the timing of clearing in particular will be constrained by the migratory bird breeding season. The <i>Migratory Bird Convention Act</i> directs that vegetation clearing should not be conducted during the breeding bird season in order to avoid destruction of bird nests. Nest surveys will be undertaken by a qualified biologist, if vegetation must be cleared during the breeding bird season.	None.	Complete.
		Section 2.8 Wildlife and Birds: The TTN has observed bears eating the plastic covering the guy wire. AMEC should identify different materials that could be used to prevent this from happening.	Noted. This will be considered during the detailed design process. Our understanding is that plastic is placed around guy wires to ensure visibility and safety and reflects current industry and CSA standards.	None.	Complete.

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		Section 2.9 Rare and Endangered Species: The ranking system for each of the species and the reasons behind the designation of low/moderate/high should be clearly quantified without subjective terms.	The rationale for assigning a probability of occurrence is stipulated within each section for a given species-at-risk (SAR). Recent breeding and/or presence/absence records within the region, presence/absence during the 2008 and 1983 baseline surveys, MNR NRVIS data, Natural Heritage Information data (which includes locations and dates of observations), availability of suitable habitat within the Project site, correspondence with MNR, correspondence with other SAR experts (i.e. in the case of Wolverine, the provincial expert, Dr. Justina Ray was contacted for comment on the potential for Wolverine occurrence within the region around the Detour site) and professional judgment were all taken into consideration when delineating probability of occurrence for a given SAR. Qualitatively assessing a probability of occurrence using the criteria listed above is considered reasonable, particularly given the dynamic nature of wildlife distribution and abundance from year to year. If a species has been observed in the region and if there is suitable habitat for this species within the Project area this species was given moderate to high probability of occurrence (or noted as a probable breeder). This approach likely over-estimated the probability of occurrence for several of these SAR; ensuring that each SAR is given consideration for the effects assessment and appropriate mitigation measures are taken into account.	None.	Complete.
		Section 2.9 Rare and Endangered Species: The description of relevant legislation that protects some of these species, such as the Fish and Wildlife Conservation Act (FWCA) and Migratory Bird Convention Act (MBCA) is appropriate, though incomplete. This section makes no mention of the potential for application of Ontario's Provincial Policy Statement (PPS) (2005).	In Section 6.5, the PPA is mentioned as follows "Ontario has several other laws that help protect SAR and their habitats. A policy under the Planning Act called the Provincial Policy Statement (PPS; MMAH 2005) is used by land use planners and others to help make sure that SAR are not harmed by land development. For example, the PPS states that "development is not permitted in significant habitats of endangered and threatened species".	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Section 2.9 Rare and Endangered Species: Generally, the responsibility for designating significant wildlife habitat falls upon the MNR and relevant municipalities..... the exclusion of the PPS from the discussion of relevant legislation to wildlife casts doubt on the ability of further work to take into account potential occurrences of significant wildlife habitat within or adjacent to the study area.	In Section 6.5, the PPA is mentioned as follows "Ontario has several other laws that help protect SAR and their habitats. A policy under the Planning Act called the Provincial Policy Statement (PPS; MMAH 2005) is used by land use planners and others to help make sure that SAR are not harmed by land development. For example, the PPS states that development is not permitted in significant habitats of endangered and threatened species". MNR data on significant wildlife habitat and other natural features (i.e. Provincially significant wetlands (PSWs) or Areas of Natural and Scientific Interest (ANSIs)) was obtained from the MNR and included in the DLPP EA. There are no known ANSI's or PSWs within the DLPP study area. Mapped significant habitat features from MNR database within the study area include over-wintering habitat for caribou and moose, calving and rutting areas for caribou as well as raptor stick nests. As such, these features have been taken into consideration and have been mapped and incorporated into the text.	None.	Complete.
		Section 2.9 Rare and Endangered Species: The PPS legislation, and in order to remain consistent with the Proponent's desire to minimize unnecessary disruption to the natural environment, all identified significant wildlife habitat types associated with the life processes of species observed and/or potentially occurring within the study area be acknowledged as priorities for identification and avoidance of disruption, prior to examining for their occurrence in seasonally appropriate surveys.	AMEC requested all data from MNR that pertains to all known and identified wildlife habitat including moose over-wintering areas, spawning areas, hibernacula, caribou calving areas, caribou over-wintering areas, caribou rutting areas and raptor stick nests. All of these significant wildlife habitat attributes within the study area have been mapped and are presented in the DLPP EA. Significant wildlife habitat such as raptor nests and over-wintering, rutting and calving areas for caribou have been identified	None.	Complete.

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		Section 2.9 Rare and Endangered Species: Update to reflect any changes that have occurred with Woodland Caribou-relevant legislation and other documents since the time of the EA preparation.	Currently there is a recovery strategy, a conservation plan and a scientific review that have been included in this document for caribou. These are all the most relevant pieces of documentation as they relate to the ESA 2007 for this species at this time. The habitat regulation for this species has not yet been released.	None.	Complete.
		Section 2.9 Rare and Endangered Species: Eagles have been spotted along Island Falls and Abitibi River. Coordinating the timing of construction activities and the life cycle activities of wildlife need to be explored.	Vegetation clearing is proposed to be conducted outside of the breeding bird season to mitigate disruption to breeding birds. Nest surveys will be undertaken if vegetation must be cleared during the breeding bird season. There are currently no known raptor nests are located within or proximal to the ROW. Should any sticknests be identified during construction phase, the area will be avoided until a qualified avian biologist along with regulatory authorities can be contacted for direction. Mitigation will include buffers around nests as per provincial guidelines.	None.	Complete.
		Section 2.9 Rare and Endangered Species: Clarify the reason none of the proposed alternative routes incorporated the use of other „previously disturbed areas” such as the Regional and/or Primary Roads, and that this option be presented to the First Nations as a method of minimizing impacts to the confirmed Woodland Caribou habitat.	The proposed approximately 180 km routing was defined in the approved ToR process as: using and expanding on the routing of the former transmission line ROW from the Detour Lake site to Island Falls; and expanding the existing transmission line ROW from Island Falls north to the Pinard Transformer Station. It includes other previously disturbed areas as possible while maintaining a reasonably direct route.	None.	Complete.

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		Section 2.10 Land Use: Identify who the Sustainable Forest Licensee is for the area, if TTN have any claim, and what form it will be removed in (e.g., timber, chipping).	The Sustainable Forest Licensee (SFL) is Abitibi River Forest Management Incorporated. First Resource Management Group Incorporated is an agent for the SFL responsible for planning in the Abitibi River Forest Management Unit. The SFL holder will be given the first right of refusal to any merchantable timber related to construction of the DLPP as stated in Section 8.12 of DLPP EA. Detour Gold will coordinate with the SFL for the licensing, harvest, and payment of the Crown timber. Detour Gold acknowledges TTNs interests and will engage TTN in further discussion on this interest.	None.	Complete
		Section 2.10 Land Use: More details on how Detour Gold will avoid creating new permanent access ways to the transmission corridor.	The exact means of access will be defined through the environmental approvals and construction tendering processes. TTN will be engaged in discussions on future environmental approvals and permits. Particular attention will be given to those that address access issues.	None.	Complete.
		Section 2.10 Land Use: DLPP EA indicates that the DLPP could be considered as a benefit to mineral lease/claim holders but does not indicate how.	Detour Gold is currently unaware of any other potential users of the line. Any future access to the DLPP would require Ontario Energy Board and the Independent Electricity System Operator support and public consultation to ensure that there is no system impact. Other users would be responsible for seeking approvals as well as finance whatever infrastructure is required. Also see response to Section 2.13.	None.	Complete.
		Section 2.10 Land Use: Assess impacts on traplines. Mitigation/compensation measures should be identified.	Any mitigation/compensation required for effects to traplines is being addressed as part of the Impact Benefit Agreement (IBA) between Detour Gold and TTN. This is a private and confidential process that to our knowledge, neither party wants made public.	None.	Complete.
		Section 2.11 Traffic and Transportation: The construction effects should note the potential for impacts associated with crossing both Highway 634 and Highway 632 and MTO requires.... permit.	The DLPP does not cross Highway 632. We believe this is a typographical error and that the reviewer meant Highway 652. Detour Gold is in consultation with MTO regarding its requirements. MTO was provided the opportunity to comment on the DLPP EA.	None.	Complete.

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		Section 2.11 Traffic and Transportation: ... equipment movement within the hydro ROW will have a greater impact on wildlife than increased traffic on the access roads.	There are potential effects on wildlife from both increased traffic on access roadways and from movement of construction and maintenance equipment within the ROW.	None.	Complete.
		Section 2.12 Socio-Economics: Provide an analysis of the specific employment and business opportunities available to the TTN and the ability of TTN to take advantage of these opportunities.	Detour Gold will optimize Aboriginal employment, training and procurement opportunities as / if stated in the terms negotiated in the IBA. This is a private and confidential process that to our knowledge, neither party wants made public.	None.	Complete.

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		Section 2.12 Socio-Economics: Provide more information regarding the specific employment and business commitments.	Information on Detour Gold's employment and business opportunities was made available at community meetings (March, April and May, 2010) and via the website (www.detourgold.com) through the Employment & Business Opportunities Fact Sheet March 2010 (available on the project website and at community information sessions). In general, typical employment and business opportunities for the project include: • Catering and accommodation goods and services (i.e., catering equipment, food supply and preparation, accommodation materials, supplies and related housekeeping services, and waste management) • Communication Infrastructure and support services (i.e., Internet, telephone/radio, cellular phones, television service) • Construction (i.e., building supplies and materials, Plumbing, electrical, carpentry, and heating, ventilation, and air conditioning services, other construction supplies and services as required) • Equipment (lease, purchase, maintenance) (i.e., heavy equipment and machinery, Vehicles and smaller equipment, equipment maintenance/repair) • Fuel (i.e., Bulk supply of diesel and other fuels as required) • Logistics (i.e., Expediting; coordinating transfer of materials to and from the site, Transportation of workers to and from the site, Delivery and courier services) • Medical Services (i.e., medical supplies, paramedic services)	None.	Complete.

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		Section 2.13 Other Power Users. Outline the potential for the new power line to be used by others, including the TTN communities, including a discussion of any constraints to such use.	There is a detailed description of the process required to approve a transmission line in Section 8.15, including the mandatory requirement for technical review by the Ontario Energy Board and the Independent Electricity System Operator. This process is going on in parallel with the Individual EA process (as is common in the industry). The transmission line is being pursued by Detour Gold to support the Detour Lake Project. It is our understanding that connection by any other users will require agreement by the then owner of the transmission line, as well as meeting any regulatory requirements that might be imposed, such as by the Ontario Energy Board, the Independent Electricity System Operator as well as environmental approvals, such as those required under the <i>Ontario Environmental Assessment Act</i>.	None.	Complete.
		Section 2.14 Traditional Land Uses. The effects of the project on the 14 traplines identified in the existing conditions section require further assessment. Appropriate mitigation/compensation measures should be identified. Detour Gold should outline the types of effects for which compensation would be offered and the manner in which it proposes to establish an equitable level of compensation for all trapline holders.	Specific effects of the project on traplines held by TTN members are expected to be documented in the Traditional Ecological Knowledge (TEK) Study currently being prepared by Muskegowuk Environment Research Council for TTN. Any mitigation/compensation required for effects including lost income to traplines held by members of TTN is being addressed as part of the IBA between Detour Gold and TTN. This is a private and confidential process that to our knowledge, neither party wants made public.	None.	Complete.

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		Section 2.14 Traditional Land Uses: The effects of the project on the 14 traplines identified in the existing conditions section require further assessment. Appropriate mitigation/compensation measures should be identified. Detour Gold should outline the types of effects for which compensation would be offered and the manner in which it proposes to establish an equitable level of compensation for all trapline holders.	Specific effects of the project on traplines held by TTN members are expected to be documented in the TEK Study currently being prepared by Muskegowuk Environment Research Council for TTN. Any mitigation/compensation required for effects to traplines held by members of TTN is being addressed as part of the IBA between Detour Gold and TTN. All trapline permit holders have been provided with notices regarding the DLPP through the MNR (rather than directly by Detour Gold due to potential privacy issues). Detour Gold will follow up with any requests for discussion about potential effects to traplines if contacted directly by the trapline permit holder. Given that trapline permit holder contact information is confidentially held by the MNR, Detour Gold is not in the position to directly contact trapline permit holders. At this time, Detour Gold is only able to provide mitigation/compensation for effects to traplines held by members of TTN as part of the IBA.	None.	Complete.
		Section 2.14 Traditional Land Uses: Include any relevant information contained in the TTN traditional knowledge studies that is approved by the TTN for disclosure.	To date, and to our knowledge, the TTN TEK Study has not been completed and therefore no information has been approved by the TTN community for disclosure.	None.	Complete.
		Section 2.15 Heritage and Cultural Resources: A licensed archaeologist on-site during construction would ensure that any cultural heritage or archaeological resources are quickly identified and that the necessary steps taken to protect, document and preserve such resources.	Detour Gold has committed to having a licensed archaeologist available during construction during work in areas of designated high potential from archaeological investigations to date by Woodland Heritage Surveys and White Spruce Archaeology.	None.	Complete.

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		Section 2.15 Heritage and Cultural Resources: Areas should be surveyed and monitored by the archaeologist whenever topsoil is removed.	No significant removal of topsoil is proposed. Detour Gold has committed to having a licensed archaeologist available during construction during work in areas of designated high potential from archaeological investigations to date by Woodland Heritage Surveys and White Spruce Archaeology.	None.	Complete.
		Section 2.15 Heritage and Cultural Resources: Detour Gold shall notify the TTN and other First Nations when human remains or other archaeological or cultural heritage features are uncovered.	Agreed.	None.	Complete.
		Section 2.16 Visual Environment A more detailed site specific visual assessment should be undertaken with respect to the DLPP at the North French River Conservation Reserve and the Little Abitibi River Provincial Park and site specific mitigation measures identified.	As a transmission line was present previously at both of these locations in recent times and the locations are not readily accessible, it was determined that completion of a detailed site specific visual assessment was not necessary to accurately assess the potential environmental impacts. This approach was discussed with the MNR who manages these areas. Proposed mitigation measures are provided in Section 8.18.1.	None.	Complete.
		Section 2.17 Assessment of Effects: The net effects analysis should be revised to acknowledge that the DLPP will result in some net effects and that their significance is assessed using the methodology described in Section 8.19.	The net effects analysis follows the methodology provided in Section 8.19.1 and proposed in the approved ToR. As indicated in Section 8.19.1, the net effects assessment takes into account proposed mitigation measures captured by the DLPP EA; and that more specifically "This assessment is contingent on the application of the mitigation measures proposed and commitments made throughout the EA."	None.	Complete.

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		Section 2.18 Potential Effects of Malfunctions and Accidents: The mitigative measures outlined in the report were adequate. However the additional preventative measures should be added: • fuels should not be stored closer than 15 m to the edge of a water body; • machines should be turned off when not in use; and • any associated waste should be disposed of in an appropriate manner.	See Section 8.20.1. Fuel storage areas (excluding small containers moveable by hand) will be established and mobile refuelling activities will occur a minimum of 200 m away from waterbodies wherever practical, but no closer than 50 m from waterbodies. Contractors will be requested to turn off machines where not in use, except when it would affect operation of the equipment (or where the equipment is being used as weather refuge etc.). All wastes associated with construction activities will be disposed of according to regulatory requirements. Construction (with the exception of wood waste from vegetation clearing) and sanitary waste will not be disposed of at the work sites.	None.	Complete.
		Section 2.18 Potential Effects of Malfunctions and Accidents: The review of the preventive measures to be undertaken is adequate in aiding to deter accidents from occurring.	Noted.	None.	Complete.
		Section 2.18 Potential Effects of Malfunctions and Accidents: Fire protection should consist of fixed protection systems (e.g., high expansion foam systems or dry chemical systems), in areas where it is most likely for a fire to occur. These systems should be supplemented by fire extinguishers.	The transmission line will be constructed outdoors and fire protection systems are not believed to be appropriate. With substations etc., fire protection will meet building codes and other appropriate engineering standards. Fire prevention equipment will meet or exceed, industry standards for remote locations and will include well maintained fire extinguishers. Vehicles transporting materials are required to have properly serviced fire extinguisher and first response spill equipment.	None.	Complete.
		Section 2.18 Potential Effects of Malfunctions and Accidents: A food-waste management plan should be authored.	Contractors will be required to handle food and food wastes in a responsible manner, and workers will be educated and policies enforced to ensure no feeding of wildlife. All wastes are to be removed on a regular basis. Preparation of a food waste management plan will be required by the DLPP contractors to help ensure the safety of both the workers and wildlife.	None.	Complete.

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		Section 2.18 Potential Effects of Malfunctions and Accidents: Acknowledge disturbance caused to bird species that nest earlier than June 1, and an explanation of measures taken to mitigate those disturbances while nesting.	All clearing and other activities will be completed in accordance with the <i>Migratory Bird Convention Act</i> and other applicable legislation / regulatory instruments. The majority of tree clearing activities will be undertaken in the winter, thus migratory bird species will not be disturbed. Nest surveys will be undertaken by a qualified biologist, if vegetation must be cleared during the breeding bird season. It is recognized that raptors start nesting as early as the beginning of February. There are no known raptor nests located within the proposed ROW. Should any sticknests be identified during construction, the area will be avoided until a qualified avian biologist can be contacted for direction. Mitigation will include buffers around nests as per provincial guidelines.	None.	Complete.
		Section 2.18 Potential Effects of Malfunctions and Accidents: Report the location of all observed wildlife road mortalities to the proper authority(ies). Carrion will be removed to avoid additional vehicle / wildlife interactions.	Agreed. In addition, contractors will be required to keep a log of all wildlife observance and interactions. Any significant interactions will be required to be reported to Detour Gold immediately in order that appropriate mitigative measures can be implemented.	None.	Complete.
		Section 2.19 Cumulative Effects: No indication as to how this conclusion was reached and what geographic area was examined. Given the presence of mining claims and forestry activities in the area, consideration should be given to activities such as mining exploration and ongoing forestry activities in the CEA.	The geographic area included the defined socio-economic study area and well as the general region for any potential larger project. Research was conducted through public venues to determine if any other projects / activities were proposed in the area, including review of forestry management plans etc. Discussions were also held with the Ministry of Northern Development, Mines and Forestry and the MNR to assess whether any other projects were imminent in the area that were not publicly known. Due to privacy issues, Detour Gold was not provided details, but were informed that there were no such projects or activities.	None.	Complete.

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		Section 2.19 Cumulative Effects: Only one "imminent future project/activity was identified, that being ...	Discussions were held with the MNR district office in Cochrane concerning other defined projects which could be considered in the cumulative effects analysis for both the DLPP and the DLP. MNR indicated that the only such defined imminent and applicable, projects within the study area of either the DLPP and the DLP were initiatives planned by Detour Gold in connection with the DLPP and the DLP, together with the potential for reactivation of a small quarry site by M.J. Labelle near the western end of the DLP all-season gravel road. AMEC has subsequently learned that plans for redevelopment of the quarry site have been put on hold. Plans for the harvesting of the three forest blocks shown in the DLPP EA along, or near to, the transmission ROW, have been deferred (Mick Gauthier pers. Comm. June 29, 2010). Other types of "projects" that could potentially proceed, but are as yet undefined are: possible new resource access roads; possible additional forestry operations; possible additional mineral developments; possible new transmission lines; possible new recreational trails; and the possible setting up of new recreational camps and cottages. While all such projects are potentially possible in the future, to our knowledge none have as yet been defined as planned imminent projects. Should any such projects be defined in the future they would require their own approvals and may or may not have to consider effects in relation to the DLPP and the DLP. Hydro One is considering developments within the Moose River basin but any such developments would be expected to mainly affect aquatic environments, and as the DLPP is not expected to adversely affect aquatic environments there is no meaningful potential for cumulative effects.	None.	Complete.
		Section 2.19 Cumulative Effects: Cumulative effects of noise ... are adequate, but should include a section on the potential for displacement of wildlife	Comment noted, but as per Section 8.21.2: Noise Effects, no cumulative effects involving noise (to either humans or wildlife) are anticipated in relation to the DLPP.	None.	Complete.

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		Section 2.19 Cumulative Effects: Review of disturbance to vegetation communities ...	Figures provided in Appendix F show that vegetation communities along the transmission line, within 1 km on either side of the ROW consist of Black Spruce dominated communities, including treed bogs (i.e., Communities 18, 20, 21 and 26), together with a number of historic cutover areas. These communities are also prevalent in the broader region well beyond the 2 km ROW corridor shown in the figures. The entire transmission line length is approximately 174 km. The 2 km corridor bordering the transmission line ROW therefore occupies an area of approximately 350 km², and expands to thousands of km² outside of the corridor. Given that Black Spruce dominated communities occupy the major portion of these areas, the 3.26 km² new cut area represents <1% of the corridor area and a very small fraction of Black Spruce and other forest communities beyond the corridor area. Providing precise measures of disturbance percentages to each specific vegetation community for such small areas is not warranted and would not further the evaluation of cumulative effects. With regard to re-vegetation of the site at closure, such re-vegetation would occur as a result of natural regrowth. Development and maintenance of the transmission line will be such that the ground cover, with low shrubs and tree seedlings, will remain intact. Once ROW maintenance is suspended at (or near) closure existing tree seedlings within the ROW, and seed fall from the adjacent forest will provide the basis for new forest growth. Planting programs are not proposed or necessary.	None.	Complete.
		Section 2.19 Cumulative Effects: Clearing an area directly adjacent to the pre-existing ROW eases wildlife movement ...	AMEC disagrees with the comment. A 40 m wide transmission line corridor between the DLP mine site and Island Falls is unlikely to afford any more effect passage for wildlife movement than the existing 30 m wide cleared corridor, including for Wolves. Similarly, a 100 m wide transmission line corridor between Island Falls and Pinard is unlikely to provide any more effective passage for wildlife movement (including for Wolves) than the existing Hydro One transmission line corridor.	None.	Complete.

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		Section 2.19 Cumulative Effects: It is not rational to assume that habitat fragmentation will not be 'of concern' to wildlife ...	Statements in Section 8.10.1 of the DLPP EA regarding habitat fragmentation could have been better worded. Since all but the mine site terminal end of the new transmission will involve the widening of existing ROWs, there will be no additional "fragmentation" of habitat along approximately 93% of the ROW; and even in areas close to the mine site the transmission line ROW will be in close proximity to other DLP components, such that additional habitat fragmentation caused by transmission line construction in conjunction with mine site development in this area would be minimal.	None.	Complete.
		Section 2.19 Cumulative Effects: The statement "At closure, all disturbed areas will be eventually become productive forest habitat" implies ...	Related statements in the DLPP are correct in as much as all disturbed terrestrial habitats that remain as terrestrial habitats, following mine closure, will gradually revert to productive forest habitat. It was not indicated that all of the mine site area would eventually revert to their "original vegetated" cover types, as suggested by the reviewer. There will be topographic changes within developed areas that would favour the development of different forest community types following mine closure, compared with those originally present. In the case of the transmission line there will be no topographic changes, such that original vegetated forest communities would eventually become re-established, given sufficient time once the transmission line is removed.	None.	Complete.
		Section 2.19 Cumulative Effects: It is not unreasonable to expect some level of cumulative effects(s) on wildlife ...	It was not stated that there would be "no" cumulative effects on wildlife as a result of the combined development of both the DLPP and the DLP, but instead that the cumulative effects taking into consideration planned mitigation measures, including the development of a compact mine site, the use and expansion of existing ROWs for transmission line construction, and mine site revegetation efforts at closure, were "not significant" within the context of criteria used to assess effects.	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Section 2.19 Cumulative Effects: Disturbance to Rare, Threatened and Endangered Species ...	The reviewer is correct that mention of these additional species of potential occurrence (Lake Sturgeon, Golden Eagle, Yellow Rail, Black Turn, Peregrine Falcon, Short-eared Owl and Canada Warbler) was omitted from Section 8.21. Habitats utilized by these species, and their potential for occurrence within the study area, were discussed in Sections 6.5.1 and 6.5.2. The only species from this group considered to have a reasonable potential for occurring within habitats that would be altered or displaced by transmission line construction were the Yellow Rail, Black Turn, Short-eared Owl and the Canada Warbler. Habitats preferred by the first three of these species consist of low wet habitats and / or grassland / herbaceous habitats. These habitat types would not be appreciably altered by transmission line construction, or would be expanded, as ground cover would be left intact. The Canada Warbler prefers a broad range of forested, shrubland and regenerating forest habitats which are not limited locally or in the broader region. Hence the only one of these species to which cumulative effects could reasonably be applied would be to the Canada Warbler, for which habitats are not limiting.	None.	Complete.
		Section 2.19 Cumulative Effects: Cumulative adverse effects to Caribou ... does not take into account the potential for increased predator pressure on the caribou	This aspect is addressed on Page 131 of the DLPP EA.	None.	Complete.
		Section 2.19 Cumulative Effects: Review of traffic volumes ... cumulative effects to wildlife as a result of traffic is best addressed in the sections of Disturbance to Wildlife ...	Vehicular collisions involving Caribou are discussed in Section 8.21. The potential for cumulative effects involving other species is considered to be minor since there will be limited overlap between construction activities (including the transport of persons and materials) associated with transmission line construction, and those associated with mine site construction and operation.	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Section 2.20 Consultation Plan: TTN consider finalizing the draft Consultation Protocol developed by AECOM, and distributing copies of the Protocol to the Crown and the proponent with a view to working with them to develop a comprehensive plan for meaningful consultation and communication with TTN community members, for this and subsequent components of the Detour Lake mine project.	No response required by proponent. Detour Gold would support development of such a Protocol and is looking forward to working with TTN on reviewing and once a Protocol is finalized, implementing it so that meaningful engagement occurs about the project activities over the long-term and for the life of the project.	NA	Complete.
		Section 2.20 Consultation Plan: TTN consider a range of activities to raise awareness and capacity within the community to participate meaningfully in the EA process, including a training workshop about the EA process and developing and distributing the Consultation Protocol in a plain-language format which is accessible to community members.	No response required by proponent. Detour Gold has always been open to hearing how TTN would like to be engaged in the project. Detour Gold would be happy to participate in an EA training workshop if requested by TTN. TTN should be aware that the Chiefs of Ontario have an environmental assessment toolkit at their disposal which may provide additional information/resources for this effort.	NA	Complete.
		Section 2.20 Consultation Plan: TTN consider engaging the Province in taking a more active oversight role in the EA process and associated consultation for the proposed undertaking.	No response required by proponent.	NA	Complete.
		Section 2.20 Consultation Plan: An opportunity for TTN to provide input on the chosen elements of the DLPP EA Description of the Environment (what would be defined as Valued Ecosystem Components), and to identify additional elements, was not provided nor was such input solicited in other venues. Solicit information from TTN and include in the DLPP EA.	Detour Gold provided copies of both the draft and proposed ToR for the DLPP EA in September and November respectively, prior to the ToR being approved. It is through these review processes, that Aboriginal communities and other stakeholders had an opportunity to provide input into the input into the EA approach and design. Detour Gold also met with TTN to discuss the ToR preparation. Detour Gold did not receive any comments during the comment period from the TTN or its representatives, on either the draft or proposed ToR.	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Section 2.20 Consultation Plan. Timing and number of PICs were inconsistent with the normal requirements of the EAI process as laid out in the Code of Practice for Consultation in Ontario's EA Process. Should address this issue in the text.	The Code of Practice for Consultation in Ontario's EA Process states: "Beyond the mandatory notification contacts, appropriate consultation methods and techniques should be selected to fit the circumstances and proponents objectives (e.g., information gathering, information dissemination, consultation)" (p. 15). As such there are no requirements for PICs (or public information centres) as a specific method by which the proponent engages stakeholders and Aboriginal communities in the ToR or EA process. A Consultation Plan was prepared and approved by the Minister which was implemented in its entirety. Given the low number of responses from stakeholders and Aboriginal groups during the preparation of both the draft and proposed ToR, the need for public information centres was not considered a necessary method of engagement. Please note that there was no firm commitment for public information sessions made in this part of the ToR preparation (see Section 4.0 of Proposed ToR). A summary of consultation requirements for EAs (as outlined in the Code of Practice for Consultation in Ontario's EA Process p. 24) and the points of contact provided by Detour Gold are as follows: <u>Code Requirement:</u> Minimum of 3 to 4 points of contact, depending on the complexity and environmental sensitivity during the preparation of the ToR. <u>Detour Gold provided:</u> Newspaper notices (for both draft and proposed ToR), couriered copies of both draft and ToR to Aboriginal communities and other stakeholders, provided both draft and proposed ToR at public viewing locations including First Nation Band offices, posted notices in First Nation Band offices; hosted site tours, held at least 3 meetings with various Aboriginal groups. This is approximately and conservatively 12 points of contact during the preparation of the ToR.	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		continued	<u>Code Requirement:</u> Minimum of 3 to 4 points of contact, depending on the complexity and environmental sensitivity during the preparation of the ToR. <u>Detour Gold provided:</u> Newspaper notices (for both draft and proposed ToR), couriered copies of both draft and ToR to Aboriginal communities and other stakeholders, provided both draft and proposed ToR at public viewing locations including First Nation Band offices, posted notices in First Nation Band offices; hosted site tours, held at least 3 meetings with various Aboriginal groups. This is approximately and conservatively 12 points of contact during the preparation of the ToR. <u>Code Requirement:</u> Opportunity to comment on submitted ToR before Minister makes decision <u>Detour Gold provided:</u> See above. The opportunity to comment on the submitted (proposed) ToR was provided between November 28 – January 4 <u>Code Requirement:</u> Consultation required during the preparation of the environmental assessment (minimum of 4 to 6 points of contact, depending on the complexity and environmental sensitivity) <u>Detour Gold provided:</u> Nine community meetings were held in March and April, 2010 during the preparation of the environmental assessment. <u>Code Requirement:</u> Opportunity to comment on submitted environmental assessment <u>Detour Gold provided:</u> Five community meetings were held in May and another 2 in June following submission of the environmental assessment and within this review period. <u>Code Requirement:</u> Final opportunity for comments on the Ministry Review of the environmental assessment before Minister makes decision <u>Detour Gold provided:</u> This stage has not yet occurred.		

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
			Based on this analysis, we feel that the basis of this comment is unfounded. Details of the stakeholder and aboriginal engagement activities are documented in Section 9 and Appendix H of the DLPP EA.		
		Section 2.20: Consultation Plan: The proponent should ensure that the Record of Consultation reflects the range of comments received from TTN from the early engagement phase to present, and how these comments are dispositioned, both for the provincial environmental assessment but also as part of the record preceding the CEAA Comprehensive EA for the Detour Lake Project.	Agreed. A full and detailed list of the contacts to date with TTN has been prepared and forwarded to TTN separate from this response. This includes meeting minutes, and a description of concerns along with where these concerns were addressed in the EA document. If concerns were not addressed, a rationale will be provided. For the CEAA Comprehensive Study Report (environmental assessment), comments and interests will be attributed to each Aboriginal group or stakeholder and will show where these comments and interests have been addressed in the EA. If comments and interests are not addressed in the EA (for example, because they were not part of the EA scope), we will provide a rationale.	None.	Complete.
		Section 2.20 Consultation Plan. Timing of release of the EA in advance of completion of the TEK Studies	The TEK Studies for TTN have been underway since December 2008. Study completion, for various reasons beyond Detour's control, has been delayed on several occasions. It was our hope that the TEK studies would have been completed well in advance of the EA submissions. Detour Gold is committed to supporting the TEK studies and avoiding or mitigating any effects to traditional land uses. A number of concerns were shared during TEK steering committee meetings which were documented in section 8.16. These concerns were discussed and addressed in the DLPP EA.	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Section 2.20 Consultation Plan: Timing of and errata in public notifications	We acknowledge the error made in the notification for the Moosonee (April 1, 2010) and Iroquois Falls (April 8, 2010) indicated that the ToR was still under review by the MOE on these dates. The Notice of Commencement and the Notice of Submission of the EA were advertised in the same edition of the Wawatay News due to the frequency of newspaper editions. We acknowledge that the Notice of Commencement could have been released earlier. TTN were informed of the timing of the submission of the EA during their meeting held March 15 and at community meetings held March 24, 2010. The Ontario Codes of Practice for Consultation in Ontario's Environmental Assessment Process and for Preparing and Reviewing Environmental Assessments in Ontario, and the Guide to Environmental Assessment Requirements for Electricity Projects do not specify a required amount of time between these mandatory notices.	None.	Complete.
		Overall Comments: DLPP EA must quantify the width of the ROW.	See Section 5.2	None.	Complete.
		Overall Comments: Ownership of the ROW and transmission lines must be documented in the DLPP EA.	As indicated in the DLPP EA, Detour Gold is not in the business of power generation or power transmittal and the transmission line is intended solely to meet the needs of the proposed mine. Transferral of the transmission line after it is built to a qualified operator would be considered for this reason; however there are currently no advanced negotiations or agreements in this regard. The ROW will remain Crown Land although Land Use Permits will be requested.	None.	Complete.
		Overall Comments: TTN does not want treated poles to be used, and would prefer the use of cedar poles.	Detour Gold proposes to use cedar poles for construction as possible, in recognition of comments received through the consultation processes to date. Should treated poles be required (such as due to lack of availability of suitably sized cedar poles etc.), all standards for their use will be followed.	None.	Complete.
		Overall Comments: The DLPP EA should also outline how the transmission line will be strung.	This will be defined by the contractor, but will be required to follow standard industry practices. This typically includes helicopter use, but may be modified.	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Overall Comments: There should be information concerning how the transmission lines will be decommissioned, and/or will it be assumed by Hydro One. This must be clarified.	See Section 5.6.	None.	Complete.
		Overall Comments: No mention of how the winter road on the ROW will be prepared to ensure a solid base of frost. This should be explained.	See Section 5.4.2. Winter roads have been used effectively in the region to construct other transmission lines, including the original transmission line from Island Falls to the Detour Lake site. While distance from permanent access points complicates the logistics of travel, the winter road can be designed and maintained to accommodate the traffic flow.	None.	Complete.
		Overall Comments: There is no mention of any documentation produced during the development of the historical ROW.	Both the environmental baseline study and analysis of alignments from the original transmission line to the Detour Lake site were reviewed and used (see Section 13, References, EAG nd and EAG 1983; and throughout the text). The information available in these documents reflects the scientific knowledge and regulatory requirements at the time. It should also be noted that one of the authors of these reports is part of the team involved in the DLPP EA.	None.	Complete.
		Overall Comments: ... it should be noted where the construction personnel will be staying.	See Section 5.4.2. There are no plans to create permanent camps along the ROW to house workers during construction. Workers will be accommodated off the ROW; likely at the Detour Lake Project site and in Cochrane / Smooth Rock Falls.	None.	Complete.
		Overall Comments: Larger scale mapping is needed. The current mapping does not accurately represent the features and boundaries as it is at too high a level.	Extensive mapping is provided in the DLPP EA consistent with the scale of the Project and anticipated effects associated with transmission line construction, operation and decommissioning. Satellite imagery is provided along the entire route to assist in the visualization of the ROW. Additional mapping is not available for the region due to the general remoteness of the location.	None.	Complete.

Table 1: Detour Lake Project Monthly Mean Snowfall

Station	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
Kapuskasing, Ontario (cm)	60.8	36.4	46.2	28.1	9.3	0.6	0	0	2.0	21.8	50.5	57.3	313.0
Matagami, Quebec (cm)	60.4	35.6	40.6	32.1	8.6	1.2	0	0	3.6	27.7	45.9	58.1	313.8
Detour Site	60.6	36	43.4	30.1	9.0	0.9	0	0	2.8	24.8	48.2	57.7	313.4

Source: Environment Canada, Kapuskasing, Ontario and Matagami, Quebec (Climate Normal data from 1971 to 2000); www.climate.weatheroffice.gc.ca/climateData/canada_e.html, accessed March 29, 2010.

