



APPENDIX D-2

**GOVERNMENT RECORDS
(NOVEMBER 10, 2012 TO OCTOBER 7, 2013)**

Note: Does not include correspondence which may be considered confidential.



APPENDIX D-2a

**GOVERNMENT COMMENTS AND RESPONSES ON DRAFT ENVIRONMENTAL
ASSESSMENT REPORT (VERSION 2)**

Stakeholder: Hydro One Networks Inc.
Point of Contact: Cyrus Elmpak-Mackie, Transmission Asset Management
Comments received: September 3, 2013
Comments regarding: Rainy River Project, Draft Environmental Assessment Report (Ver. 2)

#	COMMENT	RESPONSE	STATUS*
1	In our initial review, we have confirmed that Hydro One Transmission facilities are located within immediate vicinity of the proposed site in your study area. Please allow appropriate lead-time in your project schedule in the event that proposed development impacts Hydro One infrastructure which requires relocation or modifications, or needs an outage, that may not be readily available.	<p>Thank you Mr. Elmpak for the HydroOne comments on the Environmental Assessment of the Rainy River Gold Project. As you know, the project is subject to a Provincial Individual Environmental Assessment as agreed with the Ministry of the Environment in the spring of 2012. Sasha McLeod with the Ministry of the Environmental Approvals Branch in Toronto is the Provincial lead coordinator for the Environmental Assessment and is responsible for ensuring that all Provincial Environmental Assessment requirements (including any Class EA) aspects are met.</p> <p>The project is also subject to a Federal Standard Environmental Assessment underway and harmonized with the concurrent Provincial process. The Draft Environmental Assessment was issued by Rainy River Resources in July of 2013 and is currently being commented on by both Provincial and Federal regulatory agencies so your input is indeed timely.</p> <p>RRR has passed your comments on to our engineers who are managing this project aspect with their consultant Wayne Clarke at SanZoe Consulting. Someone from the engineering team will be in touch with Roman Dorfman to discuss the aspects below in more detail.</p>	Complete
2	In planning, please note that developments should not reduce line clearances and limit access to our facilities at any time in the study area of your Proposal.	RRR and our consultants are aware of these requirements, but appreciate your comment.	Complete

#	COMMENT	RESPONSE	STATUS*
3	Any construction activities must maintain the electrical clearance from the transmission line conductors as specified in the Ontario Health and Safety Act for the respective line voltage.	RRR and our consultants are aware of these requirements, but appreciate your comment.	Complete
4	The integrity of the structure foundations must be maintained at all times, with no disturbance of the earth around the poles, guy wires and tower footings. There must not be any grading, excavating, filling or other civil work close to the structures.	RRR and our consultants are aware of these requirements, but appreciate your comment.	Complete
5	Note that existing rights of ways may have provisions for future lines or already contain secondary land uses (i.e. pipelines, water mains, parking, etc). Please take this into consideration in your planning.	RRR and our consultants are aware that these provisions may occur and have considered these aspects in the planning of the RRP.	Complete
6	Once details are known and it is established that your development will affect Hydro One facilities including the rights of way, please submit plans that detail your development and the affected Hydro One facilities to: Roman Dorfman, Hydro One Real Estate Management 185 Clegg Road, Markham L6G 1B7 Phone: (905) 946-6273 roman.dorfman@HydroOne.com	We understand that the RRR / engineering primary contact for Hydro One is to be Mr. Blackburn, the major account representative, who will direct information within Hydro One. Please let us know if that has changed.	Complete
7	Please note that the proponent will be responsible for costs associated with modification or relocation of Hydro One facilities, as well as any added costs that may be incurred due to increase efforts to maintain our facilities.	RRR and our consultants are aware of this requirement.	Complete

*As of submission of the Final Environmental Assessment Report. Reference is made to where the comment has been closed in the report where appropriate.

Stakeholder: Ministry of Economic Development, Trade and Employment
Point of Contact: Michael Hilfinger, Senior Policy Advisor
Comments received: September 3, 2013
Comments regarding: Rainy River Project, Draft Environmental Assessment Report (Ver. 2)

#	COMMENT	RRR RESPONSE	STATUS*
1	<p>We note that, according to the consultant (pp. 12-1 and 12-2), the successful completion of the project would:</p> <ul style="list-style-type: none"> • Contribute a total of \$5.5 billion to the provincial economy during the life of the mine, with jobs created along the supply chain throughout Ontario; • Reverse the structural downturn in the Northwestern Ontario regional economy and associated population decline, which has been driven to a large extent by out-migration of youth and skilled workers; • Attract new working-age migrants to the region, resulting in modest population growth; • Develop skills in the local workforce that could later be transferred to other sectors; and • Bring about improvements to local transportation infrastructure. <p>In light of these significant projected benefits to the local, regional and provincial economy, MEDTE looks forward to the timely approval of the Environmental Assessment and commencement of the project.</p>	<p>Rainy River Resources appreciates the support the Ministry of Economic Development, Trade and Employment, and look forward to bring the Rainy River Project through construction into operation. The region has experienced recent declines in both employment and population in large part related to the downturn in the forestry industry, and development of the Rainy River Project has received very strong support to date from the Municipal and Provincial governments, as well as First Nations which is greatly appreciated.</p>	Complete

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Stakeholder: Ministry of Northern Development and Mines
Point of Contact: Neal Bennett, Mineral Exploration and Development Consultant
Comments received: September 3, 2013
Comments regarding: Rainy River Project, Draft Environmental Assessment Report (Ver. 2)

#	COMMENT	RRR RESPONSE	STATUS*
1	Section 1.5: RRR currently does not have all the proper land tenure for development under Ontario's <i>Mining Act</i> based on the project footprint provided by RRR. Tenure for lands must be obtained under the <i>Mining Act</i> as the right to extract minerals comes with a mining lease. Various parts of the proposed mine site development currently do not have this tenure in place.	Rainy River Resources (RRR) lands group has been working diligently with the Ministry of Northern Development and Mines (MNDM) and others, to progress obtaining leases in advance of the proposed Rainy River Project development. RRR would appreciate any assistance available from the MNDM and yourself, to expedite the land tenure needed in order that the development is not delayed from the current project schedule.	On-going
2	Page 2-4: The consultation list expanded in May 2012 as the scope of the project changed from advanced exploration to production. Prior advice was based on an exploration scenario, and was also based on MNDM's knowledge of traditional territories at that time. Therefore as the project moved towards a production decision the potential for impacts encompasses a larger area, and therefore the Crown scoped additional First Nations/Métis communities into the Consultation list.	RRR and our consultant appreciate your clarification / comment and it is noted.	Complete
3	Page 2-4: Draft EA reads <i>"In order to allow adequate time for the Aboriginal technical review, the draft EA Report (Version 1) was released to fourteen Aboriginal groups for an independent technical review of the RRGF EA Report."</i> On page 2-6 and 2-7 there is a list of 16 communities provided to RRR by the Crown. Why were 2 of these communities excluded from the early release of the draft EA document?	The Draft Environmental Assessment (EA) Report (Version 1) was voluntarily released by RRR to the First Nations and Sunset Country Métis as listed on the Provincial Consultation list 8 weeks prior to public and agency release. Onigaming First Nation indicated to RRR during meetings that they would coordinate with other Lake Band First Nations (Provincial Notification Communities) as needed. RRR is certain that the collective First Nations would be pleased to share the results of the independent First Nations technical review with the Notification communities.	Complete

*As of submission of the Final Environmental Assessment Report. Reference is made to where the comment has been closed in the report where appropriate.

Stakeholder: Ministry of Northern Development and Mines
Point of Contact: Rob Purdon, Mine Rehabilitation Specialist
Comments received: September 3, 2013
Comments regarding: Rainy River Project, Draft Environmental Assessment Report (Ver. 2)

#	COMMENT	RESPONSE	STATUS*
1	I am concerned that the proponent is not going to finalize Appendix P (Assessment of Alternatives for Tailings and Mine Rock Storage) as part of the EIS. This is an important component from a mine closure perspective and I am reluctant to provide detailed comments on the EIS as I will likely have to re-visit these comments...	Appendix P is only related to the Federal process for approval of placement of mineral waste over waters frequented by fish and accordingly is in their Regulatory-prescribed format (a Multiple Accounts Analysis). The alternatives assessment for tailings and mine rock from the Provincial perspective is complete in our opinion within the draft Environmental Assessment (EA) Report. A copy has been provided to MNDM separately.	Complete
2	Section 7.7.1 – Groundwater – Environmental Effects: There is not enough detail provided as to how potential water quality impairments to the Pinewood River originating from the tailings or east waste rock pile will be mitigated. It is not clear in the EIS that there has been adequate characterization of the metal leaching potential of these materials and the “parenthood” statements made as mitigation in the EIS do not add the required clarity.	Rainy River Resources (RRR) and our consultant suggest that the reviewer consider Section 4.12 in regards to proposed design / mitigation measures. Further detail will be provided in Federal and Provincial environmental approval applications (such as the Environmental Compliance Approval for Industrial Sewage Works and Closure Plan), including design details as applicable. Extensive information regarding potential metal leaching is provided in Appendix G: Report on Metal Leaching / Acid Rock Drainage Characterization of Mine Rock and Tailings, provided with the Draft EA Report. This report was previously provided to the Ministry of Northern Development and Mines (MNDM) in advance of the issuance of the Draft EA report on May 21, 2013 (and as an Interim Draft report on November 2, 2012).	On-going

#	COMMENT	RESPONSE	STATUS*
3	<p>Section 13.4.1 – Geochemistry FMP – Context and Objectives: “At closure the major portion of the tailings will be flooded to limit exposure to oxygen or covered with clay/clay till overburden” – which will it be? The proponent should present a clearer concept for long term management of the tailings in support of the EA, especially when it appears that a large portion of the tailings has the potential to be acid generating and/or have a significant potential for metal leaching.</p>	<p>The intent to cover the tailings surface at closure with a combined water and overburden cover is outlined in the project description (Section 4.19.3):</p> <p>"The tailings management area development plan currently provides for a water and overburden cover at closure to restrict oxygen contact with the tailings surface.";</p> <p>as well as within the evaluation of alternatives (Section 6.19.4), as stated in Section 6.19.4.3, "...The combined alternative consisting of an enlarged central ponded area, surrounded by a perimeter zone of tailings covered with overburden, provides the best balance of environmental protection, cost and risk, and is therefore the preferred alternative."</p> <p>Please let us know if any further clarification is required.</p>	Complete
4	<p>“Any problematic runoff and seepage from low grade ore and encapsulated east mine rock stockpiles will be collected and managed, both during operations and as part of mine closure.” While this statement may commit the proponent to undertake these activities, it is impossible to determine if the collection and management measures will be effective when no details have been provided.</p>	<p>Detail regarding the proposed runoff and seepage management is provided in Section 4 by area, and particularly within Section 4.12 (Water Management) and Figures 4.5 and 4-10.</p> <p>Further detail will be provided in Federal and Provincial environmental approval applications (such as the Environmental Compliance Approval for Industrial Sewage Works), including design details as applicable.</p> <p>Please let us know if any further clarification is required at this time.</p>	Complete

#	COMMENT	RESPONSE	STATUS*
5	<p>Appendix E, Section 3.3 Stockpiles: The draft conceptual closure plan calls for a multi-layered cover for the east mine rock pile to inhibit water infiltration and the influx of oxygen. Conceptually this could be a valid approach but more details and costs will need to be provided when the proponent submits a certified closure plan to MNDM for filing.</p>	<p>RRR and our consultant appreciates the support the Ministry of Northern Development and Mines (MNDM) provided during the early planning stage for this approach discussed initially during the January 2013 Federal / Provincial closure planning session, described more fully in the conceptual closure plan.</p> <p>The draft Closure Plan to be submitted in December 2013 for MNDM for review and in 2014 as a final Closure Plan for MNDM filing, will include more detail as required by the Provincial requirements.</p>	On-going
6	<p>Appendix E, Section 4.4 Tailings Management Area: The draft conceptual closure plan indicates that “for dam safety reasons, it is preferred that the permanent water cover should not come into contact with the TMA dams” and that there will be “a perimeter zone of exposed tailings beach of approximately 200m width” which will be covered with a low permeability layer of overburden to prevent infiltration and oxygenation of the tailings. It is not clear what dam safety concerns drive this, but there could be problems with erosion of the cover on the tailings beaches due to wave action and/or precipitation over the long term. More detail regarding the drivers for this aspect of tailings management is needed.</p>	<p>The intent to cover the tailings management area at closure with a combined water and overburden cover and the rationale for this approach is provided in the evaluation of alternatives (Section 6.19.4). The closure water balance will be described in the draft Closure Plan to be submitted in December 2013 for MNDM for review and in 2014 within the final Closure Plan for MNDM filing.</p>	Complete

#	COMMENT	RESPONSE	STATUS*
7	<p>From a water balance perspective it is not clear that the closure of the TMA proposed in the draft conceptual closure plan will be sufficient. While there will be measures in place to allow emergency overflow, more detail is required to determine if evapotranspiration from the TMA will be sufficient to preclude the need for discharge works.</p>	<p>As indicated in Section 4.19.3 of the Draft EA Report, at closure "Overflow spillway(s) will be developed or deepened to ensure efficient drainage of excess runoff." Similarly, Section 4.4 of the draft Conceptual Closure Plan (Appendix E), states that "A drainage way / spillway will be developed to connect the central pond with the TMA [tailings management area] perimeter spillway designed to pass the peak of the probable maximum flood (the most severe flood reasonably possible for the drainage area)."</p> <p>There is no intent nor statement in the Draft EA Report that the TMA will not discharge at closure. As indicated above, the discharge structures will be designed for the highest expected discharge as is the industry standard and regulatory requirements, but it will nonetheless be able to pass regular discharges (if water quality criteria are met).</p> <p>The closure water balance will be described in the draft Closure Plan to be submitted in December 2013 for MNM for review and in 2014 within the final Closure Plan for MNM filing.</p>	Complete
8	<p>There is no mention of any drainage works to direct overflow to the open pit, however, in Section 4.6.2, the draft conceptual closure plan indicates that "the water management pond will no longer be required once the TMA is fully reclaimed and is capable of generating a runoff of acceptable water quality or the runoff is directed to the open pit to assist with pit flooding/water quality control." Much more clarity around the long term management of discharge from the TMA is required both from a water quality and water quantity perspective.</p>	<p>The TMA is proposed to discharge to the environment at closure once an acceptable water quality standard is obtained. With the agreement of applicable regulatory agencies, it may be appropriate to direct this water to the open pit to enhance the flooding rate. The concept of enhanced open pit flooding is described in more detail in Appendix 1 of the Conceptual Closure Plan (itself Appendix E of the Draft EA Report).</p> <p>Further detail will be provided in the draft Closure Plan to be submitted in December 2013 for MNM for review and in 2014 within the final Closure Plan for MNM filing.</p>	On-going

#	COMMENT	RESPONSE	STATUS*
9	<p>Appendix E, Section 4.5.2 General Infrastructure: The draft conceptual closure plan indicates that the “potential onsite landfill and demolition landfill containing only non-hazardous domestic and demolition wastes will be reclaimed”. This is inconsistent with statements made in the Summary of Draft Environmental Assessment Report (Environmental Impact Statement) which indicates that the preferred alternative is to “use and expand the existing Township of Chapple landfill with continued RRR financial support”.</p>	<p>With respect, the statement is not inconsistent, as the intent is to utilize the existing Township of Chapple landfill during operations, and develop a dedicated landfill for closure onsite as described in Section 4.5.2 of the Draft EA Report "Non-hazardous domestic solid wastes for the construction and operation phases will likely be deposited in an offsite landfill facility (or alternatively in an onsite facility), with an onsite demolition landfill being created to support closure."</p> <p>The Summary indicates the following: (Section 7.2) "The preferred alternative for the project operations phase (alternatives for closure are addressed separately in the Summary), is to use and expand the existing Township of Chapple landfill, with continued RRR financial support. This alternative is more economic, will continue an existing relationship with the Township of Chapple, will not infringe on other users of offsite landfills and will be environmentally responsive."</p> <p>RRR will clarify in the Final EA Report Summary that an onsite demolition landfill is also proposed.</p>	<p>Complete</p> <p>Vol 1 Sec 6.3</p> <p>Vol 2 Sec 4.14</p> <p>App E</p>
10	<p>Appendix E, Section 4.6.2 Impoundment Structures: See the comments regarding overflow from the TMA above.</p>	<p>See response above.</p>	<p>Complete</p>

#	COMMENT	RESPONSE	STATUS*
11	<p>Appendix G, Section 8.2.1 Surrogate Development: While I am supportive of the “surrogate approach” used to construct the block model to determine PAG and NPAG mine rock distributions and support the adjustment of the trendline to ensure that no PAG material is classified as NPAG, the proponent should provide more details regarding how they intend to audit or monitor their work as the mine develops to ensure that PAG material is segregated and handled appropriately. Perhaps this will be presented in the missing Appendix P [...]</p>	<p>Your comments are appreciated.</p> <p>The proposed segregation approach is described briefly in Section 4.6.2 of the Draft EA Report, and will be detailed in the Closure Plan to be filed with MNDM. A draft is intended to be provided to MNDM in December 2013.</p> <p>Appendix P is only related to the Federal process for approval of placement of mineral waste over waters frequented by fish and accordingly is in their Regulatory-prescribed format (a Multiple Accounts Analysis).</p> <p>A copy has been provided to MNDM separately.</p>	On-going
12	<p>It is my recommendation that periodic static and kinetic testing is performed during operations to confirm that the surrogate characterization method remains valid with respect to changes and/or variability in the ore and waste rock. The proponent should develop an auditing program for consideration.</p>	<p>Your comments are appreciated.</p> <p>The proposed segregation approach is described briefly in Section 4.6.2 of the Draft EA Report, and will be described in the draft Closure Plan to be submitted in December 2013 for MNDM for review and in 2014 within the final Closure Plan for MNDM filing. A quality assurance / quality control program will be described in the Closure Plan and implemented.</p>	On-going
13	<p>Appendix G, Section 8.3 ARD Onset Times: This section indicates that “without appropriate mitigation measures such as the planned encapsulation of PAG mine rock, hot spots could be sufficiently developed to have noticeable acid on-set after 5 years and more pronounced acid onset from unprotected PAG rock could be evident within 10 years post exposure.” I am at a loss to find details regarding the “planned encapsulation” in the documents submitted other than those provided with the draft conceptual closure plan (as noted above) and cannot provide further comments.</p>	<p>Per your comments, the encapsulation plan has been provided in the conceptual closure plan in order to obtain comments prior to finalization of the design.</p> <p>Further detail will be provided in the draft Closure Plan to be submitted in December 2013 for MNDM for review and in 2014 within the final Closure Plan for MNDM filing.</p>	On-going

#	COMMENT	RESPONSE	STATUS*
14	<p>Appendix H, Section 3.3.4.3 - Bedrock: It is interesting that data collected from the deeper boreholes show “reasonably rapid” climatic responses but indicates that there is no real connection between the shallow aquifer (e.g. above the Pleistocene Aquitard) and the deeper bedrock aquifer. The proponent concludes there are only limited groundwater inputs to the Pinewood River watershed. The presence of upward gradients and fairly widespread artesian conditions speaks to an area or areas of significant recharge which drive the climatic responses in the deeper aquifers and this is captured in the conceptual model.</p>	<p>Agreed. The artesian conditions result from entry of water into groundwater system along the higher ground around the valley where there is thin overburden, but water being unable to exit the system in the low lying valley where the bedrock is capped by tight clay rich overburden. The timing of the response in the valley wells to recharge in the hills is a function of the lower aquifer being confined by the overlying clay, and as a result having almost no storage. The deeper aquifer is not a high producing aquifer and groundwater does not rapidly flow from the hills to the valley. However, the increased water levels in the hills around the valley do rapidly put pressure on the confined aquifer in the valley, which is manifested as a rapid increase in water levels in the wells in the valley.</p> <p>The Pinewood River near the site is essentially perched (or isolated) in above the clay-rich overburden, with very little connectivity to the confined aquifer below. This is seen in the seasonally dry flow conditions when groundwater inflows to the river are too small to sustain flow in the river, despite the artesian conditions in the aquifer below.</p> <p>Furthermore, as the bedrock aquifer in the hills where the recharge is occurring also lacks significant storage, it only requires limited recharge to increase the water levels. As result of the lack of storage in what is a mostly confined or bedrock groundwater system, small amounts of recharge in the hills causes rapid increases in the heads measured in the valley.</p>	Complete

#	COMMENT	RESPONSE	STATUS*
		<p>The heads in the valley dissipate slowly over time through a combination of: a) focussed groundwater flow at locations where the clay aquitard is thin such along the slopes of the valley or where it is pieced within the valley by bedrock knolls; and b) slow groundwater movement through the clay aquitard to the surface at rates where most would be captured by plants in the summer or stored by ice in winter, accounting for the dry conditions observed in the Pinewood River.</p>	
15	<p>As the inputs to the Pinewood River watershed originate from only the shallow surficial alluvium/peat, any shallow groundwater impairment from tailings areas, waste rock dumps and low grade ore stockpiles could report to the river and compromise water quality. While options to mitigate these impacts could be presented in Appendix P, it is absent from the document.</p>	<p>Seepage is proposed to be collected per requirements of the Metal Mining Effluent Regulation and as described in Section 4.12 and shown on Figures 4.5 and 4-10.</p> <p>Appendix P is only related to the Federal process for approval of placement of mineral waste over waters frequented by fish and accordingly is in their Regulatory-prescribed format (a Multiple Accounts Analysis).</p> <p>A copy has been provided to MNM separately.</p>	Complete
16	<p>I hope to re-visit these comments and the EIS in more detail once the proponent provides Appendix P.</p>	<p>A copy of the Assessment of Alternatives for Tailings and Mine Rock Storage has been provided to Mr. Purdon.</p>	Complete

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Stakeholder: Ministry of Northern Development and Mines
Point of Contact: Jeannette Cawston, NDO Fort Frances and Rainy River District
Comments received: August 16, 2013
Comments regarding: Rainy River Project, Draft Environmental Assessment Report (Ver. 2)

