

Ministry of Transportation

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November 16, 2015

TBT Engineering Limited
1918 Yonge Street
Thunder Bay, ON P7E 6T9

Attention: Scott Peterson, P.Ge., Vice President

Re: Draft PDR Highway 11 realignment
Premier – Hard Rock Gold Project

Dear Scott:

The Highway 11 realignment is included in the scope of the Premier – Hard Rock Gold Project Environmental Assessment process. Since the preferred route will be selected a part of this process the ministry's comments on the Draft Preliminary Design Report (PDR) does not constitute the ministry's official approval of any of the alignment options presented. As indicated in the executive summary, all costs for the realignment, including utility relocation will be the responsibility of the proponent.

The ministry has the following comments on the draft PDR:

- Assessment of impacts from any designated substance (such as arsenic) within the new right-of-way (ROW) should identify potential risks to MTO and their service providers during future highway construction and maintenance (under the Occupational Health and Safety Act).
- MTO will review the detailed proposal to leave the existing tailings in place when they are available during detailed design. MTO is concerned with the potential impact the contaminants may have on infrastructure such as culverts and guiderail cable.
- MTO requires details on how the proponent will control blasting and any precautions that will be taken within a 1 km radius of the MTO ROW or the MTO patrol yard to ensure the safety of the travelling public and workers.
- PGAC grade should be changed from 58-34 to 58-40.
- Reference for minimum geotechnical investigation should reference "Provincial Pavement Engineering Investigation Guidelines, Version 1.1" dated June 2013.
- Foundation Engineering: What is the composition of the "organic material" encountered in the boreholes? The slope stability analysis identifies this material as "Peat", Is this material Amorphous, fine fibrous, coarse fibrous? An effective friction angle of 28°, this seems high considering the organic nature of the deposit. Were any Atterberg limit tests conducted on the Tailings?
- The new commercial entrance for access to the mine site mentioned in section 5.8 discusses a Traffic Impact Study (TIS). Since MTO has not reviewed the TIS this should be a draft TIS. The proposed location for the new commercial entrance at station 17+848 Rt. Plan B-896-11-2 has to be reviewed for compliance with MTO's

Highway Access Management Guidelines. Also, Corridor Management "Office", should be changed to Corridor Management "Section".

- Section 7.0, 8.1 Corridor Control, should be changed to Corridor Management. Section 8.1.1, MNR should be changed to MNRF.
- Section 8.1.2, remove "with some possible exceptions for Bell Canada per Statutory Authority".
- Section 8.1.3, the proponent will ensure that any permits that are required by property owners for access or development to or adjacent to the new alignment will be obtained and they are in compliance with ministry policy.
- Exhibit 5.2 Typical Section & Sheet 4 Alignment, Station 12+000 – 12+700, intersection with Michael Power Blvd. indicates an urban section with curb for the island. Was a rural cross section considered?

Please review the above comments and respond accordingly. As this project progresses and more details are available the ministry will provide additional comments.

If you have any questions regarding these comments you can contact me at the above phone number or email address.

Sincerely,

<Original signed by>

Cindy Brown,
Head, Corridor Management