DOCUMENT INFO

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DOCUMENT INFO

SUMMARY OF COMMENTS ON ENVIRONMENTAL ASSESSMENT DOCUMENT

Proposal: Individual EA Detour Lake Power Project (DLPP)
 Proponent: Detour Gold (DG) Canada Corporation
 Comments: Vince Deschamps, AECOM retained by Coral Rapids Power Limited Partnership on behalf of Taykwa Tagamou Nation

Initial Comment	Proponent's Response	Follow-Up Comment	Proponent's Response(2)					
Section 2.6 Fisheries and Aquatic Habitat: Mention the ice bridges will be monitored for incidents such as debris jams or scouring of bed and banks	As indicated in the DLPP EA (Section 8.1), ice bridges will be monitored during spring thaw for incidents such as debris jams or scouring of bed and banks and mitigation implemented as necessary	There is no specific mention of a monitoring plan for the ice bridges, only mention of mitigation if damming occurs during the spring thaw. How will these areas be monitored and will there be additional site visits if unseasonably warm temperatures occur prior to the average timing of the spring thaw?	The ice bridges will be visually inspected on a frequent basis prior to use and during use, on no less than a daily basis to assess competence. Thickness of the ice will be determined by augering if appropriate to ensure safety If there is unseasonably warm temperatures, or closer to the end of the season, more frequent inspections will occur if necessary to ensure the safety of workers and reduce the potential for environmental damage					
Section 2.7 Terrestrial Habitat/Vegetation Transects used for terrestrial community description and delineation should be labelled on all vegetation cover type maps for a visual of the area covered during investigations	Vegetation community type delineations were estimated using SPOT 5 satellite imagery, aerial survey field observations and MNR, Forest Resource Inventory forest stand species composition data provided by the Cochrane MNR District (2008). The entire alignment including transects covering up to 500 on either side of the ROW, was flown four times to ensure a complete coverage of the ROW and the adjacent habitats	Delineation of vegetation communities through remote imagery is acceptable. However, we would ask whether any ground-truthing was undertaken to confirm vegetation types in the field? We would not expect that all communities would be ground-truthed, but would expect that a representative sample would have been checked to confirm the accuracy of the delineation process	Extensive field vegetation surveys were undertaken within each distinct forest community, wetland and cultural vegetation type during investigations for the Detour Lake Project (Terrestrial Baseline Study) Aerial surveys of the DLPP and review of existing Forest Resource Inventory mapping for the area confirmed that vegetation community composition within the DLPP study area are analogous to those occurring in the Detour Lake Project study area. As such, extensive ground-truthing of a representative sample has been undertaken This is a typographic error. There are nineteen, 11x17 maps in Appendix F titled "Vegetation Cover Maps", that show the information					
Section 2.7 Terrestrial Habitat/Vegetation Given the amount of wetland (up to 153.8 ha) being affected by the construction of the proposed transmission line, more detail should be given in the description of these wetlands and their associated plant communities (re Table 6-5)	The wetlands present are largely open and treed bog habitat types as well as alder thickets and Black Spruce Swamps, all of which are common in northeastern Ontario. Figure App F-1 provides the location and spatial extent of each of these communities within the study area and the text describes the most frequently occurring species that make up the canopy, shrub and herb layers. Additional detail on species composition will not change the effects assessment or mitigation employed to minimize impacts to these wetlands.	Could not locate Figure App F-1. Could AMEC be referring to the maps in Appendix F? If so, Black Spruce Swamp types are not explicitly identified (there are numerous Black Spruce community types, but which ones are considered 'wetlands' (once it is deciphered) and that additional detail is not required	For clarity, the Black Spruce Swamp types are <table border="1"><tr><td>Black Spruce - Larch - Speckled Alder - Stair-step Moss</td></tr><tr><td>Black Spruce - Leatherleaf - Sphagnum</td></tr><tr><td>Black Spruce - Stair-step Moss</td></tr><tr><td>Black Spruce - Bog Rosemary - Pale Laurel - Sphagnum</td></tr><tr><td>Treed Wetland (Treed Bog)</td></tr></table>	Black Spruce - Larch - Speckled Alder - Stair-step Moss	Black Spruce - Leatherleaf - Sphagnum	Black Spruce - Stair-step Moss	Black Spruce - Bog Rosemary - Pale Laurel - Sphagnum	Treed Wetland (Treed Bog)
Black Spruce - Larch - Speckled Alder - Stair-step Moss								
Black Spruce - Leatherleaf - Sphagnum								
Black Spruce - Stair-step Moss								
Black Spruce - Bog Rosemary - Pale Laurel - Sphagnum								
Treed Wetland (Treed Bog)								
Section 2.7 Terrestrial Habitat/Vegetation Herbicides should not be used for ROW maintenance, therefore a 'no spray policy' should be adopted. Manual clearing methods should only be used, and this also has the advantage of providing employment opportunities	As indicated in Section 7.4.3, herbicide is the preferred method for periodic vegetation control. Detour Gold will ensure that all contractors meet regulatory requirements at the time of clearing, in regards to chemical, mechanical or manual tending as well as other commitments made within the DLPP EA. Chemical, mechanical and manual tending are currently approved approaches to vegetation management for transmission lines. Selective vegetation clearing is expected to be required in the order of every five to ten years, depending on the location and species present While Detour Gold recognizes that manual clearing would provide employment opportunities, the logistics of manual clearing of the entire line rather than focussing on sensitive area(s), including transport of personnel to/from camps, waste handling etc. over the extended period of time that would be required for manual clearing, make this approach undesirable, in addition to the efficiency / cost aspect	TTN has indicated that the use of herbicides is not to their preference, and that Detour Gold should reconsider their position. TTN concerns stem from the potential impacts on vegetation and aquatic ecosystems, and not the potential loss of employment opportunities as implied by Detour Gold	Noted					

Initial Comment	Proponent's Response	Follow-Up Comment	Proponent's Response(2)
Section 2.8 Wildlife and Birds Areas should be set aside for Woodland Caribou for life processes such as breeding and wintering	Calving, rutting and over-wintering areas for caribou have been identified. The ROW as defined in the approved ToR, passes through these identified areas. Despite efforts to maintain as compact a ROW as practical based on historic / existing ROWs, an estimated 218.7 ha of additional Black Spruce / Jack Pine forest / freed bog habitat is expected to be disturbed as a result of the DLPP. This is equivalent to 0.0005% of the home range of a single animal. Data in the literature suggest that linear features can adversely affect Caribou populations. Wolves in particular are known to utilize linear corridors to better access Caribou populations. As the DLPP proposes to utilize / expand on existing ROWs along almost the entire alignment, significantly increased predation due to improved Wolf access is not expected.	Calving, rutting and over-wintering areas have been identified and mapped in the report. However, a clear explanation of the potential impacts of the proposed ROW on those habitats and life functions is not provided. Although the removal of 218.7 ha of habitat outside of the existing ROW might be equivalent to 0.0005% of the home range of a single animal, the report does not explain how significant that 0.0005% of the home range might be to the population, i.e., does it represent any or all of the calving, rutting and over-wintering habitat? Furthermore, the report does not take into account the compounded effects of removing 218.7 ha of existing vegetation in addition to re-cleaning vegetation along the existing ROW. Please provide more discussion.	Home-ranges are compiled of calving, over-wintering and rutting areas. As such, the 0.0005% of expected disturbance should be considered as including all those areas. The mapped calving/rutting/over-wintering areas are known locations, and there are other Caribou in the area that have not been monitored to this extent by MNR that may be in the area (including the DLPP study area). As such, determining a relevant estimate of level of impact this additional 218.7 ha of vegetation removal will have on a population level is not feasible. The estimate of 0.0005% of a home-range of a single animal was calculated to give a coarse approximation of the proportion of disturbance to a given animal in the area. This proportion is very small because efforts were made in the planning stage of the DLPP to minimize additional vegetation removal to the extent possible by using a previous ROW to the extent practical, rather than the shorter cross-country route that would have opened up new areas. As discussed extensively in the text, the main impact to local Caribou is the linear corridor itself, not the additional vegetation removal. Caribou can adjust to some levels of disturbance within their range, however, features such as linear corridors impact their populations by facilitating improved hunting efficiency by Wolves. The linear corridor was created over 25 years ago. As such, the main impact of this corridor has already been experienced by local Caribou. We assumed that Wolves have been using this corridor since it was created and thus additional increases in Wolf use would be minimal.
Section 2.9 Rare and Endangered Species The ranking system for each of the species and the reasons behind the designation of low/moderate/high should be clearly quantified without subjective terms.	The rationale for assigning a probability of occurrence is stipulated within each section for a given species-at-risk (SAR). Recent breeding and/or presence/absence records within the region, presence/absence during the 2008 and 1983 baseline surveys, MNR NRVIS data, Natural Heritage Information data (which includes locations and dates of observations), availability of suitable habitat within the Project site, correspondence with MNR, correspondence with other SAR experts (i.e. in the case of Wolverine, the provincial expert, Dr. Justina Ray was contacted for comment on the potential for Wolverine occurrence within the region around the Detour site) and professional judgment were all taken into consideration when delineating probability of occurrence for a given SAR. Qualitatively assessing a probability of occurrence using the criteria listed above is considered reasonable, particularly given the dynamic nature of wildlife distribution and abundance from year to year. If a species has been observed in the region and if there is suitable habitat for this species within the Project area this species was given moderate to high probability of occurrence (or noted as a probable breeder). This approach likely over-estimated the probability of occurrence for several of these SAR, ensuring that each SAR is given consideration for the effects assessment and appropriate mitigation measures are taken into account.	Probability of occurrence should not be assigned to species that were actually recorded in the study area, as these represent definitive sightings and therefore the issue of "probability" is irrelevant. The text for each of the species included in Section 5.5 should clearly state whether the species has been recorded in the study area, and if so, its probability of occurrence noted as confirmed and the conditions under which it was recorded noted (e.g. within the breeding season for birds). If the species presence was not confirmed through field investigations, then assigning a probability of occurrence, as described by AMEC, is appropriate.	SAR within the DLPP study area include Caribou and several bird species. Surveys for wildlife within the DLPP study area included winter aerial surveys for Caribou, Moose, Wolves and other smaller mammals. As a result, the only "confirmed" SAR for DLPP is Caribou. Surveys for birds for the DLPP were not undertaken and as such direct confirmation for presence of an avian SAR cannot be made. However, surveys of the Detour Lake Project site recorded several of the avian SAR known to occur in region. As vegetation communities (and associated habitat attributes) within the Detour Lake Project study area are analogous to those within the DLPP study area, a probability of occurrence for each of the known Detour Lake Project SAR was assigned to the DLPP study area.

Initial Comment	Proponent's Response	Follow-Up Comment	Proponent's Response(2)
Section 2.9 Rare and Endangered Species The description of relevant legislation that protects some of these species, such as the Fish and Wildlife Conservation Act (FWCA) and Migratory Bird Convention Act (MBCA) is appropriate, though incomplete. This section makes no mention of the potential for application of Ontario's Provincial Policy Statement (PPS) (2005).	In Section 6.5, the PPA is mentioned as follows "Ontario has several other laws that help protect SAR and their habitats. A policy under the Planning Act called the Provincial Policy Statement (PPS, MMAH 2005) is used by land use planners and others to help make sure that SAR are not harmed by land development. For example, the PPS states that "development is not permitted in significant habitats of endangered and threatened species" MNR data on significant wildlife habitat and other natural features (i.e. Provincially significant wetlands (PSWs) or Areas of Natural and Scientific Interest (ANSIs)) was obtained from the MNR and included in the DLPP EA. There are no known ANSIs or PSWs within the DLPP study area. Mapped significant habitat features from MNR database within the study area include over-wintering habitat for caribou and moose, calving and rutting areas for caribou as well as raptor stick nests. As such, these features have been taken into consideration and have been mapped and incorporated into the text.	The PPS is referenced in several locations throughout the report. However, no analysis has been provided that clearly determines whether any of the habitat along the proposed right-of-way represents either significant habitat of endangered/threatened species and/or significant wildlife habitat of endangered/threatened species and/or significant wildlife. It must be demonstrated that there will be no negative impacts on the natural features or their ecological functions in order to comply with the PPS.	For clarity, the PPS is not referenced in several locations. The PPS is only referenced (and mentioned) in the EA document per the following quote: "Ontario has several other laws that help protect SAR and their habitats. A policy under the Planning Act called the Provincial Policy Statement (PPS, MMAH 2005) is used by land use planners and others to help make sure that SAR are not harmed by land development. For example, the PPS states that development is not permitted in significant habitats of endangered and threatened species." MNR data on significant wildlife habitat and other natural features (i.e. Provincially significant wetlands (PSWs) or Areas of Natural and Scientific Interest (ANSIs)) was obtained from the MNR and included in the DLPP EA. There are no known ANSIs or PSWs within the DLPP study area. Mapped significant habitat features from MNR database within the study area include over-wintering habitat for caribou and moose, calving and rutting areas for caribou as well as raptor stick nests. As such, these features have been taken into consideration and have been mapped and incorporated into the text.
Section 2.9 Rare and Endangered Species Generally, the responsibility for designating significant wildlife habitat falls upon the MNR and relevant municipalities. The exclusion of the PPS from the discussion of relevant legislation to wildlife casts doubt on the ability of further work to take into account potential occurrences of significant wildlife habitat within or adjacent to the study area.	In Section 6.5, the PPA is mentioned as follows "Ontario has several other laws that help protect SAR and their habitats. A policy under the Planning Act called the Provincial Policy Statement (PPS, MMAH 2005) is used by land use planners and others to help make sure that SAR are not harmed by land development. For example, the PPS states that development is not permitted in significant habitats of endangered and threatened species" MNR data on significant wildlife habitat and other natural features (i.e. Provincially significant wetlands (PSWs) or Areas of Natural and Scientific Interest (ANSIs)) was obtained from the MNR and included in the DLPP EA. There are no known ANSIs or PSWs within the DLPP study area. Mapped significant habitat features from MNR database within the study area include over-wintering habitat for caribou and moose, calving and rutting areas for caribou as well as raptor stick nests. As such, these features have been taken into consideration and have been mapped and incorporated into the text.	The report provides an incomplete review of the potential for significant wildlife habitats in the ROW. This could easily be resolved through the inclusion of a table that lists the categories of significant wildlife habitat, as defined in the Natural Heritage Manual (OMNR, 1999, revised 2010) with an indication as to whether the habitat type is present in (or adjacent to) the ROW, whether it would be impacted and, if so, whether the recommended mitigation would result in no negative impact on the feature or its function. Categories of significant wildlife habitat identified in the NHRM include: habitats of seasonal concentrations of animals, rare vegetation communities or specialized habitat for wildlife, habitats of species of conservation concern, and animal movement corridors. Each of these categories contains specific habitat types, which can be easily assessed according to the criteria provided in the Significant Wildlife Technical Guide (OMNR, 2000).	Please see above.
Section 2.10 Land Use More details on how Detour Gold will avoid creating new permanent access ways to the transmission corridor.	The exact means of access will be defined through the environmental approvals and construction tendering processes. TTN will be engaged in discussions on future environmental approvals and permits. Particular attention will be given to those that address access issues.	Based on AECOM's discussions with TTN members, it is TTN's position that no new access ways to the right-of-way should be created. Deferring the development of mitigation to future project phases is not acceptable. This defeats the purpose and intent of the EA. Without the identified mitigation, the significance of effects cannot be determined. The proponents should specify the mitigation to be used, or at a minimum the options that will be considered and the process by which decisions will be made and with whose involvement. Consultation with TTN is required in the event that a new access way is unavoidable in order to determine what further mitigation and/or accommodation is warranted. This needs to be acknowledged by Detour Gold.	The right-of-way route was selected to minimize the potential for new accessways is one of the core principles of the entire project. At this time no new accessways are proposed, but if required, consultation will occur.

Initial Comment	Proponent's Response	Follow-Up Comment	Proponent's Response(2)
Section 2.10 Land Use Assess impacts on traplines Mitigation/compensation measures should be identified	Any mitigation/compensation required for effects to traplines is being addressed as part of the Impact Benefit Agreement (IBA) between Detour Gold and TTN. This is a private and confidential process that to our knowledge, neither party wants made public.	Deferral of the assessment of effects to the IBA process is not acceptable. This defeats the purpose and intent of the EA. At a minimum, the EA should identify in general terms the types of effects (e.g. reduced harvest, loss of income etc.) that are anticipated on traplines and trapline holders, and the types of mitigation/compensation that is being considered by Detour Gold. The EA could present 'best practices' with respect to mitigation/compensation based on other projects in northern Ontario. Detour Gold should acknowledge TTN's position that the allocation and management of traplines by the Ontario Ministry of Natural Resources is undertaken with private individuals and not with the TTN community as a whole. The fact that a trapline is held by a TTN member does not diminish nor infringe on the rights of the TTN. As such, compensation afforded to trapline holders does not constitute accommodation for effects on TTN. To this end, it is TTN's position that Detour Gold should consult and negotiate appropriate mitigation and/or compensation measures with individual trapline holders independently of consultations and negotiations with the TTN regarding accommodation.	The type of potential effects to traditional land uses including trapping and other traditional uses of trapline areas, are documented in Section 8.0 (p.142) of the Individual EA and are based in part on discussions held with the TTN TEK Steering Committee. Mitigation of these potential effects to traditional uses are also provided in this section the Individual EA and reflect best practices and are being considered by Detour Gold. Best practices for mitigation/compensation on trapping based on other projects in northern Ontario were sourced from various people involved in mining EAs conducted in northern Ontario and through discussion with MNR, and include: • Goldcorp Muskegwhite Mine – There is reference in the Individual EA only to the "Muskegwhite Agreement" signed in 1995 between the area First Nations and Placer Dome (the previous owner) which was subsequently adopted by Goldcorp. No indication is given about compensation to individual trappers in the environmental assessment document. • De Beers, Victor Diamond Mine – There was no practice of directly compensating trappers because IBAs covered all impacts to members of the FN's including environmental and traditional practices (including trapping). Trappers were paid out of the IBA payment package through the First Nation leadership as determined by the leadership. • According to the MNR, forestry companies mitigate potential effects by avoiding harvesting near cabins or trails, but no compensation is paid directly to the trapline permit holder.
Section 2.12 Socio-Economics Provide an analysis of the specific employment and business opportunities available to the TTN and the ability of TTN to take advantage of these opportunities	Detour Gold will optimize Aboriginal employment, training and procurement opportunities as / if stated in the terms negotiated in the IBA. This is a private and confidential process that to our knowledge, neither party wants made public.	Deferral of the assessment of effects to the IBA process is not acceptable. This defeats the purpose and intent of the EA. At a minimum, the EA should identify in general terms the types of employment and business opportunities that are likely to be available to the TTN. The information presented (below) is considered adequate for EA purposes. No information is presented in the EA on the ability of TTN to take advantage of these opportunities. This is an indication of a poor socio-economic baseline and/or consultation with the TTN.	Noted. An assessment of employment, training and business opportunities is provided in the Individual EA. Noted. The draft and proposed terms of reference for the DLPP EA were submitted for review and comment, and identified the approach to baseline information that would be used in the EA.

Initial Comment	Proponent's Response	Follow-Up Comment	Proponent's Response(2)
Section 2.12 Socio-Economics Provide more information regarding the specific employment and business commitments	Information on Detour Gold's employment and business opportunities was made available at community meetings (March, April and May, 2010) and via the website (www.detourgold.com) through the Employment & Business Opportunities Fact Sheet March 2010 (available on the project website and at community information sessions). In general, typical employment and business opportunities for the project include: - Catering and accommodation goods and services (i.e., catering equipment, food supply and preparation, accommodation materials, supplies and related housekeeping services, and waste management); - Communication Infrastructure and support services (i.e., Internet, telephone/radio, cellular phones, television service); - Construction (i.e., building supplies and materials, Plumbing, electrical, carpentry, and heating, ventilation, and air conditioning services, other construction supplies and services as required); - Equipment (lease, purchase, maintenance) (i.e., heavy equipment and machinery, Vehicles and smaller equipment, equipment maintenance/repair); - Fuel (i.e., Bulk supply of diesel and other fuels as required); - Logistics (i.e., Expediting, coordinating transfer of materials to and from the site, Transportation of workers to and from the site, Delivery and courier services); - Medical Services (i.e., medical supplies, paramedic services).	The information presented in this response is considered adequate for EA purposes and should have been presented in the main text of the EA, as part of the socio-economic assessment. In a subsequent response (see Overall Comments, line 8) AMEC has indicated that there are no plans for work camps. Please clarify the nature of the following business opportunity as it implies a work camp: "...catering and accommodation goods and services (i.e., catering equipment, food supply and preparation, accommodation materials, supplies and related housekeeping services, and waste management)".	Noted Detour Gold will have construction and operations work camps to accommodate the work force related to the Detour Lake Project (including the DLPP). Therefore the business opportunity for catering and accommodation goods and services is applicable, although not just to the DLPP.
Section 2.14 Traditional Land Uses The effects of the project on the 14 traplines identified in the existing conditions section require further assessment. Appropriate mitigation/compensation measures should be identified. Detour Gold should outline the types of effects for which compensation would be offered and the manner in which it proposes to establish an equitable level of compensation for all trapline holders.	Specific effects of the project on traplines held by TTN members are expected to be documented in the TEK Study currently being prepared by Muskegowuk Environment Research Council for TTN. Any mitigation/compensation required for effects to traplines held by members of TTN is being addressed as part of the IBA between Detour Gold and TTN. All trapline permit holders have been provided with notices regarding the DLPP through the MNR (rather than directly by Detour Gold due to potential privacy issues). Detour Gold will follow up with any requests for discussion about potential effects to traplines if contacted directly by the trapline permit holder. Given that trapline permit holder contact information is confidentially held by the MNR, Detour Gold is not in the position to directly contact trapline permit holders. At this time, Detour Gold is only able to provide mitigation/compensation for effects to traplines held by members of TTN as part of the IBA.	AECOM has not reviewed the MNR notice procedure or the contents of the notice. Therefore there remains as to whether the notice was administered to all TTN trapline holders and whether the notice provided clear instructions as to how and who to contact at Detour Gold to negotiate compensation for effects. Detour Gold needs to be proactive and ensure that all trapline holders are aware of the project, aware of its likely effects and Detour Gold's intention to mitigate/compensate for these effects. Detour Gold need to ensure that instructions to trapline holders are clear and unambiguous. Detour Gold should keep TTN Chief and Council apprised of its progress in this regard and the response from trapline holders. Detour Gold should seek TTN assistance if individual trapline holders do not contact Detour Gold. For clarity, it is TTN's position that Detour Gold's mitigation/compensation included in the IBA does not replace mitigation/compensation to individual trapline holders.	Due to the confidentiality of personal information of the land use / trapline permit holders, Detour / AMEC relied on the MNR to distribute notices (as we understand is standard practise) about the DLPP EA to the permit holders registered to use lands within a 5 km boundary from the centre line of the proposed transmission line corridor. Therefore, all trapline permit holders within this boundary were provided notice directly from the MNR. The notices sent by MNR to landowners / permit holders were the same as those issued to the newspapers and provide contact information for Detour Gold to discuss the project. If TTN is aware of the members who hold traplines overlapping the mine site or the transmission line and have gained approval to share their personal contact information directly with AMEC/Detour, we add them to our project mailing list. This would ensure that they receive project notices and information directly from Detour / AMEC as well as from MNR in the future. Noted
Section 2.15 Heritage and Cultural Resources A licensed archaeologist on-site during construction would ensure that any cultural heritage or archaeological resources are quickly identified and that the necessary steps taken to protect, document and preserve such resources.	Detour Gold has committed to having a licensed archaeologist available during construction during work in areas of designated high potential from archaeological investigations to date by Woodland Heritage Surveys and White Spruce Archaeology.	It is not clear what is meant by "having a licensed archaeologist available". Having an archaeologist on retainer may not be sufficient if the archaeologist is not on-site. Please clarify if AECOM considers it appropriate that this be limited to areas of designated high potential and any areas not studied to date.	Detour has committed that a licensed archaeologist will be available. While the final archaeological reports have been issued as yet, very limited areas have been designated as high potential to date. An archaeologist will be available for consult for the entire transmission line construction phase but may not be present at the construction site(s) if appropriate and in discussion with the archaeologist, an archaeologist will be available at the construction site during construction at the high potential areas if ground disturbance is required in the area. If the high potential area(s) will only be passed over rather than sub-surface disturbance, it is unlikely that archaeological support will be needed.

Initial Comment	Proponent's Response	Follow-Up Comment	Proponent's Response(2)
Section 2.15 Heritage and Cultural Resources Areas should be surveyed and monitored by the archaeologist whenever topsoil is removed	No significant removal of topsoil is proposed Detour Gold has committed to having a licensed archaeologist available during construction during work in areas of designated high potential from archaeological investigations to date by Woodland Heritage Surveys and White Spruce Archaeology	It is not clear what is meant by "having a licensed archaeologist available". Having an archaeologist on retainer may not be sufficient if the archaeologist is not on-site. Please clarify.	See above.
Section 2.17 Assessment of Effects The net effects analysis should be revised to acknowledge that the DLPP will result in some net effects and that their significance is assessed using the methodology described in Section 8.19	The net effects analysis follows the methodology provided in Section 8.19.1 and proposed in the approved ToR. As indicated in Section 8.19.1, the net effects assessment takes into account proposed mitigation measures captured by the DLPP EA, and that more specifically "This assessment is contingent on the application of the mitigation measures proposed and commitments made throughout the EA."	AECOM disagrees with the net effects conclusions as stated in the draft EA. It is our opinion that the net effects analysis is misleading.	There was no draft EA issued for the transmission line (Detour Lake Power Project).
Section 2.18 Potential Effects of Malfunctions and Accidents Acknowledge disturbance caused to bird species that nest earlier than June 1, and an explanation of measures taken to mitigate those disturbances while nesting	All clearing and other activities will be completed in accordance with the <i>Migratory Bird Convention Act</i> and other applicable legislation / regulatory instruments. The majority of tree clearing activities will be undertaken in the winter, thus migratory bird species will not be disturbed. Nest surveys will be undertaken by a qualified biologist, if vegetation must be cleared during the breeding bird season. It is recognized that raptors start nesting as early as the beginning of February. There are no known raptor nests located within the proposed ROW. Should any stick nests be identified during construction, the area will be avoided until a qualified avian biologist can be contacted for direction. Mitigation will include buffers around nests as per provincial guidelines.	As per previous responses and comments, please ensure that the appropriate regulatory authorities (particularly MNR) are contacted for direction should any stick nests be identified during construction or if vegetation is to be cleared during breeding bird season.	This is standard procedure and agreed. As noted, all clearing and other activities will be completed in accordance with the <i>Migratory Bird Convention Act</i> and other applicable legislation / regulatory instruments.
Section 2.20 Consultation Plan The proponent should ensure that the Record of Consultation reflects the range of comments received from TTN from the early engagement phase to present, and how these comments are dispositioned, both for the provincial environmental assessment but also as part of the record preceding the CEAA Comprehensive EA for the Detour Lake Project.	Agreed. A full and detailed list of the contacts to date with TTN has been prepared and forwarded to TTN separate from this response. This includes meeting minutes, and a description of concerns along with where these concerns were addressed in the EA document. If concerns were not addressed, a rationale will be provided. For the CEAA Comprehensive Study Report (environmental assessment), comments and interests will be attributed to each Aboriginal group or stakeholder and will show where these comments and interests have been addressed in the EA. If comments and interests are not addressed in the EA (for example, because they were not part of the EA scope), we will provide a rationale.	We suggest TTN consider requesting that the Crown and Detour Gold include the document discussed by Detour Gold in their response, minus any information TTN considers confidential or sensitive, as part of the public consultation record of the EA.	Noted and agreed should TTN wish the contents (or selected contents) made public.
Overall Comments The DLPP EA should also outline how the transmission line will be strung	This will be defined by the contractor, but will be required to follow standard industry practices. This typically includes helicopter use, but may be modified.	A more fulsome response to this comment is required. AMEC is requested to describe standard industry practice, particularly with response to helicopter use. TTN members have been asking questions in this regard that should be answered by Detour Gold in more detail.	For clarity, the first (and only) request Detour Gold has received regarding the stringing of the line was from AECOM. There have been no requests from TTN members to our knowledge for this information. Standard industry practice is use of either on-land cranes or helicopters as well as specialized equipment to tension the conductor once in place. Helicopters may be used to avoid requirement for development of high quality roads to support heavy equipment, as well as for permanent roads for periodic inspections.

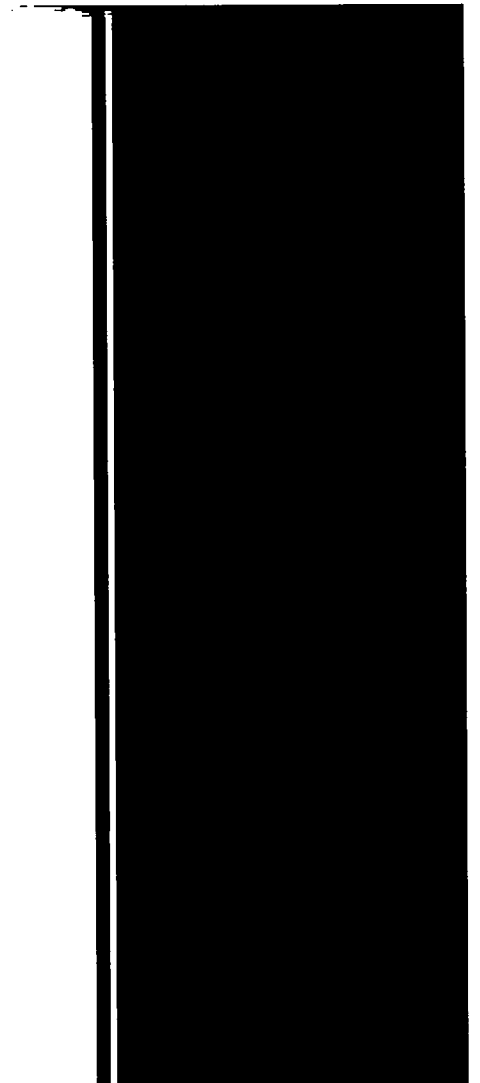
Initial Comment	Proponent's Response	Follow-Up Comment	Proponent's Response(2)
Overall Comments No mention of how the winter road on the ROW will be prepared to ensure a solid base of frost. This should be explained.	See Section 5.4.2. Winter roads have been used effectively in the region to construct other transmission lines, including the original transmission line from Island Falls to the Detour Lake site. While distance from permanent access points complicates the logistics of travel, the winter road can be designed and maintained to accommodate the traffic flow.	A more fulsome response to this comment is required. AMEC is requested to describe standard industry practice, particularly with response to winter road design and maintenance procedure. TTN members have been asking questions in this regard that should be answered by Detour Gold in more detail.	For clarity, there have been no requests from TTN members to our knowledge for this information. The following approach is proposed, the details of which may be modified during the environmental permitting process. The alignment will be surveyed and trees along the route that require removal will be cut either with chainsaws (if applicable) or they will be "bladed" (snapped off at near ground level), while in a frozen state, using a low weight tracked vehicle. Ground cover will be left intact. Construction will start with compaction of the snow using a Bombardier Snow Cat (or equivalent light bearing vehicle). Rollers and timber drags will be used to help to compact the snow. Once initial preparations have been made using the Snow Cat (or equivalent), and rollers and timber drags, heavier equipment (dozers and graders) will be brought into service to complete the road construction. Clean snow may be used to build up a surface and protect the underlying ground surface, particularly on slopes. An ice cap will be prepared by using "hot box" water trucks to spray water onto the road surface to form an ice cap.

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**Technical Review of the Detour Lake Power
Project Individual Environmental
Assessment 230 kV Transmission Line
Power Supply**



**Technical Review of the Detour Lake Power
Project Individual Environmental
Assessment 230 kV Transmission Line
Power Supply**

Prepared by:

-

Project Number:

Date:

Statement of Qualifications and Limitations

The attached Report (the "Report") has been prepared by AECOM Canada Ltd. ("Consultant") for the benefit of the client ("Client") in accordance with the agreement between Consultant and Client, including the scope of work detailed therein (the "Agreement").

ined in the Report (collectively, the "Information"):

-
- qualifications contained in the Report (the "Limitations")
- Consultant's professional judgment
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their use of, reliance upon, or decisions or actions based on the Report or any of the Information ("improper use of the Report"), except to the extent those parties have obtained the prior written consent of Consultant to use and rely

AECOM

Project No: 60149315

Regarding:

Please find enclosed a report on AECOM's technical review of Detour Gold's

AECOM Canada Ltd.

A handwritten signature in black ink, appearing to read "Vin Devel", followed by a horizontal line.

Distribution List

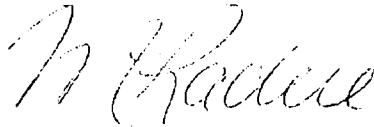
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Association / Company Name

AECOM Signatures

Report Prepared By:



Report Reviewed By:



Executive Summary

*Detour Gold – Detour Lake Power Project Individual
Environmental Assessment 230kV Transmission Line Power Supply*

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The review identified a variety of concerns, and a summary of AECOM's comments and

completed in accordance with Ontario's *Environmental Assessment Act*

Environmental Assessment Act

Canadian

AECOM's review

It is AECOM's opinion tha

Table of Contents

Statement of Qualifications and Limitations
Letter of Transmittal
Distribution List
Executive Summary

page

1. Introduction 1

2. Technical Review 3

3.	Environmental Management and Monitoring	36

4.	Conclusions	39

5.	References	46

List of Figures

List of Tables

Appendices

1. Introduction

*Detour Gold – Detour Lake Power Project Individual
Environmental Assessment 230kV Transmission Line Power Supply*

1.1 Scope of Work

could have on the environment. The results of AECOM's technical review

*Detour Lake Draft Environmental Study Report,
Ministry of Natural Resources Class Environmental Assessment,*

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1.2 The Project

completed in accordance with Ontario's *Environmental Assessment Act*

to Crown resources. Therefore, MNR's requirements for the DLPP

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AECOM's

Canadian Environmental Assessment Act

2. Technical Review

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2.1 Air Quality

Climate and Air Quality Baseline Study

of the Environment Canada Atmospheric Environment Service's Canadian Air and Precipitation Mo

Climate and Air Quality Baseline Study

2.2 Noise

AECOM's review of
Sound Level Limits for Stationary Sources in Class 3 Areas

and the MOE's

The use of MOE's guidelines to identify the site as a Class 3 Area

Booms, and Fletcher and Bushnell's (1978) *Effects of Noise on Wildlife*

Animal Response to Sonic

2.3 Climate

Climate and Air Quality Baseline Study

2.4 Hydrology

AECOM's

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pecifically, mitigation of "high ground" on islands of the Abitibi River crossing.

MNR's *Environmental Guidelines for Access Roads and Water Crossings*

2.5 Water Quality

Ontario In-Water Construction Timing Windows

2.6 Fisheries and Aquatic Habitat

Species at Risk Act

Species at Risk in Ontario

2.7 Terrestrial Habitat/Vegetation

			<i>Picea mariana</i>
			<i>Pinus</i>
<i>banksiana</i>		<i>Populus tremuloides</i>	<i>Betula</i>
<i>papyrifera</i>	<i>Picea glauca</i>	<i>Abies balsamifera</i>	

		<i>Chamaedaphne calyculata</i>	<i>Ledum</i>
<i>groenlandicum</i>	<i>Kalmia polifolia</i>	<i>Vaccinium</i> sp	
	<i>Sphagnum nemoreum</i> , <i>S. balticum</i> , and <i>S. angustifolium</i>		
	<i>Eriophorum vaginatum</i>	<i>Eriophorum viridicarinatum</i>	<i>Carex magellanica</i>
<i>Carex rostrata</i>	<i>Menyanthes trifoliata</i>	<i>Vaccinium oxycoccos</i>	
<i>Rubus chamaemorus</i>			

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¹ Consisting of Black Spruce-Leatherleaf-Sphagnum (120.4 ha), Black Spruce-Speckled Alder-Labrador Tea-Sphagnum (0.1 ha), Black Spruce-Bog Rosemary-Pale Laurel-Sphagnum, Treed Wetland (24.9 ha), Open Wetland (1.4 ha) and Cotton-grass Open Bog Type (0.2 ha), as described in Table 6-9.

"no spray policy" should be adopted. M
meant by "Industry standard techniques" that will be used for clearing and

2.8 Wildlife and Birds

species were identified as being "potentially" in the area)

2.9 Rare and Endangered Species

'limited', or if there are 'several' or 'some' breeding records within the study area

Conservation Act

Migratory Bird Convention Act

Fish and Wildlife

application of Ontario's *Provincial Policy Statement*

2.1.4 Development and site alteration

significant wetlands

significant woodlands

significant valleylands

significant wildlife habitat

significant areas of natural and scientific interest

2.1.5	Development	site alteration	fish habitat
	provincial	federal requirements	
2.1.6	Development	site alteration	adjacent lands
	features and areas		natural heritage
	adjacent lands		ecological function
	impacts	ecological functions	negative

Concern as well as for species not listed as 'at risk' can fall under the designation of significant wildlife habitat.

EA states "
ation during project planning", the

Endangered Species Act

Endangered Species Act

n the absence of habitat regulations, the 'general habitat'

(see Section 6.5), especially arbitrarily as 'low', 'moderate', and 'high', is

area and the determination of the 'suitability' of habitat.
'at r '

recognizes that "finer scale adjustments" or "minor variants" to the routing

legislation, and in order to remain consistent with the proponent's desire to minimize

2.10 Land Use

Land Use Policy Atlas

is of Ontario's *Crown*

Based on AECOM's discussions with TTN members, it is TTN's position that no new access ways to the

2.11 Traffic and Transportation

AECOM's review of the air quality components consisted
and MTO's *Building and Land Use Policy*

2.12 Socio-Economics

TTN's desire that Detour Gold identify any opportunities for equi

offered by the DLPP. Finally, the attribution of a positive effect of "potentially slowing population declines" to the

2.13 Other Power Users

2.14 Traditional Land Uses

members. However, based on discussions with TTN, it is TTN's position that the allocation and management of

TTN's position that Detour Gold

2.15 Archaeology and Cultural Heritage

carried out on "any sites of Aboriginal value identified as a result of the traditional land use studies during the 2010 field season". However, this

2.16 Visual Environment

2.17 Assessment of Effects

ction 8.19 and "net effects" are summarized in Table

rather than determining the 'net effect'.

Guide to Environmental Assessment Requirements for Electricity Projects
described in the Guide, they are 'significance criteria'.

"no net effect" of the DLPP on the environment. These conclusions of "no net effect" are not credible as the DLPP

conclude that there will be "no net effect".

To claim "no net effect" more information would be required regarding the effectiveness of

2.18 Potential Effects of Malfunctions and Accidents

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2.18.2.1 *Fuel Release during Truck Transport or Dispensing Operations*

2.18.2.2 *Transportation Accident (non-fuel shipment)*

2.18.2.3 *Project Related Fires*

2.18.2.4 *Excessive Disturbance to Wildlife*

8.20.4 states "With regard to clearing of vegetation, all tree clearing would occur adverse effects to migratory birds." This statement disre

The section also states that "The only firearms allowed on site according to a wildlife management plan"

2.18.3.1 *Fuel Release during Truck Transport or Dispensing Operations*

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-

2.18.3.2 *Transportation Accident (non-fuel shipment)*

2.18.3.3 *Project Related Fires*

2.18.3.4 *Excessive Disturbance to Wildlife*

e site at each day's end.

"Transporting people by bussing or other grouped means to the ROW on a daily basis" is desirable and appropriate

2.19 Cumulative Effects

Section 8.21.2 indicates that future projects and activities are defined in CEAA as projects and activities that "will be carried out" and a "imminent projects and activities". Only one "imminent future project/activity was identified, that being the Detour

ction on "Disturbance to Wildlife'.

pated and how they will be mitigated. It is mentioned "at closure, all disturbed areas will be eventually become productive forest habitat"

The timeline/scale of the document's definition/interpretation and use of the word 'cumulative' is not clear.

'expect' what is 'likely' to occur, however

"It is not believed that this would appreciably stress the wildlife or cause increased wildlife disease."

"The fragmenting of habitat (and particularly forest habitat), is not expected to be of concern to individual species or even individual animals."

It is not rational to assume that habitat fragmentation will not be 'of concern' to wildlife at any scale, from a

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Animals do not necessarily live by 'averages' as m

The statement "At closure, all disturbed areas will be eventually become productive forest habitat" implies that areas

The statement "At closure, all disturbed area *sic* habitat" is not

"Such displacement associated with the Detour Lake Project will occ

adjust...Therefore, as per discussions involving effects to vegetation communities, cumulative effects to

ow much time does it take for a wildlife population to 'adjust'? Which

The species listed as being of 'potential concern' are discussed here, though this section only lists those species

This section also states that "anticipated...cumulative adverse effects to Caribou
d not significant."

The statement "habitats would be rehabilitated at closure" should be expanded to desc

iso, the term 'rehabilitated' should be

– for example, is ' ' being used to mean ensuring the area's terrestrial and aquatic habitat is
is the word ' ' being used to imply the area will be

In Section 6.5.2, the statement "

" is not further referred to in the context of the importance of these lichen mats and

should be included in the discussion of potential effects and mitigation in 'Disturbance
'.

The statement "This section also states that "anticipated...cumulative adverse effects to Caribou related to habitat
"

The cumulative effects assessment of traditional land uses and pursuits states that "it is anticipated that there will be effects involving traditional land uses and pursuits...and that verification relating to Aboriginal groups themselves"

2.20 Consultation Plan and Consultation to Date

The Category "C"
Environmental Assessment Act

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2.20.1.1 Public Consultation Requirements for Individual EAs

Code of Practice for Consultation in Ontario's Environmental Assessment Process (June, 2007)

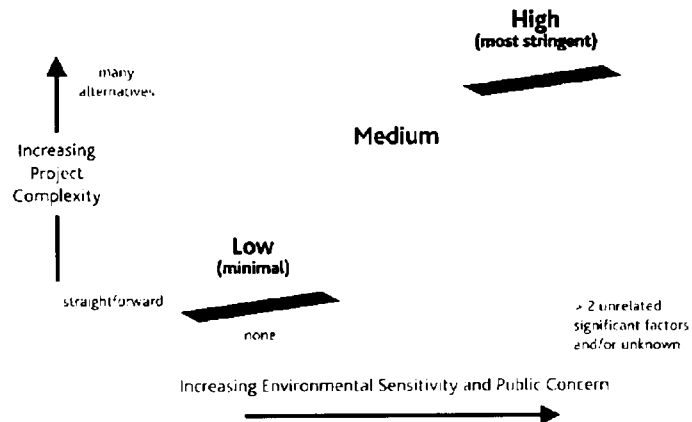


Figure 1: The Range of Public Consultation Requirements in the Ontario IEA Process.