#	COMMENT	RRR RESPONSE	STATUS*
1	Section 2: It is important that further engagement is done, especially with the Emo and Rainy River Chamber of Commerce as well as the Real Estate businesses in Fort Frances and Emo who could advise RRR on the true picture of the housing market across the Rainy River District.	Rainy River Resources (RRR) and our consultant have been in contact with a number of agencies regarding the local housing market. The Rainy River Future Development Corporation commented on the Draft Environmental Assessment (EA) Report that "that the community will accommodate the new population with no strain ..." In a recent presentation to Mayor and Council of Fort Frances, Kyle Stanfield, RRR reiterated the companies' support for the pre-existing diverse housing and home builders in the region.	Complete
2	Section 3: It is clear that the stakeholder and Aboriginal people consultation has been extensive to date. Continuing consultation with stakeholders and First Nation communities throughout all phases of the Rainy River Gold Project are vital.	Your comment is appreciated. RRR feels very strongly that it is important to engage those stakeholders and Aboriginal groups likely to be affected by the Rainy River Project (RRP) in either a positive or negative manner, and will continue to do so going forward.	Complete
3	Section 5.13.3.3: Caliper Lake Provincial Park has been closed by the Province effective May 2013.	This additional information is appreciated and will be indicated in the Final Environmental Assessment (EA) Report.	Complete Vol 2 Sec 5.14.3.3
4	Section 5.13.7: (Township of Emo 2012) The Township of Emo has a water and sewer upgrade capital project underway. The work involves looping main water lines, upgrading pumps and motors at the Emo water treatment plant and expanding the existing lagoon to provide more capacity. The Township received funding through the Municipal Infrastructure Improvement Initiative.	This additional information is appreciated and will be indicated in the Final EA Report.	Complete Vol 2 Sec 5.14.7

#	COMMENT	RRR RESPONSE	STATUS*
5	<p>Section 5.13.8.3: No mention in this section of the Confederation College Fort Frances Campus nor Contact North Ontario's distance education and training network offices in Fort Frances and Emo.</p>	This additional information is appreciated and will be indicated in the Final EA Report.	Complete Vol 2 Sec 5.14.8.3
6	<p>Section 5.13.9: The Rainy River Health Care Committee has completed construction on the Rainy River Locum Rental House. Visiting locums are very impressed with the facility.</p>	This additional information is appreciated and will be indicated in the Final EA Report.	Complete Vol 2 Sec 5.14.9
7	<p>Section 5.13.11: In Fort Frances Sister Kennedy Centre offers a full range of programs and serves as a <i>social</i> setting for Fort Frances seniors. The Community Care Access Centre (CCAC) connects residents with the care they may need, at home and in the community. Fort Frances, Emo and Rainy River have a volunteer based "Meals on Wheels" program.</p>	This additional information is appreciated and will be indicated in the Final EA Report.	Complete Vol 2 Sec 5.14.11
8	<p>Section 7.18.4.2: <i>Potential suitability of the reclaimed mine footprint for agriculture use in the region.</i> RRR has been in contact with the Emo Agriculture Research Station and its manager Kim-Jo Bliss to begin discussions on land use upon closure of the Rainy River Gold Project.</p>	RRR is looking forward to a response from the Station on collaboration research the Company can provide capacity towards.	On-going
9	<p>Section 7.19.3: <i>Where feasible, goods and services will be procured from local and regional suppliers as well as suppliers that can further demonstrate Aboriginal employee content.</i> A recommendation could be to have a commitment to develop a procurement policy with the EA.</p>	Your comment is appreciated and will be considered.	Complete

#	COMMENT	RRR RESPONSE	STATUS*
10	<p>Section 7.19.3: <i>As the mine approaches the end of mine life, RRR will implement strategies to transition the workforce to buffer the effects of job losses, as well as an adjustment committee.</i></p> <p>Recommendation would be to have those strategy plans in place and committed within this EA. i.e. career transition counselling. Further, a timeline for having a Community Adjustment Committee developed should be specified within the EA.</p>	<p>Your comment is appreciated. RRR is not able to commit to specific potential transition measures at this time, but as indicated in the Draft EA Report, strategies will be implemented in consultation with the District employment and training programs.</p>	Complete
11	<p>Section 7.20.2.3: <i>Monitor regional housing supply.</i></p> <p>RRR has not been in contact with Real Estate business in Fort Frances to discuss the housing supply.</p>	<p>RRR and our consultants have been in contact with a number of agencies regarding the housing market, and the Rainy River Future Development Corporation commented on the Draft EA Report that "that the community will accommodate the new population with no strain ..."</p>	Complete
12	<p>Section 7.20.3.2 (Township of Emo 2012): The Township of Emo has a water and sewer upgrade capital project underway. The work involves looping main water lines, upgrading pumps and motors at the Emo water treatment plant and expanding the existing lagoon to provide more capacity. The Township received funding through the Municipal Infrastructure Improvement Initiative.</p>	<p>The additional information is appreciated and will be indicated in the Final EA Report.</p>	Complete Vol 2 Sec 7.20.3.2

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Stakeholder: Ontario Ministry of the Environment
Point of Contact: Sushant Agarwal, Senior Air Review Engineer, Environmental Approvals Branch
Comments received: September 3, 2013
Comments regarding: Rainy River Project, Draft Environmental Assessment Report (Ver. 2)

#	COMMENT	RESPONSE	STATUS*
1	<p>Appendix B4, HCN emissions: Hydrogen Cyanide (HCN) emissions from the ore processing area has been estimated using the procedure defined in the document "Emission estimation technique manual for gold ore processing Version 2.0, NPI, Govt of Australia". This documents also refers to the potential release of HCN emissions from the tailing storage areas due to natural degradation of cyanide. At the Rainy River facility, the tailings slurry is described to be pumped to the tailings management area after cyanide destruction. The company should provide emission estimates for the relevant averaging times and the potential impacts of HCN from the tailings area due to destruction of residual cyanide in the slurry.</p>	<p>The calculations and procedures in the Australian NPI document do not consider use of HCN destruction technologies. The procedures developed for estimating emissions from tailings were developed for mines where HCN is sent to the tailings ponds in high concentrations with no treatment or destruction. The calculations approach is for natural degradation and volatilization of HCN in a tailings system where HCN goes from the process directly to the tailings areas.</p> <p>At this Rainy River Project (RRP), HCN is destroyed in the process at the mill using SO₂. Little or no residual HCN leaves the process area and goes to the tailings area. As such, no HCN emissions from the tailings were considered.</p>	Complete
2	<p>Section 4, Page 4 of 16: Project Description indicates that ammonia emissions are expected from the cyanide destruction process using SO₂. Ammonia is also known to be released from the electrowinning stage of the process (NPI, ver 2 document). Accordingly emissions and the associated impacts of ammonia should be provided.</p>	<p>Although ammonia is released from the cyanide destruction and electrowinning, it is released in insignificant amounts. The attached calculations and modelling assessment (Table S1) indicates that small quantities of ammonia released from these two sources, results in a maximum point-of-impingement that is under 1% of the Ministry of the Environment (MOE) O.Reg. 419 Schedule 3 standard.</p>	Complete

#	COMMENT	RESPONSE	STATUS*
3	<p>Appendix B5, Road Dust Emissions</p> <p>a. Sample calculations for SPM emissions are provided on page 7 of 24 for the road segment HR1. However, reference to HR1 emissions is neither provided in Table 3 or in Table 2. It is not clear if this segment is taken into account in the total road emissions from the facility.</p>	<p>The sample calculation is a generic example used to show the specific details of a calculation for a generic road section. The example is not specific to any of the actual road segments assessed. All road segments shown in the actual table on pages 6 and 7 of 24 are included in the modelling.</p>	<p>Complete</p>

#	COMMENT	RESPONSE	STATUS*
4	<p>b. A control efficiency of 85% is used for estimating SPM emissions from the unpaved haul roads. This is the upper range of control efficiencies that can generally be achieved for unpaved roads using traditional dust suppression methods. The company should provide details of the controls/management measures to be used to achieve this control efficiency of 85% (e.g. frequency of road watering, amount of water used), along with the relevant references in support of these efficiencies. This would also help with the finalization and implementation of the future fugitive dust management plan.</p>	<p>The road dust emissions are to be controlled by implementation of a number of control measures: speed limit, road surface management and water and dust suppressant application. In accordance with the supporting documents (US EPA, AP-42, unpaved roads; IFC EHS General Guidelines; both attached) watering of unpaved roads could provide up to 95% to 98% control efficiency, and the speed limit restrictions could lead to reductions of up to 80%. In accordance with the recommended procedure the control efficiencies of two or more control technologies in the concurrent assessment are multiplicative (EET AU page 12 attached). The extra control was not used to retain a conservative assessment and only one control efficiency of 85% (total) for watering was applied for the road dust emission calculations. This level of mitigation should be considered conservative and readily achievable.</p> <p>A detailed dust management plan will be submitted as part of the Environmental Compliance Approvals (air) required by the MOE. The plan will include: triggers for watering (e.g. visual dust plumes); frequency of watering; road surface management (to reduce silt loadings); record keeping forms; training; responsibility; and complaint recording and management.</p> <p>Follow-up monitoring programs will be used to assess the efficiency of the control measures and allow for continued improvement and enhancement of any programs to ensure air quality requirements are met.</p>	On-going

#	COMMENT	RESPONSE	STATUS*
5	<p>Other related points: I agree with Hosseins comment on the AQ impacts of the construction phase. The project intends to use existing aggregate pits in the study area and thus more details would be needed to justify that the operating phase is more conservative.</p>	<p>The main sand and gravel pit will be the licensed pit formerly owned by the Ministry of Transportation, located just northwest of the processing plant site. This pit has been inactive for several years and will resume operation during construction of the RRP.</p> <p>The only other known specific aggregate pits will be dedicated short term quarries: one for constructing the Highway 600 re-alignment, and one for constructing the East Access Road. Both of these should be operational for only a few months.</p> <p>Other aggregate for onsite construction will come from crushing of non potentially acid generating (NPAG) mine rock. The rate of NPAG handling and crushing will be significantly lower during the construction phase than during RRP operations.</p> <p>The dust best management plan required by the MOE to support the Environmental Compliance Approvals (air) will also be implemented to construction activities. As such, the total particulate and metals emissions during construction will be significantly lower than during operations. The impacts of the operational phase will be greater and for a longer duration than the impacts during the construction phase. The operational phase emissions and impact were therefore the main focus of the impact assessment.</p>	On-going

#	COMMENT	RESPONSE	STATUS*
6	Potential for malfunction/accident in the sulphur dioxide pressurized vessel, accidental releases of sulphur dioxide and associated contingency/response measures should be discussed in Section 9 on Malfunctions and Accidents.	Handling pressurized SO ₂ is standard practice in the gold mining and other industries. Rainy River Resources (RRR) will apply all appropriate industry specific procedures for routine handling and associated contingency / response measures for the site. The policies will include routine handling procedures, specific equipment and connection requirements, appropriate training of personnel, alarm systems, emergency actions, worker evacuation procedures, coordination with emergency responders (including local fire and police) and corrective action procedures. This will be addressed in the Final EA Report.	Complete Vol 2 Sec 9.3.9

*As of submission of the Final Environmental Assessment Report. Reference is made to where the comment has been closed in the report where appropriate.

Additional Attachments to Ministry of the Environment Response:

Supporting Emissions Calculations;
Excerpt from US EPA, AP-42 regarding unpaved roads;
Dust Suppression and Odor Control; and
IFC Environmental, Health, and Safety (EHS) Guidelines.

Stakeholder: Ontario Ministry of the Environment
Point of Contact: Jodie Horihan, Regional Air Compliance Engineer, Northern Region
Comments received: September 3, 2013
Comments regarding: Rainy River Project, Draft Environmental Assessment Report (Ver. 2)

#	COMMENT	RESPONSE	STATUS*
1	A review of the above draft EA has been completed, as it relates to Air Quality. In particular, as the document relates to emission estimates and air dispersion modelling and O.Reg 419/05 - local air quality (sections 5.2.2, 5.3, 7.3, 8.5, 10.3, 10.4, 13.2, Appendices F and Q). Comments will not be provided on the monitoring aspects of air quality as that will be provided separately by the Regional Air Quality Analyst.	Comment noted. Rainy River Resources will respond to the comments from the Regional Air Quality Analyst.	Complete
2	In summary, the proponent; <ul style="list-style-type: none"> • Considered all relevant air contaminants of concern • Used the correct air dispersion model • Referenced all current MOE regulations, standards and guidance documents • Demonstrated that contaminants of concern were within the O.Reg 419 Schedule 3 limits when cumulative effects not considered • Demonstrated a potential exceedence for PM_{2.5} when cumulative effects and worse case operating scenario used (to be mitigated by Best Management Practices Plan) <p>Therefore I have no comments or concerns with their draft EA.</p>	Comment noted with appreciation.	Complete

*As of submission of the Final Environmental Assessment Report. Reference is made to where the comment has been closed in the report where appropriate.

Stakeholder: Ontario Ministry of Tourism, Culture and Sport
Point of Contact: Amy Didrikson, Heritage Planner
Comments received: September 3, 2013
Comments regarding: Rainy River Project, Draft Environmental Assessment Report (Ver. 2)

#	COMMENT	RRR RESPONSE	STATUS*
1	<p>Volume ,1 Section 6.12, Page 18: The section heading should read “Cultural Heritage Resources and Traditional Land Use” instead of “Archaeology and Traditional Land Use”.</p> <p>This section describes background information gathered pertaining to archaeological resources, as well as built heritage resources and cultural heritage landscapes (all considered “cultural heritage resources” based on current terminology), in addition to traditional land use.</p>	<p>This heading will be changed in the Final Environmental Assessment (EA) Report.</p>	<p>Complete</p> <p>Vol 1 Sec 7.13</p>
2	<p>Volume ,1 Section 6.12, Page 18: There are two built heritage assessments referenced in this section (“a cultural (built) heritage assessment [which] was completed in 2013 and will be followed up as per Ministry of Tourism, Culture and Sport guidance”, and the “inventory of cultural heritage landscapes and built heritage [which] has been compiled and is being followed up on during 2013”). Please clarify the scope and purpose of each. There appears to be overlap between the two studies of built heritage (and cultural heritage landscapes) described in this section. MTCS has not been circulated on either assessment / inventory and wishes to understand the purpose and rationale of each.</p>	<p>This paragraph will be revised for clarity as there was only one report prepared.</p>	<p>Complete</p> <p>Vol 1 Sec 7.13</p>

#	COMMENT	RRR RESPONSE	STATUS*
3	<p>Volume 1, Section 7.2, Page 19: This section states that alternative methods were considered for a number of project elements, which do not appear to include the East Access Road. Clarification is needed regarding whether or not alternatives were considered in the routing of the East Access Road.</p> <p>It is noted that a different route is proposed for the East Access Road in the EIS versus the ToR document. Please clarify the rationale behind the change.</p>	<p>A discussion of alternatives for site access including the East Access Road is provided in Section 6.16. As the engineering design progressed, it was determined that <i>the most direct route (traversing west - east) crosses low lying terrain, particularly in the western area where a number of small ponds and creeks are present. For that reason, a somewhat longer (400 m) route was selected which avoids most of the low lying and wet terrain (Figures ES-1, 4.1).</i></p> <p>The slight re-alignment of the East Access Road to the north from that originally shown in the conceptual layout in the Terms of Reference, provides better terrain conditions and allows avoidance of a low-lying area and creek.</p>	Complete
4	<p>Volume 1, Section 12.0: It is unclear what is meant by “heritage resources” and “heritage management”. Clarification is required regarding the types of cultural heritage resources to be examined as part of the follow-up monitoring programs (FMPs) and environmental management systems. MTCS would like to ensure that: (i) built heritage resources, (ii) cultural heritage landscapes; and, (iii) archaeological resources will all be examined as part of the follow-up monitoring programs (FMPs) and environmental management systems.</p>	This will be clarified in the Final EA Report.	Complete Vol 2 Sec 13.0
5	<p>Volume 2, Section 1.7.3, Page 1 – 12: The title to Appendix M (“Heritage Resources Baseline”) does not accurately reflect the range of cultural heritage resources considered in this section. This section should read “Cultural Heritage Resources Baseline”. The term “Cultural Heritage Resources” is understood to include archaeological resources, built heritage resources and cultural heritage landscapes.</p>	This will be changed in the Final EA Report.	Complete Vol 2 Sec 1.7.3

#	COMMENT	RRR RESPONSE	STATUS*
6	<p>Volume 2, Section 5.2.1: This section states that the natural environment studies have included aspects such as:</p> <ul style="list-style-type: none"> • Archaeology and cultural resources <p>The term “cultural resources” is unclear. Our ministry uses the term “cultural heritage resources” to capture archaeological resources, built heritage resources and cultural heritage landscapes. Revise the following aspect described in this section:</p> <ul style="list-style-type: none"> • Archaeology and Cultural Resources <u>Archaeology and Cultural Heritage Resources</u> 	<p>This terminology was used as it is was considered to be more familiar to the public. The Final EA Report will be revised to utilize the terminology described by the Ministry of Culture, Tourism and Sport (MCTS) in its comment.</p>	<p>Complete</p> <p>Vol 2 Sec 5.2.1</p>
7	<p>Volume 2, Section 5.2.1: This section states that an assessment of “Cultural (built) heritage” was undertaken by Unterman McPhail Associates. It is unclear whether this assessment addressed cultural heritage landscapes. The term built heritage resources is not understood to include cultural heritage landscapes. Therefore, if both types of cultural heritage resources were assessed by Unterman McPhail this should be clarified in the document.</p>	<p>Both built heritage and cultural heritage landscapes were assessed by Unterman and McPhail. A copy of their report has now been provided to MCTS and will also be appended to the Final EA Report.</p>	<p>Complete</p> <p>Vol 2 Sec 5.2.1</p> <p>App M-3</p>
8	<p>Volume 2, Section 5.2.18, Page 5-38: This section states that “Archaeological and Cultural Resource studies are classified into four stages (1 through 4)”. As explained in our comments on the Terms of Reference, archaeological assessments do not address known or potential built heritage resources or cultural landscapes. The EIS should contain consistent and accurate terminology with respect to cultural heritage resources. Revise this section to state that “Archaeological Assessments are classified into four stages...”.</p>	<p>This will be changed in the Final EA Report.</p>	<p>Complete</p> <p>Vol 2 Sec 5.2.18</p>
9	<p>Volume 2, Section 5.2.19, Page 5-39: The definition for built heritage resources from the PPS is provided, but not cultural heritage landscapes. Definitions for built heritage resources and cultural heritage landscapes should both be provided in this section to acknowledge both types of cultural heritage resources addressed in this section. Revise the first paragraph of this section with definitions for both built heritage resources and cultural heritage landscapes.</p>	<p>A definition for both built heritage resources and cultural heritage landscapes will be provided in the Final EA Report.</p>	<p>Complete</p> <p>Vol 2 Sec 5.2.19</p>

#	COMMENT	RRR RESPONSE	STATUS*
10	<p>Volume 2, Section 5.2.19, Page 5-39: It is unclear whether the scope of Unterman McPhail's heritage impact assessment included the new access road proposed as part of this EA.</p> <p>We are concerned that a component of the project works (the new proposed East Access Road) has been evaluated without baseline information on built heritage resources and cultural heritage landscapes. Clarify in this section whether the study area of Unterman and McPhail's heritage impact assessment includes the route of the proposed new East Access Road.</p>	<p>The East Access is as proposed in the Terms of Reference conceptual layout, apart from a minor re-alignment north to avoid low-lying area and waterbodies. This area was considered by Unterman and McPhail.</p>	<p>Complete</p> <p>App M-3</p>
11	<p>Volume 2, Section 5.2.19, Page 5-40: This section states that "Representatives of MTCS were contacted to determine whether there are cultural heritage resources (such as those listed in Table 1 under Part IV of the Ontario Heritage Act, road bridges listed in the Provincial Government Ontario Heritage Bridge Guideline, Ontario Heritage Trust easement properties or Federally recognized properties) within or beside the RRGP site and proposed Highway 600 re-alignment". MTCS does not provide information on behalf of the Ontario Heritage Trust, or on behalf of the Federal Government.</p> <p>Please clarify the information sources for this information in this section. The Ontario Heritage Trust and the Federal Government should be contacted directly for information on easement properties and Federally recognized properties, as they are the purveyors of this information. If these public bodies have been contacted already, this should be clarified in the EIS.</p> <p>Contact the Ontario Heritage Trust and the Federal Government (Parks Canada) for information on easement properties and National Historic Sites, respectively.</p>	<p>This paragraph will be modified in the Final EA Report to more accurately reflect the information sources.</p>	<p>Complete</p> <p>Vol 2 Sec 5.2.19</p>

#	COMMENT	RRR RESPONSE	STATUS*
12	<p>Volume 2, Section 5.11, Page 5-167: We would like to re-iterate our comment submitted to you on the ToR that traditional knowledge / traditional land use (TK/TLU) information should be sought regarding cultural heritage resources, which would include historical use of the area.</p> <p>There is no indication in the EIS that TK/TLU studies have sought information with respect to cultural heritage resources, specifically historical use and associations the subject property may have with historic events, activities or persons.</p> <p>Provide further documentation as to how cultural heritage resource (and historic use) information has been sought through TK/TLU studies.</p>	<p>Section 5.2 of the Draft EA Report describes methods used to collect TK / TLU data for the Rainy River Project (RRP). Section 5.11 provides results of TK / TLU studies conducted to date, that indicate very little if any Aboriginal TLU occurring within the study area within recent memory. Hence there has been no specific TK / TLU data collected thus far that could further inform RRP baseline studies, including cultural heritage resources.</p> <p>RRR has therefore made every reasonable effort to collect baseline data relevant to areas of stated interest by the involved Aboriginal peoples, recognizing that further TK / TLU data may become available at a later date. Section 13.9.2 of the July 2013 Draft EA Report provides a commitment to continue to periodically collected TK data throughout the life of the mine.</p>	Complete
13	<p>Volume 2, Section 5.14.2, Page 5-166: This statement is incorrect: "In Ontario, archaeological sites are protected under Ontario Heritage Act Regulation 170/04". "Archaeological sites" are <i>defined</i> under O. Reg 170/04, but are protected under the <i>Ontario Heritage Act</i>. The statement currently included does not accurately interpret the applicable legislation. Revise the statement to read, "In Ontario, archaeological sites are protected under the <i>Ontario Heritage Act</i>".</p>	This will be corrected in the Final EA Report.	Complete Vol 2 Sec 5.15.2
14	<p>Volume 2, Section 5.15, Page 5-168: The definition for built heritage resources from the PPS is provided, but not cultural heritage landscapes. Definitions for built heritage resources and cultural heritage landscapes should both be provided in this section to acknowledge both types of cultural heritage resources addressed in this section. Revise the first paragraph of this section with definitions for both built heritage resources and cultural heritage landscapes.</p>	A definition for cultural heritage landscapes will be provided in the Final EA Report.	Complete Vol 2 Sec 5.2.19

#	COMMENT	RRR RESPONSE	STATUS*
15	<p>Volume 2, Section 5.15, Page 5-169: This section states that a copy of the Unterman McPhail built heritage and cultural heritage landscape report will be provided in the final EA Report as Appendix M-3. Can this report be provided to MTCS in advance of the release of the final EA Report so that we can pro-actively provide comment?</p> <p>MTCS would like the opportunity to review the Unterman McPhail report in advance of the release of the Final EA Report so that we may pro-actively provide comment on the range and extent of the built heritage resources and cultural heritage landscapes which were examined. Include a commitment to provide a copy of the Unterman McPhail report to MTCS in advance of the release of the Final EA Report in Table 14-1 and section 14 of the EIS Report.</p>	<p>A copy of the Unterman and McPhail report has now been issued to MTCS (September 25, 2013).</p>	<p>Complete</p>
16	<p>Volume 2, Section 5.15.2, Page 5-169: This section states that “Representatives of MTCS were contacted to determine whether there are cultural heritage resources (such as those listed in Table 1 under Part IV of the Ontario Heritage Act, road bridges listed in the Provincial Government Ontario Heritage Bridge Guideline, Ontario Heritage Trust easement properties or Federally recognized properties) within or beside the RRGP site and proposed Highway 600 re-alignment”. MTCS does not provide information on behalf of the Ontario Heritage Trust, or on behalf of the Federal Government. Please clarify the information sources for this information in this section.</p> <p>The Ontario Heritage Trust and the Federal Government should be contacted directly for information on easement properties and Federally recognized properties, as they are the purveyors of this information. If these public bodies have been contacted already, this should be clarified in the EIS.</p> <p>Contact the Ontario Heritage Trust and the Federal Government (Parks Canada) for information on easement properties and National Historic Sites, respectively.</p>	<p>This paragraph will be modified in the Final EA Report to more accurately reflect the information sources.</p>	<p>Complete</p> <p>Vol 2 Sec 5.16.2</p>

#	COMMENT	RRR RESPONSE	STATUS*
17	<p>Volume 2, Section 7.1.1.2, Page 5-168: Please correct the typo in the following bullet:</p> <ul style="list-style-type: none"> • Cultural heritage resources (including archaeological resources, built heritage resources and cultural heritage landscapes archaeology); 	This typographic error will be corrected in the Final EA Report.	Complete Vol 2 Sec 7.1.1.2
18	<p>Volume 2, Section 7.2.2, Page 7-10: Please revise the following paragraph: “Project activities also have the potential to affect: housing stock; community services (such as health care and general community services); traffic patterns, traffic volumes and the state of existing road infrastructure; the sustainability of local communities; human health; and archaeological and cultural heritage resources”. MTCS understands the term “cultural heritage resources” to include archaeological resources, built heritage resources and cultural heritage landscapes.</p>	This will be corrected in the Final EA Report.	Complete Vol 2 Sec 7.2.2

#	COMMENT	RRR RESPONSE	STATUS*
19	<p>Volume 2, Section 7.2.2, Page 7-11: The third paragraph states: “The proposed RRGP may overlap areas that have cultural values such as burial or ceremonial sites, although none have been identified to date”. This does not appear to be accurate read alongside the Rainy River Gold Project Environmental Assessment High-level Review Report, prepared by Dillon Consulting in July 2013, on behalf of a number of First Nations groups. This report states on page 14 that First Nations have expressed concern that the site could have burial sites, particularly around muskeg areas.</p> <p>The EIS report should include a complete account of the consultation to-date. The current stipulation in the EIS that burial sites have not yet been identified could be revised to more clearly indicate that there is the potential for burial sites in the area based on consultation with local First Nations. Revise the text on page 7-11 to read: “The proposed RRGP may overlap areas that have cultural values such as burial or ceremonial sites. Consultation to date with local First Nations has confirmed that such sites may exist on the site”.</p>	<p>Detailed and lengthy consultation records are provided in Appendix D of the Draft EA Report.</p> <p>While there is always the potential for discovery of an unknown site during any development, there have been no comments to date to Rainy River Resources (RRR) or its consultants, that there are known local burial sites or ceremonial sites that could be affected by the RRP development plans (or in any other context), during any of consultation or TK / TLU studies.</p> <p>RRR will immediately notify the MTCS and other appropriate regulatory agencies, should this change during ongoing consultation activities. A protocol is in place for notification of appropriate authorities during construction and other activities, which will be added to the Final EA Report (Section 7.22.2).</p> <p>Hence RRR does not propose to change the Final EA Report to indicate that local First Nations have confirmed that such sites may exist on the site.</p>	Complete
20	<p>Volume 2, Section 7.22.1, Page 7-168: Please revise the following statement: “The assessment of archaeological and cultural heritage resources is regulated by the Province of Ontario under the Ontario Heritage Act under license from the MTCS”. MTCS licenses archaeologists, and as a result regulates <u>archaeological assessments</u> in Ontario. However, this statement includes the term cultural heritage resources which refers to built heritage resources and cultural heritage landscapes. MTCS does not license professionals who assess built heritage resources or cultural heritage landscapes specifically.</p>	<p>This will be corrected in the Final EA Report.</p>	Complete Vol 2 Sec 7.22.1

#	COMMENT	RRR RESPONSE	STATUS*
21	<p>Volume 2, Section 7.22.1, Page 7-169: Please revise the following statement: “Cultural heritage value is established in Ontario based on a number of indicators identified in the Standards and Guidelines”, which does not accurately reflect how cultural heritage value or interest is determined for built heritage resources or cultural heritage landscapes. O.Reg. 9/06 outlines the criteria used to determine whether or not a built heritage resource or cultural heritage landscape is of cultural heritage value or interest. The MTCS Standards and Guidelines for Consultant Archaeologists relates exclusively to archaeological resources. Revise the statement as follows: “Cultural heritage value for archaeological sites is established in Ontario based on a number of indicators identified in the Standards and Guidelines”.</p>	This will be corrected in the Final EA Report.	Complete Vol 2 Sec 7.22.1
22	<p>Volume 2, Table 7-48, Page 7-226: This table includes a VSEC row labeled “cultural heritage resources” which appears to refer to archaeological resources. MTCS understands cultural heritage resources to include archaeological resources, built heritage resources, and cultural heritage landscapes. Revise this row to read “Archaeological Resources”</p>	This will be revised in the Final EA Report.	Complete Vol 2 Tables 7-48, 7-50, 7-52, 7-54, 7-56
23	<p>Volume 2, Table 7-48, Page 7-226: This table includes a VSEC row labeled “Built Heritage Resources”, which should be supplemented by “Cultural Heritage Landscapes” to ensure the full suite of cultural heritage resources are included as part of the analysis. The outstanding built heritage resource and cultural heritage landscape assessment by Unterman McPhail needs to be fully reflected in this table. Revise this VSEC row to read “Built Heritage Resources and Cultural Heritage Landscapes”.</p>	This will be revised in the Final EA Report.	Complete Vol 2 Tables 7-48, 7-50, 7-52, 7-54, 7-56
24	<p>Appendix L Socio-economic baseline, Page v: Please correct the reference to the Ministry of Tourism, Culture and Sport in the glossary (which currently refers to our Ministry as the Ontario Ministry of Tourism and Culture). Our Ministry has recently been renamed to the Ontario Ministry of Tourism, Culture and Sport. Revise the glossary and all subsequent references to read the “Ontario Ministry of Tourism, Culture and Sport”.</p>	<p>An addendum will be added to Appendix L to indicate the change in the Ministry name since the time when the document was originally prepared.</p> <p>The glossary and main text of the Draft EA Report referenced the Ontario Ministry of Tourism, Culture and Sport, except in reference to publications released by the Ministry of Culture.</p>	Complete App L

#	COMMENT	RRR RESPONSE	STATUS*
25	<p>Appendix O Comprehensive Alternatives Assessment Tables, Page v:</p> <p>It is unclear how, for certain alternative methods, it has been determined that the effect on built heritage and cultural heritage landscapes is “N/A”. For example, aggregate extraction can affect built heritage resources and cultural heritage landscapes depending on proximity.</p> <p>Water taking from lakes could impact cultural heritage landscapes, depending on the extent of the water taking. In addition, it is unclear how the proponent has concluded that “no apparent” effects on built heritage and cultural heritage landscapes will result from the Highway 600 Realignment, the power supply alternatives or the Transmission Line Routing when the assessment by Unterman and McPhail on built heritage and cultural heritage landscapes has not yet been completed.</p> <p>The rationales behind the conclusions regarding cultural heritage resources are not explained in the accompanying text in section 6.</p>	<p>The tables contained in Appendix O will be revised to reflect the results of the Unterman and McPhail report; along with the text provided in Section 6 of the Final EA Report.</p>	<p>Complete</p> <p>App O</p>

*As of submission of the Final Environmental Assessment Report. Reference is made to where the comment has been closed in the report where appropriate.

Stakeholder: Ontario Ministry of the Environment
Point of Contact: Paula Spencer, Surface Water Specialist
Comments received: September 3, 2013
Comments regarding: Rainy River Project, Draft Environmental Assessment Report (Ver. 2)

#	COMMENT	RESPONSE	STATUS*
1	<p>Sections 4.12.6 and 7.6.1.2: Section 4.4.1 of MOE Procedure B-1-5 requires that the low flow statistic (7Q20) is used as the design flow for the receiving system. The 7Q20 documented in Table 5-21 of the draft EIS is 8 m³/day, (which is essentially zero flow), indicating that the Pinewood River has no assimilative capacity. Because the Pinewood River has no assimilative capacity, effluent quality will be required to meet very stringent criteria (i.e. PWQO) at all points of discharge to the Pinewood River.</p> <p>The current proposal for effluent discharge to the Pinewood River is not consistent with MOE Water Quality Management Policies 1, 2 and 5.</p> <p>The Pinewood River is the only receiving waterbody identified in the draft EIS. An assessment of alternate discharge locations may be appropriate given the very low flows observed in the Pinewood River.</p> <p>The proponent needs to provide more information on how very stringent effluent criteria will be met at the proposed discharge points to the Pinewood River.</p> <p>The proponent should also include an assessment of any alternative discharge options in the revised EIS document.</p>	<p>Per Section 4.12.6 of the Draft Environmental Assessment (EA) Report, Rainy River Resources (RRR) and its consultants have acknowledged that if the 7Q20 criteria were to be used, the...<i>aged effluent from the water management pond would have to achieve the PWQO (or alternative scientifically defensible criteria) without the benefit of any mixing in the receiver.</i> To avoid this consideration (i.e., to ensure that adequate mixing is available at all times) ... <i>RRGP proposes to adopt a minimum mixing ratio of at least one part receiving water flow to one part treated and aged final effluent flow during discharge periods to allow for at least some measure of mixing.</i></p> <p>RRR and our consultant respectfully believe that the current proposal for effluent discharge to the Pinewood River is consistent with Ministry of the Environment (MOE) policies. RRR would welcome the opportunity for more detailed discussions if further clarity is needed. RRR expects that the effluent discharge criteria will be more fully defined in the Provincial Environmental Compliance Approval (ECA).</p> <p>RRR understands that stringent effluent criteria will be applied to the RRP through the ECA process. Further details relating to effluent discharge criteria and assumptions are provided in response to other comments below.</p>	On-going

#	COMMENT	RESPONSE	STATUS*
	Cont'd	There are no reasonable alternative discharge locations for the Rainy River Project (RRP). The RRP is surrounded by private lands which make the routing of any pipeline challenging; and if agreements are possible with the landowners, extremely costly. The Rainy River is the largest receiver in the region, and it is 35 to 40 km from the tailings management area (TMA), and an international waterway. Little Grassy River is approximately 30 km away to the north.	
2	<p>Sections 4.12.5, 4.12.6 and 7.6.1.2; Tables 4-4 and 7-14: The proponent must consider the lack of assimilative capacity in the Pinewood River when designing the proposed treatment system, in order to produce a very high quality effluent that can meet stringent criteria at all direct discharge points to the Pinewood River. Alternative treatment processes should be proposed to the Ministry for evaluation.</p> <p>The proponent should provide documentation to the Ministry on alternative treatment processes that can achieve a higher quality of effluent, taking into consideration the need to meet very stringent effluent criteria (ie. PWQO).</p>	<p>As indicated in Section 4.12.6, RRR and our consultant fully acknowledge the general lack of assimilative capacity in the Pinewood River. This has been carefully considered in the design and proposed operation of the water management system. Further information will be provided in the Provincial ECA application.</p> <p>The system of water management and treatment proposed for the RRP is robust (in plant effluent treatment using SO₂/Air, coupled with extensive post-treatment effluent aging, extensive water recycle, and wetland treatment; all in an integrated manner with provision for storage during wet and dry year sequences as needed) and has been proven effective at other Ontario mines at scales consistent with the RRP.</p> <p>Respectfully, RRR and its consultant do not agree with the statement in the rationale for the MOE comment, "<i>that the treatment system is unlikely to be adequate</i>" to meet the anticipated effluent criteria, based on AMEC's experience with other recent Ontario mining projects and MOE policies. Further detail will be provided in the application for a Provincial ECA.</p> <p>Consideration of alternative wastewater management approaches and measures are provided in Sections 6.4, 6.7, 6.8 of the Draft EA Report.</p>	On-going

#	COMMENT	RESPONSE	STATUS*
3	<p>Section 4.12.6; Table 4-4: Table 4-4 outlines the expected effluent quality after cyanide destruction (SO₂/Air) and 60-day aging in the Tailings Management Area (TMA)/Water Management Pond (WMP). For several parameters, concentrations increase from “Test at Time 0” to the 60-day aging results. Clarification is needed on why concentrations of boron, cadmium, lead, zinc, and thiocyanate increase over the 60-day aging period. Table 4-4 includes expected effluent quality after cyanide destruction and a 60-day aging period.</p> <p>Modified receiver targets have been proposed for several contaminants of concern (CofC). Further information is needed on the potential impacts of using these modified targets on the Pinewood River.</p> <p>In the revised EIS, the proposed effluent criteria should be clearly documented in order to assess potential impacts to the Pinewood River.</p> <p>Section 4 and Section 7 state that water from the TMA will be transferred to the WMP and allowed to age for a minimum of one month, whereas Table 4-4 refers to 60-day aging tests to assess the effectiveness of natural degradation and to predict effluent quality. Clarification is needed on the expected retention time, taking into consideration the very stringent effluent criteria that will be required prior to discharging to the Pinewood River. In addition, the water balance must reflect the expected retention time required to meet effluent criteria</p>	<p>Boron concentrations remained essentially stable throughout the 60-day aging period, with concentrations being well below the Provincial Water Quality Objective (PWQO) for the protection of aquatic life value.</p> <p>Thiocyanate (CNS) also remained stable during the 60-day aging test. However, available operating data from the Barrick Gold Holt-McDermott Mine near Kirkland Lake show that CNS declines markedly in aging natural ponds (with the help of bacterial action) to levels generally below 1 mg/L, as discussed in Section 7.6.1.2 of the Draft EA Report, and is not expected to be of concern.</p> <p>Zinc and cadmium are neutral soluble metals, and were observed to come into solution during the aging test work. Concentrations were stable after the 60-day period. The observed concentrations for these two metals are influenced (aggravated) by the very thin water column (approximately 6 cm) present over the submerged tailings in the test program.</p> <p>Further information on modified receiver targets is provided in Section 7.6.1.2 of the Draft EA Report. All modified receiver targets will be fully protective of aquatic life in the Pinewood River for long term (continuous chronic) exposure.</p> <p>Final effluent criteria will be selected so as to achieve PWQO or modified receiver targets as discussed in Section 7.6.1.2. The final details will be addressed in the ECA application required by the Province.</p>	On-going

#	COMMENT	RESPONSE	STATUS*
	<p>Cont'd</p> <p>The proponent should provide the following in the revised EIS:</p> <ol style="list-style-type: none"> 1. Predicted effluent quality at the discharge point (points) 2. Clarification on why concentrations of several CofC's increase over the 60-day aging period 3. Further information on the potential impacts of modified targets on the Pinewood River. 4. Clarification on the expected retention time of effluent to achieve required effluent quality. 	<p>RRR and our consultant understand that the Province accepts two approaches that would be applicable to the RRP and in either case the receiver would be fully protected:</p> <ul style="list-style-type: none"> • The first approach is to set a discharge limit based on a minimum (conservative mixing ratio). Data for this approach are presented in Tables 7-14 and 7-15 of the Draft EA Report . The presumed 1:1 mixing ratio shown in Table 7-14 is highly conservative as shown in Table 7-15. • The second approach, which may be more favourable, would be to calculate daily discharge criteria on the basis of loadings required to achieve PWQO or modified equivalents. A combination of approaches for different parameters has also been used by the MOE in the past in the preparation of ECAs for Ontario mining projects. <p>With regard to the four points requiring further discussion in the EA, much of the requested information is presented in Sections 4.12 and 7.6.1.2 of the Draft EA Report. Additional clarifications will be added to the Final EA Report as requested.</p>	<p>Complete</p> <p>Vol 2 Sec 7.6.1.2</p> <p>AppW-1</p>

#	COMMENT	RESPONSE	STATUS*
4	<p>Sections 4.12.7 and 7.6.1.1: Section 7 states that the majority of treated effluent from the TMA will be piped to the Pinewood River during the months of April, May, October, and November to take advantage of maximum receiving water capacity for water quality control. This water will be discharged assuming a 1:1 dilution ratio in the Pinewood River during the above mentioned months. However, based on Procedure B-1-5 and the 7Q20 low flow statistic, the Pinewood River does not provide any assimilative capacity.</p> <p>The Water Discharge Pond will decant to the constructed wetland from June-September and December-January. Flows in excess of wetland capacity will be directed to the Pinewood River to prevent damage to the constructed wetland due to high flows.</p> <p>The proponent should note that any water discharged to the Pinewood River must meet stringent effluent criteria (i.e. PWQO's). If water does not meet discharge criteria, it must be stored onsite until effluent limits are met.</p> <p>The water balance should include adequate storage, including contingency storage, in the event discharge limits are not being achieved for extended periods of time (several years). Neither Figure 4-12 nor Section 4.12.8 describes plans for contingency water storage. This should be discussed in the revised EIS.</p> <p>The proponent needs to ensure all water discharged to the Pinewood River meets effluent criteria. Updates to the proposed effluent treatment components and revised effluent discharge pathways should be included in the EIS.</p> <p>In addition, the revised EIS should include updates to the water balance to reflect the potential need to store water onsite for extended periods of time.</p>	<p>RRR and our consultant acknowledge that any water discharged to the Pinewood River will be required to meet the effluent criteria defined in the future Provincial ECA. The proposed discharge is based on a conservative, minimum 1:1 receiver to effluent mixing ratio as per Tables 7-14 and 7-15 of the Draft EA Report. Daily flow and discharge volumes would be required to determine permissible effluent discharge restrictions on any given day. If the minimum 1:1 mixing ratio could not be achieved on any given day, there would be no discharge. The 7Q20 condition is not relevant if minimum mixing ratios are proposed. A loading based discharge constraint can also be used as per the response immediately above.</p> <p>It is recognized and planned that any effluent discharged to the Pinewood River would be such that PWQO or scientifically defensible modified receiver targets would be met in the Pinewood River. Receiver values apply to the receiver and not to the effluent.</p> <p>The water management system is robust in its contingency storage to accommodate sequences of wet and dry years; but there are no plans (or anticipated need) to store water for several years. Further information will be provided in the ECA application to better clarify aspects discussed above.</p>	<p>On-going</p> <p>App W-1</p>

#	COMMENT	RESPONSE	STATUS*
5	<p>Section 6.19.1; Appendix T, Table 5: The expected pit lake scenario predicts that concentrations of COC's will be high initially due to seepage from the East Mine Rock Stockpile (EMRS). Concentrations in the upper pit lake will increase after stratification as a result of loading from the pit walls as they mineralize.</p> <p>The spillway will discharge passively to the Pinewood River approximately 72 years after closure in the preferred scenario. Initial discharge at 72 years will exceed PWQO for all parameters (by several orders of magnitude in some cases) except Molybdenum and Arsenic (exceeds interim PWQO and CWQG). After 300 years, considered to be the steady state concentrations, PWQO will be exceeded for the following parameters: Fe, Al, and Cr.</p> <p>Metal loadings from the pit walls seem to be optimistic and assume that water chemistry will be similar to background conditions in the long term (300 years). The MOE's experience at other sites is that once exposed, the pit walls can contribute significant metals to the water, making it necessary to treat the pit water prior to discharge to the natural environment. Because the Pinewood River has no assimilative capacity, pit lake discharge will be required to meet very stringent discharge criteria at the point of discharge to the receiver. The proponent needs to assess potential impacts to surface water from the pit lake discharge, including potential contaminant loadings, and include this in the revised EIS. In addition, the proponent needs to consider alternate scenarios for establishing the pit lake (i.e. shorter timeframes) and achieving a higher quality discharge.</p>	<p>The average overburden thickness in the pit area is 24 m. The upper layer of stratified water (approximately 30 m when the pit is completely filled) will therefore primarily be associated with clay till and lacustrine clay overburden. Pit wall exposure is therefore expected to have a negligible effect on water quality of the upper stratified layer of water.</p> <p>Protection of aquatic life guidelines apply to the receiver. Once the open pit is filled (either passively or in an enhanced manner depending on additional discussions with the regulatory authorities) the watershed catchment for the pit area will comprise a total area of approximately 9.6 km². The Pinewood River catchment opposite the open pit at closure will be approximately 60 km² and slightly further downstream at the Loslo Creek inflow, the watershed will be 106 km². Receiver to pit overflow mixing ratios at the two locations will therefore be approximately 5:1 and 10:1 respectively. Under this scenario, PWQO or scientifically defensible equivalent values for the protection of aquatic life would be met in the Pinewood River.</p> <p>If necessary additional water quality treatment will be provided to suitably protect the receiver. This potential requirement is noted of Section 4.8 of Appendix E (Draft Conceptual Closure Plan). Additional text will be added to the Final EA Report, to indicate that there is a potential requirement for additional treatment of the pit water at closure.</p>	<p>Complete</p> <p>Vol 2 Sec 6.19.1.1</p>