While rating projects on this scale is somewhat subjective, it is AECOM's opinion that the DLPP falls within the

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- Will the proponent's consultation plan for the

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Code of Practice

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Code of Practice for Preparing, Reviewing and Using Class

Environmental Assessments in Ontario (2008)

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and public comments received. According to the Province's *Code of Practice for Preparing and Reviewing Environmental Assessments in Ontario* (October, 2009)

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- Describe the proponent's response to comments and how concerns were considered in the preparation

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2.20.1.2 Best Practice in Aboriginal Consultation and Accommodation

Current "best practice" is perhaps best summarized by Stevenson (1996):

“

”

et al.
Engagement

Guidebook on Mineral Exploration, Mining and Aboriginal Community

2.20.2.1 *An Overview of Consultation with TTN to Date*

H, section H(5) of the IEA report). MOE's public comment period for this

2.20.2.2 Evaluation of Consultation

The Consultation Plan

Code of Practice for

Consultation in Ontario's Environmental Assessment Process

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Consultation to Date

to have made efforts to address some of TTN's needs to participate in the

Use indicates the following, in regard to Detour Gold's justificatio

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"

Detour Gold's efforts to disconnect the EA process from the Aboriginal consultation and accommodation process

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Code of Practice for Consultation in Ontario's EA

Process

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TTN's (as represented by AECOM) review of the

shortcomings in the DLPP EA, it is AECOM's opinion that consultation efforts to date have not met
Code of Practice

engagement phase to present, and how these comments are dispositioned, both for the Province's assessment of

- of TTN's rights and interests, which
-
-
- *Code of Practice*

for the Province's assessment of the adequacy of consultation,

2.21 General Comments

treated poles to surface and groundwater. It is AECOM's understanding that this

4. Conclusions

AECOM review team's

Table 1: Summary of Concerns/Issues and Recommendations from the DLPP EA Technical Review

Discipline	Concerns/Issues	Recommendation	Climate and Air Quality Baseline
	•	• Study	
	•	•	
	•	•	
	•	•	
	•	•	
	•	•	
	•	•	
	•	• • •	
	•	•	
	•	•	
	•	•	-
	•	•	-
	•	•	

Table 1: Summary of Concerns/Issues and Recommendations from the DLPP EA Technical Review

Discipline	Concerns/Issues	Recommendation
	•	•
	•	• There should be clarification on what is meant by "industry standard techniques" that will be used for
	•	•
	•	•
	•	• proponent's desire to minimize unnecessary disruption to the natural
	•	•
	•	• e use of other 'previously disturbed areas' such as the Regional and/or
	•	•
	•	•
	•	•

Table 1: Summary of Concerns/Issues and Recommendations from the DLPP EA Technical Review

Discipline	Concerns/Issues	Recommendation
	•	•
	•	• •
	•	•
	•	•
	•	• • •
	•	•

Table 1: Summary of Concerns/Issues and Recommendations from the DLPP EA Technical Review		
Discipline	Concerns/Issues	Recommendation
	•	•
	•	• • •
	•	•
	•	•
	•	• • •
	•	•
	• and activities that "will be carried out" and as a considered the effects of future "imminent ivities". Only one "imminent	•
	•	•
	•	•

Table 1: Summary of Concerns/Issues and Recommendations from the DLPP EA Technical Review		
Discipline	Concerns/Issues	Recommendation
		•
	•	•
	•	•
	Code of Practice for Consultation in Ontario's EA Process	•
	•	•
	•	•
	•	•

5. References

Animal Respond to Sonic Booms.

Effects of Noise on Wildlife

Guidebook: Mineral Exploration, Mining and

Aboriginal Community Engagement

Sound Level Limits for Stationary Sources in Class 3 Areas (Rural). Queen's

Building and Land Use Policy.

Indigenous Knowledge in Environmental Assessment.

Appendix A



APPENDIX A

Detour Gold-CRP-AECOM Meeting- April 29, 2010

1. Record of CRP and AECOM Questions and Comments at April 29 Meeting with Detour Gold

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Questions/Comments on the MNR Class EA for Crown Land Disposition (Class C)

Q1- A1-
Q2- A2-

Q3-	
	and other land users' interests are tied to their activities, but First Nations interests
A3-	
Q4-	
A4	
Q5-	
A5-	
Q6-	
A6-	
Q7-	
A7-	
Q8-	
A8-	
Q9-	
A9-	
Q10-	
A10-	
Q11-	
A11-	
Q12-	
A12-	
Q13-	
A13-	We're not relying on freshwater to a large extent, so it shouldn't be a big issue.
Q14-	
A14-	We'll easily make effluent quality values, but will struggle to meet receiving water quality values
Q15-	
A15-	
Q16-	
A16-	
Q17-	
A17	

Q18- A18-
Q19- A19-
Q20- A20-
Q21- A21- TTN response- Detour Gold Response- Additional comments from TTN-
Q22- A22-
Q23 A23 We're not a member yet, but are following the P3 process. Eventually we will sign on to TSM.
Q24- A24-
Q25- You'll be taking your water out of Hopper Lake? A25-
Q26- A26- Dredging the sediments is not a requirement, it's an option. There a O at a later date if it's decided that dredging the lake is a preferred option.

Q27-**A27-***Questions/Comments on the Individual EA for the Transmission Line***Q1-****A1-****TTN Comment-****Q2-****A2-****TTN Comment-****Q3-****A3-****Q4****A4-***Questions/Comments on the Closure Plan*

We won't be financed by Canadian banks, but rather a consortium of international banks. They will look at

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Modified: Tuesday, Oct 05, 2010 12:30:03 PM

DOCUMENT INFO

August 30, 2010

Mr. Derek Teevan
Vice President Aboriginal and Government Affairs
Detour Gold Corporation
Royal Bank Plaza, South Tower
200 Bay St., Suite 2200, Box 23
Toronto, ON M5J 2J1

Dear Mr. Teevan:

Project No: 60149315

Regarding: Technical Review of the Detour Lake Power Project Individual Environmental Assessment – 230 kV transmission Line Power Supply

Thank you very much for the responses you provided on June 29, 2010 to our initial comments on the DLPP Individual Environmental Assessment. Our technical review team has reviewed your responses and have updated *Table 1: Summary of Concerns/Issues and Recommendations from the DLPP EA Technical Review* (attached) to reflect our assessment of the responses. As you will see from the table, most of our comments have been satisfactorily addressed. There are, however, several comments for which we require further clarification and/or discussion.

In general we are quite pleased with the progress that is being made, and we look forward to working with you to resolve the outstanding concerns.

Sincerely,
AECOM Canada Ltd.



Vince Deschamps, M.Sc, MCIP, RPP
Senior Environmental Planner
vince.deschamps@aecom.com
VJD:vjd

Encl. Table 1: Summary of Concerns/Issues and Recommendations from the DLPP EA Technical Review

cc: Chief Linda Job, Peter Archibald, Tina Gagnon, Wayne Ross, Taykwa Tagamou Nation
Sue Hartwig, Coral Rapids Power Limited Partnership
Sheila Daniel, AMEC Earth & Environmental
Alex Blasko, Ontario Ministry of Environment

TTN - Detour Lake Power Project Technical Review

Table 1. Summary of Concerns/Issues and Recommendations from the DLPP EA Technical Review

Section	AECOM Comment	AMEC Response	AECOM Action/Response
Section 2.1 Air Quality	It would be beneficial to include the <i>Climate and Air Quality Baseline Study</i> in the appendices of the report. ... the information provided in the report is adequate.	Noted. A summary is presented in the Environmental Assessment (EA) Document. In the interest of document length, the baseline documents were not provide in their entirety as they were not necessary to assess environmental impacts, but they are available. A copy of the <i>Climate and Air Quality Baseline Study</i> is available on request.	Response satisfies our comment. No further action is required.
Section 2.2 Noise	Expand discussion on the types of impacts to wildlife and bird species as a result of construction noise (e.g., Woodland Caribou). ... there have been Woodland Caribou studies carried out... they should be included in the DLPP EA.	As is discussed in Section 8.10, construction activities may cause local displacement of wildlife and migratory birds that are likely to return after construction activities cease. It is not believed that this would appreciably stress the wildlife or cause increased wildlife disease. Vegetation clearing will largely be undertaken in the winter which reduces impacts to migratory bird species. Woodland Caribou occur within the DLPP ROW during the winter and may be affected by the noise. The noise will be restricted to the construction period of the transmission line and thus is considered a short-term effect. The Ontario Ministry of Natural Resources (MNR) was very helpful in providing open access to their information regarding Woodland Caribou studies. This information along with field studies completed by AMEC, was the primary basis for the Woodland Caribou discussion with the DLPP EA.	Response satisfies our comment. No further action is required.
Section 2.3 Climate	Include in the existing climate conditions section total annual snowfall, average length of the frost free period and when frozen ground conditions occur. There should be more historical data presented for the study area.	Detour Gold recognizes that an atypical winter may pose construction constraints and scheduling difficulties for the DLPP. Other transmission lines have been constructed in the region using only winter road access. Nonetheless, this information is included below and in Table 1 and Figure 1 attached. Mean annual snowfall information was obtained from the weather stations located in Kapuskasing, Ontario and Matagami, Quebec. Using Environment Canada data compiled from 1971 to 2000 the mean annual snowfall was calculated to be 313 cm and 313.8 cm for Kapuskasing, Ontario and Matagami, Quebec respectively. The mean annual snowfall for the Detour Lake Project is estimated at 313.4 cm, as presented in Table 1. The frost free period for the Detour Lake Project was selected based on the map provided in the attached Figure 1 from the National Atlas of Canada (Natural Resources Canada 2010). Figure 1 illustrates that the approximate frost free period for the Detour Lake Project ranges from 80 to 100 days. The remoteness of the site dictates the availability of historical data.	Response satisfies our comment. No further action is required.
Section 2.4 Hydrology	A lengthy description was provided regarding suggested best management practices regarding ice bridges. • Indicate that the water used will be clean (e.g., free of sediments, vegetative materials, gravel). • Water taken from a creek should not exceed 10% of instantaneous flow (as per the Department of Fisheries and Oceans). • A water monitor should be at the crossings where a PTTW is required. • Describe type of machinery that would be used to pump water and how steps would be taken to prevent fish mortality. • State the operational guidelines concerning the development of the approach (to the ice bridge construction). • Clarify the width of the bridge, single span is preferred. • Identify the operation guidelines concerning ice thickness for safe passage of vehicles. • Provide information about erosion prevention guidelines that will be followed. Detail how the crossings will be built for the largest watercourses (5.0 – 14.5 m and 15 – 49.5 m in width). • Construction of ice bridges should be considered in-water work and addressed. More detail should be provided concerning Best Management Practices for temporary crossings and fording. (Section 2.5 Water Quality). • Provide details of other types of temporary crossings that may be used.	Ice bridges will be developed following standard industry practices and in keeping with all regulatory requirements. Construction of ice bridges will follow the Fisheries and Oceans Canada Ontario Operations Statement "Ice Bridges and Snow Fills" (Version 3 or later) and other applicable regulatory instruments. Construction details will be provided and reviewed through the environmental approvals process. In addition for clarity, per standard operating practices, any water used will be in a natural condition (free of sediments, vegetative materials, gravel etc.). • water takings will not exceed 10% of instantaneous flow or as otherwise defined through the environmental approvals process for taking water. • water takings(s) will be monitored per environmental approvals and standard operating practices (see Section 5.4.2). • water taking methodologies will follow standard industry practices and will be detailed through the environmental approvals process. Including types of machinery (typically portable pumps) and means to prevent fish mortality (typically screens on intakes). • narrow (single lane) bridges are not generally preferred, as they are more susceptible to rutting / damage. As indicated in the DLPP EA, there will be no disturbance to stream bed or banks (or re-shaping of the stream morphology etc.). No other types of crossings (including fording), are proposed at this time, however, if they are necessary, construction details will be provided and reviewed through the environmental approvals process.	Response satisfies our comment. No further action is required.
	The poles should be sited to avoid problems with erosion and the collapse of lines, and the subsequent operations to identify any problems.	It is in Detour Gold's interest to ensure that all poles are sited to avoid problems with erosion and collapse of the lines as without power the Detour Lake Project will not be able to operate and will be shut down. These aspects will be considered fully during the detailed design and pole placement for the transmission line.	Response satisfies our comment. No further action is required.

TTN - Detour Lake Power Project Technical Review

Table 1: Summary of Concerns/Issues and Recommendations from the DLPP EA Technical Review

Section	AECOM Comment		AMEC Response		AECOM Action/Response	
	Mapping indicates that beaver dams may have to be crossed		Poles will be located to avoid existing beaver dams. Removal of beaver dams if any, will follow regulatory requirements, and will occur in consultation with the MNR and the trapline holder.		Response satisfies our comment. No further action is required.	
	This report references the MNR Environmental Guidelines for Access Roads and Water Crossings as being published in 1995. This is incorrect, the guidelines were last revised in 1990.		Agreed			
Section 2.5 Water Quality	 construction of ice bridges should be considered in-water work		Ice bridges will be developed following standard industry practices and in keeping with all regulatory requirements. Construction of ice bridges will follow the Fisheries and Oceans Canada Ontario Operations Statement "Ice Bridges and Snow Fills" (Version 3 or later) and other applicable regulatory instruments.		Response satisfies our comment. No further action is required.	
	Removal of vegetation (from riparian zone) can reduce habitat quality (e.g., increased sedimentation and water temperatures) for fish and other aquatic species, and needs to be addressed.		Per Section 5.4.1, riparian vegetation that does not have the potential to interfere with the conductors (i.e., cannot reasonably be expected to grow to sufficient height) will be left intact. Trees may be trimmed (or topped) to ensure clearance requirements. In cases where trees are felled, the stumps and root mat will be retained to protect the banks from erosion and encourage the growth or re-growth of riparian vegetation.		Response satisfies our comment. No further action is required.	
	How construction and sanitary wastewater from work sites will be disposed of should be addressed		All wastes associated with construction activities will be disposed of according to regulatory requirements. Construction (with the exception of wood waste from vegetation clearing) and sanitary waste will not be disposed of at the work sites.		Response satisfies our comment. No further action is required.	
	The DLPP EA should state all vehicles and machinery will be cleaned prior to arriving to the work site		The DLPP EA indicates that vehicles and machinery must be maintained in good working order. This would include presence of any contamination on the vehicle body.		Response satisfies our comment. No further action is required.	
Section 2.6 Fisheries and Aquatic Habitat	Extreme weather events may hinder the stability and functionality of the ice bridges. There should be mention of a monitoring and mitigation plan to address this.		Ice bridges will be developed and monitored according to standard industry practices and in keeping with all regulatory requirements. There will be no use of ice bridges that are not fully functional and meet regulatory requirements, both for the safety of workers as well as the environment.		Response satisfies our comment. No further action is required.	
	Mention the ice bridges will be monitored for incidents such as debris jams or scouring of bed and banks		As indicated in the DLPP EA (Section 8.1), ice bridges will be monitored during spring thaw for incidents such as debris jams or scouring of bed and banks and mitigation implemented as necessary.		There is no specific mention of a monitoring plan for the ice bridges, only mention of mitigation if damming occurs during the spring thaw. How will these areas be monitored and will there be additional site visits if unseasonably warm temperatures occur prior to the average timing of the spring thaw?	
	Identify alternative methods that may be used and potential negative effects on fish and aquatic habitat.		No other types of crossings are proposed at this time, however, if they are necessary, construction details will be provided and reviewed through the environmental approvals process.		Response satisfies our comment. No further action is required.	
	Identify the winter movement patterns of fish.		The use of ice roads and ice bridges in northern Ontario and Canada as a whole is a well-established practice considered to have little potential for negative, long term effects to fish habitat. Both the Fisheries and Oceans Canada and Transport Canada have determined that the construction and utilization of these temporary structures are acceptable providing general mitigative measures are followed. In addition, fish in northern Ontario generally become reliant on refuge pools or other habitats where suitable water depths provide protection from frazzle and anchor ice formations, or in the case of small intermittent streams, from complete freezing of the creek cross section. These refuge pool areas are typically associated with meander pools or beaver impoundments which are widespread and common in the small to medium sized creeks of northern Ontario, and expected to be present and available to fish both upstream and downstream of the proposed crossings. Fish generally move to overwintering areas in the fall prior to significant ice formation, and as such should not be prevented from reaching established refuge areas by ice bridge creation (although it is possible that localized movement of resident fish in the early spring may be temporarily restricted by ice bridges).			
	A buffer should be maintained between the ROW and water features		Per Section 5.4.1, equipment will generally not be positioned closer than 5 m to watercourses during clearing activities except when unavoidable (such as at crossings). The equipment's		Response satisfies our comment. No further action is required.	

TTN - Detour Lake Power Project Technical Review

Table 1. Summary of Concerns/Issues and Recommendations from the DLPP EA Technical Review

Section	AECOM Comment	AMEC Response	AECOM Action/Response
Section 2.7 Terrestrial Habitat/ Vegetation	In general, terrestrial investigations have used adequate methods and covered sufficient area to collect the information needed to complete an Individual EA. Additional mapping is needed to show the ELC communities, preferably superimposed on an air photo.	boom reach will be used to complete brushing within this 5 m buffer strip, or it will be cleared by hand or as directed by environmental permits. The goal of the clearing is to facilitate safe temporary access, as well to ensure that vegetative cover is compatible with overhead conductors and allows the safe operation of the transmission line. Clearing will be conducted in accordance with the requirements stipulated in environmental permits. Depending on the vegetation currently present, this may require complete clearing (heavy forest cover) or minimal disturbance (herb and shrub areas). Ground vegetation and root masses are intended to remain intact as grubbing is not required. Existing treed buffer zones will be retained on shorelines wherever possible, unless they interfere with the minimal clearance requirements for the conductors and/or as required for access. Riparian vegetation that does not have the potential to interfere with the conductors (i.e., cannot reasonably be expected to grow to sufficient height) will be left intact. Trees may be trimmed (or topped) to ensure clearance requirements. In cases where trees are felled, the stumps and root mat will be retained to protect the banks from erosion and encourage the growth or re-growth of riparian vegetation.	Response satisfies our comment. No further action is required.
	Additional information should be added supporting the rejection of alternative routing options avoiding three Natural Heritage features.	The vegetation community classifications were superimposed on satellite imagery are provided in Appendix F (19 maps). Air photos were not utilized as SPOT5 imagery was available and deemed a reasonable means of delineating habitat features and vegetation communities. ELC mapping is not appropriate for northeastern Ontario as it is specific to (and was developed for) southern Ontario vegetation communities. As discussed in the text, the Field Guide to Forest Ecosystems of Northeastern Ontario (FENO) classification system (Taylor et al. 2000) was used to classify the vegetation along and adjacent to the ROW and is the appropriate classification system for this part of Ontario. The figures contained in Appendix F depict the spatial extent and location of each distinct community. ELC is only used to describe the old field meadow community that occurs along the disturbed (cleared) area of the existing ROW (and whose distribution is included in App-F-1 vegetation figure), as this community type is not included in the FENO system.	Response satisfies our comment. No further action is required.
	Transacts used for terrestrial community description and delineation should be labelled on all vegetation cover type maps for a visual of the area covered during investigations.	Through the development, consultation and approval of the ToR for the DLPP, the framework for the EA development was narrowed to a limited but justified number of alternatives to be considered within the EA document. The proposed approximately 180 km routing was defined through the ToR process as using and expanding on the routing of the former transmission line ROW from the Detour Lake site to Island Falls, and expanding the existing transmission line ROW from Island Falls north to the Pinard Transformer Station.	Delineation of vegetation communities through remote imagery is acceptable. However, we would ask whether any ground-truthing was undertaken to confirm vegetation types in the field? We would not expect that all communities would be ground-truthed, but would expect that a representative sample would have been checked to confirm the accuracy of the delineation process.
	Identified Natural Heritage Features, the North French River Conservation Reserve, the Little Abitibi Provincial Park, and the Fraserdale Wetland Complex Conservation Reserve should also be labelled on the vegetation cover type maps in order to see where the ROW crosses each of these features.	Vegetation community type delineations were estimated using SPOT 5 satellite imagery, aerial survey field observations and MNR, Forest Resource Inventory stand species composition data provided by the Cochrane MNR District (2008). The entire alignment including transects covering up to 500 m on either side of the ROW, was flown four times to ensure a complete coverage of the ROW and the adjacent habitats.	Response satisfies our comment. No further action is required.
	Terrestrial Habitat/Vegetation: Clarification is needed in regards to the location of the ROW, should the sites be north of Little Abitibi Provincial Park and within North French River Conservation Reserve? (re: Section 8.1 bullet 3)	The locations of these features can be identified using the coordinate systems present on all the maps. The outlines were not included on the vegetation cover maps due to the necessary complexity of the figures to show the habitat types. For completeness, figures are attached with the overlay requested.	Section 7.4.1 does not clearly indicate the ROW locations relative to Little Abitibi Provincial Park and North of the French River Conservation Reserve. However, upon review of the maps described in the previous response, these locations are clearly evident. No further action is required.
	Given the amount of wetland (up to 153.8 ha) being affected by the	The proposed ROW locations relative to the Little Abitibi Provincial Park and within North French River Conservation Reserve are described in Section 7.4.1.	Could not locate Figure App F-1. Could AMEC be referring to the maps in Appendix

TTN - Detour Lake Power Project Technical Review

Table 1. Summary of Concerns/Issues and Recommendations from the DLPP EA Technical Review

Section	AECOM Comment	AMEC Response	AECOM Action/Response
	construction of the proposed transmission line, more detail should be given in the description of these wetlands and their associated plant communities (re. Table 6.9).	and Black Spruce Swamps, all of which are common in northeastern Ontario. Figure App F-1 provides the location and spatial extent of each of these communities within the study area and the text describes the most frequently occurring species that make up the canopy, shrub and herb layers. Additional detail on species composition will not change the effects assessment or mitigation employed to minimize impacts to these wetlands.	F? If so, Black Spruce Swamp types are not explicitly identified (there are numerous Black Spruce community types, but which ones are considered 'wetlands' is not clear). Despite this, we agree that there is sufficient information provided (once it is deciphered) and that additional detail is not required.
	Herbicides should not be used for ROW maintenance; therefore a "no spray policy" should be adopted. Manual clearing methods should only be used, and this also has the advantage of providing employment opportunities.	As indicated in Section 7.4.3, herbicide is the preferred method for periodic vegetation control. Detour Gold will ensure that all contractors meet regulatory requirements at the time of clearing, in regards to chemical, mechanical or manual tending as well as other commitments made within the DLPP EA. Chemical, mechanical and manual tending are currently approved approaches to vegetation management for transmission lines. Selective vegetation clearing is expected to be required in the order of every five to ten years, depending on the location and species present. While Detour Gold recognizes that manual clearing would provide employment opportunities, the logistics of manual clearing of the entire line rather than focussing on sensitive area(s), including: transport of personnel to/from camps, waste handling etc. over the extended period of time that would be required for manual clearing, make this approach undesirable, in addition to the efficiency / cost aspect. Information regarding these aspects are provided in Section 5.4.1. Industry standards utilized by transmission line contractors / operators include: - Control of Woody Vegetation, Document Number FP-113 R4, Hydro One Networks Inc., 2005. - Safe Practices When Applying Pesticides, Document Number FP-106 R3, Hydro One Networks Inc., 2006. - Environmental Guidelines for the Construction and Maintenance of Transmission Facilities Hydro One Networks Inc., 2008. The bird list is based on detailed breeding bird surveys of the Detour study area undertaken in 2008 (and in 2009). The mammal list was generated from spring and summer incidental observations as well as winter aerial track surveys that were initiated in 2008. Additional bird and mammal species were included from the original baseline survey undertaken in 1983 (Ecological Applications 1983). These baseline surveys were comprehensive and provide a good understanding of the bird and mammal species assemblages using the region. The wildlife communities recorded in the study area for the baseline work are characteristic of what is typically observed in northeastern Ontario. The habitats within the Detour Lake Project study area are comparable to those found along the transmission line route and it is reasonable to expect that the species assemblages would be similar. In the current list, main groups are all represented: raptors, waterfowl, warblers etc. as well as forest, wetland, shrubby and/or forest dependent species and considered with respect to effects and mitigation. This level of understanding is appropriate for the EA stage of the Project. One of the main concerns is to ensure that appropriate mitigation strategies are in place and sensitivities are accounted for, which has been completed. Addition of a few avian species (good bat data is not available for this area) will not alter the scope of the effects assessment or the proposed mitigation strategies. Nonetheless, revised lists have been prepared as requested and are attached to this response.	TTN has indicated that the use of herbicides is not to their preference, and that Detour Gold should reconsider their position. TTN concerns stem from the potential impacts on vegetation and aquatic ecosystems, and not the potential loss of employment opportunities, as implied by Detour Gold.
	There should be clarification on what is meant by "Industry standards" that will be used for clearing and maintenance activities.		Response satisfies our comment. No further action is required.
Section 2.8 Wildlife and Birds	The wildlife species lists for birds and mammals should be as thorough as the reptiles and amphibians lists, and include species not observed but potentially occurring on site, this would include up to another 20 species of mammals, including bats, and several more bird species.		Response satisfies our comment. No further action is required.
	The methods employed to conduct the aerial surveys are well documented. However the methods used to survey for the amphibians and birds are not detailed or explained.	Detailed survey methods are presented in the baseline reports referenced in the DLPP EA. These studies are available on request.	Please provide copies of these reports for our review.
	The reptile and amphibian species list includes species observed during surveys, as well as species potentially occurring on site (although it is not clear how these species were identified as being "potentially" in the area). However, there was no inclusion of species not observed but potentially occurring on site within the lists of birds, mammals or invertebrates.	The Ontario herpetological atlas breaks up the Province into squares, one of these squares encompasses the region of the Project site, species whose presence was recorded in the square around the Project site were deemed as "potentially" in the area. There is only one reptile that occurs this far north in Ontario, Eastern Gartersnake. This species was observed during the baseline surveys as well as being recorded in the region from the Ontario	Response satisfies our comment. No further action is required.

TTN - Detour Lake Power Project Technical Review

Table 1. Summary of Concerns/Issues and Recommendations from the DLPP EA Technical Review

Section	AECOM Comment	AMEC Response	AECOM Action/Response
	herpetological atlas. Amphibian lists were augmented with data from the Ontario herpetological atlas as surveys in 2008 found few species and it was felt that this may not be representative of the region. Salamanders were also taken from the atlas as they are notoriously hard to detect in the field and presence can be easily missed. Based on the level of effort to undertake wildlife surveys for both birds and mammals in the Detour site study area as well as along the transmission line, it was not felt that these lists required additional augmentation from Provincial databases. See above comment for more detail.		
	Raptor Nest - it is not clear where or not nest observed by the MNR within 200 m of the ROW were confirmed present or absent by the AMEC field studies.	These stick nests recorded by MNR in 1995 and 2005 were not observed by AMEC biologists during any of the fall or winter aerial surveys.	Response satisfies our comment. No further action is required.
	Areas should be set aside for Woodland Caribou for life processes such as breeding and wintering.	Calving, rutting and over-wintering areas for caribou have been identified. The ROW as defined in the approved TOR, passes through these identified areas. Despite efforts to maintain as compact a ROW as practical based on historic / existing ROWs, an estimated 218.7 ha of additional Black Spruce / Jack Pine forest / treed bog habitat is expected to be disturbed as a result of the DLPP. This is equivalent to 0.0005% of the home range of a single animal. Data in the literature suggest that linear features can adversely affect Caribou populations. Wolves in particular are known to utilize linear corridors to better access Caribou populations. As the DLPP proposes to utilize / expand on existing ROWs along almost the entire alignment, significantly increased predation due to improved Wolf access is not expected.	Calving, rutting and over-wintering areas have been identified and mapped in the report. However, a clear explanation of the potential impacts of the proposed ROW on those habitats and life functions is not provided. Although the removal of 218.7 ha of habitat outside of the existing ROW might be equivalent to 0.0005% of the home range of a single animal, the report does not explain how significant that 0.0005% of the home range might be to the population, i.e., does it represent any or all of calving, rutting and over-wintering habitat? Furthermore, the report does not take into account the compounded effects of removing 218.7 ha of existing vegetation in addition to re-clearing vegetation along the existing ROW. Please provide more discussion.
	Concerning bird nests built on the hydro poles, the DLPP EA needs to detail how they will be dealt with.	Nests (if any) will be considered on a case by case basis in association with the MNR. In general, they will be left in place unless there is potential to affect the reliability of the transmission line or Detour Gold are directed otherwise.	Response satisfies our comment. No further action is required.
	Table 12.1 should include a commitment to conduct clearing outside the bird breeding season.	See Section 5.4.1. Clearing will be conducted in accordance with the requirements stipulated in environmental permits (such as work permits and forestry licenses) as well as other regulatory requirements. For example, the timing of clearing in particular will be constrained by the migratory bird breeding season. The <i>Migratory Bird Convention Act</i> directs that vegetation clearing should not be conducted during the breeding bird season in order to avoid destruction of bird nests. Nest surveys will be undertaken by a qualified biologist. If vegetation must be cleared during the breeding bird season.	Response satisfies our comment. No further action is required.
	The TTN has observed bears eating the plastic covering the guy wire. AMEC should identify different materials that could be used to prevent this from happening.	Noted. This will be considered during the detailed design process. Our understanding is that plastic is placed around guy wires to ensure visibility and safety and reflects current industry and CSA standards.	Response satisfies our comment. No further action is required, but TTN will follow-up on progress during detailed design process.
Section 2.9 Rare and Endangered Species	The ranking system for each of the species and the reasons behind the designation of low/moderate/high should be clearly quantified without subjective terms.	The rationale for assigning a probability of occurrence is stipulated within each section for a given species at risk (SAR). Recent breeding and/or presence/absence records within the region, presence/absence during the 2008 and 1983 baseline surveys, MNR NRVIS data, Natural Heritage Information data (which includes locations and dates of observations), availability of suitable habitat within the Project site, correspondence with MNR, correspondence with other SAR experts (i.e. in the case of Wolverine, the provincial expert, Dr. Justina Ray was contacted for comment on the potential for Wolverine occurrence within the region around the Detour site) and professional judgment were all taken into consideration when delineating probability of occurrence for a given SAR. Qualitatively assessing a probability of occurrence using the criteria listed above is considered reasonable, particularly given the dynamic nature of wildlife distribution and abundance from year to year. If a species has been observed in the region and if there is suitable habitat for this species within the Project area this species was given moderate to high probability of occurrence (or noted as a probable breeder). This approach likely over-estimated the probability of occurrence for several of these SAR, ensuring that each SAR is given	Probability of occurrence should not be assigned to species that were actually recorded in the study area, as these represent definitive sightings and therefore the issue of "probability" is irrelevant. The text for each of the species included in Section 6.5 should clearly state whether the species has been recorded in the study area, and if so, its probability of occurrence noted as Confirmed and the conditions under which it was recorded noted (e.g., within the breeding season for birds). If the species presence has not been Confirmed through field investigations, then assigning a probability of occurrence, as described by AMEC, is appropriate.

TTN - Detour Lake Power Project Technical Review

Table 1 Summary of Concerns/Issues and Recommendations from the DLPP EA Technical Review

Section	AECOM Comment	AMEC Response	AECOM Action/Response
	The description of relevant legislation that protects some of these species, such as the Fish and Wildlife Conservation Act (FWCA) and Migratory Bird Convention Act (MBCA) is appropriate, though incomplete. This section makes no mention of the potential for application of Ontario's Provincial Policy Statement (PPS) (2005).	In Section 6.5, the PPA is mentioned as follows "Ontario has several other laws that help protect SAR and their habitats. A policy under the Planning Act called the Provincial Policy Statement (PPS, MMAH 2005) is used by land use planners and others to help make sure that SAR are not harmed by land development. For example, the PPS states that 'development is not permitted in significant habitats of endangered and threatened species'."	The PPS is referenced in several locations throughout the report. However, no analysis has been provided that clearly determines whether any of the habitat along the proposed right-of-way represents either significant habitat of endangered/threatened species and/or significant wildlife habitat, both of which are afforded protection under Section 2.1 of the PPS. Should any of the habitats along the ROW meet the criteria for either significant habitat of endangered/threatened species and/or significant wildlife habitat, it must be demonstrated that there will be no negative impacts on the natural features or their ecological functions in order to comply with the PPS.
	Generally, the responsibility for designating significant wildlife habitat falls upon the MNR and relevant municipalities. the exclusion of the PPS from the discussion of relevant legislation to wildlife casts doubt on the ability of further work to take into account potential occurrences of significant wildlife habitat within or adjacent to the study area.	In Section 6.5, the PPA is mentioned as follows "Ontario has several other laws that help protect SAR and their habitats. A policy under the Planning Act called the Provincial Policy Statement (PPS, MMAH 2005) is used by land use planners and others to help make sure that SAR are not harmed by land development. For example, the PPS states that 'development is not permitted in significant habitats of endangered and threatened species'."	The report provides an incomplete review of the potential for significant wildlife habitats in the ROW. This could easily be resolved through the inclusion of a table that lists the categories of significant wildlife habitat, as defined in the Natural Heritage Reference Manual (OMNR, 1999, revised 2010) with an indication as to whether the habitat type is present in (or adjacent to) the ROW, whether it would be impacted and, if so, whether the recommended mitigation would result in no negative impact on the feature or its function.
	The PPS legislation, and in order to remain consistent with the Proponent's desire to minimize unnecessary disruption to the natural environment, all identified significant wildlife habitat types associated with the life processes of species observed and/or potentially occurring within the study area be acknowledged as priorities for identification and avoidance of disruption, prior to examining for their occurrence in seasonally appropriate surveys.	MNR data on significant wildlife habitat and other natural features (i.e. Provincially significant wetlands (PSWs) or Areas of Natural and Scientific Interest (ANSIs)) was obtained from the MNR and included in the DLPP EA. There are no known ANSIs or PSWs within the study area. Mapped significant habitat features from MNR database within the study area include over-wintering habitat for caribou and moose, calving and rutting areas for caribou as well as raptor stick nests. As such, these features have been taken into consideration and have been mapped and incorporated into the text.	Categories of significant wildlife habitat identified in the NHRM include: habitats of seasonal concentrations of animals, rare vegetation communities or specialized habitats for wildlife, habitats of species of conservation concern, and, animal movement corridors. Each of these categories contains specific habitat types, which can be easily assessed according to the criteria provided in the Significant Wildlife Technical Guide (OMNR, 2000).
	Update to reflect any changes that have occurred with Woodland Caribou-relevant legislation and other documents since the time of the EA preparation.	AMEC requested all data from MNR that pertains to all known and identified wildlife habitat including moose overwintering areas, spawning areas, hibernacula, caribou calving areas, caribou over-wintering areas, caribou rutting areas and raptor stick nests. All of these significant wildlife habitat attributes within the study area have been mapped and are presented in the DLPP EA. Significant wildlife habitat such as raptor nests and overwintering, rutting and calving areas for caribou have been identified.	See comments above
	Eagles have been spotted along Island Falls and Abitibi River. Coordinating the timing of construction activities and the life cycle activities of wildlife need to be explored	Currently there is a recovery strategy, a conservation plan and a scientific review that have been included in this document for caribou. These are all the most relevant pieces of documentation as they relate to the ESA 2007 for this species at this time. The habitat regulation for this species has not yet been released.	Response satisfies our comment. No further action is required. We recommend additional updates be included in subsequent EA documentation (i.e., MNR Class EA and Federal EA).
	Clarify the reason none of the proposed alternative routes incorporated the use of other "previously disturbed areas" such as the Regional and/or Primary Roads, and that this option be presented to the First Nations as a method of minimizing impacts to the confirmed Woodland Caribou habitat	Vegetation clearing is proposed to be conducted outside of the breeding bird season to mitigate disruption to breeding birds. Nest surveys will be undertaken if vegetation must be cleared during the breeding bird season. There are currently no known raptor nests are located within or proximal to the ROW. Should any sticknests be identified during construction phase, the area will be avoided until a qualified avian biologist along with regulatory authorities can be contacted for direction. Mitigation will include buffers around nests as per provincial guidelines.	Response satisfies our comment. No further action is required.
Section 2.10	Identify who the Sustainable Forest Licensee is for the area, if TTN have any	The proposed approximately 180 km routing was defined in the approved ToR process as: using and expanding on the routing of the former transmission line ROW from the Detour Lake site to Island Falls, and expanding the existing transmission line ROW from Island Falls north to the Pinard Transformer Station. It includes other previously disturbed areas as possible while maintaining a reasonably direct route.	Response satisfies our comment. No further action is required.

TTN - Detour Lake Power Project Technical Review

Table 1 Summary of Concerns/Issues and Recommendations from the DLPP EA Technical Review

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Land Use	claim, and what form it will be removed in (e.g., timber, chipping).	First Resource Management Group incorporated is an agent for the SFL responsible for planning in the Abitibi River Forest Management Unit. The SFL holder will be given the first right of refusal to any merchantable timber related to construction of the DLPP as stated in Section 8.12 of DLPP EA. Detour Gold will coordinate with the SFL for the licensing, harvest, and payment of the Crown timber. Detour Gold acknowledges TTN's interests and will engage TTN in further discussion on this interest.	Based on AECOM's discussions with TTN members, it is TTN's positions that no new access ways to the right-of-way should be created. Deferring the development of mitigation to future project phases is not acceptable. This defeats the purpose and intent of the EA. Without the identified mitigation, the significance of effects cannot be determined. The proponents should specify the mitigation to be used, or at a minimum the options that will be considered and the process by which decisions will be made and with whose involvement. Consultation with TTN is required in the event that a new access way is unavoidable in order to determine what further mitigation and/or accommodation is warranted. This needs to be acknowledged by Detour Gold.
	More details on how Detour Gold will avoid creating new permanent access ways to the transmission corridor.	The exact means of access will be defined through the environmental approvals and construction tendering processes. TTN will be engaged in discussions on future environmental approvals and permits. Particular attention will be given to those that address access issues.	AMEC's response suggests that the line presence of an operational transmission line may benefit mineral lease/claim holders that use the line following approval from the OEB, IESO and others. Response satisfies our comment. No further action is required.
	DLPP EA indicates that the DLPP could be considered as a benefit to mineral lease/claim holders but does not indicate how.	Detour Gold is currently unaware of any other potential users of the line. Any future access to the DLPP would require Ontario Energy Board and the Independent Electricity System Operator support and public consultation to ensure that there is no system impact. Other users would be responsible for seeking approvals as well as finance whatever infrastructure is required. Also see response to Section 2.13.	Deferral of the assessment of effects to the IBA process is not acceptable. This defeats the purpose and intent of the EA. At a minimum, the EA should identify in general terms the types of effects (e.g., reduced harvest, loss of income, etc.) that are anticipated on traplines and trampoline holders, and the types of mitigation/compensation that is being considered by Detour Gold. The EA could present 'best practices' with respect to mitigation/compensation based on other projects in northern Ontario.
	Assess impacts on traplines. Mitigation/compensation measures should be identified.	Any mitigation/compensation required for effects to traplines is being addressed as part of the Impact Benefit Agreement (IBA) between Detour Gold and TTN. This is a private and confidential process that to our knowledge, neither party wants made public.	Detour Gold should acknowledge TTN's position that the allocation and management of traplines by the Ontario Ministry of Natural Resources is undertaken with private individuals and not with the TTN community as a whole. The fact that a trampoline held by a TTN member does not diminish nor infringe on the rights of the TTN. As such, compensation afforded to trampoline holders does not constitute accommodation for effects on TTN. To this end, it is TTN's position that Detour Gold should consult and negotiate appropriate mitigation and/or compensation measures with individual trampoline holders independently of consultations and negotiations with the TTN regarding accommodation.
Section 2.11 Traffic and Transportation	The construction effects should note the potential for impacts associated with crossing both Highway 634 and Highway 632 and ... MTO requires...	The DLPP does not cross Highway 632. We believe this is a typographical error and that the reviewer meant Highway 652. Detour Gold is in consultation with MTO regarding its requirements. MTO was provided the opportunity to comment on the DLPP EA.	Response satisfies our comment. No further action is required.
	... equipment movement within the hydro ROW will have a greater impact on wildlife than increased traffic on the access roads.	There are potential effects on wildlife from both increased traffic on access roadways and from movement of construction and maintenance equipment within the ROW.	Response satisfies our comment. No further action is required.
Section 2.12 Socio-Economics	Provide an analysis of the specific employment and business opportunities available to the TTN and the ability of TTN to take advantage of these opportunities	Detour Gold will optimize Aboriginal employment, training and procurement opportunities as / if stated in the terms negotiated in the IBA. This is a private and confidential process that to our knowledge, neither party wants made public.	Deferral of the assessment of effects to the IBA process is not acceptable. This defeats the purpose and intent of the EA. At a minimum, the EA should identify in general terms the types of employment and business opportunities that are likely to be available to the TTN. The information presented (below) is considered adequate for EA purposes. No information is presented in the EA on the ability of TTN to take advantage of these opportunities. This is an indication of a poor socio-economic baseline and/or consultation with the TTN.