#	COMMENT	RESPONSE	STATUS*
6	<p>Sections 4.12 and 6.11: The EIS states that the project will require 3,000,000 m³/year of fresh water during operations. For initial start-up of the project, water will be taken from the Pinewood River. The 7Q5, 7Q10, and 7Q20 are less than 50 m³/day for the Pinewood River. Further information is needed to assess the impacts of proposed water takings on the watershed. The information presented in the EIS suggests that the Pinewood River may not be an acceptable water source. In addition, information on proposed alternate sources of water is very limited.</p> <p>The preferred alternative for water taking during operations is water from the West Creek. Lack of information on West Creek hydrology does not allow for assessment potential impacts to this system.</p> <p>In addition, further information needs to be provided regarding the use of Off Lake, Burditt Lake, Little Pine Lake or Boundary Lake, which are described in the Water Supply Alternatives section (6.11).</p> <p>The site water balance needs to include adequate fresh water storage to supply water during periods of low flow or winter conditions.</p> <p>The proponent needs to provide further information on the potential impacts of water taking on the proposed surface water sources. In addition, further information is needed on how water taking limitations will affect the site water balance.</p>	<p>During operations the only freshwater requirement is from the West Creek Pond at 1,647 m³/d (601,155 m³/a). All other water will be supplied from site contact water which requires treatment and management in any event, and is therefore regarded as recycle water.</p> <p>The effects of water taking on the Pinewood River are described in Section 7.6 of the Draft EA Report. There is ample water in the Pinewood River under the proposed percentage water taking restrictions, to provide the initial water inventory for process plant start-up, as shown in Table 4-3. Table 4-3 shows the available water at the percentage taking restrictions (i.e., 20 and 15 percent), and not the total river flow. If necessary water from the Pinewood River could be collected over a longer period upwards to two years.</p> <p>Further information will be provided in the Final EA Report regarding the hydrology of West Creek, with such flows being prorated from Pinewood River data.</p> <p>There is no intent (or need) to take water from either initially proposed lake as a contingency measure. The Pinewood River is capable of supplying the required quantity of process plant start-up water, and once in operation, there will be a net surplus of water. Further optimizations are planned to reduce this net surplus; hence water from the two lakes is not required and reference will be removed from the Final EA Report.</p>	<p>Complete</p> <p>App W-1</p> <p>Vol 2 Sec 6.11.3 Sec 8.2.1 + others</p>

#	COMMENT	RESPONSE	STATUS*
	Cont'd	<p>The site water balance provides for fresh water supply during periods of low flow through use of the West Creek Pond. The fresh water requirement is 1,647 m³/d, which can easily be supplied by the reservoir under all flow conditions. Restrictions on fresh water taking from the West Creek Pond will require discussion with Regulatory agencies, and are being considered in the development of the fisheries No Net Loss Plan.</p> <p>Sections 7.5 and 7.6 of the Draft EA Report describe the effects of water taking on both the smaller local creeks and on the Pinewood River.</p>	
7	<p>Appendix T, Tables 4 and 6: Seepage from the TMA and ERMS will eventually discharge into Pinewood River. Expected water quality information in Appendix T indicates C of C's will exceed PWQO. Because the Pinewood River has no assimilative capacity, seepage will be required to meet very stringent criteria at the point of discharge. The proponent will need to quantify potential seepage and provide expected loading calculations. In addition, potential surface water impacts should be assessed and included in the revised EIS.</p> <p>The proponent should include the following in the revised EIS:</p> <ol style="list-style-type: none"> 1. Quantification of potential seepage 2. Predicted loadings of CofC's from seepage 3. Assessment of potential impacts from discharge of seepage to surface water receivers 	<p>The seepage data reported in Table 4 of Appendix T is seepage from the toe of the mine rock stockpile that will exit to surface and be collected in the Mine Rock Pond, which will then be transferred to the open pit. This is not groundwater seepage.</p> <p>The estimated quantity of seepage exiting the TMA at closure (maximum condition as the tailings will be substantively flooded at closure) is 1,690 m³/d (Appendix S, Section 4.1). The predicted quantity of seepage exiting the East Mine Rock Stockpile that is not captured by site collection systems ranges from approximately 50 m³/d during operations to 25 m³/d after closure (Appendix S, Section 4.1) .</p> <p>The quality of groundwater seepage exiting the TMA will be provided in the Final EA Report. Based on data from comparable operating mines, this seepage quality is likely to be in the order of 1/50 to 1/100 of the quality of water contained in the TMA.</p> <p>The assessment of potential receiving water effects will be documented in the Final EA Report as requested.</p>	Complete App W-1

#	COMMENT	RESPONSE	STATUS*
8	<p>Sections 4.19.2 and 4.6.2: The west mine rock stockpile (WMRS) will contain NPAG, while the EMRS will store PAG. Section 4.19.2 states that ARD in the WMRS will not be an issue. In addition, NPAG rock is being proposed as an aggregate source for on-site construction. Extensive testing, following accepted protocols, will be needed to ensure that the waste rock is accurately classified based on potential acid generating properties.</p> <p>The proponent should provide contingency plans for the WMRS and NPAG used in construction, in the event that ARD issues are identified through monitoring programs.</p>	<p>A new subsection will be added to Section 9 (Malfunctions and Accidents) of the Final EA Report to address contingency measures should acid rock drainage issues arise with the West Mine Rock Stockpile / mine rock used in construction.</p>	<p>Complete</p> <p>Vol 2 Sec 9.4.2</p>
9	<p>Sections 4.12.7.3, 4.12.8 and 7.6.1.1: The flow in the Pinewood River is very low during the winter months. It is not typical for northern minesites to discharge effluent in winter conditions. Water balance calculations should account for potential difficulties with winter discharge to ensure adequate storage capacity.</p> <p>In addition, the proponent is reminded that all discharge entering the Pinewood River will need to meet restrictive effluent criteria. It is unlikely effluent quality will meet required criteria during the winter months because ammonia and cyanide breakdown is greatly reduced in winter climatic conditions.</p> <p>The proponent needs to clarify whether effluent will be discharged in winter conditions and how the water balance will be affected.</p> <p>In addition, the proponent is reminded that all effluent discharged to the Pinewood River will need to meet very restrictive criteria.</p>	<p>Further explanation will be provided with Table 4-5 in the Final EA Report for greater clarity. Per Table 4-5, certain of the ponds will operate all year, and particularly those ponds which supply operations and do not discharge to the environment.</p> <p>Winter discharge through the Constructed Wetland is proposed for water that meets quality standards to offset reductions in flow volume in Pinewood only, per Section 7.6.1.2 of the Draft EA Report.</p> <p>RRR and its consultants acknowledge that any water discharged to the Pinewood River will be required to meet the effluent criteria defined in the future Provincial ECA. Any such discharge will be required to be fully protective of aquatic life in the Pinewood River under all flow conditions. The RRP water management approach is based on this assumption.</p>	<p>Complete</p> <p>Vol2 Table 4-5</p> <p>App W-1</p>

#	COMMENT	RESPONSE	STATUS*
10	<p>Appendix I: The volume of data prohibits a detailed review and assessment of statistical methods.</p> <p>The proponent should note that adequate baseline data will be required as part of the provincial permitting process.</p>	<p>The baseline studies were designed to characterize the physical, chemical, and biological aspects of potentially impacted watersheds and were issued to the MOE previously although the reviewer may not have been involved at that time (July 2012 to earlier this year). The water monitoring program includes multi-year seasonal sampling as provided in Appendices I-2, I-3 and N.</p> <p>RRR took a pro-active approach to baseline data very early in the mining project cycle. The reviewer is correct; there is an extremely high volume of water quality baseline data available for this project, compared to other projects AMEC has been involved with in Ontario.</p> <p>Focussed data regarding temporal variability associated with the collected data and trends over time will be provided with the Provincial environmental approval applications.</p>	On-going
11	<p>Figure 4-8: The proponent should provide documentation to clarify all discharges that will be reporting to the Pinewood River and any other surface water receiver. For example, on Figure 4-9, there is no discharge pathway from the WDP to the Pinewood River; however, section 4.12.7.1 states that flows in excess of wetland capacity will be directed to the Pinewood River to prevent damage to the wetland due to high flows.</p> <p>The proponent should provide documentation to clarify all direct discharges that will be reporting to surface water receivers.</p>	<p>The reviewer is correct. All excess water discharged directly from the Water Management Pond to the Pinewood River would be by pipeline (and not through the Water Discharge Pond). The Water Discharge Pond will be used as part of the treatment system and to control that portion of the Water Management Pond effluent which is to pass through the Constructed Wetland.</p> <p>Relative to Constructed Wetland capacity, it should be noted that the catchment area for the Water Discharge Pond is small, such that high flows through the Constructed Wetland would only occur when water is being discharged from the Water Management Pond to the Water Discharge Pond. Site operators will therefore have considerable control of the system and will not discharge excess flows through the Constructed Wetland that would exceed its capacity.</p>	Complete App W-1

#	COMMENT	RESPONSE	STATUS*
12	Appendix I: Data should be collected using advanced sampling and analytical protocols for mercury to define baseline conditions, determine potential loadings, and to monitor the potential impacts of the project over time.	RRR and our consultant suggest that quarterly samples be collected from selected water quality monitoring stations for trace analysis of total and methyl mercury. The selected stations will be discussed with the MOE.	Complete Vol 2 Sec 13.5.2

*As of submission of the Final Environmental Assessment Report. Reference is made to where the comment has been closed in the report where appropriate.

Stakeholder: Ontario Ministry of the Environment
 Point of Contact: Stefanos Habtom, Senior Wastewater Engineer
 Comments received: September 3, 2013
 Comments regarding: Rainy River Project, Draft Environmental Assessment Report (Ver. 2)

#	COMMENT	RESPONSE	STATUS*
	I have reviewed the Rainy River Gold Mine Draft Environmental Assessment Report to assess the draft EA report in terms of the mandate of the Environmental Approval Services Section, EAB, under Section 53 of the <i>Ontario Water Resources Act</i> (OWRA) and I provide the following review comments for your consideration. [...]		
1	<p>Section 7.2, Alternative Methods: Volume 1 Summary has identified the best alternative for process plant effluent management as in-plant cyanide destruction and heavy metal precipitation using the SO₂/Air treatment process, followed by the natural degradation in the tailings management area.</p> <p>It should be noted that for Environmental Compliance Approval (ECA) purposes the final design and performance of the proposed process effluent management system will be required to meet the design effluent objectives based on the assimilative capacity study of the receiving surface water (Pinewood River).</p>	Rainy River Resources (RRR) and our consultants are aware of this requirement; and an application for submission to the Ministry of the Environment (MOE) will be in preparation later this year.	On-going
2	<p>Section 3.2.2 - Distribution of Draft EA for Aboriginal Review : Volume II (Main Text) indicates that financial resources have been allocated to the Aboriginal Groups for an independent technical review of the RRGP EA Report.</p> <p>It should be noted that before submitting an application for an ECA, RRGP shall make all efforts to address all outstanding concerns raised in the final EA by the independent technical reviewer with potential impact to the natural environment.</p>	RRR and our consultants are currently preparing responses to comments provided by the independent reviewer and will be addressing their suggestions.	Complete <i>Note that comments and responses have been requested to be confidential at this time.</i>

#	COMMENT	RESPONSE	STATUS*
3	With respect to the mandate of the Environmental Approval Services Section, EAB, the draft EA for the Rainy River Gold Mine provides adequate assessment of process wastewater treatment alternatives and selection of the preferred alternative. As outline above, more details will be required in the final EA and during the ECA application period.	Your comment is appreciated. Further details will be provided in the application intended to be submitted to the MOE later this year.	On-going

*As of submission of the Final Environmental Assessment Report. Reference is made to where the comment has been closed in the report where appropriate.

Stakeholder: Ontario Ministry of Transportation
Point of Contact: Jim McKeever, Corridor Management Planner
Comments received: September 3, 2013
Comments regarding: Rainy River Project, Draft Environmental Assessment Report (Ver. 2)

#	COMMENT	RRR RESPONSE	STATUS*
1	<p>Part of this proposed project will be the relocation/realignment of a portion of Provincial Highway 600 which currently crosses the proposed location of the open pit mine. This relocation is listed and described as part of the project in some locations, but not in others.</p> <p>From a general perspective, we found this draft report to be confusing, with references to the relocation/realignment of Provincial Highway 600 and the affects of this scattered throughout the report.</p> <p>While there may be some advantage to including these references within the particular sections and subsections in the report, this Ministry would have preferred to have a full and detailed section dedicated to this Highway 600 relocation/realignment. For the purposes of this project, this ensures that this Ministry's review, and that of others, is based on all of the relevant information being in one location so a complete picture is easily available. [...] Consequently, this Ministry would like to see such a compiled section incorporated into this document.</p>	<p>The Draft Environmental Assessment (EA) Report was structured in a manner that follows the Approved Provincial Terms of Reference and the Federal Environmental Impact Statement (EIS) guidelines, as we have been directed by the Ministry of the Environment (MOE) and the Canadian Environmental Assessment Agency (CEA Agency), who are respectively, the Provincial and Federal EA leads for the co-ordinately EA. There has been no previous request by either EA leads or the Ministry of Transportation (MTO) for a stand-alone section describing only the Highway 600 re-alignment.</p> <p>As indicated in Section 4.15 the approximately 11 km (5 km new road) re-alignment of the gravel surfaced, Highway 600 is one of the integral parts of the Rainy River Project (RRP) - itself a mine development project. There are two key sections in the Draft EA Report dedicated to the re-alignment: Section 4.15 of the Project Description and Section 6.15 of the Evaluation of Alternatives. Otherwise, the infrastructure changes are considered with the remainder of the RRP components.</p> <p>In addition to the information provided in the Draft EA Report, a highway engineering report that pulls together the re-alignment design aspects, will be prepared by a Registry Appraisal and Qualification System (RAQS) Certified engineering firm, for Ministry of Transportation (MTO) review in early October 2013. The report will be an appendix to the Final EA Report.</p>	<p>Complete App Y-2</p>

#	COMMENT	RRR RESPONSE	STATUS*
2	<p>The last sentence of the second paragraph in subsection 4.15 states that “the re-aligned Highway 600 will be constructed by RRR to Provincial (Ministry of Transportation) standards so that RRR can pursue transfer of the road to the Province after construction”.</p> <p>This statement essentially summarizes this Ministry’s perspective regarding this Highway 600 relocation/realignment. Ultimately, the design and acceptability of the relocated/realigned portion of Highway 600 will be captured in a legal agreement between the proponent and this Ministry.</p>	<p>This was the intent of the statement. Rainy River Resources (RRR) and its consultants wanted to clearly state the commitment made to the MTO in the EA documents.</p>	<p>Complete</p>
3	<p>Also in subsection 4.15, the draft EA states that the crossing of the Pinewood River will be designed in accordance with the Highway Drainage Design Standard (MTO 2008). However, this crossing will also have to be designed in accordance with the Canadian Highway Bridge Design Code (CHBDC 2006).</p>	<p>Agreed. The crossings will be designed in accordance with the Canadian Highway Bridge Design Code. This will be clarified in the Final EA Report.</p>	<p>Complete</p> <p>Vol 2 Sec 4.15</p>
4	<p>There are to be no references in this Draft EA document to design and location parameters for this relocated portion of Highway 600, as none have been officially agreed to by this Ministry, or determined by the EA process. For example, subsection 4.1 states that “the major proposed project components are expected to include: ...gravel-surfaced, Highway 600 re-alignment; ...”. The reference to gravel surface as the expectation of a relocation/realignment design parameter is to be removed in this Draft EA document. As well, all such design references should also be removed.</p>	<p>RRR and its consultants will remove this reference and other reference which we believe would be considered "design references" by MTO.</p>	<p>Complete</p> <p>Vol 2 Sec 1.3 Sec 4.1 Sec 4.15</p>

#	COMMENT	RRR RESPONSE	STATUS*
5	There are utilities currently located within the Highway 600 right-of-way. There does not appear to be any discussion on how these utilities going to be accommodated with the Highway 600 realignment. The proponent has also talked about a water line within the current and proposed Highway 600 right-of-way along that portion of Highway 600 extending west from the project site and then south along the proposed Pine River Road to the Pinewood River. The location and discussion of this within the draft report could not be found.	The design report to be issued to the MTO in October, 2013 for comment, will address all utilities and seek technical clarification from MTO as required.	Complete App Y-2
6	In subsection 6.15.2, on page 6-80. the statement is made that MTO supports Alternate C. This statement is incorrect as MTO has not stated a preference for any of the studied alternatives. While the proponent and the Municipality have indicate their preference, this Ministry has consistently stated that the EA will determine the preferred alternative location for the relocated portion of Highway 600. Consequently, all such references to a selected realignment by MTO are to be removed from the document.	With apologies, this inadvertent statement will be corrected in the Final EA Report.	Complete Vol 2 Sec 6.15.1
7	In fact, Table O-11 compares several alternatives for the re-alignment of Highway 600, undertaking a comparative evaluation of the overall advantages and disadvantages of each. It is noted that all of the alternatives had similar advantages and disadvantages for the majority of the indicators. After reviewing the information in the table, it is difficult to determine why Alternative C was the preferred alternative.	As described in Section 6.15, the alternatives are generally comparable, but with Alternate C being the preferred route of the Reeve and Council of the Township of Chapple as it follows existing Municipal road easements. From the perspective of Effects to the Human Environment, it is therefore preferred overall.	Complete

#	COMMENT	RRR RESPONSE	STATUS*
8	In subsection 4.9, the draft document states that “there are currently no plans to develop onsite construction or permanent accommodations if sufficient accommodations can be found in local communities. The option of accommodation complexes are retained herein in the event that suitable offsite permanent accommodations are not available”. Considering the anticipated size of the workforce, both during construction, and after during the operation of the mine, this aspect of development of this project should be addressed in this document. For example, the location, design, and construction of accommodation should be touched on, as well as the governmental perspective on such types of development.	Further information has determined that an accommodation complex will be not required for the operations phase, and the text of the Final EA Report will be revised accordingly. There remain no plans for the development of significant accommodation for the construction phase, although there is the potential for minor temporary facilities being develop only within the RRP development footprint. This will be clarified in the Final EA Report.	Complete Vol 2 Sec 4.9
9	There are references throughout the document to various legislation that are applicable to this proposed project. There are references to the Highway Traffic Act with respect to the Ministry of Transportation (ie. the 4th bullet point on page 15-2) but no references to the Public Transportation and Highway Improvement Act, which is the governing legislation for most of the actions of this Ministry with respect to development along provincial highways.	A more complete listing will be provided in the Final EA Report.	Complete Vol 2 Sec 15.2
10	This Ministry had asked the proponent to undertake a Traffic Impact Study, not only for the affects of the proposed development on Highway 600, but also on the proposed access road that is proposed to connect Highway 71 to the project area and Roen Road along Korpi Road. Besides providing additional access to the project area, this road will also provide access to the residents on Marr Road who will be cut off when Highway 600 is re-aligned. There does not appear to be any discussion on this part of the project.	A traffic impact study has now been completed and will be provided to the MTO shortly, and will also be referenced in the Final EA Report. <i>Provided to MTO October 3, 2013.</i>	Complete Vol 2 Sec 7.20.5 App Y-1

#	COMMENT	RRR RESPONSE	STATUS*
11	The above comments do not represent an all encompassing review. Rather, and in summary, the Ministry of Transportation would like to see a dedicated section within the Draft EA that focuses on the Highway 600 realignment. Once this has been prepared, this Ministry will then be in a position to undertake a thorough review of the Draft EA.	Please see above response to MTO Comment 1.	Complete

*As of submission of the Final Environmental Assessment Report. Reference is made to where the comment has been closed in the report where appropriate.

newgoldTM Rainy River Project

Stakeholder: Ontario Ministry of Agriculture, Food and Rural Affairs
Point of Contact: Gary Sliworsky
Comments received: September 3, 2013
Comments regarding: Rainy River Project, Draft Environmental Assessment Report (Ver. 2)

#	COMMENT	RESPONSE	STATUS*
1	I have no comments from an agricultural standpoint. Any initial concerns related to water are more than adequately covered by MOE and MNR.	Thank you for comment on the Draft Environmental Assessment Report.	Complete

*As of submission of the Final Environmental Assessment Report. Reference is made to where the comment has been closed in the report where appropriate.