TTN - Detour Lake Power Project Technical Review

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Section	AECOM Comment	AMEC Response	AECOM Action/Response
	Provide more information regarding the specific employment and business commitments.	Information on Detour Gold's employment and business opportunities was made available at community meetings (March, April and May, 2010) and via the website (www.detourgold.com) through the Employment & Business Opportunities Fact Sheet: March 2010 (available on the project website and at community information sessions). In general, typical employment and business opportunities for the project include: • Catering and accommodation goods and services (i.e., catering equipment, food supply and preparation, accommodation materials, supplies and related housekeeping services, and waste management) • Communication infrastructure and support services (i.e., Internet, telephone/radio, cellular phones, television service) • Construction (i.e., building supplies and materials, plumbing, electrical, carpentry, and heating, ventilation, and air conditioning services, other construction supplies and services as required) • Equipment (lease, purchase, maintenance) (i.e., heavy equipment and machinery, vehicles and smaller equipment, equipment maintenance/repair) • Fuel (i.e., Bulk supply of diesel and other fuels as required) • Logistics (i.e., Expediting, coordinating transfer of materials to and from the site, Transportation of workers to and from the site, Delivery and courier services) • Medical services (i.e., medical supplies, paramedic services)	The information presented in this response is considered adequate for EA purposes and should have been presented in the main text of the EA, as part of the socio-economic assessment In a subsequent response (see Overall Comments, line 8) AMEC has indicated that there are no plans for work camps. Please clarify the nature of the following business opportunity as it implies a work camp... "Catering and accommodation goods and services (i.e., catering equipment, food supply and preparation, accommodation materials, supplies and related housekeeping services, and waste management)".
Section 2.13 Other Power Users	Outline the potential for the new power line to be used by others, including the TTN communities, including a discussion of any constraints to such use.	There is a detailed description of the process required to approve a transmission line in Section 8.15, including the mandatory requirement for technical review by the Ontario Energy Board and the Independent Electricity System Operator. This process is going on in parallel with the Individual EA process (as is common in the industry). The transmission line is being pursued by Detour Gold to support the Detour Lake Project. It is our understanding that connection by any other users will require agreement by the then owner of the transmission line, as well as meeting any regulatory requirements that might be imposed, such as by the Ontario Energy Board, the Independent Electricity System Operator as well as environmental approvals, such as those required under the <i>Ontario Environmental Assessment Act</i> .	Response satisfies our comment. No further action is required.
Section 2.14 Traditional Land Uses	The effects of the project on the 14 traplines identified in the existing conditions section require further assessment. Appropriate mitigation/compensation measures should be identified. Detour Gold should outline the types of effects for which compensation would be offered and the manner in which it proposes to establish an equitable level of compensation for all trapline holders. The effects of the project on the 14 traplines identified in the existing conditions section require further assessment. Appropriate mitigation/compensation measures should be identified. Detour Gold should outline the types of effects for which compensation would be offered and the manner in which it proposes to establish an equitable level of compensation for all trapline holders.	Specific effects of the project on traplines held by TTN members are expected to be documented in the Traditional Ecological Knowledge (TEK) Study currently being prepared by Muskegowuk Environment Research Council for TTN. Any mitigation/compensation required for effects including lost income to traplines held by members of TTN is being addressed as part of the IBA between Detour Gold and TTN. This is a private and confidential process that to our knowledge, neither party wants made public. Specific effects of the project on traplines held by TTN members are expected to be documented in the TEK Study currently being prepared by Muskegowuk Environment Research Council for TTN. Any mitigation/compensation required for effects to traplines held by members of TTN is being addressed as part of the IBA between Detour Gold and TTN. All trapline permit holders have been provided with notices regarding the DLPP through the MNR (rather than directly by Detour Gold due to potential privacy issues). Detour Gold will follow up with any requests for discussion about potential effects to traplines if contacted directly by the trapline permit holder. Given that trapline permit holder contact information is confidentially held by the MNR, Detour Gold is not in the position to directly contact trapline permit holders. At this time, Detour Gold is only able to provide mitigation/compensation for effects to traplines held by members of TTN as part of the IBA.	See below. AECOM has not reviewed the MNR notice procedure or the contents of the notice. Therefore there remains as to whether the notice was administered to all TTN trapline holders and whether the notice provided clear instructions as to how and who to contact at Detour Gold to negotiate compensation for effects. Detour Gold needs to be proactive and ensure that all trapline holders are aware of the project, aware of its likely effects and Detour Gold's intention to mitigate/compensate for these effects. Detour Gold need to ensure that instructions to trapline holders are clear and unambiguous. Detour Gold should keep TTN Chief and Council apprised of its progress in this regard and the response from trapline holders. Detour Gold should seek TTN assistance if individual trapline holders do not contact Detour Gold.
	Include any relevant information contained in the TTN traditional knowledge studies that is approved by the TTN for disclosure.	To date, and to our knowledge, the TTN TEK Study has not been completed and therefore no information has been approved by the TTN community for disclosure.	For clarity, it is TTN's position that Detour Gold's mitigation/compensation included in the IBA does not replace mitigation/compensation to individual trapline holders. Response satisfies our comment. No further action is required.
Section 2.15 Heritage and	A licensed archaeologist on-site during construction would ensure that any cultural heritage or archaeological resources are quickly identified and that	Detour Gold has committed to having a licensed archaeologist available during construction during work in areas of designated high potential from archaeological investigations to date	It is not clear what is meant by "having a licensed archaeologist available". Having an archaeologist on retainer may not be sufficient if the archaeologist is not on-site.

TTN - Detour Lake Power Project Technical Review

Table 1 Summary of Concerns/Issues and Recommendations from the DLPP EA Technical Review

Section	AECOM Comment		AMEC Response		AECOM Action/Response	
	the necessary steps taken to protect, document and preserve such resources.		by Woodland Heritage Surveys and White Spruce Archaeology.		Please clarify. AECOM considers it appropriate that this be limited to areas of designated high potential and any areas not studied to date.	
Cultural Resources	Areas should be surveyed and monitored by the archaeologist whenever topsoil is removed.		No significant removal of topsoil is proposed. Detour Gold has committed to having a licensed archaeologist available during construction during work in areas of designated high potential from archaeological investigations to date by Woodland Heritage Surveys and White Spruce Archaeology.		It is not clear what is meant by "having a licensed archaeologist available". Having an archaeologist on retainer may not be sufficient if the archaeologist is not on-site. Please clarify.	
	Detour Gold shall notify the TTN and other First Nations when human remains or other archaeological or cultural heritage features are uncovered.		Agreed.		Response satisfies our comment. No further action is required.	
Section 2.16 Visual Environment	A more detailed site specific visual assessment should be undertaken with respect to the DLPP at the North French River Conservation Reserve and the Little Abitibi River Provincial Park and site specific mitigation measures identified.		As a transmission line was present previously at both of these locations in recent times and the locations are not readily accessible, it was determined that completion of a detailed site specific visual assessment was not necessary to accurately assess the potential environmental impacts. This approach was discussed with the MNR who manages these areas. Proposed mitigation measures are provided in Section 8.19.1.		Response satisfies our comment. No further action is required.	
Section 2.17 Assessment of Effects	The net effects analysis should be revised to acknowledge that the DLPP will result in some net effects and that their significance is assessed using the methodology described in Section 8.19.		The net effects analysis follows the methodology provided in Section 8.19.1 and proposed in the approved TOR. As indicated in Section 8.19.1, the net effects assessment takes into account proposed mitigation measures captured by the DLPP EA, and that more specifically "This assessment is contingent on the application of the mitigation measures proposed and commitments made throughout the EA."		AECOM disagrees with the net effects conclusions as stated in the draft EA. It is our opinion that the net effects analysis is misleading.	
Section 2.18 Potential Effects of Malfunctions and Accidents	The mitigative measures outlined in the report were adequate. However the additional preventative measures should be added: • fuels should not be stored closer than 15 m to the edge of a water body; • machines should be turned off when not in use; and • any associated waste should be disposed of in an appropriate manner.		See Section 8.20.1. Fuel storage areas (excluding small containers moveable by hand) will be established and mobile refuelling activities will occur a minimum of 200 m away from waterbodies wherever practical, but no closer than 50 m from waterbodies. Contractors will be requested to turn off machines where not in use, except when it would affect operation of the equipment (or where the equipment is being used as weather refuge etc.) All wastes associated with construction activities will be disposed of according to regulatory requirements. Construction (with the exception of wood waste from vegetation clearing) and sanitary waste will not be disposed of at the work sites.		Response satisfies our comment. No further action is required.	
	The review of the preventive measures to be undertaken is adequate in aiding to deter accidents from occurring.		Noted.		N/A	
	Fire protection should consist of fixed protection systems (e.g., high expansion foam systems or dry chemical systems), in areas where it is most likely for a fire to occur. These systems should be supplemented by fire extinguishers.		The transmission line will be constructed outdoors and fire protection systems are not believed to be appropriate. With substations etc., fire protection will meet building codes and other appropriate engineering standards. Fire prevention equipment will meet or exceed industry standards for remote locations and will include well maintained fire extinguishers. Vehicles transporting materials are required to have properly serviced fire extinguisher and first response spill equipment.		Response satisfies our comment. No further action is required.	
	A food-waste management plan should be authored.		Contractors will be required to handle food and food wastes in a responsible manner, and workers will be educated and policies enforced to ensure no feeding of wildlife. All wastes are to be removed on a regular basis. Preparation of a food waste management plan will be required by the DLPP contractors to help ensure the safety of both the workers and wildlife.		Response satisfies our comment. No further action is required.	
	Potential Effects of Malfunctions and Accidents. Acknowledge disturbance caused to bird species that nest earlier than June 1, and an explanation of measures taken to mitigate those disturbances while nesting.		All clearing and other activities will be completed in accordance with the Migratory Bird Convention Act and other applicable legislation / regulatory instruments. The majority of tree clearing activities will be undertaken in the winter, thus migratory bird species will not be disturbed. Nest surveys will be undertaken by a qualified biologist, if vegetation must be cleared during the breeding bird season. It is recognized that raptors start nesting as early as the beginning of February. There are no known raptor nests located within the proposed ROW. Should any stick nests be identified during construction, the area will be avoided until a qualified avian biologist can be contacted for direction. Mitigation will include buffers around nests as per provincial guidelines.		As per previous responses and comments, please ensure that the appropriate regulatory authorities (particularly MNR) are contacted for direction should any stick nests be identified during construction or if vegetation is to be cleared during breeding season.	
	Report the location of all observed wildlife road mortalities to the proper		Agreed. In addition, contractors will be required to keep a log of all wildlife observance and		Response satisfies our comment. No further action is required. Please ensure that	

TTN - Detour Lake Power Project Technical Review

Table 1. Summary of Concerns/Issues and Recommendations from the DLP EA Technical Review

Section	AECOM Comment	AMEC Response	AECOM Action/Response
	authority(ies). Carion will be removed to avoid additional vehicle / wildlife interactions.	Interactions. Any significant interactions will be required to be reported to Detour Gold immediately in order that appropriate mitigative measures can be implemented.	copies of the logs are provided to Detour Gold and included in ongoing wildlife monitoring programs Response satisfies our comment. No further action is required
Section 2.19 Cumulative Effects	No indication as to how this conclusion was reached and what geographic area was examined. Given the presence of mining claims and forestry activities in the area, consideration should be given to activities such as mining exploration and ongoing forestry activities in the CEA.	The geographic area included the defined socio-economic study area and well as the general region for any potential larger project. Research was conducted through public venues to determine if any other projects / activities were proposed in the area, including review of forestry management plans etc. Discussions were also held with the Ministry of Northern Development, Mines and Forestry and the MNR to assess whether any other projects were imminent in the area that were not publicly known. Due to privacy issues, Detour Gold was not provided details, but were informed that there were no such projects or activities. Discussions were held with the MNR district office in Cochrane concerning other defined projects which could be considered in the cumulative effects analysis for both the DLP and the DLP. MNR indicated that the only such defined imminent and applicable, projects within the study area of either the DLP and the DLP were initiatives planned by Detour Gold in connection with the DLP and the DLP, together with the potential for reactivation of a small quarry site by M. J. Labelle near the western end of the DLP all-season gravel road. AMEC has subsequently learned that plans for redevelopment of the quarry site have been put on hold. Plans for the harvesting of the three forest blocks shown in the DLP EA along, or near to, the transmission ROW, have been deferred (Mick Gauthier pers. Comm. June 29, 2010). Other types of "projects" that could potentially proceed, but are as yet undefined are possible new resource access roads; possible additional forestry operations; possible additional mineral developments; possible new transmission lines; possible new recreational trails; and the possible setting up of new recreational camps and cottages. While all such projects are potentially possible in the future, to our knowledge none have as yet been defined as planned imminent projects. Should any such projects be defined in the future they would require their own approvals and may or may not have to consider effects in relation to the DLP and the DLP. Hydro One is considering developments within the Moose River basin but any such developments would be expected to mainly affect aquatic environments, and as the DLP is not expected to adversely affect aquatic environments there is no meaningful potential for cumulative effects	The response provided is helpful and provides additional rationale to justify the narrow scope of the cumulative effects assessment. We note that best professional practice in cumulative effects assessment indicates that a cumulative effects assessment should not only consider certain/planned projects and activities (i.e., what AMEC calls planned imminent projects) but also "reasonably foreseeable" projects and activities. We will review the cumulative effects assessment for the mine site with this in mind Response satisfies our comment. No further action is required
	Only one "imminent future project/activity was identified, that being ...	Comment noted, but as per Section 8.21.2, Noise Effects, no cumulative effects involving noise (to either humans or wildlife) are anticipated in relation to the DLP.	Response satisfies our comment. No further action is required.
	Cumulative effects of noise ... are adequate, but should include a section on the potential for displacement of wildlife Review of disturbance to vegetation communities	Figures provided in Appendix F show that vegetation communities along the transmission line, within 1 km on either side of the ROW consist of Black Spruce dominated communities, including treed bogs (i.e., Communities 18, 20, 21 and 26), together with a number of historic cutover areas. These communities are also prevalent in the broader region well beyond the 2 km ROW corridor shown in the figures. The entire transmission line length is approximately 174 km. The 2 km corridor bordering the transmission line ROW therefore occupies an area of approximately 350 km ² , and expands to thousands of km ² outside of the corridor. Given that Black Spruce dominated communities occupy the major portion of these areas, the 3.26 km ² new cut area represents <1% of the corridor area and a very small fraction of Black Spruce and other forest communities beyond the corridor area. Providing precise measures of disturbance percentages to each specific vegetation community for such small areas is not warranted and would not further the evaluation of cumulative effects. With regard to re-vegetation of the site at closure, such re-vegetation would occur as a result of natural regrowth. Development and maintenance of the transmission line will be such that the ground cover, with low shrubs and tree seedlings, will remain intact. Once ROW maintenance is suspended at (or near) closure existing tree seedlings within the ROW, and seed fall from the adjacent forest will provide the basis for new forest growth. Planting programs are not	Response satisfies our comment. No further action is required

TTN - Detour Lake Power Project Technical Review

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	Section 2.19 Cumulative Effects: Clearing an area directly adjacent to the pre-existing ROW eases wildlife movement ...	AMEC disagrees with the comment. A 40 m wide transmission line corridor between the DLP mine site and Island Falls is unlikely to afford any more effect passage for wildlife movement than the existing 30 m wide cleared corridor, including for Wolves. Similarly, a 100 m wide transmission line corridor between Island Falls and Pinard is unlikely to provide any more effective passage for wildlife movement (including for Wolves) than the existing Hydro One transmission line corridor.	Response satisfies our comment. No further action is required.
	It is not rational to assume that habitat fragmentation will not be 'of concern' to wildlife ...	Statements in Section 8.10.1 of the DLPP EA regarding habitat fragmentation could have been better worded. Since all but the mine site terminal end of the new transmission will involve the widening of existing ROWs, there will be no additional 'fragmentation' of habitat along approximately 93% of the ROW, and even in areas close to the mine site the transmission line ROW will be in close proximity to other DLP components, such that additional habitat fragmentation caused by transmission line construction in conjunction with mine site development in this area would be minimal.	Response satisfies our comment. No further action is required.
	The statement "At closure, all disturbed areas will be eventually become productive forest habitat" implies ...	Related statements in the DLPP are correct in as much as all disturbed terrestrial habitats that remain as terrestrial habitats, following mine closure, will gradually revert to productive forest habitat. It was not indicated that all of the mine site area would eventually revert to their "original vegetated" cover types, as suggested by the reviewer. There will be topographic changes within developed areas that would favour the development of different forest community types following mine closure, compared with those originally present. In the case of the transmission line there will be no topographic changes, such that original vegetated forest communities would eventually become reestablished, given sufficient time once the transmission line is removed.	Response satisfies our comment. No further action is required.
	It is not unreasonable to expect some level of cumulative effects(s) on wildlife ...	It was not stated that there would be "no" cumulative effects on wildlife as a result of the combined development of both the DLP and the DLP, but instead that the cumulative effects taking into consideration planned mitigation measures, including the development of a compact mine site, the use and expansion of existing ROWs for transmission line construction, and mine site revegetation efforts at closure, were "not significant" within the context of criteria used to assess effects.	Response satisfies our comment. No further action is required.
	Disturbance to Rare, Threatened and Endangered Species ...	The reviewer is correct that mention of these additional species of potential occurrence (Lake Sturgeon, Golden Eagle, Yellow Rail, Black Turn, Peregrine Falcon, Short-eared Owl and Canada Warbler) was omitted from Section 8.21. Habitats utilized by these species, and their potential for occurrence within the study area, were discussed in Sections 6.5.1 and 6.5.2. The only species from this group considered to have a reasonable potential for occurring within habitats that would be altered or displaced by transmission line construction were the Yellow Rail, Black Turn, Short-eared Owl and the Canada Warbler. Habitats preferred by the first three of these species consist of low wet habitats and / or grassland / herbaceous habitats. These habitat types would not be appreciably altered by transmission line construction, or would be expanded, as ground cover would be left intact. The Canada Warbler prefers a broad range of forested, shrubland and regenerating forest habitats which are not limited locally or in the broader region. Hence the only one of these species to which cumulative effects could reasonably be applied would be to the Canada Warbler, for which habitats are not limiting.	Response satisfies our comment. No further action is required.
	Cumulative adverse effects to Caribou ... does not take into account the potential for increased predator pressure on the caribou. Review of traffic volumes ... cumulative effects to wildlife as a result of traffic is best addressed in the sections of Disturbance to Wildlife ...	This aspect is addressed on Page 131 of the DLPP EA. Vehicular collisions involving Caribou are discussed in Section 8.21. The potential for cumulative effects involving other species is considered to be minor since there will be limited overlap between construction activities (including the transport of persons and materials)	Response satisfies our comment. No further action is required.

TTN - Detour Lake Power Project Technical Review

Table 1. Summary of Concerns/Issues and Recommendations from the DLPP EA Technical Review

Section	AECOM Comment	AMEC Response	AECOM Action/Response
Section 2.20 Consultation Plan	TTN consider finalizing the draft Consultation Protocol developed by AECOM, and distributing copies of the Protocol to the Crown and the proponent with a view to working with them to develop a comprehensive plan for meaningful consultation and communication with TTN community members, for this and subsequent components of the Detour Lake mine project.	associated with transmission line construction, and those associated with mine site construction and operation. No response required by proponent. Detour Gold would support development of such a Protocol and is looking forward to working with TTN on reviewing and once a Protocol is finalized, implementing it so that meaningful engagement occurs about the project activities over the long-term and for the life of the project.	Response satisfies our comment. No further action is required.
	TTN consider a range of activities to raise awareness and capacity within the community to participate meaningfully in the EA process, including a training workshop about the EA process and developing and distributing the Consultation Protocol in a plain-language format which is accessible to community members.	No response required by proponent. Detour Gold has always been open to hearing how TTN would like to be engaged in the project. Detour Gold would be happy to participate in an EA training workshop if requested by TTN. TTN should be aware that the Chiefs of Ontario have an environmental assessment toolkit at their disposal which may provide additional information/resources for this effort.	Response satisfies our comment. No further action is required.
	TTN consider engaging the Province in taking a more active oversight role in the EA process and associated consultation for the proposed undertaking.	No response required by proponent.	N/A
	An opportunity for TTN to provide input on the chosen elements of the DLPP EA Description of the Environment (what would be defined as Valued Ecosystem Components), and to identify additional elements, was not provided nor was such input solicited in other venues. Solicit information from TTN and include in the DLPP EA.	Detour Gold provided copies of both the draft and proposed ToR for the DLPP EA in September and November respectively, prior to the ToR being approved. It is through these review processes, that Aboriginal communities and other stakeholders had an opportunity to provide input into the input into the EA approach and design. Detour Gold also met with TTN to discuss the ToR preparation. Detour Gold did not receive any comments during the comment period from the TTN or its representatives, on either the draft or proposed ToR.	We are not contesting that these events took place, nor their timing. Our point, as stated in section 2.20.22 of our report was that 'A specific and explicit opportunity for TTN to provide input on the chosen elements of the DLPP EA Description of the Environment (what would be defined as VECs), and to identify additional elements, was not provided nor was such input solicited in other venues.' The recommendation is to solicit this information from TTN and include it in the DLPP EA. This information will provide assurance that TTN VECs are understood and documented, and that the EA considers impacts on TTN VECs.
	Timing and number of PICs were inconsistent with the normal requirements of the EAI process as laid out in the Code of Practice for Consultation in Ontario's EA Process. Should address this issue in the text.	The Code of Practice for Consultation in Ontario's EA Process states: "Beyond the mandatory notification contacts, appropriate consultation methods and techniques should be selected to fit the circumstances and proponents objectives (e.g., information gathering, information dissemination, consultation)" (p. 15). As such there are no requirements for PICs (or public information centres) as a specific method by which the proponent engages stakeholders and Aboriginal communities in the ToR or EA process. A Consultation Plan was prepared and approved by the Minister which was implemented in its entirety. Given the low number of responses from stakeholders and Aboriginal groups during the preparation of both the draft and proposed ToR, the need for public information centres was not considered a necessary method of engagement. Please note that there was no firm commitment for public information sessions made in this part of the ToR preparation (see Section 4.0 of Proposed ToR). A summary of consultation requirements for EAs (as outlined in the Code of Practice for Consultation in Ontario's EA Process p. 24) and the points of contact provided by Detour Gold are as follows: Code Requirement: Minimum of 3 to 4 points of contact, depending on the complexity and environmental sensitivity during the preparation of the ToR. Detour Gold provided Newspaper notices for both draft and proposed ToR, couriered copies of both draft and ToR to Aboriginal communities and other stakeholders, provided both draft and proposed ToR at public viewing locations including First Nation Band offices, posted notices in First Nation Band offices, hosted site tours, held at least 3 meetings with various Aboriginal groups. This is approximately and conservatively 12 points of contact during the preparation of the ToR. Code Requirement: Minimum of 3 to 4 points of contact, depending on the complexity and environmental sensitivity during the preparation of the ToR. Detour Gold provided Newspaper notices for both draft and proposed ToR, couriered copies of both draft and ToR to Aboriginal communities and other stakeholders, provided both draft and proposed ToR at public viewing locations including First Nation Band offices, posted notices	We appreciate the detail provided in this response. The TTN Consultation and Accommodation Protocol provides the opportunity for Detour Gold to address TTN consultation requirements for future approvals. TTN's desire for a Consultation and Accommodation Protocol was driven in part by TTN concerns with the challenges experienced in adequately and meaningfully participating in Detour Gold's proponent driven consultation schedule and process. Developing an understanding of TTN VECs could have been accomplished earlier in the EA process through a meaningful consultation process developed in collaboration with TTN. TTN interests and TTN understanding of VECs ought to be adequately represented and addressed within the EA. Once TTN VECs are established, and impacts on those VECs are addressed within the EA, TTN may determine that consultation and accommodation have been adequately undertaken. Detour Gold's consultation process, to-date, does not meet the expectations outlined in the TTN Consultation and Accommodation Protocol. We suggest that the following be considered by both TTN and Detour Gold for future consultation efforts to make sure that TTN interests are documented, understood and meaningfully addressed within future approval processes. • Notifications should not be confused with consultation events • In practice, consultation events of the same type and purpose held with different audiences should not be counted as individual points of contact, but rather as a single point of contact • Four to six points of contact are required during the preparation of the EA (page

TTN - Detour Lake Power Project Technical Review

Table 1: Summary of Concerns/Issues and Recommendations from the DLPP EA Technical Review

Section	AECOM Comment	AMEC Response	AECOM Action/Response
		In First Nation Band offices, hosted site tours, held at least 3 meetings with various Aboriginal groups. This is approximately and conservatively 12 points of contact during the preparation of the ToR. Code Requirement: Opportunity to comment on submitted ToR before Minister makes decision Detour Gold provided: See above. The opportunity to comment on the submitted (proposed) ToR was provided between November 28 – January 4 Code Requirement: Consultation required during the preparation of the environmental assessment (minimum of 4 to 6 points of contact, depending on the complexity and environmental sensitivity) Detour Gold provided: Nine community meetings were held in March and April, 2010 during the preparation of the environmental assessment. Code Requirement: Five Opportunity to comment on submitted environmental assessment Detour Gold provided: Five community meetings were held in May and another 2 in June following submission of the environmental assessment and within this review period. Code Requirement: Final opportunity for comments on the Ministry Review of the environmental assessment before Minister makes decision Detour Gold provided: This stage has not yet occurred. Based on this analysis, we feel that the basis of this comment is unfounded. Details of the stakeholder and aboriginal engagement activities are documented in Section 9 and Appendix H of the DLPP EA	23 of the Code of Practice for a "medium sensitivity" Category C transmission project subject to an individual EA, not three to four as stated in Detour Gold's response. - Consultation events such as PICs should be carried out within the procedural framework of the EA process such that they are preceded by adequate notice of commencement and are followed by notice of completion for each step (ToR and preparation of the EA) for the benefit of participants and the Minister. - Several PICs were held, including two events directly for TTN members (one in Mooseonee, and one in Cochrane). This was an interactive method, and was complementary to the predominantly information-focused events or mandatory notifications discussed in Detour Gold's response. However, this single point of contact was conducted between the two stages of this EA. It is important to determine the scheduling of consultation events and the nature of those events with TTN.
	The proponent should ensure that the Record of Consultation reflects the range of comments received from TTN from the early engagement phase to present, and how these comments are dispositioned, both for the provincial environmental assessment but also as part of the record preceding the CEAA Comprehensive EA for the Detour Lake Project.	Agreed. A full and detailed list of the contacts to date with TTN has been prepared and forwarded to TTN separate from this response. This includes meeting minutes, and a description of concerns along with where these concerns were addressed in the EA document. If concerns were not addressed, a rationale will be provided. For the CEAA Comprehensive Study Report (environmental assessment), comments and interests will be attributed to each Aboriginal group or stakeholder and will show where these comments and interests have been addressed in the EA. If comments and interests are not addressed in the EA for example, because they were not part of the EA scope, we will provide a rationale.	We suggest TTN consider requesting that the Crown and Detour Gold include the document discussed by Detour Gold in their response, minus any information TTN considers confidential or sensitive, as part of the public consultation record of the EA
	Timing of release of the EA in advance of completion of the TEK Studies	The TEK Studies for TTN have been underway since December 2008. Study completion, for various reasons beyond Detour's control, has been delayed on several occasions. It was our hope that the TEK studies would have been completed well in advance of the EA submissions. Detour Gold is committed to supporting the TEK studies and avoiding or mitigating any effects to traditional land uses. A number of concerns were shared during TEK steering committee meetings which were documented in section 8.16. These concerns were discussed and addressed in the DLPP EA.	Input available from previous TEK steering committee meetings can be used to help frame TTN VECs. Future TEK steering committee meetings might be used to help generate and refine TTN VECs, and review potential impacts on those VECs
	Timing of and errata in public notifications	We acknowledge the error made in the notification for the Mooseonee (April 1, 2010) and Iroquois Falls (April 8, 2010) indicated that the ToR was still under review by the MOE on these dates. The Notice of Commencement and the Notice of Submission of the EA were advertised in the same edition of the Wawatay News due to the frequency of newspaper editions. We acknowledge that the Notice of Commencement could have been released earlier. TTN were informed of the timing of the submission of the EA during their meeting held March 15 and at community meetings held March 24, 2010. The Ontario Codes of Practice for Consultation in Ontario's Environmental Assessment Process and for Preparing and Reviewing Environmental Assessments in Ontario, and the Guide to Environmental Assessment Requirements for Electricity Projects do not specify a required amount of time between these mandatory notices.	According to Appendix H (Consultation) of the DLPP Individual EA, the Wawatay News is published weekly on Thursday. The Wawatay News website (http://www.wawataynews.ca/about_wawatay) states that it is published bi-weekly on Thursday. Either way, the newspaper's frequency is sufficient for the Notice of Commencement to have been released prior to the Notice of Submission. Although the Ontario Codes of Practice do not stipulate a mandatory amount of time between the publishing of these Notices, it is appropriate to provide adequate time for review and consultation within the study timeframe. We suggest that any future notices provide sufficient time for commenting and consultation.
Overall	DLPP EA must quantify the width of the ROW	See Section 5.2	Response satisfies our comment. No further action is required.
Comments	Ownership of the ROW and transmission lines must be documented in the DLPP EA.	As indicated in the DLPP EA, Detour Gold is not in the business of power generation or power transmission and the transmission line is intended solely to meet the needs of the proposed mine. Transfer of the transmission line after it is built to a qualified operator	Response satisfies our comment. No further action is required.

TTN - Detour Lake Power Project Technical Review

Table 1 - Summary of Concerns/Issues and Recommendations from the DLPP EA Technical Review

Section	AECOM Comment	AMEC Response	AECOM Action/Response
		would be considered for this reason, however there are currently no advanced negotiations or agreements in this regard. The ROW will remain Crown Land although Land Use Permits will be requested.	
	TTN does not want treated poles to be used, and would prefer the use of cedar poles	Detour Gold proposes to use cedar poles for construction as possible, in recognition of comments received through the consultation processes to date. Should treated poles be required (such as due to lack of availability of suitably sized cedar poles etc.), all standards for their use will be followed.	Response satisfies our comment. No further action is required. TTN should be made aware of this circumstance should it arise.
	The DLPP EA should also outline how the transmission line will be strung	This will be defined by the contractor, but will be required to follow standard industry practices. This typically includes helicopter use, but may be modified.	A more fulsome response to this comment is required. AMEC is requested to describe standard industry practice, particularly with respect to helicopter use. TTN members have been asking questions in this regard that should be answered by Detour Gold in more detail.
	There should be information concerning how the transmission lines will be decommissioned, and/or will it be assumed by Hydro One. This must be clarified.	See Section 5.6.	Response satisfies our comment. No further action is required.
	No mention of how the winter road on the ROW will be prepared to ensure a solid base of frost. This should be explained	See Section 5.4.2. Winter roads have been used effectively in the region to construct other transmission lines, including the original transmission line from Island Falls to the Detour Lake site. While distance from permanent access points complicates the logistics of travel, the winter road can be designed and maintained to accommodate the traffic flow.	A more fulsome response to this comment is required. AMEC is requested to describe standard industry practice, particularly with respect to winter road design and maintenance procedure. TTN members have been asking questions in this regard that should be answered by Detour Gold in more detail.
	There is no mention of any documentation produced during the development of the historical ROW	Both the environmental baseline study and analysis of alignments from the original transmission line to the Detour Lake site were reviewed and used (see Section 1.3, References; EAG and EAG 1983; and throughout the text). The information available in these documents reflects the scientific knowledge and regulatory requirements at the time. It should also be noted that one of the authors of these reports is part of the team involved in the DLPP EA.	Response satisfies our comment. No further action is required.
	... it should be noted where the construction personnel will be staying.	See Section 5.4.2. There are no plans to create permanent camps along the ROW to house workers during construction. Workers will be accommodated off the ROW, likely at the Detour Lake Project site and in Cochrane / Smooth Rock Falls.	Response satisfies our comment. No further action is required.
	Larger scale mapping is needed. The current mapping does not accurately represent the features and boundaries as it is at too high a level.	Extensive mapping is provided in the DLPP EA consistent with the scale of the Project and anticipated effects associated with transmission line construction, operation and decommissioning. Satellite imagery is provided along the entire route to assist in the visualization of the ROW. Additional mapping is not available for the region due to the general remoteness of the location.	The mapping provided with the comments provides sufficient detail. No further action is required.

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June 24, 2010

Melanie Paradis
Director of Lands, Resources and Consultation
Métis Nation of Ontario
75 Sherbourne St., Suite 222
Toronto, ON
M5A 2P9

Dear Ms. Paradis:

Re: Comments on Detour Lake Power Project, Individual Environmental Assessment

We are in receipt of your e-mail and report of June 22, 2010 with comments responding to the Detour Lake Power Project (DLPP) Individual Environmental Assessment (EA) on behalf of the Métis Nation of Ontario (MNO).

We have provided our response in a tabular format consistent with the Ministry of the Environment requirements for DLPP EA comments contained in Sections 3, 4 and 5 of your report (per your e-mail).

We look forward to continuing to actively engage the MNO and the Region 3 Consultation Committee in the Detour Lake Power Project and trust you will find responses to your comments satisfactory.

If you have any additional comments or questions, please don't hesitate to contact us.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Derek Teevan', written in a cursive style.

Derek Teevan
VP Aboriginal and Government Affairs

Cc: Marcel Lafrance, Chair Region 3 Consultation Committee
Jim Robertson, Detour Gold, Director Environment and Sustainability
Sheila Daniel, AMEC Earth & Environmental
Alex Blasko, Ontario Ministry of Environment

SUMMARY OF COMMENTS ON ENVIRONMENTAL ASSESSMENT DOCUMENT

Proposal: Individual EA Detour Lake Power Project (DLPP)
Proponent: Detour Gold (DG) Canada Corporation

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
Melanie Paradis Métis Nation of Ontario June 22, 2010	Figures 6-8 and 6-9 illustrate the habitat areas of moose, caribou and wolves. What will the impact of such construction be on important caribou and moose wintering habitat? What will the impact be on wolf activity in the area?	Calving and rutting areas for caribou and over-wintering areas for caribou moose occur within the study area and the proposed transmission line route will transverse some of these habitats. Wolves have also been recorded along the existing right-of-way (ROW). Despite efforts to maintain as compact a ROW as practical based on historic / existing ROWs, an estimated 218.7 ha of additional Black Spruce / Jack Pine forest / treed bog habitat is expected to be disturbed as a result of the DLPP. This is equivalent to 0.0005% of the home range of a caribou. Though this is a small proportion of caribou range, studies have illustrated that linear features can adversely affect Caribou populations. Wolves in particular are known to utilize linear corridors to better access Caribou and improve their hunting success. As the DLPP proposes to utilize / expand existing ROWs along almost the entire alignment, significantly increased predation on local caribou due to improved Wolf access is not expected. Moose will likely benefit from the additional clearance along the ROW as it will create additional foraging opportunities during the winter through increased access to woody browse species.	None.	Complete.

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	Section 6.6.6 states: "The status of the various traditional land use studies and who is responsible for the studies is documented in Table 6-18. These studies are now underway with the MCFN, TTN (Interim Final Report completed) and MNO (Region 3)." This statement is incorrect. No traditional land use study is currently underway as MNO and Detour Gold have not yet come to an agreement regarding work plan and budget for such a study.	The statement could more correctly have been stated as follows: These studies are now underway with the MCFN, TTN (Interim Final Report completed) and <i>discussions with MNO (Region 3) are underway to initiate a similar study.</i>"	None.	Complete.
	a) What is the potential effect if the ice bridges are not constructed as proposed? b) What is the effect of plowing and tamping snow, ice and permafrost on the soil and surrounding environment along the ice road? c) Detour Gold is proposing to undertake 108 water crossings along the ROW for the transmission line. What is the cumulative impact of all of these water crossings on the regional environment? d) What will be the impact from small spills (oil, fuel and other fluid leaks) from equipment during construction and use of the ROW?	a) If the ice bridges are not constructed according to standard industry practices as proposed in the EA document: i) it will not be possible to obtain environmental approvals and/or the bridges will not comply with regulatory requirements; and further, ii) the bridges will not provide a safe means of access for vehicles to the right-of-way. In either instance, the ice bridges will not be operated. Detour Gold will not allow contractors to operate sub-standard ice bridges without appropriate regulatory approval(s). b) The use of ice roads and ice bridges in northern Ontario and Canada as a whole is a well-established practice. If properly developed, operated and maintained, the effect is minor. As indicated in the DLPP EA, in order to ensure that the soil and surrounding environment is not impacted by winter road use, the travelway and/or winter roads will not be allowed to continue if rutting occurs. It should also be noted there is no permafrost along the ROW.	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		continued	c) No cumulative impact is expected. Construction of ice bridges will follow the Fisheries and Oceans Canada Ontario Operations Statement "Ice Bridges and Snow Fills" (Version 3 or later) and other applicable regulatory instruments. Both the Fisheries and Oceans Canada and Transport Canada have determined that the construction and utilization of these temporary structures are acceptable providing general mitigative measures are followed (and as proposed in the DLPP EA). As indicated in the DLPP EA, there will be no disturbance to stream bed or banks (or re-shaping of the stream morphology etc.). d) Detour Gold will require that all equipment used be in good working order / maintained properly; and any and all spills will be required to be cleaned up immediately no matter the size. As a result, no impact is expected.		
		Section 8.9.1 states: "In total, the DLPP will displace an estimated 278.5 ha of natural vegetation communities as well as 433.5 ha of previously disturbed lands (cultural vegetation communities)." The word "displace" suggests that Detour Gold intends to move or relocate the natural vegetation communities. That is not the likely intention. A more accurate word choice would be "destroy".	The use "displace" was utilized as the vegetation will be cut down, but root masses will be left intact. The vegetation is expected to regrow, but in some instances, the existing vegetation may be displaced by other native species.	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Section 8.9.2 states: "It is anticipated that periodic clearing of woody vegetation will be required to ensure adequate clearance below the conductors. This clearing could be completed mechanically, manually, or through herbicide application, depending on the individual location and consultation activities." The MNO Consultation Committee representing the James Bay/Abitibi/Temiscamingue region is strongly opposed to the use of any and all chemical sprays on the transmission line and will not be satisfied until that option is completely removed from the EA.	Noted. Chemical, mechanical and manual tending are currently approved and commonly utilized approaches to vegetation management for transmission lines in Ontario.	None.	Complete.

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	Section 8.10.1 states: "It is also expected that the current ROW is likely used by some species as a movement corridor. During the construction phase, such movement may be temporarily disrupted; however, wildlife will still be able to use the existing ROW during the night-time, are also likely to be able to use alternative areas for movement and are likely to return to using the ROW once construction has ceased." How will construction activities impact Woodland Caribou and other species that are sensitive to disruptions?	Sensitive wildlife and birds may be temporarily affected by noise effects and other disturbance related to construction activities, as well as direct vegetation / habitat loss. Construction activities may cause a local displacement of sensitive wildlife and migratory birds that are likely to return after construction activities cease. It is not believed that this would appreciably stress the wildlife or cause increased wildlife disease and is considered a temporary effect. Most species will be able to avoid these effects by moving to adjacent areas of similar habitat and will not be affected appreciably by construction of the DLPP. Vegetation clearing is expected to be largely undertaken in the winter which reduces potential impacts to migratory bird species. Woodland Caribou occur within the Project site for overwintering, calving and rutting and may be affected by the noise. Caribou can be most sensitive to noise during the calving season, which occurs in May and June. During these months it is not anticipated that construction activities will be overly disruptive as vegetation clearing is being undertaken in the winter. The noise will be restricted to the construction period of the transmission line and thus is considered a short-term effect. Noted.	None.	Complete.
	Section 8.16 and 8.17 outline the potential effects to Aboriginal Traditional Land Uses. To date, no work has been undertaken by Detour Gold and MNO to determine potential effects to the Métis Way of Life and Traditional Land Uses.		None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Section 8.21.2 states: "At closure, all disturbed areas will be eventually become productive forest habitat." What is the timeline for "eventually"?	Regrowth of the ROW will occur immediately following construction. Based on experience in the area and the regrowth seen within the previous transmission line ROW, early successional thickets of Balsam Poplar and Trembling Aspen can be expected to occur within the ROW within a decade of decommissioning the ROW. Late successional, more mature mixed and coniferous forest communities comprised of species such as Black Spruce, White Spruce, Balsam Fir and Jack Pine can be expected to occur within 30 to 40 years after decommissioning of the ROW.	None.	Complete.

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	Section 8.21.2 states: "... The resulting cumulative effects from DLPP forest clearing actions, in combination with forest clearing associated with Detour Lake Project mine site area activities, are therefore regarded as being not significant." The project proposes to remove 23.26 square kilometers (20 sq. km. for mine site and 3.26 sq. km. for transmission line) of undisturbed forest. How is it that this was determined to be "not significant"? What is meant by "reversible in the longer-term at closure"? Does the proponent expect that over time the entire ROW will regenerate naturally, or do they expect to replant?	The methodology for determination of effects is provided 8.19.1 and is as proposed in the approved Terms of Reference. Similar methodologies were used to assess effects for the Detour Lake Project within the MNR Class EA for the Detour Lake Project. For the larger effect (i.e., for the removal of forest habitat in association with the Detour Lake Project) the effect was considered to be not significant because forest communities to be removed were commonplace, located adjacent to existing disturbed areas, and would be rehabilitated at closure. Additional clearing associated with widening of existing transmission line ROWs in association with the DLPP was considered to be minor, and not likely to contribute to an overall significant impact, taking into account proposed mitigation measures. Disturbance to vegetation along the transmission line ROW is considered reversible in the long-term, as over time the ROW will naturally regenerate, to be consistent in habitat and species to the surrounding environment. More specifically, ground cover, including grasses, sedges, mosses, low herbaceous plants, low shrubs and tree seedlings, along the transmission line ROW will remain essentially intact, and will provide a base for vegetation regrowth following removal of the transmission line. As such there are no plans to re-plant the transmission line ROW following transmission line removal. Conditions at the mine site would be different. Here there will be direct displacement of existing forest and ground cover by the development of buildings, roads, other infrastructure, mineral stockpiles, and the tailings area. Restoration of these areas at closure will require the removal of buildings, contouring stockpiles, placement of overburden / soil covers, and active seeding and planting of prepared areas. By implementing such measures, forest communities will eventually become re-established, but due to changes in topography and drainage, the newly developed forest communities will be different from the initial communities, but will still consist of native species assemblages.	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Section 8.21.2 states: "Wildlife associated with cleared forest and bog areas will be displaced into the surrounding landscape.... Therefore, as per discussions involving effects to vegetation communities, cumulative effects to local wildlife populations are regarded as being not significant." What studies have been conducted that indicate wildlife will "adjust" to ensure cumulative effects are "not significant"? While some larger, more mobile animals might be able to move away from disturbed areas, insects, soil fauna, and small animals will not be able to do so. In the case of a bog, for example, disturbance of the bog will not result in "displacement", which suggests movement to another location, but severe impact, if not complete destruction, of the bog community except for a few larger animal species.	The considerations raised by the reviewer apply more to mine site development, rather than to transmission line construction, where the ground cover would remain essentially intact, and work would be undertaken mainly in the winter. Large and moderate sized mammals, birds, and some smaller animals (including many insects) will be able to move away from cleared forest and bog areas, as noted by the reviewer. However, also as noted by the reviewer, less mobile, generally smaller animal species may not be able to actively relocate and may be destroyed depending on the species and the specific circumstance. Specific studies were not conducted relative to the dispersal potential of different animal species; nor does AMEC consider it necessary to conduct such studies as the dispersal / mobility capacity of most species groups is evident from the morphology, and when one starts to include insects and soil fauna, there are multitudes of species involved. It is sufficient to acknowledge that some species of animals will be capable of moving away from disturbance, and other mostly smaller, less mobile forms will not. Some level of environmental impact is unavoidable, and the goal is to minimize adverse environmental effects to a reasonable and acceptable level, within the context of overall project benefits, as well as to actively restore the mine site area to productive habitat.	None.	Complete.

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	Section 8.21.2 includes a section (on page 159) which discusses Woodland Caribou and crude statistics to justify an argument that the cumulative effects of the project on caribou habitat would be "limited, and not significant", because the combined area of the transmission line and the Detour Lake gold mine would only "be capable of supporting an estimated 0.25 individual caribou, and would be equivalent to 0.5% of the home range of a single animal", ... What research was done on the potential effects of linear openings (roadways and transmission corridors) on Woodland Caribou?	The estimate of the proportion of home-range removed by the additional vegetation clearance was included to give a relative idea of size. This section then discusses the issues relative to linear features and caribou, which are considered to be more important. Caribou studies in this region have found that caribou utilize habitats adjacent to the existing ROW year-round (see Figure 6-9) for calving, rutting and over-wintering, and all of these areas have been included in the overall estimate of home-range size. Most areas of an animals' home-range are important to the life-cycle of the animal, which is why such areas are included in their home-range in the first place. Therefore this estimate of 0.5% includes the assumption that this proportion of home-range habitat could be important to a given local individual caribou. Attempts have been made for both the transmission line and the mine site area to reduce disturbance to the smallest areas practicable, and to focus such disturbance in the immediate vicinity of previously disturbed areas, rather than to open up new areas. Research has been undertaken to assess the effects of linear corridors on Caribou and other wildlife species. These studies were reviewed and incorporated into the EA. These studies have illustrated that linear features can adversely affect Caribou populations, through increased access by Wolves (who are known to utilize linear features as movement corridors increasing their hunting efficiency). As the DLPP proposes to utilize / expand on existing ROWs along almost the entire alignment, significantly increased predation on local Caribou due to improved Wolf access is therefore not expected. Baseline information and monitoring studies using winter aerial surveys of both caribou and wolves were initiated in 2008 and were continued in 2009 and 2010. MNR also continues to gather data on caribou in the Detour region. In the winter of 2009, MNR collared; six animals north of the Detour Lake Project site and an additional four animals in the general region of Otter Rapids and Smooth Rock Falls.	None.	Complete.

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	continued	These 10 animals all appear to have ranges that encompass parts of the DLPP study area. In March 2010, 29 animals were collared in the general region of Detour Lake Project; four northwest of Smooth Rock Falls, three north of Otter Rapids between the Mattagami and Abitibi Rivers, six west and north of Kesagami River and 16 south and west of the Detour Mine site area. Previous to these efforts, the MNR collared 30 animals in the Detour Lake area from 1998 to 2001. Thus baseline data on local caribou populations exists and continues to improve with the continued efforts of MNR to collar animals (as well as investigations supported by Detour Gold). Noted: Detour Gold will hold discussions with the MNO regarding this request.		
	Section 12.2 outlines the proposed monitoring. The MNO requests a role as an environmental monitor. It is recommended that a committee similar to the Mattagami Extensions Coordinating Committee be established to ensure Métis and First Nations environmental concerns are effectively monitored and mitigated during construction, operations, and closure.		None.	Complete.

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	The Woodland Caribou studies completed to date are insufficient. There has been no assessment of the findings regarding the complete absence of caribou presence during 2009. There is no explanation given regarding their absence, as well as the absence of wolves and wolverines. Additional work must be done by Detour Gold to determine definitively where the caribou were during that year and why they were not present in the area of the site. It is not enough to simply say that the caribou were not present. It is imperative that we know why the caribou were not there. It is possible that the caribou were not present because of disruptive activities in the surrounding area. In order to understand the cumulative effects on the regional caribou population, the cause of the absence of the caribou population must be determined.	Baseline information and monitoring studies using winter aerial surveys of both caribou and wolves were initiated in 2008 and were continued in 2009 and 2010. MNR also continues to gather data on caribou in the Detour region through GPS collar monitoring that was initiated in 1998 and continues to date which they have provided to Detour Gold and its consultants. Results from the aerial surveys conducted by AMEC on behalf of Detour Gold, indicate that Caribou using over-wintering areas around Detour site have exhibited some level of variability in their distribution and abundance from 2008 to 2010. In 2010, a total of 38 animals were sighted, largely northeast and east of the mine site during the aerial survey with group sizes ranging from 3 to 15 individuals. In 2008, 55 Caribou were sighted and Caribou were spotted largely west and north-east of the mine site with observed group sizes varying from 2 to 17 individuals. In 2009 however, no live individuals were observed, although two dead Caribou were recorded (apparent animal kills), and the abundance and density of tracks observed across the study area was reduced. The 2010 early and late winter surveys had similar distributions in the locations of where Caribou were observed, the main difference was in the abundance of Caribou. In January, Caribou were more abundant in the study area, particularly northeast of the mine, tracks and animals were observed frequently. In March, Caribou occurrence was largely confined to the eastern side of the study area, however, tracks and animals were not as frequent and most tracks seemed to be heading farther east outside of the study area boundary. Whether this pattern of abundance from early to late winter continues will have to be assessed after additional early winter surveys are undertaken.	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		continued	This variability in the number of Caribou and Caribou tracks observed in the Detour Lake Project site study area between 2008 and 2010 should not be considered unusual. Caribou winter ranges can be quite large (856 km² and 711.4 km²; Metsaranta and Mallory 2007, Stuart-Smith et al. 1997) and animals will use different areas from year to year depending on factors such as food availability, predator avoidance and snow accumulation (Gustine and Parker 2008; Metsaranta and Mallory 2007; Stuart-Smith et al. 1997). Various studies (AMEC 2006; AMEC 2008; Schafer et al. 2000) have found that Caribou do not exhibit the same level of site fidelity to wintering areas as they do calving areas. Thus, it can be continued to be expected that variability in local habitat use by Caribou in winter will continue in the future. The distribution of Wolves has changed with general abundance of Moose and Caribou. In 2008, Wolves were observed in many areas in close proximity to Caribou and a Caribou kill by Wolves was recorded northwest of the Mine site. In 2009, when both Caribou and Moose were not as abundant, Wolf tracks were not observed as frequently. In 2010, Wolf tracks were often observed in the southwest corner of the study area where Moose abundance was high. It can be expected that the distribution and abundance of Wolves using the study area will continue to mirror that of Caribou and Moose. Wolverines do not currently occur in the Detour region. Historically, they have occurred in the Detour Lake area (Dawson 2000), however currently their range is largely confined to the northwestern portion of Ontario. There is evidence that Wolverines are moving further east expanding their range (Ray 2010). It is considered unlikely that they are within the DLPP study area at the present time, but should they continue to expand their range east, they may be present in the future.		

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	The construction of the transmission line is anticipated to take place during the winter. What impact will these activities have on wintering habitat of Woodland Caribou, moose, and other species of interest to the Métis?	Woodland Caribou occur within the Project site for over-wintering, calving and rutting and may be affected by the noise. Caribou can be most sensitive to noise during the calving season, which occurs in May and June. During these months it is not anticipated that construction activities will be overly disruptive as vegetation clearing is being undertaken in the winter. The noise will be restricted to the construction period of the transmission line and thus is considered a short-term effect. Moose are not generally considered sensitive to noise or human disturbance. Additional clearing within the ROW will result in an increase in foraging habitat for moose. The noise and disturbance will be restricted to the construction period of the transmission line and thus is considered a short-term effect.	None.	Complete.
	There are numerous impacts for which mitigation measures will not compensate for the impact – specifically the impacts to Woodland Caribou and other species. How can it be that Detour Gold has concluded that there will be "no net effects"?	The methodology for determination of effects is provided 8.19.1 and is as proposed in the approved Terms of Reference. Significance and net effects have been defined accordingly on consideration of proposed mitigation.	None.	Complete.
	With respect to environmental issues, Detour Gold and MNO would both benefit from arriving at a mutually agreeable Protocol to set out and guide their relationship throughout the Project's duration and to set out the participation of the potentially affected Métis community in the planning, design, and implementation of construction programs, monitoring, mitigation, and biodiversity programs and plans.	Noted: Detour Gold will hold discussions with MNO in this regard.	None.	Complete.

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	Detour Gold, MNO, the Province of Ontario, and the Government of Canada would all benefit from the creation of a Detour Environmental Coordinating Committee which would consist of equal representation from Métis and First Nations communities, Provincial and Federal regulatory authorities, and the proponent of the Detour Gold mine (Detour Gold or any future owner/operator of the site) with the mandate of coordinating all environmental monitoring and mitigation activities ,....	Noted: Detour Gold will hold discussions with MNO and regulatory agencies in this regard.	None.	Complete.
	Detour Gold and MNO would both benefit from a commitment to provide immediate capacity for MNO to hire a Project Coordinator (to be based in Timmins or Cochrane) to be a point-of-contact between MNO, the regional rights-bearing Métis community and Detour Gold.	Noted: Detour Gold will hold discussions with MNO in this regard.	None.	Complete.
	Detour Gold and MNO would both benefit from the creation of a list of species of interest to the Métis to be developed through a regional Métis Traditional Knowledge study ,....	Noted: Detour Gold will hold discussions with MNO in this regard in associated with discussions regarding Traditional Knowledge Study.	None.	Complete.

DOCUMENT INFO

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DOCUMENT INFO



June 29, 2010

Vince Deschamps
Senior Environmental Planner
AECOM
2-512 Woolwich Street
Guelph, ON
N1H 3X7

Dear Mr. Deschamps:

Re: Comments on Detour Lake Power Project, Individual Environmental Assessment

We are in receipt of your e-mail of June 17, 2010 with comments responding to the Detour Lake Power Project (DLPP) Individual Environmental Assessment (EA) on behalf of the Coral Rapids Power Limited Partnership who are working on behalf of the Taykwa Tagamou Nation.

Due to the length of the document of comments submitted, we have provided our response in a tabular format consistent with the Ministry of the Environment requirements, primarily based on your Table 1 (Summary of Concerns / Issues and Recommendations from the DLPP EA Technical Review, as well as other comments within the main text not captured within Table 1.

We look forward to continuing to actively engage you in the DLPP and trust you will find responses to your comments satisfactory.

If you have any additional comments or questions, please don't hesitate to contact us.

Sincerely,

A handwritten signature in black ink, appearing to read 'Derek Teevan'.

Derek Teevan
VP Aboriginal and Government Affairs

Cc: Chief Linda Archibald, Peter Archibald, Tina Gagnon, Taykwa Tagamou Nation
Merv McLeod, Sue Hartwig, representing Taykwa Tagamou Nation
Jim Robertson, Detour Gold, Director Environment and Sustainability
Sheila Daniel, AMEC Earth & Environmental
Alex Blasko, Ontario Ministry of Environment

Detour Gold Corporation, Royal Bank Plaza, South Tower
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SUMMARY OF COMMENTS ON ENVIRONMENTAL ASSESSMENT DOCUMENT

Proposal: Individual EA Detour Lake Power Project (DLPP)
Proponent: Detour Gold (DG) Canada Corporation

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
1. Vince Deschamps, AECOM retained by Coral Rapids Power Limited Partnership on behalf of Taykwa Tagamou Nation June 17, 2010	Section 2.1 Air Quality: It would be beneficial to include the <i>Climate and Air Quality Baseline Study</i> in the appendices of the report. the information provided in the report is adequate.	Noted. A summary is presented in the Environmental Assessment (EA) Document. In the interest of document length, the baseline documents were not provide in their entirety as they were not necessary to assess environmental impacts, but they are available. A copy of the Climate and Air Quality Baseline Study is available on request.	None.	Complete.
	Section 2.2 Noise: Expand discussion on the types of impacts to wildlife and bird species as a result of construction noise (e.g., Woodland Caribou). there have been Woodland Caribou studies carried out,... they should be included in the DLPP EA.	As is discussed in Section 8.10, construction activities may cause local displacement of wildlife and migratory birds that are likely to return after construction activities cease. It is not believed that this would appreciably stress the wildlife or cause increased wildlife disease. Vegetation clearing will largely be undertaken in the winter which reduces impacts to migratory bird species. Woodland Caribou occur within the DLPP ROW during the winter and may be affected by the noise. The noise will be restricted to the construction period of the transmission line and thus is considered a short-term effect. The Ontario Ministry of Natural Resources (MNR) was very helpful in providing open access to their information regarding Woodland Caribou studies. This information along with field studies completed by AMEC, was the primary basis for the Woodland Caribou discussion with the DLPP EA.	None.	Complete.

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	Section 2.3 Climate: Include in the existing climate conditions section total annual snowfall, average length of the frost free period and when frozen ground conditions occur. There should be more historical data presented for the study area.	Detour Gold recognizes that an atypical winter may pose construction constraints and scheduling difficulties for the DLPP. Other transmission lines have been constructed in the region using only winter road access. Nonetheless, this information is included below and in Table 1 and Figure 1 attached. Mean annual snowfall information was obtained from the weather stations located in Kapuskasing, Ontario and Matagam, Quebec. Using Environment Canada data compiled from 1971 to 2000 the mean annual snowfall was calculated to be 313 cm and 313.8 cm for Kapuskasing, Ontario and Matagam, Quebec respectively. The mean annual snowfall for the Detour Lake Project is estimated at 313.4 cm, as presented in Table 1. The frost free period for the Detour Lake Project was selected based on the map provided in the attached Figure 1 from the National Atlas of Canada (Natural Resources Canada 2010). Figure 1 illustrates that the approximate frost free period for the Detour Lake Project ranges from 80 to 100 days. The remoteness of the site dictates the availability of historical data.	None.	Complete.

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	Section 2.4 Hydrology: A lengthy description was provided regarding suggested best management practices regarding ice bridges: • Indicate that the water used will be clean (e.g., free of sediments, vegetative materials, gravel); • Water taken from a creek should not exceed 10% of instantaneous flow (as per the Department of Fisheries and Oceans); • A water monitor should be at the crossings where a PTTW is required; • Describe type of machinery that would be used to pump water and how steps would be taken to prevent fish mortality; • State the operational guidelines concerning the development of the approach (to the ice bridge construction); • Clarify the width of the bridge; single span is preferred; • Identify the operation guidelines concerning ice thickness for safe passage of vehicles; • Provide information about erosion prevention guidelines that will be followed;	Ice bridges will be developed following standard industry practices and in keeping with all regulatory requirements. Construction of ice bridges will follow the Fisheries and Oceans Canada Ontario Operations Statement "Ice Bridges and Snow Fills" (Version 3 or later) and other applicable regulatory instruments. Construction details will be provided and reviewed through the environmental approvals process. In addition for clarity, per standard operating practices: • any water used will be in a natural condition (free of sediments, vegetative materials, gravel etc.), • water takings will not exceed 10% of instantaneous flow or as otherwise defined through the environmental approvals process for taking water; • water taking(s) will be monitored per environmental approvals and standard operating practices (see Section 5.4.2). • water taking methodologies will follow standard industry practices and will be detailed through the environmental approvals process, including types of machinery (typically portable pumps) and means to prevent fish mortality (typically screens on intakes); • narrow (single lane) bridges are not generally preferred, as they are more susceptible to rutting / damage. As indicated in the DLPP EA, there will be no disturbance to stream bed or banks (or re-shaping of the stream morphology etc.). No other types of crossings (including fording), are proposed at this time; however, if they are necessary, construction details will be provided and reviewed through the environmental approvals process.	None.	Complete.

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	Section 2.4 Hydrology Ice Bridge comments (continued): - Detail how the crossings will be built for the largest watercourses (5.0 –14.5 m and 15 – 49.5 m in width); - Construction of ice bridges should be considered in-water work and addressed. More detail should be provided concerning Best Management Practices for temporary crossings and fording. (Section 2.5 Water Quality); - Provide details of other types of temporary crossings that may be used.	See above.		
	Section 2.4 Hydrology: The poles should be sited to avoid problems with erosion and the collapse of lines, and the subsequent operations to identify any problems.	It is in Detour Gold's interest to ensure that all poles are sited to avoid problems with erosion and collapse of the lines as without power the Detour Lake Project will not be able to operate and will be shut down. These aspects will be considered fully during the detailed design and pole placement for the transmission line.	None.	Complete.
	Section 2.4 Hydrology: Mapping indicates that beaver dams may have to be crossed.	Poles will be located to avoid existing beaver dams. Removal of beaver dams if any, will follow regulatory requirements, and will occur in consultation with the MNR and the trapline holder.	None.	Complete.
	Section 2.4 Hydrology: This report references the MNR' Environmental Guidelines for Access Roads and Water Crossings as being published in 1995. This is incorrect; the guidelines were last revised in 1990.	Agreed.	None.	Complete.
	Section 2.5 Water Quality: ... construction of ice bridges should be considered in-water work	Ice bridges will be developed following standard industry practices and in keeping with all regulatory requirements. Construction of ice bridges will follow the Fisheries and Oceans Canada Ontario Operations Statement "Ice Bridges and Snow Fills" (Version 3 or later) and other applicable regulatory instruments.	None.	Complete.

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	Section 2.5 Water Quality: Removal of vegetation (from riparian zone) can reduce habitat quality (e.g., increased sedimentation and water temperatures) for fish and other aquatic species, and needs to be addressed.	Per Section 5.4.1: riparian vegetation that does not have the potential to interfere with the conductors (i.e., cannot reasonably be expected to grow to sufficient height) will be left intact. Trees may be trimmed (or topped) to ensure clearance requirements. In cases where trees are felled, the stumps and root mat will be retained to protect the banks from erosion and encourage the growth or re-growth of riparian vegetation.	None.	Complete.
	Section 2.5 Water Quality: How construction and sanitary wastewater from work sites will be disposed of should be addressed	All wastes associated with construction activities will be disposed of according to regulatory requirements. Construction (with the exception of wood waste from vegetation clearing) and sanitary waste will not be disposed of at the work sites.	None.	Complete.
	Section 2.5 Water Quality: The DLPP EA should state all vehicles and machinery will be cleaned prior to arriving to the work site.	The DLPP EA indicates that vehicles and machinery must be maintained in good working order. This would include presence of any contamination on the vehicle body.	None.	Complete.
	Section 2.6 Fisheries and Aquatic Habitat: Extreme weather events may hinder the stability and functionality of the ice bridges. There should be mention of a monitoring and mitigation plan to address this.	Ice bridges will be developed and monitored according to standard industry practices and in keeping with all regulatory requirements. There will be no use of ice bridges that are not fully functional and meet regulatory requirements, both for the safety of workers as well as the environment.	None.	Complete.
	Section 2.6 Fisheries and Aquatic Habitat: Mention the ice bridges will be monitored for incidents such as debris jams or scouring of bed and banks.	As indicated in the DLPP EA (Section 8.1), ice bridges will be monitored during spring thaw for incidents such as debris jams or scouring of bed and banks and mitigation implemented as necessary.	None.	Complete.
	Section 2.6 Fisheries and Aquatic Habitat: Identify alternative methods that may be used and potential negative effects on fish and aquatic habitat.	No other types of crossings are proposed at this time; however, if they are necessary, construction details will be provided and reviewed through the environmental approvals process.	None.	Complete.

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	Section 2.6 Fisheries and Aquatic Habitat: Identify the winter movement patterns of fish.	The use of ice roads and ice bridges in northern Ontario and Canada as a whole is a well-established practice considered to have little potential for negative, long terms effects to fish habitat. Both the Fisheries and Oceans Canada and Transport Canada have determined that the construction and utilization of these temporary structures are acceptable providing general mitigative measures are followed. In addition, fish in northern Ontario generally become reliant on refuge pools or other habitats where suitable water depths provide protection from frazzle and anchor ice formations, or in the case of small intermittent streams, from complete freezing of the creek cross section. These refuge pool areas are typically associated with meander pools or beaver impoundments which are widespread and common in the small to medium sized creeks of northern Ontario, and expected to be present and available to fish both upstream and downstream of the proposed crossings. Fish generally move to overwintering areas in the fall prior to significant ice formation, and as such should not be prevented from reaching established refuge areas by ice bridge creation (although it is possible that localized movement of resident fish in the early spring may be temporarily restricted by ice bridges).	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Section 2.6 Fisheries and Aquatic Habitat: A buffer should be maintained between the ROW and water features.	Per Section 5.4.1, equipment will generally not be positioned closer than 5 m to watercourses during clearing activities except when unavoidable (such as at crossings). The equipment's boom reach will be used to complete brushing within this 5 m buffer strip, or it will be cleared by hand or as directed by environmental permits. The goal of the clearing is to facilitate safe temporary access, as well to ensure that vegetative cover is compatible with overhead conductors and allows the safe operation of the transmission line. Clearing will be conducted in accordance with the requirements stipulated in environmental permits. Depending on the vegetation currently present, this may require complete clearing (heavy forest cover) or minimal disturbance (herb and shrub areas). Ground vegetation and root masses are intended to remain intact as grubbing is not required. Existing treed buffer zones will be retained on shorelines wherever possible, unless they interfere with the minimal clearance requirements for the conductors and/or as required for access. Riparian vegetation that does not have the potential to interfere with the conductors (i.e., cannot reasonably be expected to grow to sufficient height) will be left intact. Trees may be trimmed (or topped) to ensure clearance requirements. In cases where trees are felled, the stumps and root mat will be retained to protect the banks from erosion and encourage the growth or re-growth of riparian vegetation.	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Section 2.7 Terrestrial Habitat/Vegetation: In general, terrestrial investigations have used adequate methods and covered sufficient area to collect the information needed to complete an individual EA. Additional mapping is needed to show the ELC communities, preferably superimposed on an air photo.	The vegetation community classifications were superimposed on satellite imagery are provided in Appendix F (19 maps). Air photos were not utilized as SPOT5 imagery was available and deemed a reasonable means of delineating habitat features and vegetation communities. ELC mapping is not appropriate for northeastern Ontario as it is specific to (and was developed for) southern Ontario vegetation communities. As discussed in the text, the Field Guide to Forest Ecosystems of Northeastern Ontario (FENO) classification system (Taylor et al. 2000) was used to classify the vegetation along and adjacent to the ROW and is the appropriate classification system for this part of Ontario. The figures contained in Appendix F depict the spatial extent and location of each distinct community. ELC is only used to describe the old field meadow community that occurs along the disturbed (cleared) area of the existing ROW (and whose distribution is included in App-F-1 vegetation figure), as this community type is not included in the FENO system.	None.	Complete.
		Section 2.7 Terrestrial Habitat/Vegetation: Additional information should be added supporting the rejection of alternative routing options avoiding three Natural Heritage features.	Through the development, consultation and approval of the ToR for the DLPP, the framework for the EA development was narrowed to a limited but justified number of alternatives to be considered within the EA document. The proposed approximately 180 km routing was defined through the ToR process as: using and expanding on the routing of the former transmission line ROW from the Detour Lake site to Island Falls; and expanding the existing transmission line ROW from Island Falls north to the Pinard Transformer Station.	None.	Complete.
		Section 2.7 Terrestrial Habitat/Vegetation: Transects used for terrestrial community description and delineation should be labelled on all vegetation cover type maps for a visual of the area covered during investigations.	Vegetation community type delineations were estimated using SPOT 5 satellite imagery, aerial survey field observations and MNR, Forest Resource Inventory forest stand species composition data provided by the Cochrane MNR District (2008). The entire alignment including transects covering up to 500 on either side of the ROW, was flown four times to ensure a complete coverage of the ROW and the adjacent habitats.	None.	Complete.

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	Section 2.7 Terrestrial Habitat/Vegetation: Identified Natural Heritage Features, the North French River Conservation Reserve, the Little Abitibi Provincial Park, and the Fraserdale Wetland Complex Conservation Reserve should also be labelled on the vegetation cover type maps in order to see where the ROW crosses each of these features.	The locations of these features can be identified using the coordinate systems present on all the maps. The outlines were not included on the vegetation cover maps due to the necessary complexity of the figures to show the habitat types. For completeness, figures are attached with the overlay requested.	None.	Complete.
	Section 2.7 Terrestrial Habitat/Vegetation: Clarification is needed in regards to the location of the ROW, should the sites be north of Little Abitibi Provincial Park and within North French River Conservation Reserve? (re: Section 8.1 bullet 3)	The proposed ROW locations relative to the Little Abitibi Provincial Park and within North French River Conservation Reserve are described in Section 7.4.1.	None.	Complete.
	Section 2.7 Terrestrial Habitat/Vegetation: Given the amount of wetland (up to 153.8 ha) being affected by the construction of the proposed transmission line, more detail should be given in the description of these wetlands and their associated plant communities (re: Table 6-9).	The wetlands present are largely open and treed bog habitat types as well as alder thickets and Black Spruce Swamps, all of which are common in northeastern Ontario. Figure App F-1 provides the location and spatial extent of each of these communities within the study area and the text describes the most frequently occurring species that make up the canopy, shrub and herb layers. Additional detail on species composition will not change the effects assessment or mitigation employed to minimize impacts to these wetlands.	None.	Complete.

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	Section 2.7 Terrestrial Habitat/Vegetation: Herbicides should not be used for ROW maintenance: therefore a "no spray policy" should be adopted. Manual clearing methods should only be used, and this also has the advantage of providing employment opportunities.	As indicated in Section 7.4.3, herbicide is the preferred method for periodic vegetation control. Detour Gold will ensure that all contractors meet regulatory requirements at the time of clearing, in regards to chemical, mechanical or manual tending as well as other commitments made within the DLPP EA. Chemical, mechanical and manual tending are currently approved approaches to vegetation management for transmission lines. Selective vegetation clearing is expected to be required in the order of every five to ten years, depending on the location and species present. While Detour Gold recognizes that manual clearing would provide employment opportunities, the logistics of manual clearing of the entire line rather than focussing on sensitive area(s), including: transport of personnel to/from camps, waste handling etc. over the extended period of time that would be required for manual clearing, make this approach undesirable, in addition to the efficiency / cost aspect. Information regarding these aspects are provided in Section 5.4.1. Industry standards utilized by transmission line contractors / operators include: • Control of Woody Vegetation, Document Number FP 113 R4, Hydro One Networks Inc, 2005 • Safe Practices When Applying Pesticides, Document Number FP 106 R3, Hydro One Networks Inc, 2006 • Environmental Guidelines for the Construction and Maintenance of Transmission Facilities. Hydro One Networks Inc. 2008	None.	Complete.
	Section 2.7 Terrestrial Habitat/Vegetation: There should be clarification on what is meant by "Industry standards" that will be used for clearing and maintenance activities.	Information regarding these aspects are provided in Section 5.4.1. Industry standards utilized by transmission line contractors / operators include: • Control of Woody Vegetation, Document Number FP 113 R4, Hydro One Networks Inc, 2005 • Safe Practices When Applying Pesticides, Document Number FP 106 R3, Hydro One Networks Inc, 2006 • Environmental Guidelines for the Construction and Maintenance of Transmission Facilities. Hydro One Networks Inc. 2008	None.	Complete.

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	Section 2.8 Wildlife and Birds: The wildlife species lists for birds and mammals should be as thorough as the reptiles and amphibians lists, and include species not observed but potentially occurring on site; this would include up to another 20 species of mammals, including bats, and several more bird species.	The bird list is based on detailed breeding bird surveys of the Detour study area undertaken in 2008 (and in 2009). The mammal list was generated from spring and summer incidental observations as well as winter aerial track surveys that were initiated in 2008. Additional bird and mammal species were included from the original baseline survey undertaken in 1983 (Ecological Applications 1983). These baseline surveys were comprehensive and provide a good understanding of the bird and mammal species assemblages using the region. The wildlife communities recorded in the study area for the baseline work are characteristic of what is typically observed in northeastern Ontario. The habitats within the Detour Lake Project study area are comparable to those found along the transmission line route and it is reasonable to expect that the species assemblages would be similar. In the current list, main groups are all represented: raptors, waterfowl, warblers etc. as well as forest, wetland, shrubby and/or forest dependent species and considered with respect to effects and mitigation. This level of understanding is appropriate for the EA stage of the Project. One of the main concerns is to ensure that appropriate mitigation strategies are in place and sensitivities are accounted for, which has been completed. Addition of a few avian species (good bat data is not available for this area) will not alter the scope of the effects assessment or the proposed mitigation strategies. Nonetheless, revised lists have been prepared as requested and are attached to this response.	None.	Complete.
	Section 2.8 Wildlife and Birds: The methods employed to conduct the aerial surveys are well documented. However the methods used to survey for the amphibians and birds are not detailed or explained.	Detailed survey methods are presented in the baseline reports referenced in the DLPP EA. These studies are available on request.	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Section 2.8 Wildlife and Birds: The reptile and amphibian species list includes species observed during surveys, as well as species potentially occurring on site (although it is not clear how these species were identified as being "potentially" in the area). However, there was no inclusion of species not observed but potentially occurring on site within the lists of birds, mammals or invertebrates.	The Ontario herpetological atlas breaks up the Province into squares, one of these squares encompasses the region of the Project site, species whose presence was recorded in the square around the Project site were deemed as "potentially" in the area. There is only one reptile that occurs this far north in Ontario, Eastern Gartersnake. This species was observed during the baseline surveys as well as being recorded in the region from the Ontario herpetological atlas. Amphibian lists were augmented with data from the Ontario herpetological atlas as surveys in 2008 found few species and it was felt that this may not be representative of the region. Salamanders were also taken from the atlas as they are notoriously hard to detect in the field and presence can be easily missed. Based on the level of effort to undertake wildlife surveys for both birds and mammals in the Detour site study area as well as along the transmission line, it was not felt that these lists required additional augmentation from Provincial databases.	None.	Complete.
		Section 2.8 Wildlife and Birds: (raptor nest) It is not clear where or not nest observed by the MNR within 200 m of the ROW were confirmed present or absent by the AMEC field studies.	See above comment for more detail. These stick nests recorded by MNR in 1995 and 2005 were not observed by AMEC biologists during any of the fall or winter aerial surveys.	None.	Complete.

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	Section 2.8 Wildlife and Birds: Areas should be set aside for Woodland Caribou for life processes such as breeding and wintering.	Calving, rutting and over-wintering areas for caribou have been identified. The ROW as defined in the approved ToR, passes through these identified areas. Despite efforts to maintain as compact a ROW as practical based on historic / existing ROWs, an estimated 218.7 ha of additional Black Spruce / Jack Pine forest / treed bog habitat is expected to be disturbed as a result of the DLPP. This is equivalent to 0.0005% of the home range of a single animal. Data in the literature suggest that linear features can adversely affect Caribou populations. Wolves in particular are known to utilize linear corridors to better access Caribou populations. As the DLPP proposes to utilize / expand on existing ROWs along almost the entire alignment, significantly increased predation due to improved Wolf access is not expected. Nests (if any) will be considered on a case by case basis in association with the MNR. In general, they will be left in place unless there is potential to affect the reliability of the transmission line or Detour Gold are directed otherwise.	None.	Complete.
	Section 2.8 Wildlife and Birds: Concerning bird nests built on the hydro poles, the DLPP EA needs to detail how they will be dealt with.	See Section 5.4.1: Clearing will be conducted in accordance with the requirements stipulated in environmental permits (such as work permits and forestry licenses) as well as other regulatory requirements. For example, the timing of clearing in particular will be constrained by the migratory bird breeding season. The <i>Migratory Bird Convention Act</i> directs that vegetation clearing should not be conducted during the breeding bird season in order to avoid destruction of bird nests. Nest surveys will be undertaken by a qualified biologist, if vegetation must be cleared during the breeding bird season.	None.	Complete.
	Section 2.8 Wildlife and Birds: Table 12.1 should include a commitment to conduct clearing outside the bird breeding season.	Noted. This will be considered during the detailed design process. Our understanding is that plastic is placed around guy wires to ensure visibility and safety and reflects current industry and CSA standards.	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Section 2.9 Rare and Endangered Species: The ranking system for each of the species and the reasons behind the designation of low/moderate/high should be clearly quantified without subjective terms.	The rationale for assigning a probability of occurrence is stipulated within each section for a given species-at-risk (SAR). Recent breeding and/or presence/absence records within the region, presence/absence during the 2008 and 1983 baseline surveys, MNR NRVIS data, Natural Heritage Information data (which includes locations and dates of observations), availability of suitable habitat within the Project site, correspondence with MNR, correspondence with other SAR experts (i.e. in the case of Wolverine, the provincial expert, Dr. Justina Ray was contacted for comment on the potential for Wolverine occurrence within the region around the Detour site) and professional judgment were all taken into consideration when delineating probability of occurrence for a given SAR. Qualitatively assessing a probability of occurrence using the criteria listed above is considered reasonable, particularly given the dynamic nature of wildlife distribution and abundance from year to year. If a species has been observed in the region and if there is suitable habitat for this species within the Project area this species was given moderate to high probability of occurrence (or noted as a probable breeder). This approach likely over-estimated the probability of occurrence for several of these SAR; ensuring that each SAR is given consideration for the effects assessment and appropriate mitigation measures are taken into account.	None.	Complete.
		Section 2.9 Rare and Endangered Species: The description of relevant legislation that protects some of these species, such as the Fish and Wildlife Conservation Act (FWCA) and Migratory Bird Convention Act (MBCA) is appropriate, though incomplete. This section makes no mention of the potential for application of Ontario's Provincial Policy Statement (PPS) (2005).	In Section 6.5, the PPA is mentioned as follows "Ontario has several other laws that help protect SAR and their habitats. A policy under the Planning Act called the Provincial Policy Statement (PPS; MMAH 2005) is used by land use planners and others to help make sure that SAR are not harmed by land development. For example, the PPS states that "development is not permitted in significant habitats of endangered and threatened species".	None.	Complete.

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	Section 2.9 Rare and Endangered Species: Generally, the responsibility for designating significant wildlife habitat falls upon the MNR and relevant municipalities the exclusion of the PPS from the discussion of relevant legislation to wildlife casts doubt on the ability of further work to take into account potential occurrences of significant wildlife habitat within or adjacent to the study area.	In Section 6.5, the PPA is mentioned as follows "Ontario has several other laws that help protect SAR and their habitats. A policy under the Planning Act called the Provincial Policy Statement (PPS; MMAH 2005) is used by land use planners and others to help make sure that SAR are not harmed by land development. For example, the PPS states that development is not permitted in significant habitats of endangered and threatened species". MNR data on significant wildlife habitat and other natural features (i.e. Provincially significant wetlands (PSWs) or Areas of Natural and Scientific Interest (ANSIs)) was obtained from the MNR and included in the DLPP EA. There are no known ANSI's or PSWs within the DLPP study area. Mapped significant habitat features from MNR database within the study area include over-wintering habitat for caribou and moose, calving and rutting areas for caribou as well as raptor stick nests. As such, these features have been taken into consideration and have been mapped and incorporated into the text.	None.	Complete.
	Section 2.9 Rare and Endangered Species: The PPS legislation, and in order to remain consistent with the Proponent's desire to minimize unnecessary disruption to the natural environment, all identified significant wildlife habitat types associated with the life processes of species observed and/or potentially occurring within the study area be acknowledged as priorities for identification and avoidance of disruption, prior to examining for their occurrence in seasonally appropriate surveys.	AMEC requested all data from MNR that pertains to all known and identified wildlife habitat including moose over-wintering areas, spawning areas, hibernacula, caribou calving areas, caribou over-wintering areas, caribou rutting areas and raptor stick nests. All of these significant wildlife habitat attributes within the study area have been mapped and are presented in the DLPP EA. Significant wildlife habitat such as raptor nests and over-wintering, rutting and calving areas for caribou have been identified	None.	Complete.