Stakeholder: Ontario Ministry of the Environment
Point of Contact: Simon Haslam, Regional Hydrogeologist (in-training)
Comments received: September 4, 2013
Comments regarding: Rainy River Project, Draft Environmental Assessment Report (Ver. 2)

#	COMMENT	RRR RESPONSE	STATUS*
1	<p>Appendix S, Page 15: The hydrogeological model neglected major surface features that will affect groundwater onsite, including the tailings management area (TMA) and the east mine rock stockpile. Their exclusion in modeling is not considered conservative and has the potential to impact the site water balance.</p> <p>The report states that these features will increase the recharge to the groundwater onsite and not including them in the model is conservative and will tend to slightly overpredict the size of the drawdown cone towards these features. A similar effect is expected due to the increased recharge, explained on Page 17 of Appendix S, caused by the lowering of the water table that will allow recharge where artesian conditions did not allow recharge previously.</p> <p>It is the reviewer's opinion that these operational features may increase the seepage of water into the open pit relative to what has been modeled. The report should evaluate how these features would alter flow rates for the pit de-watering and how these increased rates would affect the zone of influence (ZOI) and the total volume of water discharging from the de-watering wells.</p> <p>These features should be added to the hydrogeological model to ensure accurate model results or the omission of these features needs to be more thoroughly justified from a hydrogeological perspective in the EA.</p>	<p>In response to this comment, the impact of the tailings management area (TMA), overburden and the east mine rock stockpiles on the model predicted seepage rates and zone of influence (ZOI) was examined by adding these features into the model corresponding to the fully developed and dewatered mine (open pit, ramp and underground mine workings). As indicated, the addition of these features resulted in the increase of the local water levels, predicted seepage rates and the decrease in the extents of ZOI. For example, under the Base Case scenario at the end of mining, the model predicted seepage rate into the fully dewatered mine increased by about 400 m³/d (i.e. from 3,400 m³/d to about 3,800 m³/d). The ZOI area reduced by about 8.8 km², i.e. from about 35.7 km² to 26.9 km². The 12% increase of the predicted seepage rate into the fully dewatered mine, due to the accounting for the additional recharge from TMA and stockpiles is within the range of uncertainty in model predictions; predicted effects are when the open is at its deepest and the TMA and stockpiles are at their largest extent. The effect would be smaller as these features are constructed.</p> <p>A more detailed response to this comment will be provided in a separate memo appended the Final Environmental Assessment (EA) Report.</p>	<p>Complete App S-2</p>

#	COMMENT	RRR RESPONSE	STATUS*
2	<p>Page 4-11 and Appendix S, Page 15: The hydrogeological model does not address the potential to induce consolidation due to dewatering; or settlement in the thick clay layers onsite due to the loading associated with surface features such as the TMA and the east mine rock stockpile. While this subject is mentioned in Section 4, a full description of the expected behavior of the thick clay layers when subject to loading and the potential consequences does not appear to be present.</p> <p>Settlement of the clay layers could result in significant changes to local drainage, which could affect the stability of these features or cause local flooding. Flooding could result in mercury release and methylation.</p> <p>The potential for such consolidation should be considered, with likely environmental or structural impacts and mitigation and contingency options discussed in the EA.</p>	<p>The effect of consolidation on surface topography will be limited to relatively small areas (mostly to the south of the open pit, between the Pinewood River and the bedrock to the south). Elsewhere, the effect of consolidation will not be noticeable either because the drawdown is too small, the land will be modified by other construction activities, or the overburden is thin.</p> <p>This will be addressed in the Final EA Report.</p>	<p>Complete</p> <p>App S-2</p>

#	COMMENT	RRR RESPONSE	STATUS*
3	<p>Page 5-75: Based on the results of the hydrogeological model, it was stated by the Consultant that a volume of seepage from the TMA and the mine rock stockpiles will not be captured by the seepage collection ditches surrounding these features. It is expected that this seepage will discharge to the Pinewood River after a period of time. While the water quality of these seepages is estimated in Appendix T, the expected contaminant attenuation within the subsurface and the contaminant loading to the river are not present. This information is required to assess the impact that groundwater discharge will have on the Pinewood River.</p> <p>The expected attenuation of contaminants within the subsurface and the loading to the river due to groundwater discharge should be quantified with potential impacts discussed in the EA.</p> <p>It would be beneficial to incorporate these contaminant loadings into the hydrogeological model since justification of the results may be required during the permitting stage to better understand the quality and quantity of seepage and potential impact to receptors.</p> <p>Due to the extremely low assimilative capacity of the receiver, it may be necessary to show that discharging water is in compliance with PWQO.</p>	<p>These comments will be addressed in a separate memo to accompany the Final EA Report, and will be incorporated into the Final EA Report as appropriate.</p>	<p>Complete App S-2</p>

#	COMMENT	RRR RESPONSE	STATUS*
4	<p>Appendix S, Figure 3-2: The hydrogeological model domain needs to be extended to reduce potential boundary effects. Significant changes in head are observed at the bottom boundary of the model domain (Appendix S, Figure 3-2) and it is believed that these changes could introduce inconsistencies in the simulated results. An extension of the model domain, or justification as to why it is not necessary, is needed.</p> <p>The simulated changes in head could be sensitive to the relationship between horizontal and vertical permeability utilized in the model, with sensitivity likely increasing with depth. This ratio was not found in the draft EA. This ratio and the sensitivity of the model to this ratio are important in understanding the interactions and interpreting results and need to be included in the final EA.</p> <p>The elevated errors in predicted head values observed with depth could be attributed to the issues noted above.</p> <p>For the final EA, the size of the model domain should be increased to a size which yields no changes in head at the bottom boundary or the size of the model domain must be more thoroughly justified with respect to model accuracy.</p>	<p>These comments will be addressed in a separate memo to accompany the Final EA Report, and will be incorporated into the Final EA Report as appropriate.</p>	<p>Complete App S-2</p>

#	COMMENT	RRR RESPONSE	STATUS*
5	<p>Page 6-100: The preferred alternative for closure of the open pit involves flooding of the pit. Since pre-development local water levels are above the ground surface, it is expected that the pit will eventually fill completely and a floodway will be constructed to permit discharge directly to the Pinewood River. While the expected water quality of the flooded pit is estimated in Appendix T, the expected contaminant loading to the river does not appear to be estimated. Since some contaminant concentrations within the pit lake are expected to be in exceedance of PWQO criteria, an estimation of the loading is needed to help assess the impact to the receiver.</p> <p>The magnitude and impacts of the contaminant loading expected from the pit lake discharge to the Pinewood River should be discussed in the EA. Due to the extremely low assimilative capacity of the receiver, it may be necessary to show that discharging water is in compliance with PWQO.</p>	<p>These comments will be addressed in a separate memo to accompany the Final EA Report, and will be incorporated into the Final EA Report as appropriate.</p>	<p>Complete App S-2</p>
6	<p>Page 6-100: The post-closure rising of the local water table could result in the partial saturation of mine rock stockpiles. Partial saturation of the stockpiles could result in acid rock drainage (ARD) generation if potentially acid generating (PAG) rocks are subjected to fluctuations in water levels. This concept was not discussed in the draft EA and should be considered in the final EA.</p> <p>The environmental impacts of increasing local groundwater levels within large surface features should be discussed in the EA with consideration to the conditions for ARD. It may be beneficial to include these large surface features in the hydrogeological model to assess the profile of the water table within them.</p>	<p>Response to these comments will be addressed in a separate memo to accompany the Final EA Report, and incorporated into the Final EA Report as appropriate.</p>	<p>Complete App S-2</p>

#	COMMENT	RRR RESPONSE	STATUS*
7	<p>Page 7-43 and Appendix S, Figure 5-1: A monitoring program for water levels, water quality, flow discharges, and receiving water aquatic life and habitat maintenance is discussed in the draft EA. While the program appears to be sufficient, further consideration of the program will be made during the permitting stage.</p> <p>No immediate action required for the EA.</p>	<p>Rainy River Resources (RRR) and our consultant anticipate further detail will be defined through the Provincial environmental approvals process.</p>	<p>On-going</p>
8	<p>Page 11-1: While this did not impact my review, just note that Tables 7-39 and 7-40 are referenced at the end of section 11.1 where I believe Tables 7-47 and 7-48 are the tables of interest.</p>	<p>This typographic error will be corrected in the Final EA Report.</p>	<p>Complete</p> <p>Vol 2 Sec 11.1</p>
9	<p>Appendix H: The draft EA did not include a thorough baseline study regarding the water quality and quantity of the domestic use wells within or surrounding the expected ZOI. However, the proponent did mention verbally that such a study would be conducted prior to mine development. This communication took place during a site visit with MOE staff (Alisdair Brown, Drew Stajkowski, and Simon Haslam) and a representative of the proponent (Mark Vancook). This baseline study is necessary to assess the background conditions of the domestic use wells in the project area as a record for comparison in the event of any well issues that may arise during the life of the project.</p> <p>Conduct a baseline study of the water quality and quantity of the domestic use wells within and surrounding the ZOI to establish pre-development conditions.</p> <p>It will be the responsibility of the proponent to remediate any water quality or quantity issues associated with domestic use wells that can be attributed to the project.</p>	<p>A study of baseline domestic well water quality will be completed to establish pre-development conditions, prior to submission of Provincial environmental approval applications.</p> <p>RRR acknowledges that impairment of groundwater quality and/or quantity (if any) in existing domestic wells caused by the Rainy River Project will be their responsibility to remediate.</p>	<p>On-going</p>

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Stakeholder: Ontario Ministry of the Environment
Point of Contact: Pierre J. R. Godbout, Senior Noise Engineer
Comments received: September 4, 2013
Comments regarding: Rainy River Project, Draft Environmental Assessment Report (Rev. 2), Acoustic Assessment Report (Appendix R)

#	COMMENT	RESPONSE	STATUS*
1	<p>Vacant Lots: The report addressed existing residential dwellings surrounding the RRGP with distance setbacks in the range of 2,609 to 6,095 metres. Aerial photography indicates that there are several other structures in the intervening lands between the reported points of receptions and the proposed RRGP, such as structures on Georgeson Road, Roen Road, Hwy 600, McMillan Road and Tait Road. Confirmation should be included in the report that there are no additional existing points of reception and/or vacant lots amenable to future noise sensitive developments in the intervening lands between the existing residences and the proposed RRGP. If additional noise sensitive receptors are present, all noise sensitive receptors should be assessed, including, if applicable, the worst-case potential points of reception on vacant lots, using the proper setbacks as defined by the Township of Chapple.</p> <p>A clear aerial photography area map showing the names of nearby roads and the location of all applicable (previously and newly identified) points of reception should be included in the report.</p>	<ul style="list-style-type: none"> • No vacant lots are present within 1,000 m of Rainy River Project (RRP) sound sources; i.e., the lots with road access that do not have Rainy River Resources (RRR) active deposition rights. See updated Figures 4 and 5 (attached) for sound contours with aerial photograph and RRR active deposition rights. • Identified structures are not actual receptors and the locations identified are within RRR active deposition rights (i.e., Georgeson Road, Roen Road, Highway 600, McMillan Road and Tait Road). • Clear aerial photography of existing roads identified is shown on Figures 4 and 5, attached as requested. 	Complete
2	<p>Night-time Operations: The report indicates the site is expected to operate 24 hours per day and 7 days per week, with the continuous operation of all sound sources (including haul trucks, front end loaders and all other vehicular activity) throughout the day and night hours (with the exception of the testing for emergency generators, which will occur only during day hours). If additional noise sensitive points of reception are located in the intervening lands between the existing residences and the proposed RRGP, as per [comment] 1, this operation may cause the sound levels to exceed the night-time limit of 40 dBA at the nearest applicable receptors. Additional noise control measures may be required such as limiting the operations to the daytime hours only.</p>	No additional points of reception have been shown to exist.	Complete

#	COMMENT	RESPONSE	STATUS*
3	<p>Ore process plant: The report indicates that “sound emissions from the ore process plant will be minimal as most of the plant equipment is enclosed within the plant building”. All noise sources on-site must be assessed, including but not limited to sources that may be associated with the process plant such as stacks, fan blowers, sound emanating from building openings, etc.</p>	<p>The design of RRP ore process plant is in the feasibility stage. The ore process plant will be included in the detailed acoustic assessment report (AAR) that supports the Provincial Environmental Compliance Approval (ECA) application which is scheduled to be completed by late 2013 / early 2014.</p>	On-going
4	<p>Tables 1 through 3: These tables should be reformatted to Tables A1 to A3, as per Appendix A referenced below, and should include the following information: a) The following information need to be included in Table A1 for all significant noise sources (i.e. sources that are audible outside the facility):</p> <ul style="list-style-type: none"> i. Source ID’s: preferably same as ESDM Source ID’s ii. Source Description iii. Source Power Level: 1/1 Octave Band Sound Power Levels in dBA iv. Source Location: Indoor or Outdoor v. Source Characteristics: Steady, Quasi Steady Impulsive; Impulsive; Buzzing; Tonal; Cyclic <p>Noise Control Measures: Silencer/Acoustic Louver/Muffler; Acoustic Lining/Plenum; Barrier/Berm/Screening; Lagging; Acoustic Enclosure; Other; Uncontrolled</p>	<p>Tables 1 through 3 have been reformatted, renamed, and are attached to this response. These revised tables will be utilized in the Final EA Report.</p> <p>Table A1 presents the baseline data; Table A2 describes the significant sound sources.</p>	Complete App R-1
	<p>b) The following information need to be included in Table A2 for all significant noise sources (i.e. sources that are audible outside the facility) and for all noise sensitive areas (Points of Reception, POR’s):</p> <ul style="list-style-type: none"> i. Source ID’s: preferably same as ESDM Source ID’s ii. Distance to POR in metres iii. Sound Level at POR (Leq) in dBA 	<p>Sound impact tables providing the details requested will be included in the detailed AAR that supports the ECA application.</p>	On-going

#	COMMENT	RESPONSE	STATUS*
	<p>c) The following information need to be included in Table A3 for all noise sensitive areas (Points of Reception, POR's):</p> <ul style="list-style-type: none"> i. Point of Reception ID's ii. Point of Reception Description iii. Sound Level at POR (Leq) in dBA iv. Verified by Acoustic Audit: Yes or No v. Performance Limit (Leq) in dBA vi. Compliance with Performance Limit: Yes or No. In the event the Acoustic Assessment Report demonstrates that the facility is not in compliance with the limits set in Publication NPC-205, the Acoustic Assessment Report should include a Noise Abatement Action Plan (NAAP) required to achieve compliance with the governing noise limits, that includes but is not limited to the following: <ul style="list-style-type: none"> 1. Required Noise Control Measures (both physical and administrative) to reduce the noise emissions from the facility to comply with the limits set in Publication NPC-205; and 2. A timetable for implementation of the Noise Control Measures (both physical and administrative), including the date for achieving compliance with the applicable sound level limits for the facility. 	<p>Table A3 has been updated with the details requested in is attached.</p>	<p>Complete</p> <p>App R-1</p>
5	<p>Land Use Zoning Designation Plan of the surrounding area complete with legend and scale is missing. The zoning plan is required within a radius of 1,000 meters. Refer to Appendix A referenced below.</p>	<p>The Land Use Zoning Designation Official Plan for the RRP and surrounding area from the Town of Chapple is attached to this response (Attachment 1).</p>	<p>Complete</p>
6	<p>Scales Area Location Plan showing the locations/elevations of the facility's noise sources and the surrounding points of reception as well as the topography and ground cover of the intervening lands between the facility and the surrounding points of reception is missing. The area location plan is required within a radius if 1,000 metres. Refer to Appendix A referenced below.</p>	<p>Aerial photography shown on attached revised Figures 4 and 5 provide noise contours, points of reception, and RRR active deposition land.</p>	<p>Complete</p>

#	COMMENT	RESPONSE	STATUS*
7	<p>Noise Source Data: The information provided to support the source sound power level data used in the report should be clearly identified. Pages that include manufacturer sound data should clearly show which sound source ID the data corresponds to. Source ID "TD" and "Tuck_XQ" shown in Appendix A have a calculated sound power level that is lower than their reported sound pressure level. Appendix A source IDs do not match the source ID used in Table 2 of the report. Any assumptions, such as but not limited to the hourly truck traffic count used for line sources, should be provided.</p>	Noted. These will be updated in the detailed AAR to support ECA application which is schedule to complete by end of 2013.	On-going
8	<p>Sound Level Calculations: One sample sound level calculations should be provided for the worst case (i.e. the closest and most exposed) point of reception.</p>	CADNA output for the most impacted receptor (POR 15) is provided in Attachment 2 for your consideration.	Complete
9	<p>In summary, the submitted noise report does not adequately address the proposed RRGP noise impact and therefore, a revised noise report is required. The revised noise report should address the above noted comments and, if applicable due to the addition of new points of reception, should also recommend the necessary noise control measures to ensure that the sound levels will be in compliance with the applicable sound level criteria.</p> <p>Please note that the required revised Acoustic Assessment Report must be prepared in accordance with the "Basic Comprehensive Certificates of Approval (Air), User Guide, Appendix A – Supporting Information for an Acoustic Assessment Report or Vibration Assessment Report Required by a Basic Comprehensive CofA" prepared by the Environmental Assessment and Approvals Branch Version 2.0, April 2004.</p>	Noted. The Final EA Report will include updates as appropriate, and a supplemental AAR will be provided with the ECA application which is scheduled to be completed by the end of 2013.	Complete App R-1

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Additional Attachments to Ministry of Environment Response:

Sample Calculations;
Township of Chapple Official Plan Schedule A Land Use Designations; and
Rainy River Gold Project Sound Contours Worst-Case Daytime Operation.

Stakeholder: Health Canada
Point of Contact: A. Denning, Regional Environmental Assessment Coordinator
Comments received: September 4, 2013
Comments regarding: Rainy River Project, Draft Environmental Assessment Report (Ver. 2)

#	COMMENT	RESPONSE	STATUS*
1	<p>General Comment – Main Report: The report is presented with the text separated from all associated tables and figures which are presented at the end of each section. This layout is confusing and requires the reviewer to flip from the text portion to the end of the section to review the referenced tables and figures.</p> <p>Please insert tables and figures in text where they are referenced.</p>	<p>The document has been prepared on behalf of Rainy River Resources (RRR) by our consultant AMEC, in their standard format for large technical documents. AMEC has found that this approach considerably reduces the length of the document, and hence the quantity of paper required to produce reports, which RRR believe supports our commitment to environmental sustainability.</p> <p>Respectfully, as all of the tables and figures are in a consistent location and well-referenced in the text, RRR and our consultants do not believe the extremely time consuming process of adjusting the formatting to insert tables and figures in the text is warranted.</p>	Complete
2	<p>Section 7.3.1.1: The EIS states that without dust mitigation, it is probable that the air concentrations of particulate matter 2.5 microns or less in diameter (PM_{2.5}) will exceed the Ontario local air quality standards. Isopleths for total particulate matter (PM_{tot}), HCN (hydrogen cyanide) and nitrogen oxides (NO_x) are provided; however, the isopleth for PM_{2.5}, which was predicted to exceed its air quality standard, is not presented.</p> <p>Please provide the isopleth for PM2.5 ... in order for HC to review the location(s) of the elevated PM_{2.5} and the proximity to nearby residences.</p>	<p>An isopleth for PM_{2.5} will be provided in the Final EA Report.</p>	Complete App Q-2

#	COMMENT	RESPONSE	STATUS*
3	<p>Table 7-4: According to this Table, PM_{tot} and PM_{2.5} associated with operational activities are at 71.7% and 95.6% of their applicable air quality criteria. HC adheres to the principles of the Canada-Wind Standards (which have been referenced in the EIS for PM_{2.5}), which include Keeping Clean Areas Clean (KCAC) and Continuous Improvement (CI) (CCME, 2000)². Particulate air pollution is considered a non-threshold contaminant, meaning that health impacts may occur at any level of exposure.</p> <p>Therefore, it is suggested to attempt to minimize air quality degradation to the greatest extent possible through state-of-the-art design and operation, especially when project-related and/or cumulative effects are a substantial fraction of applicable standards or objectives.</p> <p>Please consider all technologically and economically feasible mitigation measures to reduce particulate matter emissions to the extent possible given the potential for adverse health effects associated with inhalation exposure.</p>	<p>RRR agrees it is important to minimize emissions and related environmental (and health) impacts. RRR and our consultants will utilize this guidance during the detailed design for the Rainy River Project (RRP).</p> <p>Per Section 4.1, the RRP has been designed to:</p> <ul style="list-style-type: none"> • Use well established, conventional technologies commonly used in northern Ontario gold mines and process plants; • Respect the interests of other property owners and land users in the area; • Minimize the overall footprint and associated environmental impacts; and • Render the site suitable for other compatible land uses and functions after the mine has closed and the land has been reclaimed. 	Complete
4	<p>Nitrogen oxides (NO_x) associated with operational activities are predicted to be at 56.8% of the applicable air quality criteria. Although the predicted levels are lower than the criteria, the exposure of residential receptors to NO_x is expected to increase, because the NO_x releases were attributed to blasting activities (Section 7.21.1.1 (Potential Releases of Potential Contaminants of Concern)). Nitrogen oxides are acute respiratory irritants and thus HC advises that all technologically and economically feasible technologies be employed to reduce emissions to the extent possible.</p> <p>Please consider all technologically and economically feasible mitigation measures to reduce NO_x emissions to the extent possible given the potential for adverse health effects associated with inhalation exposure.</p>	<p>RRR agrees it is important to minimize emissions and related environmental (and health) impacts. The RRP has been design to ensure that all regulatory requirements are achieved as a minimum.</p>	Complete

#	COMMENT	RESPONSE	STATUS*
5	<p>Manganese associated with operational activities is predicted to be at 83.6% of its applicable air quality criterion. Inhalation exposure to elevated manganese has been shown to have neurological effects, ranging from fine motor control issues in the fingers, hands and wrists, to neurofunction effects in adults and children, including increased prevalence of parkinsonian-type symptoms³. Even though the predicted levels are below the applicable criteria, human exposure to manganese is expected to increase substantially as a result of the project because there are no current sources for airborne manganese in the area. Thus, all available technologies should be employed to reduce releases to the extent possible. In addition, HC advises including manganese in any air quality monitoring program developed for the project.</p> <p>Please consider all technologically and economically feasible mitigation measures to reduce manganese emissions to the extent possible and ensure that any air monitoring program(s) includes monitoring for manganese.</p>	<p>RRR agrees it is important to minimize emissions and related environmental (and health) impacts. The RRP has been designed to ensure that all regulatory requirements are achieved as a minimum.</p>	<p>Complete</p>

#	COMMENT	RESPONSE	STATUS*
6	<p>Section 13.2.1; 13.2.2; 13.2.4: The report indicates that air quality monitoring requirements are expected to be stipulated in the provincial approval for construction and operation. Section 13.2.2 (Methods for Measuring Effects) indicates that dustfall samples will be collected monthly during non-winter period for the construction, operation and active reclamation phases. Section 13.2.4 (Reporting) indicates that the proponent intends to provide the monitoring results annually. Given that several air contaminants are predicted to approach their applicable provincial air quality criteria, and some substances, such as NO_x can have acute adverse effects on humans, it is important to ensure that any air monitoring program will provide results in a timely manner (ideally in real-time) such that additional mitigation can be implemented during the events where these concentrations are elevated. It is important that these exceedances be reported as close to the time when they occur as possible (rather than on a monthly or annual basis) in order to minimize the number and duration of any exceedances.</p> <p>Please consider an ambient air monitoring program that provides sufficient information in order to determine the duration and number of events which result in elevated air contaminants. This program should produce results in a timely manner such that appropriate mitigative measures can be implemented to minimize the potential for adverse health effects.</p>	<p>The ambient air monitoring program will be consistent with the monitoring carried out at other mining sites in Ontario and will follow the requirements stipulated in the Operations Manual for Air Quality Monitoring in Ontario published by the Ministry of the Environment (MOE), as well as with any requirements included as a condition of the Environmental Compliance Approval (ECA).</p> <p>An Ambient Air Monitoring Plan will be prepared and provided to the MOE for review before the monitors are installed. The monitoring plan will stipulate the location of the monitors, the parameters that will be measured, the instruments to be used, whether there will be continuous monitoring or discrete sampling, and data reporting procedures.</p> <p>In addition to the periodic reporting that is proposed, the MOE must be notified, as soon as practical, of any measured exceedance of regulated limits (O. Reg. 419/05 standards or limits approved in the ECA). This applies to all continuous or non-continuous monitoring.</p> <p>As the emissions from the RRP will not be highly variable over time, a standard monitoring program will provide sufficient data to allow for adjustments to be made to management practices or intensified mitigation measures such as watering and road maintenance.</p>	On-going

#	COMMENT	RESPONSE	STATUS*
7	<p>General Comment – Atmospheric Environment: Please note that HC relies on other government departments, such as Environment Canada, to evaluate the accuracy of air quality modeling.</p> <p>If another department identifies concerns with the model results, HC may have additional comments with respect to air quality and human health effects.</p>	<p>Thank-you for your information regarding the role of Health Canada (HC).</p>	Complete
8	<p>Table 7-7 – Acoustic Environment: (Please note that HC does not currently have published guidelines outlining acceptable noise levels and advocates the use of the Ontario Ministry of the Environment’s (MOE) sound level limits as appropriate criteria/ benchmarks to compare to current and future predicted noise levels at nearby human receptors.)</p> <p>The table presents predicted sound levels at various receptor locations around the project site. Several of these locations are approaching or at the Ontario provincial noise standard⁴ of 40 dBA for evening and night-time hours (POR 12 is at 38 dBA; POR 13 is at 38 dBA; POR 14 is at 39 dBA and POR15 is at 40 dBA). Given that there are uncertainties in predicted operational noise values, actual noise levels during operation may exceed 40 dBA. In order to address potential noise exceedences, HC suggests that the proponent consider proposing additional mitigation measures to limit noise at affected receptors where this uncertainty exists. Health Canada advises that the proponent also consider implementing a formalized complaint-response system which would include a mechanism for confidential reporting, documentation/tracking of complaints, follow-up with complainants, and routine analysis of complaint data to help identify potential/additional noise mitigation measures, as necessary.</p> <p>Please consider additional mitigation, including formal complaint-response system, that may be utilized where noise levels may exceed acceptable Ontario provincial noise criteria.</p>	<p>RRR agrees it is important to minimize sound emissions. The RRP has been design to ensure that all regulatory requirements are achieved as a minimum.</p> <p>RRR has always presented an open door policy for communications with neighbours and will continue to do so through the construction and operation phases of the project should any complaints arise. Any complaints will be tracked and responded to in a timely manner.</p>	Complete

#	COMMENT	RESPONSE	STATUS*
9	<p>Section 5.7.5; 7.7.1; 5.1 of Summary Doc. – Groundwater: Section 5.7.5 (Water Wells) indicates that there are a possible 21 wells within a radius of approximately 2 km of the edge of the proposed open pit. Section 7.7.1 (Groundwater; Environmental Effects) states that modeling of the open pit indicates that the zone of influence is expected to extend approximately 2.5 to 3.5 km from the edge of the pit by the end of mining. Section 7.7.1 (Groundwater; Environmental Effects) also states that through land acquisition, Rainy River Resources Ltd. (RRR) will own all of the identified water supply wells within the predicted zone of influence, and as such, no adverse effects on drinking water supplies are expected on water supply wells not owned by RRR, all of which are outside of the zone of influence.</p> <p>Based on this, it appears that RRR intends to purchase all of the houses within 3.5 km of the proposed open pit. Section 5.1 (Land Ownership) of the Summary Document indicates that the company will not require the forced re-settlement of any individual families. If the purchase of all nearby homes does not occur, HC advises that RRR identify potential mitigation strategies that would be used to ensure that drinking water supplies are not impacted. In addition, depending on the accuracy of the hydrogeological modeling, impacts may extend beyond 3.5 km, which may affect drinking water supplies at houses that are farther away than predicted.</p> <p>Please provide a discussion about how groundwater supplies in the vicinity of the project will be protected and what monitoring and mitigation measures will be implemented in the event that drinking water supplies are compromised by project activities.</p>	<p>The closest non-RRR owned wells lie outside the expected zone of influence for all the modelled scenarios, and the potential for a dewatering related impact to local wells not owned by RRR is minimal.</p> <p>The monitoring and mitigation of impacts to private wells is typically addressed during the environmental approvals stage, and often addressed by incorporated private wells into the monitoring programming, and mitigating well yield effects by lowering pumps or deepening wells in response to a well complaint.</p> <p>RRR acknowledges that additional mitigation may be required should land acquisitions not be completed as expected.</p>	On-going

#	COMMENT	RESPONSE	STATUS*
10	<p>Section 6.11.1 - Groundwater (Including Water Quality and Quantity): The EIS indicates that depending on water needs at the project site, groundwater may be used as a potential water supply, particularly during the early stages of the project. It is not clear whether this alternative was evaluated in the overall hydrogeological modeling in determining the zone of influence and the numbers and locations of potentially affected private well users.</p> <p>Please provide a discussion about how groundwater use at the site may impact groundwater users in the vicinity of the project site.</p>	<p>As indicated in Section 6.11.1 [7.7.1]: <i>Groundwater well yields in the RRGP site area are limited, but it may be possible to install a series of wells that could provide a combined yield of up to approximately 300 m³/d, until such time as pit dewatering disrupted the groundwater source.</i></p> <p>This potential water taking has not been incorporated into the model as the environmental impacts were assessed based on the pit groundwater taking of 3,100 m³/d which is considerably larger, and the two takings would not occur at the same time. The wells would also be centred near the plant site which is well within the property owned by RRR.</p> <p>The effects of dewatering, the most significant groundwater use that the site is consider in Section 7 in relation to all of the VSECs identified, including land and resources use by agriculture and local residents.</p> <p>Section 7.1.1 of the Final EA Report will be revised to state: <i>"Through completed land acquisitions and binding agreements, RRR effectively owns all the identified water supply wells within the predicted zone of influence, and no measurable effects are expected on water supply wells not owned by RRR, that all lie outside this area."</i></p>	<p>Complete</p> <p>Vol 2 Sec 7.7.1</p>

#	COMMENT	RESPONSE	STATUS*
11	<p>Section 5.2.7 - Groundwater: The EIS indicates that private wells were surveyed to determine their locations, however, it does not appear that any of these wells were sampled to evaluate water quality or quantity. It would be useful to have baseline chemistry and well yield data for these private wells in order to evaluate any changes that may occur due to project activities.</p> <p>Please consider conducting well yield measurements (to evaluate current water quantity) and chemical analysis (to evaluate current water quality) in all private drinking water wells that may be impacted by the project in order to obtain accurate baseline information on these nearby wells.</p>	<p>Considerable groundwater quality data is presented in Appendix H of the Draft EA Report, from groundwater wells which RRR had access to at the time of the preparation of the Draft EA Report.</p> <p>Additional sampling is also planned prior to permitting of the mine after dedicated groundwater monitoring wells are installed. The private wells were not tested in terms of well yield as RRR always intended to purchase the wells within the zone of influence of the mine, and will either own or decommission any wells potentially affected by mine induced drawdown.</p> <p>Section 7.1.1 of the Final EA Report will be revised to state: "<i>Through completed land acquisitions and binding agreements, RRR effectively owns all the identified water supply wells within the predicted zone of influence, and no measurable effects are expected on water supply wells not owned by RRR, that all lie outside this area.</i>"</p>	<p>Complete</p> <p>Vol 2 Sec 7.7.1</p>
12	<p>Section 7.4.1 - Groundwater: The EIS discusses vibrations due to blasting, however, there is no discussion about the potential for vibrations to affect nearby drinking water wells such as through increasing turbidity or even well collapse.</p> <p>Please provide a discussion about the potential for vibrations from project activities to affect nearby drinking water wells.</p>	<p>All of the private wells are kilometres away from any blasting activities. Vibration effects are localized only and as described in Appendix R-2.</p> <p>There is no reasonable potential that private wells located distant from the open pit, could be affected by blasting activities.</p>	<p>Complete</p>

#	COMMENT	RESPONSE	STATUS*
13	<p>Section 7.7 - Groundwater: Please note that HC relies on other government departments, such as Natural Resources Canada, to evaluate the accuracy of hydrogeological modeling which evaluates the potential effect of the project on local groundwater conditions and drinking water supplies. If another department identifies concerns with the model results, HC may have additional comments with respect to drinking water quality and quantity.</p>	Thank-you for your information regarding the role of HC.	Complete
14	<p>Section 7.21 – Human Health: The EIS cites the World Health Organization provisional tolerable weekly intake consumption guidelines for cadmium and lead (on a microgram per kilogram body weight basis). A daily consumption rate for cadmium and lead was then calculated based on an adult (70 kg) person. Given that both of these substances are not considered to be carcinogenic via the ingestion route of exposure, it is more appropriate to use the most sensitive receptor (a toddler, body weight of 16.5 kg) when calculating the daily consumption rate. HC advises that the proponent recalculate consumption rates using a toddler instead of an adult. Please recalculate daily ingestion rates for the toddler in order to ensure that the most sensitive human receptor is evaluated.</p>	This information will be provided in the Final EA Report.	Complete Vol 2 Sec 7.21.1.1

#	COMMENT	RESPONSE	STATUS*
15	<p>Section 7.21.1.2 – Human Health: The EIS indicates that based on knowledge acquired to date, there is no harvesting of plants in the general vicinity of the project site. However, the EIS indicates that hunting for White-tailed Deer and Moose does occur in the area. The proposed approach to evaluate the health of these species is by monitoring White-tailed Deer liver tissue if local hunters are willing to provide samples. HC recommends that sampling and analysis be undertaken in accordance with HC's guidance on human health risk assessment for country foods (HC, 2010). In addition, if new information becomes available indicating that Aboriginal peoples do harvest plants in the vicinity of the project site, HC advises that the potential contamination of these foods should be evaluated.</p> <p>Please consider country foods collection and analysis as per HC guidance, and re-evaluate human exposure to other country foods should new information become available indicating that Aboriginal peoples do collect other country foods from the area that may be affected by project-related activities.</p>	<p>Should new information become available indicating that Aboriginal or other peoples collect country foods on a regular basis from the area that may be affected by project-related activities, RRR will consider country foods collection and analysis per HC guidance, and re-evaluate human exposure to other country foods.</p>	<p>On-going</p>

#	COMMENT	RESPONSE	STATUS*
16	<p>Section 4.1; 6.18.2 – Electric and Magnetic Fields: One project component involves the construction and operation of a 230 kV transmission line. Section 6.18.2 of report indicates that the transmission line will generate electromagnetic fields and that there may be public concern associated with potential human health effects. No specific public/aboriginal concerns related to electric and magnetic fields were identified in the EIS.</p> <p>If concern is expressed, the following assessment of EMF effects can be undertaken, including:</p> <ol style="list-style-type: none"> 1) A discussion on the current state of scientific knowledge with respect to possible health effects from EMF exposure and a review of current exposure guidelines and/or position statements from health-related organizations (e.g. World Health Organization 2007a7 and 2007b8, Federal-Provincial-Territorial Radiation Protection Committee 20089, International Commission on Non-Ionizing Radiation Protection (ICNIRP) 2010a10,b11) 2) Identification of all potential sources of EMF and potential human residents in the project area; 3) Assessment of background EMF levels at selected locations at the proposed site prior to construction, and their corresponding estimated levels after construction; and 4) A description of measures that will be taken to mitigate potential public concern over project-related EMF exposure. 	<p>RRR appreciates the advice from HC on these matters.</p>	<p>Complete</p>

*As of submission of the Final Environmental Assessment Report. Reference is made to where the comment has been closed in the report where appropriate.

Stakeholder: Transport Canada
Point of Contact: Ana Hamid, Environmental Officer (on behalf of David Zeit)
Comments received: September 4, 2013
Comments regarding: Rainy River Project, Draft Environmental Assessment Report (Ver. 2)

#	COMMENT	RESPONSE	STATUS*
1	Transport Canada does not have any specific comments to provide at this time.	Thank you for comment on the Draft Environmental Assessment (EA) Report.	Complete
2	<p>Transport Canada is responsible for the administration of the <i>Navigable Waters Protection Act</i> (NWP),.... If any of the related project undertakings cross or affect a potentially navigable waterway, the proponent should prepare and submit an application in accordance with the requirements as outlined in the Application Guide,...</p> <p>Based on the current project description it seems Transport Canada's involvement may just be an approval for a bridge over the Pinewood river. The waterbodies that are within the footprint of various mine components - West Creek, Clark Creek, Teeple Municipal Drain - are not deemed navigable. The Pinewood River, which is navigable downstream closer to where it empties into Rainy River, may be considered 'Minor' or non-navigable in the mine site. From the air, it appears to be shallow with quite a bit of aquatic vegetation.</p> <p>The proponent should review the Minor Works and Waters (<i>Navigable Waters Protection Act</i>) Order, established to outline the specific standards and criteria under which Transport Canada considers a work or waterway as a minor and does not require an application under the NWP. The proponent should assess whether their work or impacted waterway, in this case the Pinewood River, meets the criteria as described and therefore falls within one of the excluded classes. An application will only be required if it is determined that the work / waterway cannot meet the criteria established for that particular class of exclusion. [...]</p>	Thank you for your guidance in regards to navigable, non-navigable and minor waters. An approval application will be submitted if appropriate, at a future date.	Complete

*As of submission of the Final Environmental Assessment Report. Reference is made to where the comment has been closed in the report where appropriate.

Stakeholder: Department of Fisheries and Ocean
 Point of Contact: Sara Eddy, Senior Fisheries Protection Biologist
 Comments received: September 4, 2013
 Comments regarding: Rainy River Project, Draft Environmental Assessment Report (Ver. 2)

#	COMMENT	RESPONSE	STATUS*
1	Section 8.2, p. 32, Volume 1, Summary: Clarify "harmful" alteration, as per <i>Fisheries Act</i>	Clarification will be provided in the Final Environmental Assessment (EA) Report as suggested.	Complete Vol 1 Sec 9.2
2	Section 8.2, p. 32, Volume 1, Summary: Additional discussion is required regarding the restoration works as proposed compensation	The summary text will be expanded as suggested in the Final EA Report.	On-going Vol 1 Sec 9.2
3	Section 4.12.7, p.4-30, Volume 2: Where is the emergency spillway located in relation to the West Creek Diversion? Where will the spillway discharge to? Will sufficient water be released from the West Creek Pond to ensure continuous flow to the West Creek Diversion and support fish habitat year round?	Engineering design of the West Creek Diversion is on-going. The preliminary design described in the Draft EA Report will be revised to clarify that non-contact water flowing through the West Creek diversion will be maintained separate from the seepage collection ditches.	Complete Vol 2 Sec 4.12.7.4
4	Section 4.12.7.4, p.4-33, Volume 2: States that the initial 450 m of the West Creek diversion channel will operate as the emergency spillway for the West Creek pond. Additional detail on the design of this spillway and its function will be required for <i>Fisheries Act</i> regulatory approvals.	Further detail will be provided with the No Net Loss Plans (NNLP; drafts to be appended to the Final EA Report) and approval applications for the Rainy River Project (RRP) pursuant to the Federal <i>Fisheries Act</i> and Provincial <i>Lakes and Rivers Improvement Act</i> .	Complete Vol 2 Sec 4.12.7.4 App X-1, X-2, X-3

#	COMMENT	RESPONSE	STATUS*
5	<p>Section 4.12.8, p.4-34: States that in dry years, the West Creek Pond may have insufficient water for use in processing; will the West Creek diversion have water flow year round?</p>	<p>Similar to baseline conditions in West Creek, flows within the diversion channel will be intermittent and largely dependent on seasonal precipitation patterns and water demands for the mine. The ultimate design of the west creek pond and the diversion channel will include design criteria to ensure fish passage opportunity during periods of flow and fish refuge pools during period of little to no flow. Discussions between the RRR, our consultant and DFO will refine this design concept and may include some form of minimum flow regularity. Additional details will be provided in the NNLP and Authorization applications.</p>	<p>Complete</p> <p>App X-1, X-2, X-3</p> <p><i>West Creek pond no longer proposed as processing water source</i></p>
6	<p>Section 4.19.1, p.4-41: States the reclaimed open pit may be on-line with a spillway to the Pinewood River or the diversion of West Creek. Has consideration been given to contouring an upper portion of the pit to create a shallow littoral zone, if the intention is to have the pit become part of a productive aquatic system?</p>	<p>Considered was given during the preliminary closure planning to have the flooded pit online. This was not considered in regards to compensation measures due to the considerable period of time until this could occur. The intent is no longer to make a direct connection between the West Creek Diversion through the flooded open pit to the Pinewood River.</p> <p>Consideration has been given to creation of a shallow littoral zone around the flooded pit perimeter. Further detail regarding closure of the open pit will be provided in the Closure Plan required pursuant to the <i>Mining Act</i> including consideration of creating a shallow littoral zone once flooded.</p>	<p>On-going</p>

#	COMMENT	RESPONSE	STATUS*
7	<p>Section 5.1.1, p.5-2: The document states "...DFO and MNR have requested that the effect on aquatic habitats of the middle and lower reaches of the Pinewood River of the water taking for process plans needs be assessed." The next statements are regarding water quality.</p> <p>DFO was requesting further information regarding how the wetted width of the downstream watercourse, and thus fish habitat, may be affected by water taking activities. Additional text on the water taking activities throughout the project life cycle and impacts on fish and fish habitat is needed, including timing, duration and extent.</p>	<p>A summary of the impacts of flow reductions on the middle and lower reaches of the Pinewood River will be provided in the Final EA Report.</p> <p>A detailed description of flow reductions by month or season and their effect on wetted width / depth of the channel will be provided in the NNLP documentation to be appended to the Final EA Report.</p>	<p>Complete</p> <p>App W-1, X-1, X-2</p>
8	<p>Section 5.2.15, p.5-34: Note that the federal <i>Species at Risk Act</i> applies to aquatic species where they are found, not only on federal lands.</p>	<p>This is the understanding of Rainy River Resources (RRR) and our consultant, and the text will be clarified in the Final EA Report.</p>	<p>Complete</p> <p>Vol 2 Sec 5.2.1.5</p>
9	<p>Section 5.8.2, p.5-83: Note that Lake Sturgeon were found downstream in the Pinewood River in 2013</p>	<p>The capture and identification of three adult Lake Sturgeon, captured in the lower Pinewood River (within the natural environment regional study area but outside the local study area, approximately 27 kilometres downstream of the RRP site) during the spring of 2013, will be included in the Final EA Report.</p>	<p>Complete</p> <p>Vol 2 Sec 5.8.2</p>
10	<p>Table 5.24, p.5-190: Add a footnote that Lake Sturgeon was found in 2013 in the lower Pinewood River</p>	<p>The capture and identification of three adult Lake Sturgeon, captured in the lower Pinewood River (within the natural environment regional study area but outside the local study area) during the spring of 2013, will be included in the Final EA Report.</p>	<p>Complete</p> <p>Vol 2 Table 5-24</p>
11	<p>Section 6.5: This section will need to be revised based on the discussions between DFO and AMEC</p>	<p>Comment noted, and the text will be revised in the Final EA Report.</p>	<p>Complete</p> <p>Vol 2 Sec 6.5</p>
12	<p>Section 6.5.1, p.6-26: Delete wording "might be more attractive to DFO and EC". This alternative would not require overprinting waters frequented by fish.</p>	<p>This text will be modified in the Final EA Report accordingly.</p>	<p>Complete</p> <p>Vol 2 Sec 6.5.1</p>

#	COMMENT	RESPONSE	STATUS*
13	Section 6.8.1, p.6-44: May need to reword portions of this section based on discussion with DFO	Comment noted, and the text will be revised in the Final EA Report as appropriate.	Complete <i>No changes</i>
14	Section 6.8.2, p.6-47: <i>Fisheries Act</i> s.35(2) is missing from the discussion on permits required	This text will be modified in the Final EA Report accordingly.	Complete Vol 2 Sec 6.8.2
15	Section 6.9.1, p.6-52: Provide clarification of the location of the process plant to the tributary of West Creek; will mitigation measures be in place to protect fish habitat at this site?	Per Figure 4-1, the intent is that this minor drainage will be re-routed / avoided by development. This will be clarified in the Final EA Report (and has already been accounted for in draft NNLP impact assessments).	Complete Vol 2 Sec 6.9.1
16	Section 6.9.2, p.6-55: There is no discussion in the document on the effects of blasting on the aquatic environment. Potential impacts as a result of blasting in the open pit to the Pinewood River should be considered. Follow DFO's Guidelines for the Use of Explosives In or Near Canadian Fisheries Waters.	RRR and our consultants are aware of these Guidelines and RRR will ensure that any contractors involved in explosive usage at the property follow Fisheries and Oceans (DFO) guidance.	Complete
17	Section 6.11.1, p.6-64: Off Lake and Burditt Lake are identified as potential alternative water sources for the project. Have aquatic assessments and baseline studies been undertaken for these lakes?	There is no intent to take water from either lake as a contingency measure. This will be clarified in the Final EA Report.	Complete Vol 2 Sec 6.11.3
18	Section 6.11.2, p.6-69: Additional information on how water taking from the Pinewood River during construction may affect the wetted width of the watercourse and how the magnitude and timing of water taking will impact fish and fish habitat is needed.	A summary of the impacts of flow reductions on the middle and lower reaches of the Pinewood River will be provided in the Final EA Report.	Complete App W-1, X-1, X-2

#	COMMENT	RESPONSE	STATUS*
19	Section 6.15.1, p.6-81: There is no discussion on new water crossings associated with the alternative routes and potential impacts to the natural environment	Further details were presented in Appendix D of the Approved Provincial Terms of Reference which was reviewed by DFO in late 2012 / early 2013. A copy of Appendix D of the Approved Terms of Reference is will be provided to DFO. As described in Section 6.15.2, the routes are generally comparable from the effects to the natural environment perspective. Each requires a crossing of the Pinewood River and Alternative D requires an additional minor creek crossing. Further detail will be provided in the Final EA Report.	Complete Vol 2 Sec 6.15.2
20	Section 6.17.1, p.6-85: States the only significant watercourse crossing of the transmission line is the outlet of Beadle Lake. Provide more detail on this crossing in the document	Engineering of the transmission line is currently underway. All poles and other structures will be placed above the high water mark of all watercourses / waterbodies. Figure 1 attached shows an aerial photographic image of this minor creek.	Complete
21	Section 6.19.1, p.6-96: Will the outlet constructed from the open pit to the Pinewood River on closure be designed to allow fish movement?	RRR would welcome DFO's advice on this matter. Detail regarding closure of the open pit will be provided in the Closure Plan required pursuant to the <i>Mining Act</i> , including consideration of supporting fish passage.	On-going
22	Section 6.19.7.1, p.6-122: Additional discussion regarding how much will the West Creek Pond be lowered at closure, how this will affect fish and fish habitat at the site and downstream and how fish passage will be facilitated at the dam is needed.	As it is now anticipated that West Creek Pond will be developed as fish habitat, the pond will not be lowered at closure and fish passage will be retained around the dam. This will be clarified in the final document as well as in the NNLP.	Complete Vol 2 Sec 6.19.7.1
23	Section 7.2.1, p.7-7: Lake Sturgeon have been found in the Pinewood River; correct statement that presence has not been confirmed	The capture and identification of three adult Lake Sturgeon, captured in the lower Pinewood River (within the natural environment regional study area but outside the local study area, approximately 27 kilometres from the RRP site) during the spring of 2013, will be included in the Final EA Report.	Complete Vol 2 Sec 7.2.1 and others