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	Section 2.9 Rare and Endangered Species: Update to reflect any changes that have occurred with Woodland Caribou-relevant legislation and other documents since the time of the EA preparation.	Currently there is a recovery strategy, a conservation plan and a scientific review that have been included in this document for caribou. These are all the most relevant pieces of documentation as they relate to the ESA 2007 for this species at this time. The habitat regulation for this species has not yet been released.	None.	Complete.
	Section 2.9 Rare and Endangered Species: Eagles have been spotted along Island Falls and Abitibi River. Coordinating the timing of construction activities and the life cycle activities of wildlife need to be explored.	Vegetation clearing is proposed to be conducted outside of the breeding bird season to mitigate disruption to breeding birds. Nest surveys will be undertaken if vegetation must be cleared during the breeding bird season. There are currently no known raptor nests are located within or proximal to the ROW. Should any stickneests be identified during construction phase, the area will be avoided until a qualified avian biologist along with regulatory authorities can be contacted for direction. Mitigation will include buffers around nests as per provincial guidelines.	None.	Complete.
	Section 2.9 Rare and Endangered Species: Clarify the reason none of the proposed alternative routes incorporated the use of other „previously disturbed areas“ such as the Regional and/or Primary Roads, and that this option be presented to the First Nations as a method of minimizing impacts to the confirmed Woodland Caribou habitat.	The proposed approximately 180 km routing was defined in the approved ToR process as: using and expanding on the routing of the former transmission line ROW from the Detour Lake site to Island Falls; and expanding the existing transmission line ROW from Island Falls north to the Pinard Transformer Station. It includes other previously disturbed areas as possible while maintaining a reasonably direct route.	None.	Complete.

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	Section 2.10 Land Use: Identify who the Sustainable Forest Licensee is for the area, if TTN have any claim, and what form it will be removed in (e.g., timber, chipping).	The Sustainable Forest Licensee (SFL) is Abitibi River Forest Management Incorporated. First Resource Management Group Incorporated is an agent for the SFL responsible for planning in the Abitibi River Forest Management Unit. The SFL holder will be given the first right of refusal to any merchantable timber related to construction of the DLPP as stated in Section 8.12 of DLPP EA. Detour Gold will coordinate with the SFL for the licensing, harvest, and payment of the Crown timber. Detour Gold acknowledges TTNs interests and will engage TTN in further discussion on this interest.	None.	Complete.
	Section 2.10 Land Use: More details on how Detour Gold will avoid creating new permanent access ways to the transmission corridor.	The exact means of access will be defined through the environmental approvals and construction tendering processes. TTN will be engaged in discussions on future environmental approvals and permits. Particular attention will be given to those that address access issues.	None.	Complete.
	Section 2.10 Land Use: DLPP EA indicates that the DLPP could be considered as a benefit to mineral lease/claim holders but does not indicate how.	Detour Gold is currently unaware of any other potential users of the line. Any future access to the DLPP would require Ontario Energy Board and the Independent Electricity System Operator support and public consultation to ensure that there is no system impact. Other users would be responsible for seeking approvals as well as finance whatever infrastructure is required. Also see response to Section 2.13.	None.	Complete.
	Section 2.10 Land Use: Assess impacts on traplines. Mitigation/compensation measures should be identified.	Any mitigation/compensation required for effects to traplines is being addressed as part of the Impact Benefit Agreement (IBA) between Detour Gold and TTN. This is a private and confidential process that to our knowledge, neither party wants made public.	None.	Complete.
	Section 2.11 Traffic and Transportation: The construction effects should note the potential for impacts associated with crossing both Highway 634 and Highway 632 and MTO requires,... permit.	The DLPP does not cross Highway 632. We believe this is a typographical error and that the reviewer meant Highway 652. Detour Gold is in consultation with MTO regarding its requirements. MTO was provided the opportunity to comment on the DLPP EA.	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Section 2.11 Traffic and Transportation: ... equipment movement within the hydro ROW will have a greater impact on wildlife than increased traffic on the access roads.	There are potential effects on wildlife from both increased traffic on access roadways and from movement of construction and maintenance equipment within the ROW.	None.	Complete.
		Section 2.12 Socio-Economics: Provide an analysis of the specific employment and business opportunities available to the TTN and the ability of TTN to take advantage of these opportunities.	Detour Gold will optimize Aboriginal employment, training and procurement opportunities as / if stated in the terms negotiated in the IBA. This is a private and confidential process that to our knowledge, neither party wants made public.	None.	Complete.

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	Section 2.12 Socio-Economics: Provide more information regarding the specific employment and business commitments.	Information on Detour Gold's employment and business opportunities was made available at community meetings (March, April and May, 2010) and via the website (www.detourgold.com) through the Employment & Business Opportunities Fact Sheet March 2010 (available on the project website and at community information sessions). In general, typical employment and business opportunities for the project include: • Catering and accommodation goods and services (i.e., catering equipment, food supply and preparation, accommodation materials, supplies and related housekeeping services, and waste management) • Communication Infrastructure and support services (i.e., Internet, telephone/radio, cellular phones, television service) • Construction (i.e., building supplies and materials, Plumbing, electrical, carpentry, and heating, ventilation, and air conditioning services, other construction supplies and services as required) • Equipment (lease, purchase, maintenance) (i.e., heavy equipment and machinery, Vehicles and smaller equipment, equipment maintenance/repair) • Fuel (i.e., Bulk supply of diesel and other fuels as required) • Logistics (i.e., Expediting; coordinating transfer of materials to and from the site, Transportation of workers to and from the site, Delivery and courier services) • Medical Services (i.e., medical supplies, paramedic services)	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Section 2.13 Other Power Users: Outline the potential for the new power line to be used by others, including the TTN communities, including a discussion of any constraints to such use.	There is a detailed description of the process required to approve a transmission line in Section 8.15, including the mandatory requirement for technical review by the Ontario Energy Board and the Independent Electricity System Operator. This process is going on in parallel with the Individual EA process (as is common in the industry). The transmission line is being pursued by Detour Gold to support the Detour Lake Project. It is our understanding that connection by any other users will require agreement by the then owner of the transmission line, as well as meeting any regulatory requirements that might be imposed, such as by the Ontario Energy Board, the Independent Electricity System Operator as well as environmental approvals, such as those required under the <i>Ontario Environmental Assessment Act</i>.	None.	Complete.
		Section 2.14 Traditional Land Uses: The effects of the project on the 14 traplines identified in the existing conditions section require further assessment. Appropriate mitigation/compensation measures should be identified. Detour Gold should outline the types of effects for which compensation would be offered and the manner in which it proposes to establish an equitable level of compensation for all trapline holders.	Specific effects of the project on traplines held by TTN members are expected to be documented in the Traditional Ecological Knowledge (TEK) Study currently being prepared by Muskegowuk Environment Research Council for TTN. Any mitigation/compensation required for effects including lost income to traplines held by members of TTN is being addressed as part of the IBA between Detour Gold and TTN. This is a private and confidential process that to our knowledge, neither party wants made public.	None.	Complete.

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	Section 2.14 Traditional Land Uses: The effects of the project on the 14 traplines identified in the existing conditions section require further assessment. Appropriate mitigation/compensation measures should be identified. Detour Gold should outline the types of effects for which compensation would be offered and the manner in which it proposes to establish an equitable level of compensation for all trapline holders.	Specific effects of the project on traplines held by TTN members are expected to be documented in the TEK Study currently being prepared by Muskegowuk Environment Research Council for TTN. Any mitigation/compensation required for effects to traplines held by members of TTN is being addressed as part of the IBA between Detour Gold and TTN. All trapline permit holders have been provided with notices regarding the DLPP through the MNR (rather than directly by Detour Gold due to potential privacy issues). Detour Gold will follow up with any requests for discussion about potential effects to traplines if contacted directly by the trapline permit holder. Given that trapline permit holder contact information is confidentially held by the MNR, Detour Gold is not in the position to directly contact trapline permit holders. At this time, Detour Gold is only able to provide mitigation/compensation for effects to traplines held by members of TTN as part of the IBA.	None.	Complete.
	Section 2.14 Traditional Land Uses: Include any relevant information contained in the TTN traditional knowledge studies that is approved by the TTN for disclosure.	To date, and to our knowledge, the TTN TEK Study has not been completed and therefore no information has been approved by the TTN community for disclosure.	None.	Complete.
	Section 2.15 Heritage and Cultural Resources: A licensed archaeologist on-site during construction would ensure that any cultural heritage or archaeological resources are quickly identified and that the necessary steps taken to protect, document and preserve such resources.	Detour Gold has committed to having a licensed archaeologist available during construction during work in areas of designated high potential from archaeological investigations to date by Woodland Heritage Surveys and White Spruce Archaeology.	None.	Complete.

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	Section 2.15 Heritage and Cultural Resources: Areas should be surveyed and monitored by the archaeologist whenever topsoil is removed.	No significant removal of topsoil is proposed. Detour Gold has committed to having a licensed archaeologist available during construction during work in areas of designated high potential from archaeological investigations to date by Woodland Heritage Surveys and White Spruce Archaeology.	None.	Complete.
	Section 2.15 Heritage and Cultural Resources: Detour Gold shall notify the TTN and other First Nations when human remains or other archaeological or cultural heritage features are uncovered.	Agreed.	None.	Complete.
	Section 2.16 Visual Environment: A more detailed site specific visual assessment should be undertaken with respect to the DLPP at the North French River Conservation Reserve and the Little Abitibi River Provincial Park and site specific mitigation measures identified.	As a transmission line was present previously at both of these locations in recent times and the locations are not readily accessible, it was determined that completion of a detailed site specific visual assessment was not necessary to accurately assess the potential environmental impacts. This approach was discussed with the MNR who manages these areas. Proposed mitigation measures are provided in Section 8.18.1.	None.	Complete.
	Section 2.17 Assessment of Effects: The net effects analysis should be revised to acknowledge that the DLPP will result in some net effects and that their significance is assessed using the methodology described in Section 8.19.	The net effects analysis follows the methodology provided in Section 8.19.1 and proposed in the approved ToR. As indicated in Section 8.19.1, the net effects assessment takes into account proposed mitigation measures captured by the DLPP EA; and that more specifically "This assessment is contingent on the application of the mitigation measures proposed and commitments made throughout the EA."	None.	Complete.

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	Section 2.18 Potential Effects of Malfunctions and Accidents: The mitigative measures outlined in the report were adequate. However the additional preventative measures should be added: • fuels should not be stored closer than 15 m to the edge of a water body; • machines should be turned off when not in use; and • any associated waste should be disposed of in an appropriate manner.	See Section 8.20.1. Fuel storage areas (excluding small containers moveable by hand) will be established and mobile refuelling activities will occur a minimum of 200 m away from waterbodies wherever practical, but no closer than 50 m from waterbodies. Contractors will be requested to turn off machines where not in use, except when it would affect operation of the equipment (or where the equipment is being used as weather refuge etc.). All wastes associated with construction activities will be disposed of according to regulatory requirements. Construction (with the exception of wood waste from vegetation clearing) and sanitary waste will not be disposed of at the work sites.	None.	Complete.
	Section 2.18 Potential Effects of Malfunctions and Accidents: The review of the preventive measures to be undertaken is adequate in aiding to deter accidents from occurring.	Noted.	None.	Complete.
	Section 2.18 Potential Effects of Malfunctions and Accidents: Fire protection should consist of fixed protection systems (e.g., high expansion foam systems or dry chemical systems), in areas where it is most likely for a fire to occur. These systems should be supplemented by fire extinguishers.	The transmission line will be constructed outdoors and fire protection systems are not believed to be appropriate. With substations etc., fire protection will meeting building codes and other appropriate engineering standards. Fire prevention equipment will meet or exceed, industry standards for remote locations and will include well maintained fire extinguishers. Vehicles transporting materials are required to have properly serviced fire extinguisher and first response spill equipment.	None.	Complete.
	Section 2.18 Potential Effects of Malfunctions and Accidents: A food-waste management plan should be authored.	Contractors will be required to handle food and food wastes in a responsible manner, and workers will be educated and policies enforced to ensure no feeding of wildlife. All wastes are to be removed on a regular basis. Preparation of a food waste management plan will be required by the DLPP contractors to help ensure the safety of both the workers and wildlife.	None.	Complete.

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	Section 2.18 Potential Effects of Malfunctions and Accidents: Acknowledge disturbance caused to bird species that nest earlier than June 1, and an explanation of measures taken to mitigate those disturbances while nesting.	All clearing and other activities will be completed in accordance with the <i>Migratory Bird Convention Act</i> and other applicable legislation / regulatory instruments. The majority of tree clearing activities will be undertaken in the winter, thus migratory bird species will not be disturbed. Nest surveys will be undertaken by a qualified biologist, if vegetation must be cleared during the breeding bird season. It is recognized that raptors start nesting as early as the beginning of February. There are no known raptor nests located within the proposed ROW. Should any sticknecks be identified during construction, the area will be avoided until a qualified avian biologist can be contacted for direction. Mitigation will include buffers around nests as per provincial guidelines. Agreed.	None.	Complete.
	Section 2.18 Potential Effects of Malfunctions and Accidents: Report the location of all observed wildlife road mortalities to the proper authority(ies). Carrion will be removed to avoid additional vehicle / wildlife interactions. Section 2.19 Cumulative Effects: No indication as to how this conclusion was reached and what geographic area was examined. Given the presence of mining claims and forestry activities in the area, consideration should be given to activities such as mining exploration and ongoing forestry activities in the CEA.	In addition, contractors will be required to keep a log of all wildlife observance and interactions. Any significant interactions will be required to be reported to Detour Gold immediately in order that appropriate mitigative measures can be implemented. The geographic area included the defined socio-economic study area and well as the general region for any potential larger project. Research was conducted through public venues to determine if any other projects / activities were proposed in the area, including review of forestry management plans etc. Discussions were also held with the Ministry of Northern Development, Mines and Forestry and the MNR to assess whether any other projects were imminent in the area that were not publicly known. Due to privacy issues, Detour Gold was not provided details, but were informed that there were no such projects or activities.	None.	Complete.

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	Section 2.19 Cumulative Effects: Only one "imminent future project/activity was identified, that being ...	Discussions were held with the MNR district office in Cochrane concerning other defined projects which could be considered in the cumulative effects analysis for both the DLPP and the DLP. MNR indicated that the only such defined imminent and applicable, projects within the study area of either the DLPP and the DLP were initiatives planned by Detour Gold in connection with the DLPP and the DLP, together with the potential for reactivation of a small quarry site by M.J. Labelle near the western end of the DLP all-season gravel road. AMEC has subsequently learned that plans for redevelopment of the quarry site have been put on hold. Plans for the harvesting of the three forest blocks shown in the DLPP EA along, or near to, the transmission ROW, have been deferred (Mick Gauthier pers. Comm. June 29, 2010). Other types of "projects" that could potentially proceed, but are as yet undefined are: possible new resource access roads; possible additional forestry operations; possible additional mineral developments; possible new transmission lines; possible new recreational trails; and the possible setting up of new recreational camps and cottages. While all such projects are potentially possible in the future, to our knowledge none have as yet been defined as planned imminent projects. Should any such projects be defined in the future they would require their own approvals and may or may not have to consider effects in relation to the DLPP and the DLP. Hydro One is considering developments within the Moose River basin but any such developments would be expected to mainly affect aquatic environments, and as the DLPP is not expected to adversely affect aquatic environments there is no meaningful potential for cumulative effects. Comment noted, but as per Section 8.21.2: Noise Effects, no cumulative effects involving noise (to either humans or wildlife) are anticipated in relation to the DLPP.	None.	Complete.
	Section 2.19 Cumulative Effects: Cumulative effects of noise ... are adequate, but should include a section on the potential for displacement of wildlife		None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Section 2.19 Cumulative Effects: Review of disturbance to vegetation communities ...	Figures provided in Appendix F show that vegetation communities along the transmission line, within 1 km on either side of the ROW consist of Black Spruce dominated communities, including treed bogs (i.e., Communities 18, 20, 21 and 26), together with a number of historic cutover areas. These communities are also prevalent in the broader region well beyond the 2 km ROW corridor shown in the figures. The entire transmission line length is approximately 174 km. The 2 km corridor bordering the transmission line ROW therefore occupies an area of approximately 350 km², and expands to thousands of km² outside of the corridor. Given that Black Spruce dominated communities occupy the major portion of these areas, the 3.26 km² new cut area represents <1% of the corridor area and a very small fraction of Black Spruce and other forest communities beyond the corridor area. Providing precise measures of disturbance percentages to each specific vegetation community for such small areas is not warranted and would not further the evaluation of cumulative effects. With regard to re-vegetation of the site at closure, such re-vegetation would occur as a result of natural regrowth. Development and maintenance of the transmission line will be such that the ground cover, with low shrubs and tree seedlings, will remain intact. Once ROW maintenance is suspended at (or near) closure existing tree seedlings within the ROW, and seed fall from the adjacent forest will provide the basis for new forest growth. Planting programs are not proposed or necessary.	None.	Complete.
	Section 2.19 Cumulative Effects: Clearing an area directly adjacent to the pre-existing ROW eases wildlife movement ...		AMEC disagrees with the comment. A 40 m wide transmission line corridor between the DLP mine site and Island Falls is unlikely to afford any more effective passage for wildlife movement than the existing 30 m wide cleared corridor, including for Wolves. Similarly, a 100 m wide transmission line corridor between Island Falls and Pinard is unlikely to provide any more effective passage for wildlife movement (including for Wolves) than the existing Hydro One transmission line corridor.	None.	Complete.

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	Section 2.19 Cumulative Effects: It is not rational to assume that habitat fragmentation will not be 'of concern' to wildlife ...	Statements in Section 8.10.1 of the DLPP EA regarding habitat fragmentation could have been better worded. Since all but the mine site terminal end of the new transmission will involve the widening of existing ROWs, there will be no additional "fragmentation" of habitat along approximately 93% of the ROW; and even in areas close to the mine site the transmission line ROW will be in close proximity to other DLP components, such that additional habitat fragmentation caused by transmission line construction in conjunction with mine site development in this area would be minimal.	None.	Complete.
	Section 2.19 Cumulative Effects: The statement "At closure, all disturbed areas will be eventually become productive forest habitat" implies ...	Related statements in the DLPP are correct in as much as all disturbed terrestrial habitats that remain as terrestrial habitats, following mine closure, will gradually revert to productive forest habitat. It was not indicated that all of the mine site area would eventually revert to their "original vegetated" cover types, as suggested by the reviewer. There will be topographic changes within developed areas that would favour the development of different forest community types following mine closure, compared with those originally present. In the case of the transmission line there will be no topographic changes, such that original vegetated forest communities would eventually become re-established, given sufficient time once the transmission line is removed.	None.	Complete.
	Section 2.19 Cumulative Effects: It is not unreasonable to expect some level of cumulative effects(s) on wildlife ...	It was not stated that there would be "no" cumulative effects on wildlife as a result of the combined development of both the DLPP and the DLP; but instead that the cumulative effects taking into consideration planned mitigation measures, including the development of a compact mine site, the use and expansion of existing ROWs for transmission line construction, and mine site revegetation efforts at closure, were "not significant" within the context of criteria used to assess effects.	None.	Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Section 2.19 Cumulative Effects: Disturbance to Rare, Threatened and Endangered Species ...	The reviewer is correct that mention of these additional species of potential occurrence (Lake Sturgeon, Golden Eagle, Yellow Rail, Black Turn, Peregrine Falcon, Short-eared Owl and Canada Warbler) was omitted from Section 8.21. Habitats utilized by these species, and their potential for occurrence within the study area, were discussed in Sections 6.5.1 and 6.5.2. The only species from this group considered to have a reasonable potential for occurring within habitats that would be altered or displaced by transmission line construction were the Yellow Rail, Black Turn, Short-eared Owl and the Canada Warbler. Habitats preferred by the first three of these species consist of low wet habitats and / or grassland / herbaceous habitats. These habitat types would not be appreciably altered by transmission line construction, or would be expanded, as ground cover would be left intact. The Canada Warbler prefers a broad range of forested, shrubland and regenerating forest habitats which are not limited locally or in the broader region. Hence the only one of these species to which cumulative effects could reasonably be applied would be to the Canada Warbler, for which habitats are not limiting.	None.	Complete.
		Section 2.19 Cumulative Effects: Cumulative adverse effects to Caribou ... does not take into account the potential for increased predator pressure on the caribou	This aspect is addressed on Page 131 of the DLPP EA.	None.	Complete.
		Section 2.19 Cumulative Effects: Review of traffic volumes ... cumulative effects to wildlife as a result of traffic is best addressed in the sections of Disturbance to Wildlife ...	Vehicular collisions involving Caribou are discussed in Section 8.21. The potential for cumulative effects involving other species is considered to be minor since there will be limited overlap between construction activities (including the transport of persons and materials) associated with transmission line construction, and those associated with mine site construction and operation.	None.	Complete.

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	Section 2.20 Consultation Plan: TTN consider finalizing the draft Consultation Protocol developed by AECOM, and distributing copies of the Protocol to the Crown and the proponent with a view to working with them to develop a comprehensive plan for meaningful consultation and communication with TTN community members, for this and subsequent components of the Detour Lake mine project. Section 2.20 Consultation Plan: TTN consider a range of activities to raise awareness and capacity within the community to participate meaningfully in the EA process, including a training workshop about the EA process and developing and distributing the Consultation Protocol in a plain-language format which is accessible to community members. Section 2.20 Consultation Plan: TTN consider engaging the Province in taking a more active oversight role in the EA process and associated consultation for the proposed undertaking. Section 2.20 Consultation Plan: An opportunity for TTN to provide input on the chosen elements of the DLPP EA Description of the Environment (what would be defined as Valued Ecosystem Components), and to identify additional elements, was not provided nor was such input solicited in other venues. Solicit information from TTN and include in the DLPP EA.	No response required by proponent. Detour Gold would support development of such a Protocol and is looking forward to working with TTN on reviewing and once a Protocol is finalized, implementing it so that meaningful engagement occurs about the project activities over the long-term and for the life of the project. No response required by proponent. Detour Gold has always been open to hearing how TTN would like to be engaged in the project. Detour Gold would be happy to participate in an EA training workshop if requested by TTN. TTN should be aware that the Chiefs of Ontario have an environmental assessment toolkit at their disposal which may provide additional information/resources for this effort. No response required by proponent. Detour Gold provided copies of both the draft and proposed ToR for the DLPP EA in September and November respectively, prior to the ToR being approved. It is through these review processes, that Aboriginal communities and other stakeholders had an opportunity to provide input into the input into the EA approach and design. Detour Gold also met with TTN to discuss the ToR preparation. Detour Gold did not receive any comments during the comment period from the TTN or its representatives, on either the draft or proposed ToR.	NA NA NA None.	Complete. Complete. Complete. Complete.

	Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Section 2.20 Consultation Plan: Timing and number of PICs were inconsistent with the normal requirements of the EAI process as laid out in the Code of Practice for Consultation in Ontario's EA Process. Should address this issue in the text.	The Code of Practice for Consultation in Ontario's EA Process states: "Beyond the mandatory notification contacts, appropriate consultation methods and techniques should be selected to fit the circumstances and proponents objectives (e.g., information gathering, information dissemination, consultation)" (p. 15). As such there are no requirements for PICs (or public information centres) as a specific method by which the proponent engages stakeholders and Aboriginal communities in the ToR or EA process. A Consultation Plan was prepared and approved by the Minister which was implemented in its entirety. Given the low number of responses from stakeholders and Aboriginal groups during the preparation of both the draft and proposed ToR, the need for public information centres was not considered a necessary method of engagement. Please note that there was no firm commitment for public information sessions made in this part of the ToR preparation (see Section 4.0 of Proposed ToR). A summary of consultation requirements for EAs (as outlined in the Code of Practice for Consultation in Ontario's EA Process p. 24) and the points of contact provided by Detour Gold are as follows: <u>Code Requirement:</u> Minimum of 3 to 4 points of contact, depending on the complexity and environmental sensitivity during the preparation of the ToR. <u>Detour Gold provided:</u> Newspaper notices (for both draft and proposed ToR), couriered copies of both draft and ToR to Aboriginal communities and other stakeholders, provided both draft and proposed ToR at public viewing locations including First Nation Band offices, posted notices in First Nation Band offices; hosted site tours, held at least 3 meetings with various Aboriginal groups. This is approximately and conservatively 12 points of contact during the preparation of the ToR.	None.	Complete.

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	continued	<u>Code Requirement:</u> Minimum of 3 to 4 points of contact, depending on the complexity and environmental sensitivity during the preparation of the ToR. <u>Detour Gold provided:</u> Newspaper notices (for both draft and proposed ToR), couriered copies of both draft and ToR to Aboriginal communities and other stakeholders, provided both draft and proposed ToR at public viewing locations including First Nation Band offices, posted notices in First Nation Band offices; hosted site tours, held at least 3 meetings with various Aboriginal groups. This is approximately and conservatively 12 points of contact during the preparation of the ToR. <u>Code Requirement:</u> Opportunity to comment on submitted ToR before Minister makes decision <u>Detour Gold provided:</u> See above. The opportunity to comment on the submitted (proposed) ToR was provided between November 28 – January 4 <u>Code Requirement:</u> Consultation required during the preparation of the environmental assessment (minimum of 4 to 6 points of contact, depending on the complexity and environmental sensitivity) <u>Detour Gold provided:</u> Nine community meetings were held in March and April, 2010 during the preparation of the environmental assessment. <u>Code Requirement:</u> Opportunity to comment on submitted environmental assessment <u>Detour Gold provided:</u> Five community meetings were held in May and another 2 in June following submission of the environmental assessment and within this review period. <u>Code Requirement:</u> Final opportunity for comments on the Ministry Review of the environmental assessment before Minister makes decision <u>Detour Gold provided:</u> This stage has not yet occurred.		

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
		Based on this analysis, we feel that the basis of this comment is unfounded. Details of the stakeholder and aboriginal engagement activities are documented in Section 9 and Appendix H of the DLPP EA.		
	Section 2.20: Consultation Plan: The proponent should ensure that the Record of Consultation reflects the range of comments received from TTN from the early engagement phase to present, and how these comments are dispositioned, both for the provincial environmental assessment but also as part of the record preceding the CEAA Comprehensive EA for the Detour Lake Project.	Agreed. A full and detailed list of the contacts to date with TTN has been prepared and forwarded to TTN separate from this response. This includes meeting minutes, and a description of concerns along with where these concerns were addressed in the EA document. If concerns were not addressed, a rationale will be provided. For the CEAA Comprehensive Study Report (environmental assessment), comments and interests will be attributed to each Aboriginal group or stakeholder and will show where these comments and interests have been addressed in the EA. If comments and interests are not addressed in the EA (for example, because they were not part of the EA scope), we will provide a rationale.	None.	Complete.
	Section 2.20 Consultation Plan: Timing of release of the EA in advance of completion of the TEK Studies	The TEK Studies for TTN have been underway since December 2008. Study completion, for various reasons beyond Detour's control, has been delayed on several occasions. It was our hope that the TEK studies would have been completed well in advance of the EA submissions. Detour Gold is committed to supporting the TEK studies and avoiding or mitigating any effects to traditional land uses. A number of concerns were shared during TEK steering committee meetings which were documented in section 8.16. These concerns were discussed and addressed in the DLPP EA.	None.	Complete.

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	Section 2.20 Consultation Plan: Timing of and errata in public notifications	We acknowledge the error made in the notification for the Moosonee (April 1, 2010) and Iroquois Falls (April 8, 2010) indicated that the ToR was still under review by the MOE on these dates. The Notice of Commencement and the Notice of Submission of the EA were advertised in the same edition of the Wawatay News due to the frequency of newspaper editions. We acknowledge that the Notice of Commencement could have been released earlier. TTN were informed of the timing of the submission of the EA during their meeting held March 15 and at community meetings held March 24, 2010. The Ontario Codes of Practice for Consultation in Ontario's Environmental Assessment Process and for Preparing and Reviewing Environmental Assessments in Ontario, and the Guide to Environmental Assessment Requirements for Electricity Projects do not specify a required amount of time between these mandatory notices. See Section 5.2.	None.	Complete.
	Overall Comments: DLPP EA must quantify the width of the ROW.		None.	Complete.
	Overall Comments: Ownership of the ROW and transmission lines must be documented in the DLPP EA.	As indicated in the DLPP EA, Detour Gold is not in the business of power generation or power transmittal and the transmission line is intended solely to meet the needs of the proposed mine. Transferral of the transmission line after it is built to a qualified operator would be considered for this reason; however there are currently no advanced negotiations or agreements in this regard. The ROW will remain Crown Land although Land Use Permits will be requested.	None.	Complete.
	Overall Comments: TTN does not want treated poles to be used, and would prefer the use of cedar poles.	Detour Gold proposes to use cedar poles for construction as possible, in recognition of comments received through the consultation processes to date. Should treated poles be required (such as due to lack of availability of suitably sized cedar poles etc.), all standards for their use will be followed.	None.	Complete.
	Overall Comments: The DLPP EA should also outline how the transmission line will be strung.	This will be defined by the contractor, but will be required to follow standard industry practices. This typically includes helicopter use, but may be modified.	None.	Complete.

Submitter	Summary of Comments	Proponent's Response	Proposed Revisions	Status
	Overall Comments: There should be information concerning how the transmission lines will be decommissioned, and/or will it be assumed by Hydro One. This must be clarified.	See Section 5.6.	None.	Complete.
	Overall Comments: No mention of how the winter road on the ROW will be prepared to ensure a solid base of frost. This should be explained.	See Section 5.4.2. Winter roads have been used effectively in the region to construct other transmission lines, including the original transmission line from Island Falls to the Detour Lake site. While distance from permanent access points complicates the logistics of travel, the winter road can be designed and maintained to accommodate the traffic flow.	None.	Complete.
	Overall Comments: There is no mention of any documentation produced during the development of the historical ROW.	Both the environmental baseline study and analysis of alignments from the original transmission line to the Detour Lake site were reviewed and used (see Section 13, References; EAG nd and EAG 1983; and throughout the text). The information available in these documents reflects the scientific knowledge and regulatory requirements at the time. It should also be noted that one of the authors of these reports is part of the team involved in the DLPP EA.	None.	Complete.
	Overall Comments: ... it should be noted where the construction personnel will be staying.	See Section 5.4.2. There are no plans to create permanent camps along the ROW to house workers during construction. Workers will be accommodated off the ROW; likely at the Detour Lake Project site and in Cochrane / Smooth Rock Falls.	None.	Complete.
	Overall Comments: Larger scale mapping is needed. The current mapping does not accurately represent the features and boundaries as it is at too high a level.	Extensive mapping is provided in the DLPP EA consistent with the scale of the Project and anticipated effects associated with transmission line construction, operation and decommissioning. Satellite imagery is provided along the entire route to assist in the visualization of the ROW. Additional mapping is not available for the region due to the general remoteness of the location.	None.	Complete.

Table 1: Detour Lake Project Monthly Mean Snowfall

Station	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
Kapuskasing, Ontario (cm)	60.8	36.4	46.2	28.1	9.3	0.6	0	0	2.0	21.8	50.5	57.3	313.0
Matagami, Quebec (cm)	60.4	35.6	40.6	32.1	8.6	1.2	0	0	3.6	27.7	45.9	58.1	313.8
Detour Site	60.6	36	43.4	30.1	9.0	0.9	0	0	2.8	24.8	48.2	57.7	313.4

Source: Environment Canada, Kapuskasing, Ontario and Matagami, Quebec (Climate Normal data from 1971 to 2000); www.climate.weatheroffice.gc.ca/climateData/canada_e.html, accessed March 29, 2010.

Scale | 20,000,000 sq. Chet. Feet. in 115.5 Miles



Lambert Conformal Conic Projection Standard Parallels 49°N and 77°N.
NATIONAL ATLAS OF CANADA

FIGURE X



amc

DETOUR LAKE POWER PROJECT

Vegetation Cover Types

MAP 7

PROJECT N° TC81510
SCALE 1:23,000

FIGURE, App. F - h
DATE: March 2010

NOTES:

Vegetation Cover Type definitions are based on the following criteria:
- Remote Sensing Data (Satellite Imagery)
- Field Observations
- Ground Truth Data
- Expert Knowledge

Legend:

- (1) Trembling Aspen - Bush Honeysuckle - Large-leaved Aster
- (2) Trembling Aspen - White Birch - Balsam Poplar - Black Spruce - Blueberry
- (3) White Birch - Black Spruce - Blueberry
- (4) Trembling Aspen - Black Spruce - Herb Poor
- (5) Trembling Aspen - Balsam Poplar - Speckled Alder
- (6) Trembling Aspen - Black Spruce - Bush Honeysuckle - Herb Rich
- (7) Trembling Aspen - White Spruce - Squashberry
- (8) Balsam Poplar - Trembling Aspen - Mountain Maple - Ferns
- (9) White Cedar - White Spruce - Mountain Maple - Ferns
- (10) Black Spruce - Herb Rich
- (11) White Cedar - Spruce - Balsam Fir - Ferns
- (12) Jack Pine - Black Spruce - Feathermoss
- (13) Jack Pine - Black Spruce - Blueberry
- (14) Black Spruce - Starstep Moss
- (15) Black Spruce - Jack Pine - Feathermoss
- (16) Jack Pine - Blueberry - Feathermoss - Lichen
- (17) Black Spruce - Jack Pine - Feathermoss - Lichen
- (18) Black Spruce - Labrador Tea - Speckled Alder - Starstep Moss
- (19) Black Spruce - Speckled Alder - Labrador Tea - Sphagnum
- (20) Black Spruce - Larch - Speckled Alder - Starstep Moss
- (21) Black Spruce - Leatherleaf - Sphagnum
- (22) Bush and Alder Thicket
- (23) Open Wetland (Open Bog and Marsh Area)
- (24) Cultural Meadow
- (25) Cultural Plantation
- (26) Thread Wetland (Thread Bog)
- (27) Cleared Disturbance (Logged)
- (28) Open Water
- (29) Black Outcrop
- (30) Proposed Transmission Line Route
- (31) Conservation Reserve Boundary (CRB)



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DETOUR LAKE POWER PROJECT

Vegetation Cover Types

MAP 8

PROJECT N° TC81510
SCALE 1:23,000

FIGURE: App. F - I
DATE: March 2010

NOTES:

Vegetation Cover Types delineations are based on aerial photography, field observations, and ground truthing. The map is a representation of the vegetation cover types as of the date of the field work.

Vegetation Cover Types Legend:

- 19 Black Spruce - Jack Pine - Feathermoss - Lichen
- 20 Black Spruce - Labrador Tea - Speckled Alder - Star-step Moss
- 21 Black Spruce - Speckled Alder - Labrador Tea - Spaghnum
- 22 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 23 Black Spruce - Larch - Speckled Alder - Spaghnum
- 24 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 25 Black Spruce - Larch - Speckled Alder - Spaghnum
- 26 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 27 Black Spruce - Larch - Speckled Alder - Spaghnum
- 28 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 29 Black Spruce - Larch - Speckled Alder - Spaghnum
- 30 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 31 Black Spruce - Larch - Speckled Alder - Spaghnum
- 32 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 33 Black Spruce - Larch - Speckled Alder - Spaghnum
- 34 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 35 Black Spruce - Larch - Speckled Alder - Spaghnum
- 36 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 37 Black Spruce - Larch - Speckled Alder - Spaghnum
- 38 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 39 Black Spruce - Larch - Speckled Alder - Spaghnum
- 40 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 41 Black Spruce - Larch - Speckled Alder - Spaghnum
- 42 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 43 Black Spruce - Larch - Speckled Alder - Spaghnum
- 44 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 45 Black Spruce - Larch - Speckled Alder - Spaghnum
- 46 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 47 Black Spruce - Larch - Speckled Alder - Spaghnum
- 48 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 49 Black Spruce - Larch - Speckled Alder - Spaghnum
- 50 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 51 Black Spruce - Larch - Speckled Alder - Spaghnum
- 52 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 53 Black Spruce - Larch - Speckled Alder - Spaghnum
- 54 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 55 Black Spruce - Larch - Speckled Alder - Spaghnum
- 56 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 57 Black Spruce - Larch - Speckled Alder - Spaghnum
- 58 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 59 Black Spruce - Larch - Speckled Alder - Spaghnum
- 60 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 61 Black Spruce - Larch - Speckled Alder - Spaghnum
- 62 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 63 Black Spruce - Larch - Speckled Alder - Spaghnum
- 64 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 65 Black Spruce - Larch - Speckled Alder - Spaghnum
- 66 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 67 Black Spruce - Larch - Speckled Alder - Spaghnum
- 68 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 69 Black Spruce - Larch - Speckled Alder - Spaghnum
- 70 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 71 Black Spruce - Larch - Speckled Alder - Spaghnum
- 72 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 73 Black Spruce - Larch - Speckled Alder - Spaghnum
- 74 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 75 Black Spruce - Larch - Speckled Alder - Spaghnum
- 76 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 77 Black Spruce - Larch - Speckled Alder - Spaghnum
- 78 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 79 Black Spruce - Larch - Speckled Alder - Spaghnum
- 80 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 81 Black Spruce - Larch - Speckled Alder - Spaghnum
- 82 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 83 Black Spruce - Larch - Speckled Alder - Spaghnum
- 84 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 85 Black Spruce - Larch - Speckled Alder - Spaghnum
- 86 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 87 Black Spruce - Larch - Speckled Alder - Spaghnum
- 88 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 89 Black Spruce - Larch - Speckled Alder - Spaghnum
- 90 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 91 Black Spruce - Larch - Speckled Alder - Spaghnum
- 92 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 93 Black Spruce - Larch - Speckled Alder - Spaghnum
- 94 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 95 Black Spruce - Larch - Speckled Alder - Spaghnum
- 96 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 97 Black Spruce - Larch - Speckled Alder - Spaghnum
- 98 Black Spruce - Larch - Speckled Alder - Star-step Moss
- 99 Black Spruce - Larch - Speckled Alder - Spaghnum
- 100 Black Spruce - Larch - Speckled Alder - Star-step Moss



LEGEND
Vegetation Cover Types

(1) Trembling Aspen - Bush-Honeyuckle - Large-leaved Aster	(17) Black Spruce - Jack Pine - Feathermoss - Lichen	(25) Cultural Plantation
(2) Trembling Aspen - White Birch - Black Alder - Bracken Fern	(18) Black Spruce - Labrador Tea - Speckled Alder - Stair-step Moss	(26) Treed Wetland (Treed Bog)
(3) White Birch - Black Spruce - Blueberry	(19) Black Spruce - Speckled Alder - Labrador Tea - Sphagnum	(27) Cleared Disturbed Loggia
(4) Trembling Aspen - Black Spruce - Herb Poor	(20) Black Spruce - Larch - Speckled Alder - Stair-step Moss	(28) Open Water
(5) Trembling Aspen - Balsam Poplar - Speckled Alder	(21) Black Spruce - Lichen - Speckled Alder - Sphagnum	(29) Peat Outcrop
(6) Trembling Aspen - Black Spruce - Bush-Honeyuckle - Herb Rich	(22) Black Spruce - Lichen - Speckled Alder - Sphagnum	
(7) Trembling Aspen - White Spruce - Squashberry	(23) Black Spruce - Jack Pine - Feathermoss	
(8) Balsam Poplar - Trembling Aspen - Mountain Maple - Ferns	(24) Open Wetland (Open Bog and Marsh Area)	
	(25) Cultural Meadow	

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DETOUR LAKE POWER PROJECT

Vegetation Cover Types

MAP 10

PROJECT N° TC81510
SCALE 1:23,000

FIGURE App. F - k
DATE March 2010

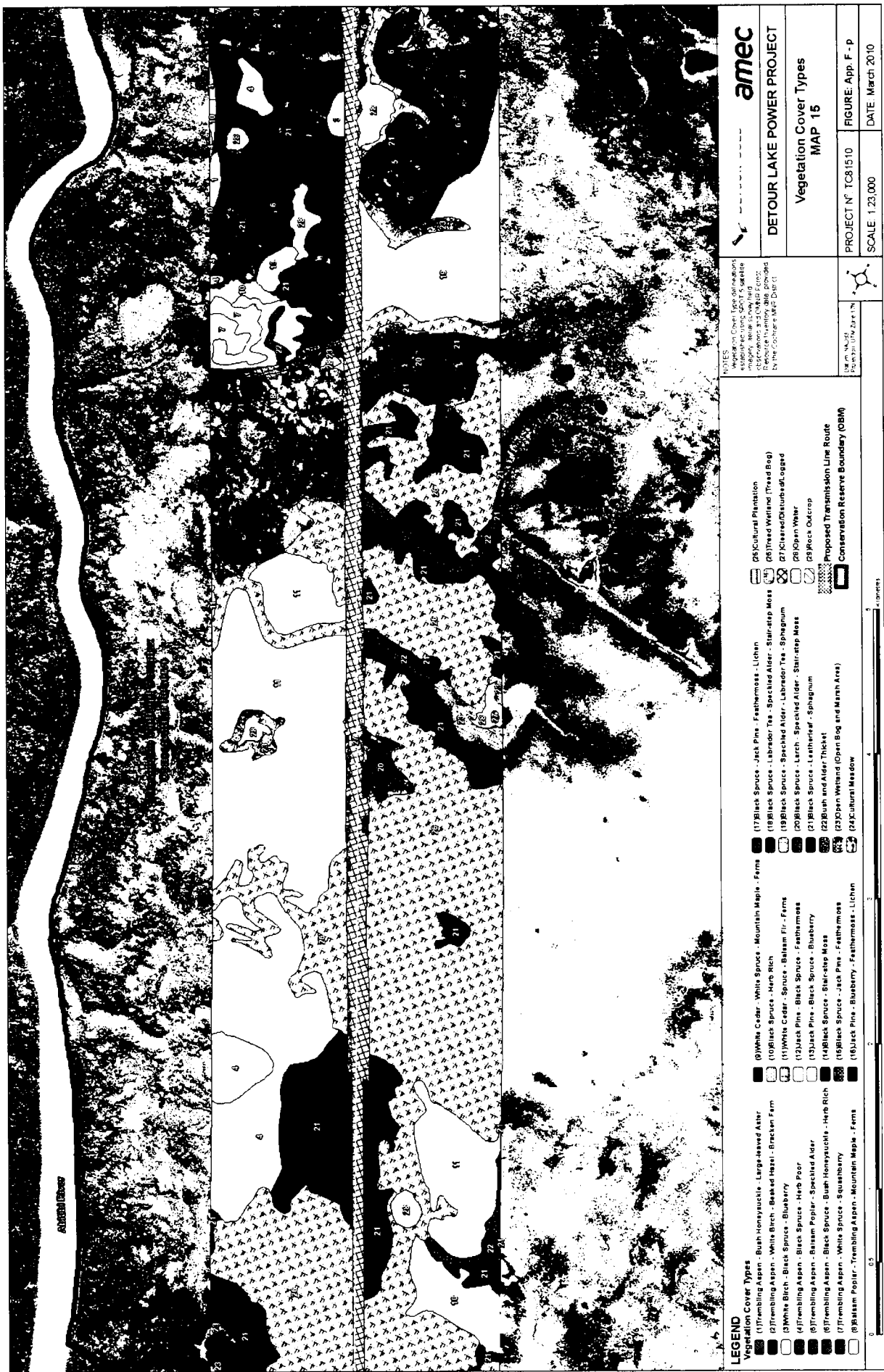
NOTES

Vegetation Cover Type designations are based on aerial photography interpretation using a 1:25,000 scale. The designations are based on the 1:25,000 scale. The designations are based on the 1:25,000 scale. The designations are based on the 1:25,000 scale.