#	COMMENT	RESPONSE	STATUS*
24	<p>Section 7.5.1, p.7-26: The potential for impacts to fish and fish habitat from pipeline crossings has not been noted previously in the document. Additional discussion is needed.</p>	<p>All pipelines for the project will traverse on other existing structures, be placed above the watercourse wetted width and span the water courses, or will travel under the watercourse by directional drilling. The only foreseen exceptions would be at water taking and discharge locations, which are anticipated to be subject to further DFO review and comment during the environmental approvals stage.</p> <p>Additional information will be provided in the Final EA Report.</p>	<p>Complete</p> <p>Vol 2 Sec 4.12.1</p>
25	<p>Section 7.5.1.1, p.7-27: Clarification on whether the constructed wetland area is intended to “support” fish during its operation as a treatment facility or whether fish will be excluded from it</p>	<p>When the constructed wetland is operational, it is part of the effluent treatment system, and as such attempts will be made to exclude fish from entry. This will be clarified in the Final EA Report.</p>	<p>Complete</p> <p>Vol 2 Sec 7.5.1.1</p>
26	<p>Section 7.5.1.1, p.7-27: During low flow and precipitation years, is the intent that no water will be discharged from the West Creek Pond to the diversion channel? Include a discussion on downstream impacts to fish and fish habitat as a result of this water taking. Will the dam at the pond be a complete barrier to fish movement in the system?</p>	<p>In dry years, the natural flow intermittency in West Creek will be exacerbated by the operation of the pond, but the design of the diversion channel will include frequent refuge pools to account for periods of little to no flow in order to mimic natural conditions in West Creek. Discussions amongst RRR, our consultant and the DFO will refine this design concept and may include some form of minimum flow regularity. Additional details will be provided in the NNLP and Authorization applications.</p>	<p>Complete</p> <p>App X-1, X-2, X-3</p>

#	COMMENT	RESPONSE	STATUS*
27	<p>Section 7.5.1.3, p.7-29: Is the seasonal connectivity between the up and downstream of the West Creek based on flow or fish passage? What is the timing and duration for the diversion channel to flow intermittently?</p>	<p>Flows within the diversion channel will be intermittent and largely dependent on seasonal precipitation patterns and water demands for the mine. The ultimate design of the West Creek pond and the diversion channel will include design criteria to ensure fish passage opportunity during periods of flow and fish refuge pools during period of little to no flow.</p> <p>Discussions amongst RRR, our consultant and the DFO will refine this design concept and may include some form of minimum flow regularity. Additional details will be provided in the NNLP and Authorization applications.</p>	<p>Complete</p> <p>App X-1, X-2</p>
28	<p>Section 7.5.3, p.7-32: Additional discussion is needed on the funding of restoration initiatives as habitat compensation</p>	<p>Agreed. Additional discussion will be required and subsequently documented in the NNLP documents and authorization applications. This will be clarified in the Final EA Report.</p>	<p>Complete</p> <p>App X-1, X-2</p>
29	<p>Section 7.5.4, p.7-33: More detail is required on the offset strategy and no net loss plans. Conceptual models of these should be appended to the EIS. Additional detail on the two plans (MMER vs. s.35 (2)) should be included in the text.</p> <p>The proposed restoration initiative does not fit the definition of habitat banking; this section and should be reworded.</p>	<p>The section will be revised and expanded in the Final EA Report. Copies of the draft NNLP will be appended to the Final EA Report.</p>	<p>Complete</p> <p>Vol 2 Sec 7.5.4</p> <p>App X-1, X-2, X-3</p>
30	<p>Section 7.5.5, p.7-33: Provide detail on the two plans under development – separate s.35(2) from MMER</p>	<p>The section will be revised and expanded, or reference to the overall offset strategy document will be made.</p>	<p>Complete</p> <p>Vol 2 Sec 7.5.5</p> <p>App X-1, X-2, X-3</p>

#	COMMENT	RESPONSE	STATUS*
31	Section 7.6.1.1, p.7-34: Will these water takings affect wetted width of the water courses and available fish habitat? Include DFO Freshwater Intake End-of-Pipe Guidelines as mitigation	The summary of the effect of water taking on the Pinewood River will be expanded upon in the Final EA Report. Reference to the DFO guideline will be added to the section.	Complete Vol 2 Sec 7.6.1.3 App X-1, X-2, X-3
32	Section 7.6.1.3, p.7-39: Change “do not usually result in harmful alterations of the watercourse...” to “HADD of fish habitat”. Should clarify that given the sensitivity of fish and fish habitat and impacts of the proposed work, <i>Fisheries Act</i> authorization is not likely required	Preferred wording will be provided in the Final EA Report as suggested. Further clarification will be provided in the Final EA Report as requested.	Complete Vol 2 Sec 7.6.1.3
33	Section 7.6.1.3, p.7-39: How will the proponent determine when additional flows from the constructed wetland are necessary to be released to the Pinewood River?	Long term flow monitoring of the site and the Pinewood River will provide opportunities to optimize the flow supplementation through the wetland feature. The amount of flow will be dependent on the performance of the wetland feature and resulting water quality.	Complete
34	Section 7.6.2, p.7-40: As per previous comments, provide clarification regarding the two offsetting plans required for MMER vs. s.35(2)	Further clarification will be provided in the Final EA Report as requested.	Complete Vol 2 Sec 7.6.2 Sec 15.1
35	Section 7.6.3, p.7-41: Prefer “maintain current fish habitat productivity” over “maintenance”	Preferred wording will be provided in the Final EA Report as suggested.	Complete Vol 2 Sec 7.6.3
36	Section 7.17.5, p.106: Additional discussion the proposed watershed restoration program is needed	This text will be clarified in the Final EA Report for clarity.	Complete Vol 2 Sec7.17.5 App X-1, X-2

#	COMMENT	RESPONSE	STATUS*
37	Table 7.9, p.7-184: May need to adjust the table based on discussions with DFO	Table 7.9 will be reviewed and adjusted accordingly in the Final EA Report.	Complete Vol 2 Table 7-9
38	Section 8.2.1, p.8-4: Burditt Lake is identified as an alternative water source for the project. Have aquatic assessments and baseline data been compiled for this waterbody? Discussion on impacts to fish and fish habitat has not been included.	Further engineering has determined that neither lake will be carried forward as a Project option. There is no intent to take water from either lake as a contingency measure. This will be clarified in the Final EA Report.	Complete Vol 2 Sec 8.2.1
39	Section 8.6, p.8-10: Note that in terms of federal aquatic Species at Risk, the only species in the area that has been assessed is Lake Sturgeon, found in the lower reach of the Pinewood River	This section will be revised in the Final EA Report as Lake Sturgeon has been found in the lower Pinewood River approximately 27 kilometres downstream of the RRP site; as the potential for expansion of habitats and range is also a potential permitting risk.	Complete Vol 2 Sec 8.6
40	Section 13.10, p.13-10: <i>Fisheries Act</i> authorizations typically do not include water quality monitoring provisions	The text will be revised accordingly in the Final EA Report.	Complete Vol 2 Sec 13.5.1
41	Section, 13.5.3, p.13-13: Deleterious substances (s.36 of the <i>Fisheries Act</i>) are administered by Environment Canada; EC should be consulted regarding deposits, rather than DFO	The text will be revised accordingly in the Final EA Report.	Complete Vol 2 Sec 13.5.3
42	Section 15.1, p.15-1: DFO's mandate is to conserve and protect fish and fish habitat. Update to read: Harmful alteration or disruption, or destruction of fish habitat Recommend expanding this section to provide further detail on the role of DFO	Additional wording will be provided in the Final EA Report as suggested, regarding the mandate of DFO.	Complete Vol 2 Sec 15.1
43	Section 15.2, p.15-3: A federal SARA permit is not required because there are no Schedule 1 aquatic species at risk or species at risk on federal lands.	The text will be revised accordingly in the Final EA Report.	Complete Vol 2 Sec 15.2

#	COMMENT	RESPONSE	STATUS*
44	<p>Table 15.1, p.15-4: Update <i>Fisheries Act</i> Authorization to: Harmful alteration or disruption, or destruction of fish habitat Description of approvals – authorizations may not be required for all of the activities listed depending on sensitivity of fish and fish habitat, design, impacts. For example, water crossings for the access roads. Surface water flows may also cause disruptions to watercourses. Should add caveat “Potentially” to the start of the section and list the works that may require authorization</p>	<p>The table will be revised in the Final EA Report as suggested.</p>	<p>Complete</p> <p>Vol 2 Table 15.1</p>
45	<p>Appendix D12: Will the final 2013 aquatic baseline report be made available?</p>	<p>The 2013 Aquatic Baseline Report is complete and currently under technical review. RRR and its consultants expect to include this baseline report in the Final EA Report.</p> <p><i>2013 Aquatic Baseline Reports were issued to CEA Agency and MOE on October 21, 2013 for distribution.</i></p>	<p>Complete</p> <p>App I-4, I-5</p>

*As of submission of the Final Environmental Assessment Report. Reference is made to where the comment has been closed in the report where appropriate.

Additional Attachments to Department of Fisheries and Ocean Response:
Preliminary Assessment of Highway 600 Re-alignment Routing Alternatives;
Proposed Highway Re-alignment Hwy 600; and
Figure 1: Aerial View of Beadle Lake Outlet.

Stakeholder: Canadian Environmental Assessment Agency
Point of Contact: Stephanie Davis, Project Manager
Comments received: September 5, 2013
Comments regarding: Rainy River Project, Draft Environmental Assessment Report (Ver. 2)

#	COMMENT	RESPONSE	STATUS*
1	<p>General: The draft EIS Summary is too general. To strengthen it, references to the draft EIS report need to be inserted for readers seeking additional information.' Insert references to the draft EIS report for readers seeking additional information.</p>	<p>The Environmental Impact Statement (EIS) Summary was prepared following the Guidelines issued to Rainy River Resources (RRR), recognizing that the Rainy River Project (RRP) is one of the first mining projects to attain this stage of assessment under the <i>Canadian Environmental Assessment Act, 2012</i>, and that no example was publicly available for RRR and its consultants to follow.</p> <p>The Summary to be issued as part of the Final Environmental Assessment (EA) Report will provide the additional detail / referencing as requested.</p> <p>RRR and its consultants would greatly appreciate if the Canadian Environmental Assessment (CEA) Agency would provide an example of an "approved" EIS Summary to RRR from another project.</p>	<p>Complete Vol 1</p>
2	<p>Summary Section 2.0, Page 5: The draft EIS states 'The Aboriginal groups engaged in discussions regarding the RRGP were identified using the following criteria..' Section 2.3, Tables 2-1 and 2-2. This section does not mention federal direction to the proponent with respect to Aboriginal engagement. The list of groups also does not include all of the communities identified by CEAA. Please see the letter to Rainy River Resources dated September 10, 2012 for more information. Insert information on federal direction regarding Aboriginal engagement. Add additional groups identified to the list. These changes also need to be made in the main text of the draft EIS report.</p>	<p>This oversight will be corrected and the Summary and Main Text of the Final EA Report will be revised to include reference / details related to the Federal guidance as requested.</p>	<p>Complete Vol 1 Sec 3.0 Vol 2 Sec 2.3 Table 2-3</p>

#	COMMENT	RESPONSE	STATUS*
3	<p>Summary Section 3.0: This section mentions a number of topics raised by the public during engagement discussions. More information is needed on what specific issues were raised and the proponent's response (which is missing). Include a table outlining the specific issues raised and the proponent's response. This could be brought forward from Appendix D.</p>	The Summary to be issued as part of the Final EA Report will provide additional detail as requested.	<p>Complete</p> <p>Vol 1 Sec 4</p> <p>Tables S-1 to S-4, S-16</p>
4	<p>This section mentions a number of topics raised by the Aboriginal groups during engagement discussions. More information is needed on what specific issues were raised and the proponent's response (which is missing). Include a table outlining the specific issues raised and the proponent's response. This could be brought forward from Appendix D.</p>	The Summary to be issued as part of the Final EA Report will provide additional detail as requested.	<p>Complete</p> <p>Vol 1 Sec 4.1 to 4.4 Table S-3, S-16</p>
5	<p>Summary Section 4.0: This section mentions only one of the proposed designated activities. List all planned activities that will be captured under the Regulations Designating Physical Activities. The following activities were identified during the review of the Project Description:</p> <p><i>8. The construction, operation, decommissioning and abandonment of a facility for the extraction of 200 000 m³/a or more of ground water or an expansion of such a facility that would result in an increase in production capacity of more than 35%.</i></p> <p><i>15. The construction, operation, decommissioning and abandonment of:</i> <i>(c) a gold mine, other than a placer mine, with an ore production capacity of 600 t/d or more;</i></p> <p>The Agency requests that the proponent also confirm whether 15(b) applies.</p> <p><i>(b) a metal mill with an ore input capacity of 4,000 t/d or more;</i> <i>These updates also need to be made in the main text of the draft EIS report.</i></p>	The Summary to be issued as part of the Final EA Report will be revised as requested.	<p>Complete</p> <p>Vol 1 Sec 5</p> <p>Vol 2 Section 1.6.1</p>

#	COMMENT	RESPONSE	STATUS*
6	Summary Section 6.6: The last paragraph in this section “Area benthic communities exhibit a low to moderate...” Recommend rewriting this paragraph in more general terms.	The description provided in Section 6.6 of the Summary is in the standard terminology used in describing the benthic environment. Nonetheless, RRR will attempt to use more general terms to provide the detail requested.	Complete Vol 1 Sec 7.6
7	Summary Section 7.2: The EIS Summary mentions that Burditt Lake and Off Lake are not considered viable alternatives for water supply on site. This is also mentioned in section 6.11.3, the alternatives assessment for water supply in the main draft EIS document. Clarify the proposal for water taking in Burditt Lake in the draft EIS Summary and in the draft EIS.	The Summary and Final EA Report Main Text will be revised to clarify this aspect. There is no intent to take water from either lake.	Complete Vol 1 Sec 8.2.9
8	Summary Section 7.2: However, water taking from Burditt Lake is considered as a contingency water source in the main text of the draft EIS (section 8.2.1, Insufficient Water). This would imply the option is feasible and may be used for start-up and initial operations. If it is considered viable, assess impacts associated with water taking from the Burditt Lake system within the EA.	The Summary and Final EA Report main text will clarify this aspect. There is no intent to take water from either lake as a contingency measure.	Complete Vol 1 Sec 8.2.9
9	Summary Section 8.2: The information in this section does not include enough detail. For example, after reading the effects on air quality the reader does not have an understanding of how the effect could occur, the pollutants that would be emitted, what mitigation is proposed or the geographic extent or magnitude of the effect. Based on the comments received during the public periods, these are issues of concern. Include additional text to address deficiencies. Including effects tables such as 7-47(or portions of the tables) from Section 7 of the draft EIS is one way to potentially minimize the amount of text that will need to be added. However, please see comments on effects tables below for more info (CEAA-20).	Section 8.2 of the Summary in the Final EA Report will provide further detail to clarify this aspect.	Complete Vol 1 Tables S-6 to S-15
10	Summary Section 8.2: When mentioning the impacts to air will cease upon closure and reclamation, the summary should reiterate the mine life. Insert the mine life.	The Summary to be issued as part of the Final EA Report will be revised as requested.	Complete Vol 1 Sec 9.2

#	COMMENT	RESPONSE	STATUS*
11	<p>Summary Section 11.0: The residual effects are not specified. Include information on residual effects for each VEC (where a residual effect exists). Insertion of updated tables from Section 7 of the draft EIS could satisfy this requirement. However, please see comments on effects tables below for more info (CEAA-19).</p>	<p>Section 11.0 of the Summary in the Final EA Report will provide further detail to clarify this aspect.</p>	<p>Complete</p> <p>Vol 1 Tables S-6 to S-15</p>
12	<p>Section 2.3: Baseline data on Aboriginal groups history, location, Treaty rights, and traditional territory (if available) is absent in the draft EIS document. There does not appear to be a section that sets out who the groups are. This information is needed in order to determine if there are potential effects on Aboriginal Treaty rights and related interests. Provide descriptions of each Aboriginal groups' (as per the list provided in CEAA's letter to Rainy River Resources dated September 10, 2012) history, location, Treaty rights and traditional territory. See attached email dated 16/08/2013 for examples from other CEAA projects.</p>	<p>A new subsection will be added to Section 5 of the Final EA Report providing this information, based publicly available information, or information provide to RRR for public use.</p>	<p>Complete</p> <p>Vol 2 Sec 5.11</p>

#	COMMENT	RESPONSE	STATUS*
13	<p>Section 3.3: Please explain why not all of the groups identified for engagement (Northwest Angle #33, Northwest Angle 37, Anishinabe of Wauzhushk Onigum (Rat Portage)) were given copies of the EIS for review. Provide explanation.</p>	<p>Per guidance provided by the Federal government on September 10 2012, these communities were considered to have a "low" consultation effort. Similarly, guidance provided by the Ontario Ministry of Northern Development and Mines (MNDM) on May 17, 2012, these communities were classified as requiring "notification".</p> <p>For this reason, these communities were only provided with notice of the availability of the Draft Ea Report. There have been no requests from these communities for additional information or copies of the Draft EA Report.</p> <p>RRR met with Provincial and Federal agencies and Crown lawyers at the offices of MNDM in Thunder Bay to discuss Consultation and Notification in July 2012. During the meeting, it was agreed together with Crown legal services, that RRR could elect to have the Crown conduct project Aboriginal Notification duties. On August 28, 2012, RRR advised the Provincial and Federal lead agencies including MNDM, that the company would elect to have the Crown undertake Notification duties.</p>	Complete

#	COMMENT	RESPONSE	STATUS*
14	<p>Section 3.3: The reviewer cannot find a record of engagement with Rat Portage FN. Provide records of contact.</p>	<p>There are now four records of contact with Anishinabe of Wauzhushk Onigum (Rat Portage) First Nation; two of which were provided in Appendix D-1 of the Draft EA Report (Amended Proposed Terms of Reference, Appendix I-5; Stakeholder and Aboriginal Records to November 9, 2012).</p> <p>There are two additional records not tabulated in the Draft EA Report:</p> <ul style="list-style-type: none"> • on October 30, 2012, RRR e-mailed a notice informing that the Proposed Terms of Reference for the RRGP was submitted for review, and providing a digital link. • on July 18, 2013, RRR provided a notice that the RRGP Draft EA Report (Ver. 2) to Anishinabe of Wauzhushk Onigum First Nation was available for review (including a digital link). 	<p>Complete</p> <p>App D-1c</p>
15	<p>Section 3.3.2: This section (comments received during the preparation of the draft EIS) would be strengthened by including a reference to Table 12-1 outlining how the project changed since originally proposed as a result of consultation with stakeholders. Provide a reference to Table 12-1 outlining how the project changed since originally proposed as a result of consultation with stakeholders.</p>	<p>This subsection of the Main Text will revised in the Final EA Report as suggested.</p>	<p>Complete</p> <p>Vol 1 Sec 4.5 Table S-4</p> <p>Vol 2 Sec 3.3.1 Table 11-1</p>

#	COMMENT	RESPONSE	STATUS*
16	<p>Section 7.1.2: The text states “a predicted environmental effect is not likely to be significant if”</p> <ul style="list-style-type: none"> • It has a low magnitude and/or geographic extent or; • Of short term duration including residual effects (i.e. the effect itself is of short term duration); or • Is likely to occur very infrequently (or not at all with little potential for long lasting effects. <p>Can you please clarify, does this mean if there is an effect with a high magnitude but a low geographic extent it be considered insignificant? Using the second set of criteria, what if the effect was of short duration but of high magnitude? Please clarify.</p>	<p>The methodology provided in the Draft EA Report is purposefully the same as in the Approved Terms of Reference reviewed previously by the regulatory agencies.</p> <p>Per your comments: <i>"if there is an effect with a high magnitude but a low geographic extent it be considered insignificant?"</i> No; the use of "and/or" is meant to imply for some topics, either low magnitude and/or limited geographic extent might not be relevant to the topic. If it has high magnitude and/or high geographic extent the predicted environmental effect would be unlikely to be insignificant.</p> <p><i>"If the effect was of short duration but of high magnitude?"</i> No, similarly, the high magnitude would suggest that it is not likely to be insignificant.</p>	Complete
17	<p>Section 7.1.2, Page 7-5: The draft EIS states ‘The effects assessments presented in this section are for the expected maximum effect expected to occur during any stage of the RRGP life.’ Effects are only presented in the draft EIS for the phase where maximum effect is expected to occur. This is usually the operational phase. Revise the text describing the methodology to reflect an effects assessment for all phases of the project (i.e. construction, operation, maintenance, foreseeable modifications and closure and decommissioning. Include a description of effects during all phases for each VEC and VSEC.</p>	RRR and our consultant request further discussion with the CEA Agency on this comment.	Complete Vol 2 Tables 7-47 to 7-56

#	COMMENT	RESPONSE	STATUS*
18	<p>Section 7.3 and 7.4: The residual effects section is missing for some VECs. In these instances, the significance criteria are still applied. Determination of significance is normally only applied when there are residual effects. Where the residual effects section is missing for the VEC/VSEC, describe the residual effects even if very small or deemed insignificant. Revise the effects assessment for each VEC and VSEC to ensure that determination of significance is applied where there are residual effects.</p>	<p>This subsection of the Main Text will be revised in the Final EA Report as suggested.</p>	<p>Complete</p> <p>Vol 2 Sec 7</p>
19	<p>Section 7, Tables 7-47 and 7-48: These tables do not set out the residual effects on each VEC or VSEC. Significance criteria appear to be applied to potential effects. Add a column setting out residual effects before applying significance criteria.</p>	<p>Tables 7-47 and 7-48 will be revised in the Final EA Report as suggested.</p>	<p>Complete</p> <p>Vol 2 Tables 7-47 to 7-56</p>
20	<p>Section 11.2, Tables 11-3 and 11-4: Tables 11-3 and 11-4 of the draft EIS appear to satisfy the requirements in section 10.1.2 and 10.1.3 of the EIS Guidelines. However, this section in the EIS Guidelines refers to the effects assessment prior to mitigation being applied. In order to address this, the Agency requests that RRR amend tables 7-47 and 7-48 by adding a column in between 'potential effect' and 'proposed mitigation' that identifies whether the VEC/VSEC is linked to section 5 of CEAA 2012. The column should use a 'Yes' or 'No' system to specify whether any of the five criteria listed below in section 10.1.2 or 10.1.3 apply:</p> <ul style="list-style-type: none"> • changes to components of the environment within federal jurisdiction; • changes to the environment that would occur on federal or transboundary lands; • changes to the environment that are directly linked or necessarily incidental to federal decisions; • effects of changes to the environment on Aboriginal peoples; and • effect of changes to the environment that are directly linked or necessarily incidental 	<p>Tables 7-47 and 7-48 will be revised in the Final EA Report as suggested.</p>	<p>Complete</p> <p>Vol 2 Tables 7-47 to 7-56 Table 11-2 to 11-5</p>

#	COMMENT	RESPONSE	STATUS*
21	Some information within this list appear to be missing in the summary tables included in the draft EIS (e.g. relationship of identified Valued Components to Aboriginal groups' potential or established Aboriginal and Treaty rights and related interests). Please make sure all requested information is present in summary tables. If you have questions on how to incorporate the information, the Agency can provide additional advice on how to fulfill this requirement.	RRR and its consultants will review the advice provided and follow up further with the CEA Agency if needed, to ensure that the Final EA Report meets these requirements.	Complete Vol 2 Tables 7-47 to 7-56
22	The Agency requests a conformity table to aid with the review during the first 30 days of the official submission. Please include a conformity table which shall clearly indicate which section of the EIS fulfills the sections in the EIS Guidelines. Include this in the official EIS submission.	Appendix B-2 of the Draft EA Report provided a conformity table comparing the Draft EA Report against the EIS Guidelines. It is intended that this comprehensive table will also be provided and updated as needed, in the Final EA Report.	Complete App B-2 (updated)
23	Please confirm public and Aboriginal comments sent to the proponent by the Agency have been responded to in Appendix D. (Additional copies can be provided if needed). Please confirm.	Copies of all of the comments received on the Draft EA Report, and tables of comments and responses will be provided in the Final EA Report.	Complete App D-1e, 2a, 3a Vol. 1 Tables S-1 to S-3, S-16 Vol. 2 Table 3-3, 11-2
	An additional comment relating to accidents and malfunctions in the cumulative effects section will be sent shortly. To be confirmed.	Comment has not been received.	Complete

*As of submission of the Final Environmental Assessment Report. Reference is made to where the comment has been closed in the report where appropriate.