Removal of vegetation data provided by the Little Abitibi River C&D.

Proposed Transmission Line Route

Provincial Park Boundary (OPM)





LEGEND
Vegetation Cover Types

(1) Trembling Aspen - Bush Honeysuckle - Large-leaved Alder	(17) Black Spruce - Jack Pine - Feathermoss - Lichen	(25) Cultural Plantation
(2) Trembling Aspen - White Birch - Samed Hazel - Blacken Fern	(18) Black Spruce - Labrador Tea - Speckled Alder - Star-step Moss	(26) Free Welland (Free Bog)
(3) White Birch - Black Spruce - Blueberry	(19) Black Spruce - Speckled Alder - Labrador Tea - Sphagnum	(27) Clear Disturbance Logged
(4) Trembling Aspen - Black Spruce - Herb Pear	(20) Black Spruce - Larch - Speckled Alder - Star-step Moss	(28) Open Water
(5) Trembling Aspen - Balsam Poplar - Speckled Alder	(21) Black Spruce - Leatherleaf - Sphagnum	(29) Rock Outcrop
(6) Trembling Aspen - Black Spruce - Bush Honeysuckle - Herb Rich	(22) Bush and Alder Thicket	(30) Proposed Transmission Line Route
(7) Trembling Aspen - White Spruce - Squashberry	(23) Open Welland (Open Bog and Marsh Area)	(31) Conservation Reserve Boundary (CBM)
(8) Balsam Poplar - Trembling Aspen - Mountain Maple - Fern	(24) Cultural Meadow	

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DETOUR LAKE POWER PROJECT

Vegetation Cover Types

MAP 16

PROJECT N° TC81510
SCALE: 1:23,000

FIGURE: App. F - q
DATE: March 2010

NOTES:
Vegetation Cover Type Determinations
are based on aerial photography, field
observations and OMIS data. Provided
as the basis for the map.

Map in UTM
Projection UTM Zone 17N

TABLE 3-3
COMPILED BIRD SPECIES LIST

Species	Scientific Name	Global Status	Provincial Status	COSEWIC/ SARA Status	OMNR/SARO Status	Other Protective Acts	Current Breeding Evidence
Common Loon	<i>Gavia immer</i>	G5	S4B,SZN			MBCA	P
American Bittern†	<i>Botaurus lentiginosus</i>	G4	S4B,SZN			MBCA	N/A
Great Blue Heron	<i>Ardea herodias</i>	G5	S5B,SZN			MBCA	H
Canada Goose	<i>Branta canadensis</i>	G5	S5B,SZN			MBCA	P
Green-winged Teal	<i>Anas crecca</i>	G5	S4B,SZN			MBCA	H
American Black Duck†	<i>Anas rubripes</i>	G5	S5B,SZN			MBCA	N/A
Mallard	<i>Anas platyrhynchos</i>	G5	S5B,SZN			MBCA	P
Northern Pintail†	<i>Anas acuta</i>	G5	S5B,SZN			MBCA	N/A
Blue-winged Teal†	<i>Anas discors</i>	G5	S5B,SZN			MBCA	N/A
American Widgeon	<i>Anas americana</i>	G5	S4B,SZN			MBCA	P
Ring-necked Duck	<i>Aythya collaris</i>	G5	S5B,SZN			MBCA	P
Greater Scaup†	<i>Aythya marila</i>	G5	S2B,SZN			MBCA	N/A
Lesser Scaup*	<i>Aythya affinis</i>	G5	S4B,SZN			MBCA	H
Common Goldeneye	<i>Bucephala clangula</i>	G5	S5B,SZN			MBCA	T,AE
Bufflehead*	<i>Bucephala albeola</i>	G5	S3B,SZN			MBCA	H
Common Merganser	<i>Mergus merganser</i>	G5	S5B,SZN			MBCA	P,T
Red-breasted Merganser	<i>Mergus serrator</i>	G5	S4B,SZN			MBCA	P
Osprey	<i>Pandion haliaetus</i>	G5	S4B,SZN			FWCA	H
Bald Eagle	<i>Haliaeetus leucocephalus</i>	G4	S4B,SZN		Special Concern	FWCA	X
Northern Harrier	<i>Circus cyaneus</i>	G5	S4B,SZN			FWCA	P
Sharp-shinned Hawk	<i>Accipiter striatus</i>	G5	S5B,SZN			FWCA	H
Northern Goshawk*	<i>Accipiter gentilis</i>	G5	S4			FWCA	H
Broad-winged Hawk†	<i>Buteo platypterus</i>	G5	S5B,SZN			FWCA	N/A
Red-tailed Hawk	<i>Buteo jamaicensis</i>	G5	S5B,SZN			FWCA	H
American Kestrel	<i>Falco sparverius</i>	G5	S5B,SZN			FWCA	H
Spruce Grouse	<i>Falco pennsylvanicus</i>	G5	S5			FWCA	T
Ruffed Grouse	<i>Bonasa umbellus</i>	G5	S5			FWCA	M
Sharp-tailed Grouse*	<i>Tympanuchus phasianellus</i>	G4	S4			FWCA	P,T
Sora*	<i>Porzana carolina</i>	G5	S4B,SZN			MBCA	T,A
Sandhill Crane	<i>Grus canadensis</i>	G5	S4B,SZN			MBCA	H
Killdeer	<i>Charadrius vociferous</i>	G5	S5B,SZN			MBCA	M
Greater Yellowlegs	<i>Tringa melanoleuca</i>	G5	S4B,SZN			MBCA	M,D
Spotted Sandpiper	<i>Actitis macularia</i>	G5	S5B,SZN			MBCA	P
Least Sandpiper*	<i>Calidris minutilla</i>	G5	S4B,SZN			MBCA	X-migrating
Dunlin	<i>Calidris alpina</i>	G5	S3B,SZN			MBCA	X-migrating
Wilson's Snipe	<i>Gallinago decora</i>	G5	S5B,SZN			MBCA	D

American Woodcock*	<i>Scolopax minor</i>	G5	S5B,SZN			MBCA	D
Bonaparte's Gull	<i>Larus philadelphia</i>	G5	S4B,SZN			MBCA	H
Great-horned Owl*	<i>Bubo virginianus</i>	G5	S5			FWCA	H
Northern Hawk Owl	<i>Surnia ulula</i>	G5	S4			FWCA	H
Great Gray Owl	<i>Strix nebulosa</i>	G5	S3S4			FWCA	M
Common Nighthawk	<i>Chordeiles minor</i>	G5	S4B,SZN	Threatened, Schedule 1	Special Concern	MBCA	H
Belted Kingfisher	<i>Ceryle alcyon</i>	G5	S5B,SZN			FWCA	H
Yellow-bellied Sapsucker	<i>Sphyrapicus varius</i>	G5	S5B,SZN			MBCA	M
Downy Woodpecker*	<i>Picoides pubescens</i>	G5	S5			MBCA	H
Hairy Woodpecker	<i>Picoides villosus</i>	G5	S5			MBCA	H
Three-toed Woodpecker	<i>Picoides tridactylus</i>	G5	S4			MBCA	M
Northern Flicker	<i>Colaptes auratus</i>	G5	S5B,SZN			MBCA	T
Pileated Woodpecker*	<i>Dryocopus pileatus</i>	G5	S4S5			MBCA	H
Olive-sided Flycatcher	<i>Contopus cooperi</i>	G4	S5B,SZN	Threatened, Schedule 1	Special Concern	MBCA	M
Yellow-bellied Flycatcher	<i>Empidonax flaviventris</i>	G5	S5B,SZN			MBCA	M
Alder Flycatcher	<i>Empidonax alhorum</i>	G5	S5B,SZN			MBCA	M
Least Flycatcher	<i>Empidonax minimus</i>	G5	S5B,SZN			MBCA	M
Eastern Phoebe*	<i>Sayornis phoebe</i>	G5	S5B,SZN			MBCA	H
Horned Lark*	<i>Eremophila alpestris</i>	G5	S5B,SZN			MBCA	X-migrating
Tree Swallow	<i>Tachycineta bicolor</i>	G5	S5B,SZN			MBCA	AE
Barn Swallow	<i>Hirundo rustica</i>	G5	S5B,SZN			MBCA	AE
Gray Jay	<i>Perisoreus canadensis</i>	G5	S5			FWCA	P,FY
Blue Jay*	<i>Cyanocitta cristata</i>	G5	S5			FWCA	M
American Crow	<i>Corvus brachyrhynchos</i>	G5	S5B,SZN				H
Common Raven	<i>Corvus corax</i>	G5	S5			FWCA	P,D
Black-capped Chickadee	<i>Parus atricapillus</i>	G5	S5			MBCA	H
Red-breasted Nuthatch	<i>Sitta canadensis</i>	G5	S5B,SZN			MBCA	M
Brown Creeper	<i>Certhia americana</i>	G5	S5B,SZN			MBCA	M
Winter Wren	<i>Troglodytes troglodytes</i>	G5	S5B,SZN			MBCA	T
Golden-crowned Kinglet	<i>Regulus satrapa</i>	G5	S5B,SZN			MBCA	M
Ruby-crowned Kinglet	<i>Regulus calendula</i>	G5	S5B,SZN			MBCA	T,A
Swainson's Thrush	<i>Catharus ustulatus</i>	G5	S5B,SZN			MBCA	M,H
Hermit Thrush	<i>Catharus guttatus</i>	G5	S5B,SZN			MBCA	M,H
American Robin	<i>Turdus migratorius</i>	G5	S5B,SZN			MBCA	P,T
American Pipit	<i>Anthus rubescens</i>	G5	S4B,SZN			MBCA	X-migrating
Cedar Waxwing	<i>Bombycilla cedrorum</i>	G5	S5B,SZN			MBCA	M
European Starling	<i>Sturnus vulgaris</i>	G5	SE			MBCA	H
Blue-headed Vireo	<i>Vireo solitarius</i>	G5	S5B,SZN			MBCA	M
Red-eyed Vireo	<i>Vireo olivaceus</i>	G5	S5B,SZN			MBCA	M
Tennessee Warbler	<i>Vermivora peregrina</i>	G5	S5B,SZN			MBCA	M

Orange-crowned Warbler	<i>Vermivora celata</i>	G5	S4B?,SZN			MBCA	M
Nashville Warbler	<i>Vermivora ruficapilla</i>	G5	S5B,SZN			MBCA	M
Chestnut-sided Warbler	<i>Dendroica pensylvanica</i>	G5	S5B,SZN			MBCA	M
Magnolia Warbler	<i>Dendroica magnolia</i>	G5	S5B,SZN			MBCA	M
Black-throated Blue Warbler*	<i>Dendroica caerulescens</i>	G5	S5B,SZN			MBCA	M
Yellow-rumped Warbler	<i>Dendroica coronata</i>	G5	S5B,SZN			MBCA	P,T
Blackburnian Warbler†	<i>Dendroica fusca</i>	G5	S5B,SZN			MBCA	N/A
Western Palm Warbler	<i>Dendroica palmarum</i>	G5T5	S5B,SZN			MBCA	P,T
Blackpoll Warbler	<i>Dendroica striata</i>	G5	S4B,SZN			MBCA	X-migrating
Black and White Warbler	<i>Mniotilta varia</i>	G5	S5B,SZN			MBCA	M
American Redstart	<i>Setophaga ruticilla</i>	G5	S5B,SZN			MBCA	M
Ovenbird	<i>Seiurus aurocapillus</i>	G5	S5B,SZN			MBCA	M
Northern Waterthrush	<i>Seiurus noveboracensis</i>	G5	S5B,SZN			MBCA	M
Mourning Warbler	<i>Oporornis philadelphia</i>	G5	S5B,SZN			MBCA	M
Common Yellowthroat	<i>Geothlypis trichas</i>	G5	S5B,SZN			MBCA	M,H
Chipping Sparrow	<i>Spizella passerine</i>	G5	S5B,SZN			MBCA	M
Savannah Sparrow	<i>Passerculus sandwichensis</i>	G5	S5B,SZN			MBCA	M
Song Sparrow	<i>Melospiza melodia</i>	G5	S5B,SZN			MBCA	M
Lincoln's Sparrow	<i>Melospiza lincolni</i>	G5	S5B,SZN			MBCA	T
White-throated Sparrow	<i>Zonotrichia albicollis</i>	G5	S5B,SZN			MBCA	P,T,A
White-crowned Sparrow	<i>Zonotrichia leucophrys</i>	G5	S4B,SZN			MBCA	X-migrating
Dark-eyed Junco	<i>Junco hyemalis</i>	G5	S5B,SZN			MBCA	M
Red-winged Blackbird	<i>Agelaius phoeniceus</i>	G5	S5B,SZN				P
Rusty Blackbird	<i>Euphagus carolinus</i>	G5	S5B,SZN	Special Concern, Schedule 1		FWCA	P
Common Grackle	<i>Quiscalus quiscula</i>	G5	S5B,SZN				H
Purple Finch	<i>Carpodacus purpureus</i>	G5	S5B,SZN			MBCA	M,H
Red Crossbill*	<i>Loxia curvirostra</i>	G5	S5B,SZN			MBCA	H
American Goldfinch	<i>Carduelis tristis</i>	G5	S5B,SZN			MBCA	M
Wood Duck*	<i>Aix sponsa</i>	G5	S5			MBCA	N/A
Northern Shoveler*	<i>Anas clypeata</i>	G5	S4			MBCA	N/A
Hooded Merganser*	<i>Lophodytes cucullatus</i>	G5	S5B,S5N			MBCA	N/A
Ruddy Duck*	<i>Oxyura jamaicensis</i>	G5	S4B,S4N			MBCA	N/A
Pied-billed Grebe*	<i>Podilymbus podiceps</i>	G5	S4B,S4N			MBCA	N/A
Red-necked Grebe*	<i>Podiceps grisegena</i>	G5	S3B,S4N			MBCA	N/A
Double-crested Cormorant*	<i>Phalacrocorax auritus</i>	G5	S5B				N/A
Merlin*	<i>Falco columbarius</i>	G5	S5B			FWCA	N/A
Yellow Rail*	<i>Coturnicops noveboracensis</i>	G4	S4B			MBCA	N/A

Virginia Rail•	<i>Rallus limicola</i>	G5	S5B				MBCA	N/A
American Coot•	<i>Fulica americana</i>	G5	S4B				MBCA	N/A
Solitary Sandpiper•	<i>Tringa solita</i>	G5	S4B				MBCA	N/A
Wilson's Phalarope•	<i>Phalaropus tricolor</i>	G5	S3B				MBCA	N/A
Ring-billed Gull•	<i>Larus delawarensis</i>	G5	S5B,S4N				MBCA	N/A
Herring Gull•	<i>Larus argentatus</i>	G5	S5B,S5N				MBCA	N/A
Black Tern•	<i>Chlidonias niger</i>	G4	S3B		Special Concern		MBCA	N/A
Common Tern•	<i>Sterna hirundo</i>	G5	S4B				MBCA	N/A
Rock Pigeon•	<i>Columba livia</i>	G5	SNA					N/A
Mourning Dove•	<i>Zenaidura macroura</i>	G5	S5				MBCA	N/A
Yellow-billed Cuckoo•	<i>Coccyzus erythrophthalmus</i>	G5	S4B				MBCA	N/A
Long-eared Owl•	<i>Asio otus</i>	G5	S4				FWCA	N/A
Short-eared Owl•	<i>Asio flammeus</i>	G5	S2N,S4B		Special Concern, Schedule 3	Special Concern	FWCA	N/A
Boreal Owl•	<i>Aegolius funereus</i>	G5	S4				FWCA	N/A
Northern Saw-whet Owl•	<i>Aegolius acadicus</i>	G5	S4				FWCA	N/A
Whip-poor-will•	<i>Caprimulgus vociferus</i>	G5	S4B		Threatened, Schedule 1	Threatened	MBCA	N/A
Ruby-throated Hummingbird•	<i>Archilochus colubris</i>	G5	S5B				MBCA	N/A
Black-backed Woodpecker•	<i>Picoides arcticus</i>	G5	S4				MBCA	N/A
Eastern Wood-Pewee•	<i>Contopus virens</i>	G5	S4B				MBCA	N/A
Great-crested Flycatcher•	<i>Myiarchus crinitus</i>	G5	S4B				MBCA	N/A
Eastern Kingbird•	<i>Tyrannus tyrannus</i>	G5	S4B				MBCA	N/A
Warbling Vireo•	<i>Vireo gilvus</i>	G5	S5B				MBCA	N/A
Philadelphia Vireo•	<i>Vireo philadelphicus</i>	G5	S5B				MBCA	N/A
Bank Swallow•	<i>Riparia riparia</i>	G5	S4B				MBCA	N/A
Cliff Swallow•	<i>Petrochelidon pyrrhonota</i>	G5	S4B				MBCA	N/A
Boreal Chickadee•	<i>Poecile hudsonica</i>	G5	S5				MBCA	N/A
House Wren•	<i>Troglodytes aedon</i>	G5	S5B				MBCA	N/A
Eastern Bluebird•	<i>Sialia sialis</i>	G5	S5B				MBCA	N/A
Veery•	<i>Catharus fuscescens</i>	G5	S4B				MBCA	N/A
Gray Catbird•	<i>Dumetella carolinensis</i>	G5	S4B				MBCA	N/A
Brown Thrasher•	<i>Toxostoma rufum</i>	G5	S4B				MBCA	N/A
Northern Parula•	<i>Parula americana</i>	G5	S4B				MBCA	N/A
Yellow Warbler•	<i>Dendroica petechia</i>	G5	S5B				MBCA	N/A
Cape May Warbler•	<i>Dendroica tigrina</i>	G5	S5B				MBCA	N/A
Black-throated Green Warbler•	<i>Dendroica virens</i>	G5	S5B				MBCA	N/A
Blackburnian Warbler•	<i>Dendroica fusca</i>	G5	S5B				MBCA	N/A

Pine Warbler•	<i>Dendroica pinus</i>	G5	S5B			MBCA	N/A
Bay-breasted Warbler•	<i>Dendroica castanea</i>	G5	S5B			MBCA	N/A
Connecticut Warbler•	<i>Oporornis agilis</i>	G4	S4B			MBCA	N/A
Wilson's Warbler•	<i>Wilsonia pusilla</i>	G5	S4B			MBCA	N/A
Canada Warbler•	<i>Wilsonia Canadensis</i>	G5	S4B			MBCA	N/A
Scarlet Tanager•	<i>Piranga olivacea</i>	G5	S4B			MBCA	N/A
Clay-colored Sparrow•	<i>Spizella pallida</i>	G5	S4B			MBCA	N/A
Field Sparrow•	<i>Spizella pusilla</i>	G5	S4B			MBCA	N/A
Vesper Sparrow•	<i>Poocetes gramineus</i>	G5	S4B			MBCA	N/A
Le Conte's Sparrow•	<i>Ammodramus leconteii</i>	G4	S4B			MBCA	N/A
Fox Sparrow•	<i>Passerella iliaca</i>	G5	S4B			MBCA	N/A
Swamp Sparrow•	<i>Melospiza georgiana</i>	G5	S5B			MBCA	N/A
Rose-breasted Grosbeak•	<i>Pheucticus ludovicianus</i>	G5	S4B			MBCA	N/A
Indigo Bunting•	<i>Passerina cyanea</i>	G5	S4B			MBCA	N/A
Bobolink•	<i>Dolichonyx oryzivorus</i>	G5	S4B			MBCA	N/A
Brown-headed Cowbird•	<i>Molothrus ater</i>	G5	S4B				N/A
Baltimore Oriole•	<i>Icterus galbula</i>	G5	S4B			MBCA	N/A
Pine Grosbeak•	<i>Pinicola enucleator</i>	G5	S4B			MBCA	N/A
White-winged Crossbill•	<i>Loxia leucoptera</i>	G5	S5B			MBCA	N/A
Pine Siskin•	<i>Carduelis pinus</i>	G5	S4B			MBCA	N/A
Evening Grosbeak•	<i>Coccothraustes vespertinus</i>	G5	S4B			MBCA	N/A
House Sparrow•	<i>Passer domesticus</i>	G5	SNA				N/A

• Regionally rare species (Cadman et al. 2000)

† Species observed on the Project Site during a previous study, not observed during AMEC 2008 surveys. (Environmental Applications Group Limited 1983)

‡ Species observed on the Project Site during AMEC 2008 surveys not noted as observed during the previous study. (Environmental Applications Group Limited 1983)

• Species potentially on the Project Site based on Atlas of the Breeding Birds of Ontario (2001-2005)

TABLE 3.5
COMPILED MAMMAL SPECIES LIST

Species	Scientific Name	Global Status	Provincial Status	COSEWIC Status	OMNR Status	Other Protective Acts
Snowshoe Hare	<i>Lepus americanus</i>	G5	S5			FWCA
Woodchuck	<i>Marmota monax</i>	G5	S5			
Red Squirrel	<i>Tamiasciurus hudsonicus</i>	G5	S5			FWCA
Beaver	<i>Castor canadensis</i>	G5	S5			FWCA
Southern Red-backed Vole†	<i>Clethrionomys gapperi</i>	G5	S5			
Rock Vole†	<i>Microtus chrotorrhinus</i>	G4	S3S4			
Muskrat	<i>Ondatra zibethicus</i>	G5	S5			FWCA
Southern Bog Lemming†	<i>Synaptomys cooperi</i>	G5	S4			
Gray Wolf	<i>Canis lupus</i>	G4	S4			FWCA
Red Fox	<i>Vulpes vulpes</i>	G5	S5			FWCA
Black Bear	<i>Ursus americanus</i>	G5	S5			FWCA
Marten	<i>Martes americana</i>	G5	S5			FWCA
Fishert†	<i>Martes pennanti</i>	G5	S5			FWCA
Mink†	<i>Mustela vison</i>	G5	S5			FWCA
River Otter	<i>Lutra canadensis</i>	G5	S5			FWCA
Lynx†	<i>Lynx canadensis</i>	G5	S5			FWCA
Moose	<i>Alces alces</i>	G5	S5			FWCA
*Woodland Caribou	<i>Rangifer tarandus</i>	G5	S3S4?	Threatened	Threatened	FWCA
Black-backed Shrew•	<i>Sorex arcticus</i>	G5	S5			FWCA
Common Shrew•	<i>Sorex cinereus</i>	G5	S5			FWCA
Pygmy Shrew•	<i>Sorex hoyi</i>	G5	S4			FWCA
Water Shrew•	<i>Sorex palustris</i>	G5	S5			FWCA
Northern Short-tailed Shrew•	<i>Blarina brevicauda</i>	G5	S5			FWCA
Star-nosed Mole•	<i>Condylura cristata</i>	G5	S5			
Little Brown Bat•	<i>Myotis lucifuga</i>	G5	S5			FWCA
Northern Long-eared Bat•	<i>Myotis septentrionalis</i>	G4	S3?			FWCA
Silver-haired Bat•	<i>Lasionycteris noctivagans</i>	G5	S4			FWCA
Eastern Red Bat•	<i>Lasiurus borealis</i>	G5	S4			FWCA
Hoary Bat•	<i>Lasiurus cinereus</i>	G5	S4			FWCA

Least Chipmunk•	<i>Neotamias minimus</i>	G5	S5			FWCA
Eastern Chipmunk•	<i>Tamias striatus</i>	G5	S5			FWCA
Northern Flying Squirrel•	<i>Glaucomys sabrinus</i>	G5	S5			FWCA
Deer Mouse•	<i>Peromyscus maniculatus</i>	G5	S5			
Heather Vole•	<i>Phenacomys ungava</i>	G5	S4			
Meadow Vole•	<i>Microtus pennsylvanicus</i>	G5	S5			
House Mouse•	<i>Mus musculus</i>	G5	SNA			
Meadow Jumping Mouse•	<i>Zapus hudsonius</i>	G5	S5			
Woodland Jumping Mouse•	<i>Napaeozapus insignis</i>	G5	S5			
Porcupine•	<i>Erethizon dorsatum</i>	G5	S5			
Coyote•	<i>Canis latrans</i>	G5	S5			FWCA
Ermine•	<i>Mustela erminea</i>	G5	S5			FWCA
Striped Skunk•	<i>Mephitis mephitis</i>	G5	S5			FWCA

† Species observed on the Project Site during a previous study, not observed during AMEC 2008 surveys. (Environmental Applications Group Limited 1983)

•Species potentially on the Project Site based on Herpetofaunal Summary Atlas

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SUMMARY OF COMMENTS ON ENVIRONMENTAL ASSESSMENT DOCUMENT

Proposal: Individual EA Detour Lake Power Project (DLPP)

Proponent: Detour Gold (DG) Canada Corporation

Comments: Vince Deschamps, AECOM retained by Coral Rapids Power Limited Partnership on behalf of Taykwa Tagamou Nation

Initial Comment	Proponent's Response	Follow-Up Comment	Proponent's Response(2)
Section 2.6 Fisheries and Aquatic Habitat: Mention the ice bridges will be monitored for incidents such as debris jams or scouring of bed and banks.	As indicated in the DLPP EA (Section 8.1), ice bridges will be monitored during spring thaw for incidents such as debris jams or scouring of bed and banks and mitigation implemented as necessary.	There is no specific mention of a monitoring plan for the ice bridges, only mention of mitigation if damming occurs during the spring thaw. How will these areas be monitored and will there be additional site visits if unseasonably warm temperatures occur prior to the average timing of the spring thaw?	The ice bridges will be visually inspected on a frequent basis prior to use and during use, on no less than a daily basis to assess competence. Thickness of the ice will be determined by augering if appropriate to ensure safety. If there is unseasonably warm temperatures, or closer to the end of the season, more frequent inspections will occur if necessary to ensure the safety of workers and reduce the potential for environmental damage.
Section 2.7 Terrestrial Habitat/Vegetation: Transsects used for terrestrial community description and delineation should be labelled on all vegetation cover type maps for a visual of the area covered during investigations.	Vegetation community type delineations were estimated using SPOT 5 satellite imagery, aerial survey field observations and MNR, Forest Resource Inventory forest stand species composition data provided by the Cochrane MNR District (2008). The entire alignment including transects covering up to 500 on either side of the ROW, was flown four times to ensure a complete coverage of the ROW and the adjacent habitats.	Delineation of vegetation communities through remote imagery is acceptable. However, we would ask whether any ground-truthing was undertaken to confirm vegetation types in the field? We would not expect that all communities would be ground-truthed, but would expect that a representative sample would have been checked to confirm the accuracy of the delineation process.	Extensive field vegetation surveys were undertaken within each distinct forest community, wetland and cultural vegetation type during investigations for the Detour Lake Project (Terrestrial Baseline Study) Aerial surveys of the DLPP and review of existing Forest Resource Inventory mapping for the area confirmed that vegetation community composition within the DLPP study area are analogous to those occurring in the Detour Lake Project study area. As such, extensive ground-truthing of a representative sample has been undertaken. This is a typographic error. There are nineteen, 11x17 maps in Appendix F titled "Vegetation Cover Maps", that show the information For clarity, the Black Spruce Swamp types are: Black Spruce - Larch - Speckled Alder - Stair-step Moss Black Spruce - Leatherleaf - Sphagnum Black Spruce - Stair-step Moss Black Spruce - Bog Rosemary - Pale Laurel - Sphagnum Treed Wetland (Treed Bog)
Section 2.7 Terrestrial Habitat/Vegetation: Given the amount of wetland (up to 153.8 ha) being affected by the construction of the proposed transmission line, more detail should be given in the description of these wetlands and their associated plant communities (re Table 6-9).	The wetlands present are largely open and treed bog habitat types as well as alder thickets and Black Spruce Swamps, all of which are common in northeastern Ontario. Figure App F-1 provides the location and spatial extent of each of these communities within the study area and the text describes the most frequently occurring species that make up the canopy, shrub and herb layers. Additional detail on species composition will not change the effects assessment or mitigation employed to minimize impacts to these wetlands.	Could not locate Figure App F-1. Could AMEC be referring to the maps in Appendix F? If so, Black Spruce Swamp types are not explicitly identified (there are numerous Black Spruce community types, but which ones are considered 'wetlands' (once it is deciphered) and that additional detail is not required	This is a typographic error. There are nineteen, 11x17 maps in Appendix F titled "Vegetation Cover Maps", that show the information For clarity, the Black Spruce Swamp types are: Black Spruce - Larch - Speckled Alder - Stair-step Moss Black Spruce - Leatherleaf - Sphagnum Black Spruce - Stair-step Moss Black Spruce - Bog Rosemary - Pale Laurel - Sphagnum Treed Wetland (Treed Bog)
Section 2.7 Terrestrial Habitat/Vegetation: Herbicides should not be used for ROW maintenance, therefore a "no spray policy" should be adopted. Manual clearing methods should only be used, and this also has the advantage of providing employment opportunities	As indicated in Section 7.4.3, herbicide is the preferred method for periodic vegetation control. Detour Gold will ensure that all contractors meet regulatory requirements at the time of clearing, in regards to chemical, mechanical or manual tending as well as other commitments made within the DLPP EA. Chemical, mechanical and manual tending are currently approved approaches to vegetation management for transmission lines. Selective vegetation clearing is expected to be required in the order of every five to ten years, depending on the location and species present. While Detour Gold recognizes that manual clearing would provide employment opportunities, the logistics of manual clearing of the entire line rather than focusing on sensitive area(s), including, transport of personnel to/from camps, waste handling etc. over the extended period of time that would be required for manual clearing, make this approach undesirable, in addition to the efficiency / cost aspect.	TTN has indicated that the use of herbicides is not to their preference, and that Detour Gold should reconsider their position. TTN concerns stem from the potential impacts on vegetation and aquatic ecosystems, and not the potential loss of employment opportunities, as implied by Detour Gold	Noted

Initial Comment	Proponent's Response	Follow-Up Comment	Proponent's Response(2)
Section 2.8 Wildlife and Birds Areas should be set aside for Woodland Caribou for life processes such as breeding and wintering	Calving, rutting and over-wintering areas for caribou have been identified. The ROW as defined in the approved ToR, passes through these identified areas. Despite efforts to maintain as compact a ROW as practical based on historic / existing ROWs, an estimated 218.7 ha of additional Black Spruce / Jack Pine forest / treed bog habitat is expected to be disturbed as a result of the DLPP. This is equivalent to 0.0005% of the home range of a single animal. Data in the literature suggest that linear features can adversely affect Caribou populations. Wolves in particular are known to utilize linear corridors to better access Caribou populations. As the DLPP proposes to utilize / expand on existing ROWs along almost the entire alignment, significantly increased predation due to improved Wolf access is not expected.	Calving, rutting and over-wintering areas have been identified and mapped in the report. However, a clear explanation of the potential impacts of the proposed ROW on those habitats and life functions is not provided. Although the removal of 218.7 ha of habitat outside of the existing ROW might be equivalent to 0.00005% of the home range of a single animal, the report does not explain how significant that 0.00005% of the home range might be to the population, i.e., does it represent any or all of the calving, rutting and over-wintering habitat? Furthermore, the report does not take into account the compounded effects of removing 218.7 ha of existing vegetation in addition to re-clearing vegetation along the existing ROW. Please provide more discussion.	Home-ranges are comprised of calving, over-wintering and rutting areas. As such, the 0.00005% of expected disturbance should be considered as including all those areas. The mapped calving/rutting/over-wintering areas are known locations, and there are other Caribou in the area that have not been monitored to this extent by MNR that may be in the area (including the DLPP study area). As such, determining a relevant estimate of level of impact this additional 218.7 ha of vegetation removal will have on a population level is not feasible. The estimate of 0.00005% of a home-range of a single animal was calculated to give a coarse approximation of the proportion of disturbance to a given animal in the area. This proportion is very small because efforts were made in the planning stage of the DLPP to minimize additional vegetation removal to the extent possible by using a previous ROW to the extent practical, rather than the shorter cross-country route that would have opened up new areas. As discussed extensively in the text, the main impact to local Caribou is the linear corridor itself, not the additional vegetation removal. Caribou can adjust to some levels of disturbance within their range; however, features such as linear corridors impact their populations by facilitating improved hunting efficiency by Wolves. The linear corridor was created over 25 years ago. As such, the main impact of this corridor has already been experienced by local Caribou. We assumed that Wolves have been using this corridor since it was created and thus additional increases in Wolf use would be minimal. SAR within the DLPP study area include Caribou and several bird species.
Section 2.9 Rare and Endangered Species The ranking system for each of the species and the reasons behind the designation of low/moderate/high should be clearly quantified without subjective terms.	The rationale for assigning a probability of occurrence is stipulated within each section for a given species-at-risk (SAR). Recent breeding and/or presence/absence records within the region, presence/absence during the 2008 and 1983 baseline surveys, MNR NRVIS data, Natural Heritage Information data (which includes locations and dates of observations), availability of suitable habitat within the Project site, correspondence with MNR, correspondence with other SAR experts (i.e. in the case of Wolverine, the provincial expert, Dr. Justina Ray was contacted for comment on the potential for Wolverine occurrence within the region around the Detour site) and professional judgment were all taken into consideration when delineating probability of occurrence for a given SAR. Qualitatively assessing a probability of occurrence using the criteria listed above is considered reasonable, particularly given the dynamic nature of wildlife distribution and abundance from year to year. If a species has been observed in the region and if there is suitable habitat for this species within the Project area this species was given moderate to high probability of occurrence (or noted as a probable breeder). This approach likely over-estimated the probability of occurrence for several of these SAR, ensuring that each SAR is given consideration for the effects assessment and appropriate mitigation measures are taken into account.	Probability of occurrence should not be assigned to species that were actually recorded in the study area, as these represent definitive sightings and therefore the issue of "probability" is irrelevant. The text for each of the species included in Section 6.5 should clearly state whether the species has been recorded in the study area, and if so, its probability of occurrence noted as confirmed and the conditions under which it was recorded noted (e.g., within the breeding season for birds). If the species presence was not confirmed through field investigations, then assigning a probability of occurrence, as described by AMEC, is appropriate.	Surveys for wildlife within the DLPP study area included winter aerial surveys for Caribou, Moose, Wolves and other smaller mammals. As a result, the only "confirmed" SAR for DLPP is Caribou. Surveys for birds for the DLPP were not undertaken and as such direct confirmation for presence of an avian SAR cannot be made. However, surveys of the Detour Lake Project site recorded several of the avian SAR known to occur in region. As vegetation communities (and associated habitat attributes) within the Detour Lake Project study area are analogous to those within the DLPP study area, a probability of occurrence for each of the known Detour Lake Project SAR was assigned to the DLPP study area.

Initial Comment	Proponent's Response	Follow-Up Comment	Proponent's Response(2)
Section 2.9 Rare and Endangered Species. The description of relevant legislation that protects some of these species, such as the Fish and Wildlife Conservation Act (FWCA) and Migratory Bird Convention Act (MBCA) is appropriate, though incomplete. This section makes no mention of the potential for application of Ontario's Provincial Policy Statement (PPS) (2005)	In Section 6.5, the PPA is mentioned as follows "Ontario has several other laws that help protect SAR and their habitats. A policy under the Planning Act called the Provincial Policy Statement (PPS, MMAH 2005) is used by land use planners and others to help make sure that SAR are not harmed by land development. For example, the PPS states that "development is not permitted in significant habitats of endangered and threatened species".	The PPS is referenced in several locations throughout the report. However, no analysis has been provided that clearly determines whether any of the habitat along the proposed right-of-way represents either significant habitat or endangered/threatened species and/or significant wildlife habitat of endangered/threatened species and/or significant wildlife. It must be demonstrated that there will be no negative impacts on the natural features or their ecological functions in order to comply with the PPS.	For clarity, the PPS is not referenced in several locations. The PPS is only referenced (and mentioned) in the EA document per the following quote "Ontario has several other laws that help protect SAR and their habitats. A policy under the Planning Act called the Provincial Policy Statement (PPS, MMAH 2005) is used by land use planners and others to help make sure that SAR are not harmed by land development. For example, the PPS states that development is not permitted in significant habitats of endangered and threatened species." MNR data on significant wildlife habitat and other natural features (i.e. Provincially significant wetlands (PSWs) or Areas of Natural and Scientific Interest (ANSIs)) was obtained from the MNR and included in the DLPP EA. There are no known ANSIs or PSWs within the DLPP study area. Mapped significant habitat features from MNR database within the study area include over-wintering habitat for caribou and moose, calving and rutting areas for caribou as well as raptor stick nests As such, these features have been taken into consideration and have been mapped and incorporated into the text Please see above
Section 2.9 Rare and Endangered Species. Generally, the responsibility for designating significant wildlife habitat falls upon the MNR and relevant municipalities. the exclusion of the PPS from the discussion of relevant legislation to wildlife casts doubt on the ability of further work to take into account potential occurrences of significant wildlife habitat within or adjacent to the study area.	In Section 6.5, the PPA is mentioned as follows "Ontario has several other laws that help protect SAR and their habitats. A policy under the Planning Act called the Provincial Policy Statement (PPS, MMAH 2005) is used by land use planners and others to help make sure that SAR are not harmed by land development. For example, the PPS states that "development is not permitted in significant habitats of endangered and threatened species". MNR data on significant wildlife habitat and other natural features (i.e. Provincially significant wetlands (PSWs) or Areas of Natural and Scientific Interest (ANSIs)) was obtained from the MNR and included in the DLPP EA. There are no known ANSIs or PSWs within the DLPP study area. Mapped significant habitat features from MNR database within the study area include over-wintering habitat for caribou and moose, calving and rutting areas for caribou as well as raptor stick nests As such, these features have been taken into consideration and have been mapped and incorporated into the text	The report provides an incomplete review of the potential for significant wildlife habitats in the ROW. This could easily be resolved through the inclusion of a table that lists the categories of significant wildlife habitat, as defined in the Natural Heritage Manual (OMNR, 1999, revised 2010) with an indication as to whether the habitat type is present in (or adjacent to) the ROW, whether it would be impacted and, if so, whether the recommended mitigation would result in no negative impact on the feature or its function. Categories of significant wildlife habitat identified in the NHRM include: habitats of seasonal concentrations of animals; rare vegetation communities or specialized habitat for wildlife; habitats of species of conservation concern; and animal movement corridors. Each of these categories contains specific habitat types, which can be easily assessed according to the criteria provided in the Significant Wildlife Technical Guide (OMNR, 2000). Based on AECOM's discussions with TTN members, it is TTN's position that no new access ways to the right-of-way should be created. Deferring the development of mitigation to future project phases is not acceptable. This defeats the purpose and intent of the EA. Without the identified mitigation, the significance of effects cannot be determined. The proponents should specify the mitigation to be used, or at a minimum the options that will be considered and the process by which decisions will be made and with whose involvement. Consultation with TTN is required in the event that a new access way is unavoidable in order to determine what further mitigation and/or accommodation is warranted. This needs to be acknowledged by Detour Gold.	The right-of-way route was selected to minimize the potential for new accessways is one of the core principles of the entire project. At this time no new accessways are proposed, but if required, consultation will occur.
Section 2.10 Land Use. More details on how Detour Gold will avoid creating new permanent access ways to the transmission corridor.	The exact means of access will be defined through the environmental approvals and construction tendering processes. TTN will be engaged in discussions on future environmental approvals and permits. Particular attention will be given to those that address access issues.		

Initial Comment	Proponent's Response	Follow-Up Comment	Proponent's Response(2)
Section 2.10 Land Use: Assess impacts on traplines. Mitigation/compensation measures should be identified.	Any mitigation/compensation required for effects to traplines is being addressed as part of the Impact Benefit Agreement (IBA) between Detour Gold and TTN. This is a private and confidential process that to our knowledge, neither party wants made public.	Deferral of the assessment of effects to the IBA process is not acceptable. This defeats the purpose and intent of the EA. At a minimum, the EA should identify in general terms the types of effects (e.g., reduced harvest, loss of income etc.) that are anticipated on traplines and trapline holders, and the types of mitigation/compensation that is being considered by Detour Gold. The EA could present 'best practices' with respect to mitigation/compensation based on other projects in northern Ontario. Detour Gold should acknowledge TTN's position that the allocation and management of traplines by the Ontario Ministry of Natural Resources is undertaken with private individuals and not with the TTN community as a whole. The fact that a trapline is held by a TTN member does not diminish nor infringe on the rights of the TTN. As such, compensation afforded to trapline holders does not constitute accommodation for effects on TTN. To this end, it is TTN's position that Detour Gold should consult and negotiate appropriate mitigation and/or compensation measures with individual trapline holders independently of consultations and negotiations with the TTN regarding accommodation.	The type of potential effects to traditional land uses including trapping and other traditional uses of trapline areas are documented in Section 8.0 (p.142) of the Individual EA and are based in part on discussions held with the TTN TEK Steering Committee. Mitigation of these potential effects to traditional uses are also provided in this section the Individual EA and reflect best practices and are being considered by Detour Gold. Best practices for mitigation/compensation on trapping based on other projects in northern Ontario were sourced from various people involved in mining EAs conducted in northern Ontario and through discussion with MNR, and include: • Goldcorp Musselwhite Mine – There is reference in the Individual EA only to the "Musselwhite Agreement" signed in 1995 between the area First Nations and Placer Dome (the previous owner) which was subsequently adopted by Goldcorp. No indication is given about compensation to individual trappers in the environmental assessment document. • De Beers, Victor Diamond Mine – There was no practice of directly compensating trappers because IBAs covered all impacts to members of the FN's including environmental and traditional practices (including trapping). Trappers were paid out of the IBA payment package through the First Nation leadership as determined by the leadership. • According to the MNR, forestry companies mitigate potential effects by avoiding harvesting near cabins or trails, but no compensation is paid directly to the trapline permit holder. Noted. An assessment of employment, training and business opportunities is provided in the Individual EA.
Section 2.12 Socio-Economics Provide an analysis of the specific employment and business opportunities available to the TTN and the ability of TTN to take advantage of these opportunities	Detour Gold will optimize Aboriginal employment, training and procurement opportunities as it stated in the terms negotiated in the IBA. This is a private and confidential process that to our knowledge, neither party wants made public.	Deferral of the assessment of effects to the IBA process is not acceptable. This defeats the purpose and intent of the EA. At a minimum, the EA should identify in general terms the types of employment and business opportunities that are likely to be available to the TTN. The information presented (below) is considered adequate for EA purposes. No information is presented in the EA on the ability of TTN to take advantage of these opportunities. This is an indication of a poor socio-economic baseline and/or consultation with the TTN.	Noted. The draft and proposed terms of reference for the DLPP EA were submitted for review and comment, and identified the approach to baseline information that would be used in the EA.

Initial Comment	Proponent's Response	Follow-Up Comment	Proponent's Response(2)
Section 2.12 Socio-Economics Provide more information regarding the specific employment and business commitments	Information on Detour Gold's employment and business opportunities was made available at community meetings (March, April and May 2010) and via the website (www.detourgold.com) through the Employment & Business Opportunities Fact Sheet March 2010 (available on the project website and at community information sessions). In general, typical employment and business opportunities for the project include: • Catering and accommodation goods and services (i.e., catering equipment, food supply and preparation, accommodation materials, supplies and related housekeeping services, and waste management) • Communication infrastructure and support services (i.e., Internet, telephone/radio, cellular phones, television services) • Construction (i.e., building supplies and materials, plumbing, electrical, carpentry, and heating, ventilation, and air conditioning services, other construction supplies and services as required) • Equipment (lease, purchase, maintenance) (i.e., heavy equipment and machinery, vehicles and smaller equipment, equipment maintenance/repair) • Fuel (i.e., Bulk supply of diesel and other fuels as required) • Logistics (i.e., Expediting, coordinating transfer of materials to and from the site, Transportation of workers to and from the site, Delivery and courier services) • Medical Services (i.e., medical supplies, paramedic services) Specific effects of the project on traplines held by TTN members are expected to be documented in the TEK Study currently being prepared by Muskegowuk Environment Research Council for TTN. Any mitigation/compensation required for effects to traplines held by members of TTN is being addressed as part of the IBA between Detour Gold and TTN. All trapline permit holders have been provided with notices regarding the DLPP through the MNR (rather than directly by Detour Gold due to potential privacy issues). Detour Gold will follow up with any requests for discussion about potential effects to traplines if contacted directly by the trapline permit holder. Given that trapline permit holder contact information is confidentially held by the MNR, Detour Gold is not in the position to directly contact trapline permit holders. At this time, Detour Gold is only able to provide mitigation/compensation for effects to traplines held by members of TTN as part of the IBA.	The information presented in this response is considered adequate for EA purposes and should have been presented in the main text of the EA, as part of the socio-economic assessment. In a subsequent response (see Overall Comments, line 8) AMEC has indicated that there are no plans for work camps. Please clarify the nature of the following business opportunity as it implies a work camp: "...catering and accommodation goods and services (i.e., catering equipment, food supply and preparation, accommodation materials, supplies and related housekeeping services, and waste management)".	Noted Detour Gold will have construction and operations work camps to accommodate the work force related to the Detour Lake Project (including the DLPP). Therefore the business opportunity for catering and accommodation goods and services is applicable, although not just to the DLPP.
Section 2.14 Traditional Land Uses The effects of the project on the 14 traplines identified in the existing conditions section require further assessment. Appropriate mitigation/compensation measures should be identified. Detour Gold should outline the types of effects for which compensation would be offered and the manner in which it proposes to establish an equitable level of compensation for all trapline holders.	Specific effects of the project on traplines held by TTN members are expected to be documented in the TEK Study currently being prepared by Muskegowuk Environment Research Council for TTN. Any mitigation/compensation required for effects to traplines held by members of TTN is being addressed as part of the IBA between Detour Gold and TTN. All trapline permit holders have been provided with notices regarding the DLPP through the MNR (rather than directly by Detour Gold due to potential privacy issues). Detour Gold will follow up with any requests for discussion about potential effects to traplines if contacted directly by the trapline permit holder. Given that trapline permit holder contact information is confidentially held by the MNR, Detour Gold is not in the position to directly contact trapline permit holders. At this time, Detour Gold is only able to provide mitigation/compensation for effects to traplines held by members of TTN as part of the IBA.	AECOM has not reviewed the MNR notice procedure or the contents of the notice. Therefore there remains as to whether the notice was administered to all TTN trapline holders and whether the notice provided clear instructions as to how and who to contact at Detour Gold to negotiate compensation for effects. Detour Gold needs to be proactive and ensure that all trapline holders are aware of the project, aware of its likely effects and Detour Gold's intention to mitigate/compensate for these effects. Detour Gold need to ensure that instructions to trapline holders are clear and unambiguous. Detour Gold should keep TTN Chief and Council apprised of its progress in this regard and the response from trapline holders. Detour Gold should seek TTN assistance if individual trapline holders do not contact Detour Gold. For clarity, it is TTN's position that Detour Gold's mitigation/compensation included in the IBA does not replace mitigation/compensation to individual trapline holders.	Due to the confidentiality of personal information of the land use / trapline permit holders, Detour / AMEC relied on the MNR to distribute notices (as we understand is standard practise) about the DLPP EA to the permit holders registered to use lands within a 5 km boundary from the centre line of the proposed transmission line corridor. Therefore, all trapline permit holders within this boundary were provided notice directly from the MNR. The notices sent by MNR to landowners / permit holders were the same as those issued to the newspapers and provide contact information for Detour Gold to discuss the project. If TTN is aware of the members who hold traplines overlapping the mine site or the transmission line and have gained approval to share their personal contact information directly with AMEC/Detour, we add them to our project mailing list. This would ensure that they receive project notices and information directly from Detour / AMEC as well as from MNR in the future. Noted.
Section 2.15 Heritage and Cultural Resources A licensed archaeologist on-site during construction would ensure that any cultural heritage or archaeological resources are quickly identified and that the necessary steps taken to protect, document and preserve such resources.	Detour Gold has committed to having a licensed archaeologist available during construction during work in areas of designated high potential from archaeological investigations to date by Woodland Heritage Surveys and White Spruce Archaeology.	It is not clear what is meant by "having a licensed archaeologist available". Having an archaeologist on retainer may not be sufficient if the archaeologist is not on-site. Please clarify AECOM considers it appropriate that this be limited to areas of designated high potential and any areas not studied to date.	Detour has committed that a licensed archaeologist will be available. While the final archaeological reports have been issued as yet, very limited areas have been designated as high potential to date. An archaeologist will be available for consult for the entire transmission line construction phase but may not be present at the construction site(s) if appropriate and in discussion with the archaeologist, an archaeologist will be available at the construction site during construction at the high potential areas if ground disturbance is required in the area. If the high potential area(s) will only be passed over rather than sub-surface disturbance, it is unlikely that archaeological support will be needed.

Initial Comment	Proponent's Response	Follow-Up Comment	Proponent's Response(2)
Section 2.15 Heritage and Cultural Resources Areas should be surveyed and monitored by the archaeologist whenever topsoil is removed.	No significant removal of topsoil is proposed. Detour Gold has committed to having a licensed archaeologist available during construction during work in areas of designated high potential from archaeological investigations to date by Woodland Heritage Surveys and White Spruce Archaeology.	It is not clear what is meant by "having a licensed archaeologist available". Having an archaeologist on retainer may not be sufficient if the archaeologist is not on-site. Please clarify.	See above.
Section 2.17 Assessment of Effects The net effects analysis should be revised to acknowledge that the DLP will result in some net effects and that their significance is assessed using the methodology described in Section 8.19.	The net effects analysis follows the methodology provided in Section 8.19.1 and proposed in the approved ToR. As indicated in Section 8.19.1, the net effects assessment takes into account proposed mitigation measures captured by the DLP EA, and that more specifically "This assessment is contingent on the application of the mitigation measures proposed and commitments made throughout the EA."	AECOM disagrees with the net effects conclusions as stated in the draft EA. It is our opinion that the net effects analysis is misleading.	There was no draft EA issued for the transmission line (Detour Lake Power Project).
Section 2.18 Potential Effects of Malfunctions and Accidents Acknowledge disturbance caused to bird species that nest earlier than June 1, and an explanation of measures taken to mitigate those disturbances while nesting	All clearing and other activities will be completed in accordance with the <i>Migratory Bird Convention Act</i> and other applicable legislation / regulatory instruments. The majority of tree clearing activities will be undertaken in the winter, thus migratory bird species will not be disturbed. Nest surveys will be undertaken by a qualified biologist if vegetation must be cleared during the breeding bird season. It is recognized that raptors start nesting as early as the beginning of February. There are no known raptor nests located within the proposed ROW. Should any stick nests be identified during construction, the area will be avoided until a qualified avian biologist can be contacted for direction. Mitigation will include buffers around nests as per provincial guidelines. Agreed. A full and detailed list of the contacts to date with TTN has been prepared and forwarded to TTN separate from this response. This includes meeting minutes, and a description of concerns along with where these concerns were addressed in the EA document. If concerns were not addressed, a rationale will be provided. For the CEAA Comprehensive Study Report (environmental assessment), comments and interests will be attributed to each Aboriginal group or stakeholder and will show where these comments and interests have been addressed in the EA. If comments and interests are not addressed in the EA (for example, because they were not part of the EA scope), we will provide a rationale.	As per previous responses and comments, please ensure that the appropriate regulatory authorities (particularly MNR) are contacted for direction should any stick nests be identified during construction or if vegetation is to be cleared during breeding bird season.	This is standard procedure and agreed. As noted, all clearing and other activities will be completed in accordance with the <i>Migratory Bird Convention Act</i> and other applicable legislation / regulatory instruments.
Section 2.20 Consultation Plan The proponent should ensure that the Record of Consultation reflects the range of comments received from TTN from the early engagement phase to present, and how these comments are dispositioned, both for the provincial environmental assessment but also as part of the record preceding the CEAA Comprehensive EA for the Detour Lake Project.		We suggest TTN consider requesting that the Crown and Detour Gold include the document discussed by Detour Gold in their response, minus any information TTN considers confidential or sensitive, as part of the public consultation record of the EA.	Noted and agreed should TTN wish the contents (or selected contents) made public.
Overall Comments: The DLP EA should also outline how the transmission line will be strung.	This will be defined by the contractor, but will be required to follow standard industry practices. This typically includes helicopter use, but may be modified.	A more fulsome response to this comment is required. AMEC is requested to describe standard industry practice, particularly with response to helicopter use. TTN members have been asking questions in this regard that should be answered by Detour Gold in more detail.	For clarity, the first (and only) request Detour Gold has received regarding the stringing of the line was from AECOM. There have been no requests from TTN members to our knowledge for this information. Standard industry practice is use of either on-land cranes or helicopters as well as specialized equipment to tension the conductor once in place. Helicopters may be used to avoid requirement for development of high quality roads to support heavy equipment, as well as for permanent roads for periodic inspections.

Initial Comment	Proponent's Response	Follow-Up Comment	Proponent's Response(2)
Overall Comments: No mention of how the winter road on the ROW will be prepared to ensure a solid base of frost. This should be explained	See Section 5.4.2. Winter roads have been used effectively in the region to construct other transmission lines, including the original transmission line from Island Falls to the Detour Lake site. While distance from permanent access points complicates the logistics of travel, the winter road can be designed and maintained to accommodate the traffic flow.	A more fulsome response to this comment is required. AMEC is requested to describe standard industry practice, particularly with response to winter road design and maintenance procedure. TTN members have been asking questions in this regard that should be answered by Detour Gold in more detail.	For clarity, there have been no requests from TTN members to our knowledge for this information. The following approach is proposed, the details of which may be modified during the environmental permitting process. The alignment will be surveyed, and trees along the route that require removal will be cut either with chainsaws (if applicable) or they will be "bladed" (snapped off at near ground level), while in a frozen state, using a low weight tracked vehicle. Ground cover will be left intact. Construction will start with compaction of the snow using a Bombarrier Snow Cat (or equivalent light bearing vehicle). Rollers and timber drags will be used to help to compact the snow. Once initial preparations have been made using the Snow Cat (or equivalent), and rollers and timber drags, heavier equipment (dozers and graders) will be brought into service to complete the road construction. Clean snow may be used to build up a surface and protect the underlying ground surface, particularly on slopes. An ice cap will be prepared by using "hot box" water trucks to spray water onto the road surface to form an ice cap.

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DOCUMENT INFO

From: Burgess, Caroline M
Sent: Friday, May 14, 2010 11:34 AM
To: Warren, Meryl
Subject: FW: RE:
For SIIMS - place holder until we receive notes from AECOM. C

Caroline Burgess, M.A., RPP, MCIP
Senior Consultant, Human Environment
AMEC Earth & Environmental
Tel: 613-727-0658 x 252
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210 Colonnade Road South, Unit 300
Ottawa, ON Canada K2E 7L5

From: Derek Teevan [mailto:DTeevan@detourgold.com]
Sent: Friday, May 14, 2010 11:29 AM
To: Burgess, Caroline M
Cc: Daniel, Sheila E
Subject: FW: RE:

fyi

From: Derek Teevan
Sent: May 14, 2010 11:05 AM
To: 'Mackay, Scott'
Cc: Sue Hartwig; Deschamps, Vince
Subject: RE: RE:

Thanks Scott.
Have a great weekend.
Derek

From: Mackay, Scott [mailto:Scott.Mackay@aecom.com]
Sent: May 14, 2010 10:58 AM
To: Derek Teevan
Cc: Sue Hartwig; Deschamps, Vince
Subject: RE:

Derek:

I took a record of questions from TTN and Detour Gold/AMEC responses, rather than minutes *per se*. I will be providing these to Sue Hartwig shortly, and she will respond to your request.

Regards,

Scott

Scott Mackay, M.Sc.

Consultation and Communications Specialist- Environment

AECOM

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scott.mackay@aecom.com

From: Derek Teevan [mailto:DTeevan@detourgold.com]

Sent: Friday, May 14, 2010 10:39

To: Mackay, Scott

Cc: Sue Hartwig

Subject:

Hi Scott:

Are you able to forward to me the minutes from our presentation and site visit?

Thanks

Derek Teevan

V.P. Aboriginal and Government Affairs

Detour Gold

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DOCUMENT INFO

From: Burgess, Caroline M
Sent: Monday, May 31, 2010 1:58 PM
To: Warren, Meryl
Subject: FW: Attendees List
For SIIMS

Caroline Burgess, M.A., RPP, MCIP
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AMEC Earth & Environmental
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From: Derek Teevan [mailto:DTeevan@detourgold.com]
Sent: Monday, May 31, 2010 1:36 PM
To: Burgess, Caroline M
Subject: FW: Attendees List

For the record.

d

From: Melanie Paradis [mailto:MelanieP@metisnation.org]
Sent: May 31, 2010 1:34 PM
To: Derek Teevan
Subject: Attendees List

Hi Derek,

Below is the list of meeting attendees for Thursday...

Marcel Lafrance, Region Councillor
Liliane Ethier, President, Temiskaming Métis Council
Natalie Durocher, President, Timmins Métis Council
David Hamilton, President, Chapleau Métis Council
Urgil Courville, President, Northern Lights Métis Council (Cochrane)
Andy Lefebvre, Captain of the Hunt
Melanie Paradis, Director of Lands, Resources & Consultations, MNO
Jason Madden, Legal Counsel

Liliane and David may have to send alternates, but right now it looks like they will both be able to attend.

Melanie Paradis
Director of Lands, Resources and Consultation
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Mobile: 519-591-9219

DOCUMENT INFO

Name: Draft Roc 08-06-24 Meeting - Politis.tif
Size: 563KB (575,940 bytes)
Modified: Tuesday, Oct 05, 2010 12:01:15 PM

DOCUMENT INFO



Meeting Minutes (draft)

Meeting Date June 24, 2008
Location Cochrane – Terry's Steak House Restaurant
Purpose To provide an introduction to the project and discuss possible issues and benefits of same.
Participants Gerald Panneton (GP) Detour Gold
Craig Goodings
Dave Simms (DS) AMEC
Caroline Burgess (CB) AMEC
Peter Politis (PP) Representative, Taykwa Tagamou Nation
Prepared by Caroline Burgess
Date July 15, 2008

Subject Meeting Summary – Project Introduction

Meeting Agenda

- None tabled

Project Overview and Discussion

- GP provided an overview of Detour Project following project information in presentation slides.
- PP stated that he is representing the TTN due to a recent death in the community and as a result the Chief was not able to attend.
- PP asked about the volume of proven reserves. GP provided information from the presentation about the resource estimates and indicated that new estimates would be released in one week.
- PP asked if the same tailings facility would be used for the proposed expansion. This was confirmed by GP, with the added note that the existing facility would need to be expanded to areas indicated on an attached map.
- GP indicated that the transmission line is scheduled for construction starting in the winter of 2009/2010 to be built by Fall 2009 and that tenders for this work would be out in mid-early 2009. GP indicated that it takes about a year for transmission line permits to be obtained. PP indicated that the TTN is a member of Five-Nations Energy.

- PP commented that the 2011 – 2015 "boom" period for the mine production is not very long.
- GP indicated that there would be up to 1000 – 1200 peak construction jobs (over a 2-year period) and about 400 operations jobs.
- GP stated that the project will build 2 work camps beside Deem Lake on the lease. One camp will be temporary to house construction workers and the second will be a longer-term "lodge" that will house operations workers and could be left as a legacy of the project for long-term tourism (fishing/recreation) opportunities.
- PP asked what happens to benefits to communities when the gold boom ends. GP indicated that the IBA terms must be tied to the revenue cycle of the company.
- PP asked for what price of gold the project is being planned. GP indicated \$700/oz is the base case. GP explained that the price of gold will never drop to below \$300 - \$400/oz again since the average price of production is \$450/oz currently. GP stated that they are not building a mine that will need to close in 5 years. GP reiterated that it is a long-term project.
- PP asked what Detour's vision was for the local communities.
- GP responded that the opportunities will be jobs, training and subcontracts. GP explained that all communities need to be part of a "web" of benefits from the project.
- PP stated that the TTN is more interested in joint ventures so that longer-term benefits are realized. They want to increase capacity and avoid social problems associated with cash influxes due to projects. The focus for TTN is on legacies. PP indicated that Joint Ventures can be built using INAC capital where the company can work tax free and therefore be more competitive. GP responded that this type of business arrangement may be hard to establish directly with Detour, but possible with contracting/service companies (e.g., drilling companies).
- GP indicated that some sub-contract opportunities would be available for catering, cleaning, lodge administration, etc.
- PP asked about possibility of Detour Gold shares for communities or setting up some profit sharing arrangement, and that any profits provided to TTN would be at least partially offset by correspondingly reduced tax burdens to the federal and provincial governments. GP stated the option for company shares is not a possibility and that there is a need to be creative about setting up benefits for communities to create a vested interest in the project. GP offered to sit as an advisor for FN-owned companies interested in exploring other areas of Northern Ontario for minerals stating that much of this area has not yet been explored.

Follow-up

- Set up meeting to discuss the project and MOU with the Chief and Council of TTN in late July or early August.

Please feel free to discuss any aspect of the above.

Caroline Burgess
Senior Consultant, Human Environment

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DOCUMENT INFO

Size: 1,007KB (1,031,037 bytes)

Modified: Tuesday, Oct 05, 2010 12:01:21 PM

Name: Draft Roc 08-06-25 Meeting - Wahgoshigfn.tif

DOCUMENT INFO



Meeting Minutes (draft)

Meeting Date June 25, 2008
Location Wahgoshig Band Offices near Lake Abitibi east of Matheson
Purpose To provide an introduction to the project and discuss possible issues and benefits of same.
Participants Gerald Panneton (GP) Detour Gold
Craig Goodings ~~Detour Gold~~
Dave Simms (DS) AMEC
Caroline Burgess (CB) AMEC
Chief David Bavin (CDB) Wahgoshig FN
Mary Boyden Mining Initiatives Development Officer,
Wahgoshig FN
Crystal Mallette Lands & Resources, Wahgoshig FN
Paul McKenzie Councillor, Wahgoshig FN

Prepared by Caroline Burgess
Date July 15, 2008

Subject Meeting Summary – Project Introduction

Meeting Agenda

- None tabled

Project Overview and Discussion

- Prior to Mary Boyden and Paul McKenzie arriving, the following was recorded during informal discussion:
 - Wahgoshig community was established in 1986, but the First Nation (FN) has been in the area since 1903.
 - There are currently 35 houses on reserve and trying to build 5 more houses.
 - WFN is trying to develop agreements with mining and forestry companies, and want to see some benefits from the resource sector – WFN has recently developed an MOU with Apollo Gold.
 - The previous chief (Paul McKenzie) worked at or for contractors at the Holt McDiarmid mine for a period of 10 years, also some WFN people have been working at Apollo.
 - The WFN has done training in drilling
 - 150 – 200 people on the reserve and 70 – 80% are young.
 - Children are bussed to elementary school in Matheson and high school in Iroquois Falls. Not many members have achieved Grade 10 level.

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- CDB stated a concern that mining businesses don't give enough time for training. GP stated that there would be time for the Detour project.
- CDB indicated that relations between TTN, MCFN and themselves is not good.
- Paul McKenzie arrives and a map is placed on the table showing the location of the project. PM indicates that south of the mine lease is part of their traditional land and that there are two grave sites is a cemetery next to Lower Detour Lake a lake southeast of the lease boundary. PM indicated that this area was his father's trapline and that he and his brother Alex had trapped there in the past. Alex was the junior trapper to his father. Paul's dad had this trapline prior to Eddie Trapper (current trapline licensee). The trapline was given to the Trappers after PM's father died.
- Currently the WFN is trying to identify, with their Elders, traditional territories and associated heritage uses. There are two women working on this project. (CB was introduced to them after the meeting: Christine Widdifield (Mallette) - Assistant and Bonnie Sackaney – Coordinator.) PM indicated that there are trails down to the Lake Abitibi post which was a meeting place and from there people went to their traplines in the winter. Trails now are hard to find or are destroyed due to forestry activities.
- There is general frustration with MNR about resource development practices.
- PM indicated that there are 1-mile-long rapids on the rivercreek between Upper and Lower Detour Lakes. There are marked graves on Detour Lake. PM had not been to the site for 30 years.
- It was explained that there are two parts to the Wahgoshig Band – one is a sister band (the Abitibiwinini FN) residing in Quebec (Amos?). There is a government agreement that 80% of funding is received by the Amos and 20% by the Wahgoshig.

All meeting participants arrive and formal portion of meeting begins . . .

- GP provides a history of his mining experiences and states that Detour has invested \$50 million in the feasibility study for the mine. The mine feasibility is subject to commodity prices which are high right now with the boom expected to last until 2015. GP states that the mine will cost \$600 - \$700 million to build and have a lifespan of 20 years with a possibility to extend by another 5 years.
- GP stated that the project is hoped to be started in 2 years and feasibility studies are underway.
- GP presents the information in the slide presentation (several copies made available for all to reference during the overview). More copies of the presentation were left for other members of the Council and/or community.
- GP stated that next resource estimates would be released on July 2.
- GP indicated that they would like to pen an MOU with the WFN and that Detour will use the same template for and MOU as for the other First Nations, but that the terms would be negotiated separately.
- GP stated that the footprint of the mine would be about 10km² and located on the old site. GP stated that there are no facilities left from the previous operation, with the

D:\lab 100144\raw files\word\draft roc 08-06-25 meeting - wahgoshigfn.docC:\DSIMMS\Favorites\DSimms\Detour_Gold\Meeting Minutes\Wahgoshig\Draft ROC 08-07-25 Meeting - WahgoshigFN.docF:\Projects in Progress\6-Other Office Projects\Mississauga\TC81510 - Detour EIA\SI\MS\ROC\Draft ROC 08-07-25 Meeting - WahgoshigFN.doc

exception of the access road and the tailings facility, so new ones would need to be built. The mine development would not touch Lower Detour Lake. GP explained his vision for the workcamp lodge to remain as a legacy for locally owned/operated hunting or fishing lodge.

- CDB stated that his people would want there is a wish for the land to returned to its natural state following mine closure, rather than leaving any facilities. He stated a concern that animals are disappearing because of disturbances to the environment. He stated that there is resource competition for hunting and fishing, that sSturgeon (fish) are disappearing and that he is concerned with the dams on the Mattagami River.
- DS stated that these effects would be addressed as part of the Closure Planning and that consultation about the lodge as a possible end use would need to occur before finalized. Also stated that for other projects we have had Elders out on the land to help to identify FN values.
- GP stated that Detour has a reclamation bond set aside to return the site back to its natural state following mine closure.
- GP stated that Detour Gold hopes to be in production by 2011.

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- CDB stated that the Band hunts and fishes on the land and is concerned that they will be prevented from going into this area to hunt and fish. He stated that the Band members do not want to be harassed if they go on the site and that this loss of use must be compensated.
- CB asked if the WFN offers cultural awareness training to industries. CDB confirmed that they provided this type of training. CB mentioned that this might help mitigate these concerns. It was also stated that the site is currently not fenced and that mining has a small footprint when compared to forestry activities.
- CDB stated that where the mine is now may have been used traditionally in the past. He stated that they want to protect their interests and don't want to stop progress, but want industry to understand their values. He stated that government does not protect their interests.
- GP stated that this is the reason for discussing the project with the WFN to understand these values.
- CDB re-iterated that governments and industries do not know what values are in their traditional territories. He stated that there is a meeting scheduled in August to discuss traditional territories and their study.
- GP stated that Detour is in the process of signing MOUs with First Nations, applying for permits and want the project to benefit all and respect rights.
- CDB stated that they are looking for opportunities. He wants the members to be employed, trained. He stated that there are currently 15 – 20 people trained in mining

but only 2 or 3 people are employed in this sector. MB indicated that she would send a list of the trained members to GP.

- The members are training in common core, diamond drilling and heavy equipment operations. MB indicated that some Wahgoshig members have strong line cutting expertise. Many, however, do not have driver's licenses and therefore have some barriers to working off-reserve. DB and MB related a success story of a Band member who had great support from the community in retaining a job with the St. Andrew's mine nearby.
- GP stated he would pass along information about Band members and their training to Detour's drilling contractor, Lafrenier Rigs.
- MB will send GP list of people from Wahgoshig with mining expertise/training.
- MB asked what responsibilities Detour has with respect to consulting with First Nations in Quebec since part of the Wahgoshig territories also extend into Quebec. CB indicated that at this time, First Nations in Ontario were being consulted about the project.
- MB stated that there is a lodge 12km away on Lake Wahgoshig that is good for community meetings.
- CDB indicated that Dan Stubbe, Wahgoshig Program Manager for Lands and Resources, himself and Paul McKenzie will be responsible for the MOU/IBA with Detour. Jerry Kerr will be Wahgoshig's representative for penning the IBA.
- CDB stated that he wants opportunities for the youth in the community so that they stay out of the drug scene. Families get jobs at the Band office, but want the community members to have broader employment choices. He has shared his strong ethic for property values in the community by implementing litter pick up days on the Reserve.
- CDB stated that there are both Cree and Algonquin people living on the Reserve, but that the Algonquin people are able to speak to traditional territories, not the Cree.
- MB offered a tour of the Core Shack and saw mill available on their Reserve. She also indicated that the business venture: Wahgoshig Industrial Services is located in Timmins. She stated that the key issues for the Band members will likely be tailings and water effects since some of the people still live off the land.
- CB asked about the process for preparing a TEK agreement with the Wahgoshig FN. CDB suggested working with Crystal Mallette and Dan Stubbe on the TEK.
- Following the meeting CDB introduced CB to Christine Widdifield (Assistant) and Bonnie Sackaney (Coordinator) for the TEK project currently underway while GP, DS, MB and CG toured the core shack.

Follow-up

- GP to send draft MOU to CDB and Dan Stubbe for review.
- MB to send list/resumes for mining trained members of the Wahgoshig.
- GP to forward resumes to Lafrenier Rigs for consideration.
- Detour to meet again with Wahgoshig this summer to finalize MOU and introduce the project to the Council and community at large.
- Once MOU signed CB to work with Dan Stubbe and Crystal on TEK agreement and study for EA.

DOCUMENT INFO

Name: Email Alex Blasko Re Ttn Comments June 18.tif
Size: 100KB (101,542 bytes)
Modified: Tuesday, Oct 05, 2010 12:30:40 PM

DOCUMENT INFO

Kelly, Mary K

From: Daniel, Sheila E
Sent: Monday, June 21, 2010 9:01 AM
To: Kelly, Mary K
Cc: Burgess, Caroline M; Warren, Meryl
Subject: FW: Technical Review of the Detour Lake Power Project (DLPP) Individual Environmental Assessment - Comments submitted on behalf of the Taykwa Tagamou Nation
Attachments: DLPP EA Technical Review June 2010_Final.pdf

Please file

Sheila E. Daniel, M.Sc., P.Geo.
Head, Environmental Management
Associate Geoscientist
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From: Blasko, Alex (ENE) [mailto:Alex.Blasko@ontario.ca]
Sent: Friday, June 18, 2010 10:03 AM
To: Daniel, Sheila E; Derek Teevan
Subject: FW: Technical Review of the Detour Lake Power Project (DLPP) Individual Environmental Assessment - Comments submitted on behalf of the Taykwa Tagamou Nation

Comments attached:
- TTN

Comments Sent Previously:
- MOE - Northern Region Surface Water
- MMAH
- MOE Timmins District

Alex Blasko
Project Officer
Environmental Assessment & Approvals Branch
Ontario Ministry of the Environment
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Fax: 416-314-7774

From: Deschamps, Vince [mailto:Vince.Deschamps@aecom.com]
Sent: June 17, 2010 11:23 AM
To: Blasko, Alex (ENE)
Cc: linda_job2003@yahoo.ca; peter archibald; Tina Gagnon - CRP; Merv McLeod; Sue Hartwig; Seim, Glenn (MNDMF)
Subject: Technical Review of the Detour Lake Power Project (DLPP) Individual Environmental Assessment - Comments submitted on behalf of the Taykwa Tagamou Nation

Dear Alex,

AECOM has been retained by the Coral Rapids Power Limited Partnership, who is working on behalf of the Taykwa Tagamou Nation (TTN), to conduct a technical review of the Detour Lake Power Project (DLPP) Individual Environmental

Assessment. Attached please find our comments on the EA Report, as per the *Notice of Submission of an Environmental Assessment* posted on the Detour Gold website, which are being submitted on behalf of the TTN. Please note that I have also sent two hard copies of our report to your office via courier. You should be receiving these later today, if you haven't already.

At this time I would also like to inform you that we have also been retained by Coral Rapids Power to conduct a technical review of the draft Detour Lake Project Draft Environmental Study Report MNR Class EA (AMEC Earth & Environmental, April 2010). We have provided our comments on the draft MNR Class Environmental Assessment to Kirk Spingett of the Ministry of Natural Resources under separate cover. I would be happy to share this report to you as well, if it is of interest to you.

Please free to contact me if you have any questions or concerns.

Kind regards,

Vince

Vince Deschamps M.Sc., MCIP, RPP

Senior Environmental Planner

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DOCUMENT INFO

Name: Email From Alex Blasko June 22.tif
Size: 104KB (106,361 bytes)
Modified: Tuesday, Oct 05, 2010 12:30:45 PM

DOCUMENT INFO

Kelly, Mary K

From: Daniel, Sheila E
Sent: Tuesday, June 22, 2010 10:15 AM
To: Kelly, Mary K
Cc: Burgess, Caroline M; Warren, Meryl
Subject: FW: Detour Comments
Attachments: 2010-06-18 Detour Gold - MNO Concerns - Final.pdf

Importance: High

Please file as others.

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From: Blasko, Alex (ENE) [mailto:Alex.Blasko@ontario.ca]
Sent: Tuesday, June 22, 2010 10:10 AM
To: Daniel, Sheila E; Derek Teevan
Subject: FW: Detour Comments
Importance: High

Hi Derek, Sheila,

In addition to the comments below, please note that we are expecting comments from the MCFN later in the review period. They have committed to providing comments by the first week or so of July. This should give us just enough time to incorporate their issues into the Ministry Review before publication. Please note that at that time I will be requested a quick turnaround on a response to any of their issues.

In addition, comments from CEAA are still outstanding, but I will speak with Dave Bell to determine when they may be able to complete their review.

Comments attached:
- Métis Nation of Ontario

Comments Sent Previously:
- MOE - Northern Region Surface Water
- MMAH
- MOE - Timmins District
- TTN
- MNR - Cochrane District
- Ministry of Tourism and Culture

Alex Blasko
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Tel: 416-314-7232
Fax: 416-314-7774

From: Melanie Paradis [mailto:MelanieP@metisnation.org]

Sent: June 22, 2010 10:01 AM

To: Seim, Glenn (MNDMF); Springett, Kirk (MNR); Blasko, Alex (ENE)

Cc: Bell, Dave [CEAA]; paul.schafer@nrcan.gc.ca; fadi.haddad@nrcan-mcan.gc.ca; Derek Teevan; Marcel Lafrance; Andy Lefebvre; Natalie Durocher; Temiskaming Council; David Hamilton; comunair@puc.net; Flo Robin; Brian Tucker

Subject: Detour Comments

Importance: High

Good morning Kirk, Alex and Glenn,

Thank you so much for allowing MNO an extra few days to submit our comments to you regarding the Detour Lake ESR and Individual EA (transmission line). We have prepared a single report that covers our comments on both regulatory approvals. The extra time that you allowed MNO ensured that the potentially effected, rights-bearing Métis community's representatives (cc'ed here) had an opportunity to review the report and provide MNO staff with direction on its content, as well as give their permission to submit the comments to the Government.

Sections 1 and 2 are specific to the ESR. Section 3 is specific to the Individual EA. Sections 4 and 5 apply to both the ESR and the Individual EA. I encourage MNDMF, MOE and MNR to review all of the sections, however, as many of MNO's questions, comments and concerns can be applicable to both regulatory approvals, and the Detour Lake Gold project more broadly.

I have also cc'ed the Federal approval authorities as we want to ensure that the comments and concerns of the rights-bearing Métis community are heard and understood at all levels of government related to this project, and that nothing falls through the cracks. I encourage the Federal approval authorities to review these comments and take them into consideration as they begin their regulatory process.

MNO looks forward to hearing from each of your Ministries regarding the attached comments. It will be useful to coordinate a meeting of the Métis community representatives, MNO staff, and Ministry staff (and perhaps the proponent as well), after you have had a chance to review the comments and Detour Gold's responses, so that there is an opportunity to discuss and ensure that all comments have been adequately addressed.

If you have any questions, please do not hesitate to contact me.

Melanie Paradis

Director of Lands, Resources and Consultation

Metis Nation of Ontario

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