Stakeholder: Natural Resources Canada
 Point of Contact: N/A
 Comments received: September 4, 2013
 Comments regarding: Rainy River Project, Draft Environmental Assessment Report (Ver. 2)

#	COMMENT	RESPONSE	STATUS*
1	<p>Volume 1, Sections 4.0, 6.3 to 6.5, 7.0; Volume 2, Sections 5.1, 5.2.1 to 5.2.5, 5.4, 5.5; Volume 3, Appendix H, Section 2.0:</p> <p>The information provided on surficial geology was reviewed to assess whether the stripping or the removal of the overburden during the mining process was accurate and may not have an adverse impact on the environment.</p> <p>Baseline data for overburden geology and soils are complete. Sufficient information has been provided to characterize the affected environment.</p>	<p>Comment noted with appreciation.</p>	<p>Complete</p>

#	COMMENT	RESPONSE	STATUS*
2	<p>Volume 3, Annex H and S; Volume 2, Sections 4.0, 5.0, 6.0, 6.3 – 6.5, 7.0, 8.0 10-13: Baseline hydrogeology, hydrogeology modeling and the proposed monitoring program were reviewed to assess the environmental impacts.</p> <p>In the hydrogeology modelling report (Volume 3 Annex S p.25 and fig. 3.5), a few of the zones of influence (ZOIs) associated with the pumping of the open pit have been extended outside the model boundaries using interpolation. This procedure is somewhat unusual, as it is commonly accepted that any stress feature (e.g., pumping well) should not interfere with the boundaries of a numerical model to ensure proper simulations. NRCan understands that the choice of northern boundary was selected according to the potentiometric map under current conditions (i.e. without pumping), but from the presented simulations, this hydraulic boundary is likely to shift gradually as the pumping of the open pit progresses, a situation that cannot be represented by the current numerical model.</p> <p>Information Request 1: NRCan requests that the proponent explain why they chose the interpolation approach instead of increasing the size of the numerical model to ensure that none of the ZOIs interfere with the model boundaries.</p> <p>Information Request 2: NRCan requests that the proponent discuss the implications of the interpolation approach on the open pit dewatering pumping rates, the size of the ZOIs and the particle tracking for the corresponding simulations.</p> <p>Information Request 3: NRCan requests that the proponent discuss the necessity of modifying the current numerical model and its planned updates (every three years following the exploitation of the open pit) to account for new boundaries.</p>	<p>These comments will be addressed in a separate technical memorandum to be issued in advance of the Final EA Report (Issued October 4, 2013).</p>	<p>Complete App S-2</p>

*As of submission of the Final Environmental Assessment Report. Reference is made to where the comment has been closed in the report where appropriate.

Stakeholder: Environment Canada
Point of Contact: N/A
Comments received: September 5, 2013
Comments regarding: Rainy River Project, Draft Environmental Assessment Report (Ver. 2)

#	COMMENT	RESPONSE	STATUS*
1	<p>Summary and Section 8.0; Pg. 29: Currently the Summary (Executive Summary) provides insufficient information to help the general reader to understand the full scope and conclusion of the environmental assessment for the project. EC recommends that the Summary VEC analysis tables (Table 7-47 & 7-48) be included in the Summary. EC also recommends that the Summary be revised to include appropriate crossreferences, the same section numbering as the main report, and the summaries from the alternatives evaluated (conclusions from each of the alternatives assessments) - as this seems to be the most descriptive summaries of the approaches chosen (e.g. Water Management Strategy details).</p>	<p>The summary will be expanded upon as requested in the Final Environmental Assessment (EA) Report.</p>	<p>Complete Vol 1 Tables S-6 to S-15</p>
2	<p>Summary; Pg. 35: On p.35 it the Summary states that: "Climate change is not considered to be a significant environmental factor due to the widely differing timescales over which both the project and climate change take place." EC agrees that this statement generally applies over the operational phase of the mine (~next 20 yrs) but the proponent does not demonstrate that this is the case over the post-closure period. Upon the completion of the further examination of the data as requested in comments EC81 & EC82 (below), EC requests that the proponent revise this statement to acknowledge that a consideration of the range of possible climate change conditions and potential impacts of climate change postclosure is warranted.</p>	<p>Additional information on climate change scenarios will be provided in the Final EA Report, recognizing that the primary concern is for maintenance of a water cover over the tailings management area (TMA), and that mitigation measures are available and have been proposed in the Draft EA Report to address long term water cover deficits, should these occur.</p>	<p>Complete Vol 1 Sec 10 App W-2</p>

#	COMMENT	RESPONSE	STATUS*
3	<p>Section 0 – Glossary; Pg. Ix: The EIS does not currently list any species' Latin name and uses only common names in the report. This is not a normal standard as it can result in confusion regarding which species is actually being discussed. EC recommends that the proponent include a Glossary of species Latin and common names.</p>	<p>A comprehensive glossary of Latin names was provided in Appendices I-1 and J-1 of the Draft EA Report, as they are quite lengthy. These appendices are referenced currently in the main text.</p> <p>Reference will be made in the Glossary of the Final EA Report to this location.</p>	<p>Complete</p> <p>Vol 1 Sec 7.6 to 7.8</p>
4	<p>General Comments: Many of the water components needed for EC's review were either missing or difficult to find as: they were often buried in the 4th level of heading sub-bullets (which does not appear in the Table of Contents) and/or they were scattered throughout the report in pieces of information without a single comprehensive description of the water management approach. EC recommends that a separate appendix be provided compiling all of the sub-sections containing pieces of the water management strategy within the report into a single comprehensive presentation. This will also help eliminate inconsistencies within the described implementation of the strategy.</p> <p>Significant information is either missing from the report or difficult to find which rationalizes how the hydrological calculations were made. EC recommends that, in the separate appendix referred to above, it describes how hydrologic calculations were made with an accompanying rationale. Specific emphasis should be placed on calculations which show that the TMA will be flooded after active mining.</p>	<p>The water management strategy is described in Section 4.12 of the Draft EA Report inclusive of all aspects.</p> <p>A new appendix will be created for the Final EA Report with additional water management information as requested by Environment Canada (EC) in its comments (Appendix W).</p> <p>Details regarding the hydrological aspects of closure will be provided in the Draft Closure Plan being prepared pursuant to the <i>Mining Act</i> for submission in December 2013 as a draft for review by the Ministry of Northern Development and Mines (MNDM).</p>	<p>Complete</p> <p>App W-1</p>

#	COMMENT	RESPONSE	STATUS*
5	<p>General Comment on the Project Description Section 4.0: A baseline map could not be found which detailed the current locations of all water bodies (rivers, creeks, ponds, tributaries, muskegs, etc.) that fall under the project site layout, including their flow path and their continuity into the mine site.</p> <p>The proponent is requested to provide a baseline map showing the current locations of all water bodies (rivers, creeks, ponds, tributaries, muskegs, etc.) that fall under the project site layout, including their flow path and their continuity into the mine site.</p>	<p>The requested figure will be included in Appendix W of the Final EA Report.</p>	<p>Complete</p> <p>App W-1</p>
6	<p>Section 4.5 – Minewater Management; Pg. 4-8: In the 2nd paragraph, the report mentions a second standby system to provide increased capacity for stormwater management but does not provide further clarification. The capacity of stormwater can directly influence the quality of runoff coming from the project site. EC recommends that the proponent provide further clarity regarding the mentioned standby system and how it is intended to function.</p>	<p>The standby system will involve providing additional contingency pumping capacity if required. All discharge from the open pit, including from any such standby pumping system will be to the Mine Rock Pond or to the TMA, and will therefore be fully contained in the system.</p> <p>Further information will be provided in the Final EA Report.</p>	<p>Complete</p> <p>Vol 2 Sec 4.5</p>
7	<p>Section 4.6.2 – Mine Rock; Pg. 4-11 to 4-12: The first paragraph states that “geochemistry studies are well advanced to understand the extent of potential acid generation and metal leaching from the mine rock.” However, in the discussion regarding the selection of materials to be used for mine site construction there is no discussion of segregation based on metal leaching potential.</p> <p>EC recommends that the proponent provide an assessment of the metal leaching potential of these materials to determine whether they can be used for construction purposes.</p>	<p>The results of geochemistry studies indicate that metal leaching from potential construction rock materials (non potentially acid generating; NPAG) mine rock to be a low risk.</p> <p>An assessment of the metal leaching potential of construction rock materials will be completed as part of the identification of construction materials.</p>	<p>On-going</p>
8	<p>Section 4.8 – Tailings Management; Pg. 4-18: The 2nd paragraph states that dams will be constructed with NPAG rock. Rock that is NPAG may be potentially metal leaching and therefore would not be suitable for dam construction. EC recommends that the proponent provide an assessment of the metal leaching potential of these materials to determine whether they can be used for construction purposes.</p>	<p>The results of geochemistry studies indicate that metal leaching from potential construction rock materials (NPAG) mine rock to be a low risk.</p> <p>An assessment of the metal leaching potential of construction rock materials will be completed as part of the identification of construction materials.</p>	<p>On-going</p>

#	COMMENT	RESPONSE	STATUS*
9	<p>Section 4.8 – Tailings Management; Pg. 4-18, Section 8.4.2; Fig. 4-5, Pg. 8-7:</p> <p>It is unclear if the flood lines will ensure that tailings are not deposited directly into McCallum Creek in high flow events and that flow from McCallum Creek will not encroach on the TMA.</p> <p>EC requests that flood lines be generated for this section of West Creek and/or additional length of the “North Dam” be investigated to ensure separation of the TMA from the creek and this information be provided in the report.</p>	<p>A considerable level of engineering design has already gone into TMA to ensure proper containment (and other aspects). Under no design circumstances will tailings be deposited in McCallum Creek or West Creek. Per Section 4.8: <i>"the TMA will be bounded by high ground in the northeast and by impoundment dams along the remaining perimeter. The tailings management area dams have been designed to meet the most severe flood and earthquake criteria, being the probable maximum flood and maximum credible earthquake in accordance with the stringent Ontario Lakes and Rivers Improvement Act requirements."</i></p> <p>The TMA is separated from McCallum Creek by a topographic high (separate sub-watershed) and containment dams / Highway 600.</p> <p>A North Dam is not required for containment of the TMA due to natural topography and would be detrimental to the water balance of the facility, as the runoff from the northeast is required for the longterm water cover.</p>	Complete

#	COMMENT	RESPONSE	STATUS*
10	<p>Section 4.8 – Tailings Management; Pg. 4-21: The report describes that water is to be discharged to the environment through the constructed wetland or through a pipeline to the Pinewood River. However, a number of important related details have not been provided, including: 1) What is the purpose of the constructed wetland and what criteria will be used to determine when effluent is discharged through the wetland? 2) Will the final discharge point for effluent be located at the Water Discharge Pond before entering the wetland?</p> <p>EC recommends that the proponent provide clarification on the intended use of the wetland for water treatment, and provide preliminary information on the proposed locations for the final effluent discharge point(s).</p>	<p>Further detail regarding the constructed wetland is provided in Sections 4.12.6 and 4.12.7.3, and Figure 4-11; as well as in Section 7.6.1.</p> <p>Per Section 4.12.7.3 "<i>A constructed wetland is proposed to be established downstream of the water discharge pond within the Cowser Drain (Loslo Creek) valley, upstream of the Pinewood River (Figure 4-11). Constructed wetlands are manmade wetlands designed to improve water quality through the enhancement of natural water treatment processes.</i>"</p> <p>The purpose of the constructed wetland is two-fold:</p> <ul style="list-style-type: none"> • to provide additional effluent treatment for that portion of the TMA effluent discharged through the wetland; and • to help maintain Pinewood River flows during low flow periods, as described in Section 7.6.1. <p>Members of Aboriginal communities have expressed support for the use of wetlands for water clarification.</p> <p>The final effluent discharge points will be the Water Management Pond for that portion of the effluent discharged directly to the Pinewood River by pipeline; and the outfall of the constructed wetland for that portion of the effluent discharged through the wetland, as the wetland will form part of the treatment works.</p> <p>In all cases it is intended that PWQO values, or scientifically defensible equivalents be met in the Pinewood River as described in Section 7.6.1 of the Draft EA Report.</p>	Complete

#	COMMENT	RESPONSE	STATUS*
11	<p>Section 4.8 – Tailings Management; Pg. 4-20: The report uses the term “realistic worst case” but does not further define this.</p> <p>EC recommends that the proponent indicate what “realistic worst case” maximum level of precipitation the TMA will be designed to hold and the “realistic worst case” minimum level of precipitation that is needed in order to maintain an aquatic cover throughout the post-closure phase.</p>	<p>This text will be revised in the Final EA Report.</p>	<p>Complete</p> <p>Vol 2 Sec 4.8</p>
12	<p>Section 4.8 Tailings Management; Pg. 4-20; and Appendix H: Based on information provided within the report, it appears that limited investigation has been done on soils under the TMA to determine potential for seepage.</p> <p>EC recommends that the proponent verify the permeability of soils under the TMA and address contingencies for either reducing permeability or providing for additional water to maintain a water cover on TMA.</p>	<p>The Draft EA Report provides only a summary of the engineering design, to support the assessment of potential environmental effects.</p> <p>AMEC has completed extensive subsurface investigations of the Rainy River Project (RRP) site, inclusive of the TMA area. Some of this is described in Appendix H (Hydrogeology Baseline) which shows a dominant silty-clay till in the borehole logs across the property. Investigations to date indicated that the TMA area is, in general, blanketed by medium to highly plastic silty clay till of Keewatin origin. The thickness of clay till varies from 3 to 18 m. A thin surficial varved silty clay layer overlies Keewatin clay till. Test results indicated the hydraulic conductivity of the clay till varies from 1×10^{-8} m/s to 5×10^{-7} m/s. Bedrock outcrops are present in some areas, mostly at the west side. Bedrock is of low permeability. The hydraulic conductivity of upper weathered bedrock / basal till unit varies from 2.8×10^{-7} m/s to 2.6×10^{-6} m/s.</p>	<p>Complete</p>

#	COMMENT	RESPONSE	STATUS*
13	<p>Section 4.8 – Tailings Management; Pg. 4-18 and 4-20 & Table 4-5; Pg.4-50 & Figure 4-5; Pg. 4-61, & Section 6.19.4.1 – Alternatives (Stabilize and Permanent Flooding); Pg. 6-112: (Reoccurring topic in report):</p> <p>The 2 m depth of water over the final tailings is not consistent with what is shown in the EIS (e.g. Figure 4-5 appears to show a 1 m water cover). It is also unclear how a minimum of 2 m of water for final closure will be provided and maintained.</p> <p>EC requests that the proponent revise figures and text as appropriate, to consistently describe the depth of water cover needed on the TMA. It is also requested that the relevant sections be cross-referenced.</p>	<p>Figure 4-5 of the Draft EA Report does not show any water cover over the tailings, as it is intended to show the TMA arrangement, rather than operating conditions. This will be clarified in the legend in the Final EA Report.</p> <p>The closure water balance will be described in the draft Closure Plan to be submitted in December 2013 for MNM for review and in 2014 within the final Closure Plan for MNM filing.</p>	On-going
14	<p>Section 4.11 – Aggregates; Pg. 4-22:</p> <p>From the review of the report it is unclear if there will be any ditching around the aggregate pit. This raises the concern of whether runoff from the aggregate pit can enter West Creek Pond or the West Creek Diversion? The report also indicates that aggregate may be used for tailings dam filters and that NPAG rock may be used as an aggregate source. Has the Proponent characterized this rock for metal leaching potential?</p> <p>EC recommends that the proponent provide an assessment of the metal leaching potential of the aggregate materials to determine whether they can be used for construction purposes and whether there is the potential for metal leaching from the aggregate pit.</p>	<p>Ditching will be in place to control any minor local runoff from the aggregate pit, to ensure it is properly managed. Runoff from the pit will not be allowed to enter the West Creek Pond or West Creek Diversion.</p> <p>The esker-sourced, aggregate pit material has been used by the Ministry of Transportation for construction / maintenance of their infrastructure in the region. AMEC is currently conducting a program to assess aggregate quality which will include metal leaching.</p>	Complete

#	COMMENT	RESPONSE	STATUS*
15	<p>Section 4.12.1 – General Approach; Pg. 4- 24: From review of the report it is unclear if there will be enough flow to maintain the wetland to be used as a treatment area.</p> <p>EC requests that the proponent identify contingencies that will be used to keep the wetland viable during prolonged dry periods if this is necessary.</p>	<p>Natural wetlands in the region, particularly those associated with the intermittent drainages common in the area, are subject to periodic dry periods. During operations, discharges from the Water Management Pond and Water Discharge Pond will be managed to ensure establishment of the wetland and viability.</p> <p>Discharges through the constructed wetland are planned for the months of June through September, and in December to possibly as late as mid-January in some years, per Section 7.6.1.</p> <p>In drier sequences of years when there is less effluent to be discharged from the system, the priority would be for maintaining flows through the constructed wetland to help maintain Pinewood River flows. During such periods there would be less direct discharge to the Pinewood River during the spring and fall periods. This aspect will be clarified in the Final EA Report.</p>	<p>Complete</p> <p>App W-1</p>
16	<p>Section 4.12.3 – Water Supply for Process Plant Operations; Pg. 4-25, & Table 5- 14: The report states “Ample water storage is available in the water management pond and the tailings management area pond to provide plant water during the winter months or during prolonged summer or fall drought.”</p> <p>EC suggests that rationale should be provided for data inputs chosen for the analysis (e.g. evaporation, precipitation, and other pertinent climatic data). The analysis should include a range of seasonal and annual precipitation and evaporation data to demonstrate that the system is robust enough to withstand a range of climate conditions including a multi-year drought over the operation of the mine.</p>	<p>Maintenance of a water supply is a critical aspect for a operating mine and has been carefully assessed. If sufficient water is not available, the process plant operations must cease.</p> <p>Further information regarding the operational water balance will be provided in Appendix W of the Final EA Report.</p>	<p>Complete</p> <p>App W-1</p>

#	COMMENT	RESPONSE	STATUS*
17	<p>Section 4.12.3 - Water Supply for Process Plant Operations; Pg. 4-26 and Section 4.6.2 – Mine Rock; 4-11: The last paragraph indicates that the east mine rock stockpile stores PAG and non-PAG mine rock, but the 4th paragraph of Section 4.6.2 (Mine Rock) indicates that it stores PAG mine rock only.</p> <p>EC recommends that the text be clarified/corrected</p>	<p>The East Mine Rock Stockpile is designed to contain potentially acid generating (PAG) mine rock produced from the open pit. As part of the conservative approach to mine rock segregation, some NPAG rock will likely be included with the PAG rock to ensure that the maximum amount of PAG rock is directed to the east mine rock stockpile. The text will be clarified in the Final EA Report.</p>	<p>Complete</p> <p>Vol 2 Sec 4.12.3</p>
18	<p>Section 4.12.5 – Tailings Management Area Water Management; Pg. 4-28: The proponent is proposing natural degradation of remaining cyanide in the TMA after SO₂/Air Treatment. Effluent aging is proposed to occur over the summer months within the TMA. Laboratory experiments undertaken by the Proponent indicate that 60 days of aging is required to produce effluent that meets federal and provincial criteria. This raises the question of whether the tailings management area pond and water management pond have the capacity to store water over an extended retention time if natural degradation is not sufficient to produce effluent that meets federal and provincial criteria. Also, how will this water be managed and treated?</p> <p>EC recommends that the proponent provide information on the capacity for effluent storage, and the proposed mitigation and treatment measures to manage the waste water in cases where the water does not meet effluent discharge criteria.</p>	<p>The TMA pond will normally operate at a capacity of 6 Mm³, but will have capacity to contain as much as 18 Mm³. This capacity is sufficient to manage water from sequences of wet years simulated from climatic records.</p> <p>Extended effluent aging will occur in both the TMA pond, and in the Water Management Pond. Together these ponds will provide several months of effluent aging.</p> <p>RRR is also looking at the potential for optimizing water inputs to the system, to further restrict runoff inputs during high precipitation years. Further information regarding the operational water balance and storage capacity will be provided in Appendix W of the Final EA Report.</p>	<p>Complete</p> <p>App W-1</p>

#	COMMENT	RESPONSE	STATUS*
19	<p>Section 4.12.6 - Final Effluent Quality and Discharge; Pg. 4-28:</p> <p>From review of this subsection two points were raised:</p> <p>1) It is not clear how much final effluent will be discharged from the Water Management Pond to the Pinewood River via the pipeline and to the constructed wetland. There also seems to be conflicting information on when final effluent will be discharged through the wetland and what the purpose is of discharging final effluent through the wetland.</p> <p>2) It is indicated numerous times in Section 4 that the constructed wetland discharges to the Pinewood River. In fact, the constructed wetland discharges to Loslo Creek, which then discharges to the Pinewood River.</p> <p>1) EC requests that the proponent correct the conflicting information regarding how effluent will be discharged through the wetland and describe the wetland's purpose. Possibly some clarification could be achieved through a comparison hydrograph showing current flows and modified/new flows over the year – this could also be useful in the Summary.</p> <p>2) EC requests that the proponent correct the text stating that the wetland discharges into the Pinewood Creek to instead state that it discharges into Loslo Creek.</p>	<p>Section 4.12 provides a detailed and careful description of the water management of the RRP, including the rates of discharge. Figure 4-12 provides a schematic of the discharge volumes requested by the comment. Table 4-5 indicates the operating period and will be clarified to indicate discharge period.</p> <p>1) RRR and our consultant requests further detail from EC regarding where conflicting information is present in the Draft EA Report.</p> <p>2) The reviewer is correct; the constructed wetland will flow into a section of the Loslo Creek / Cowser Drain prior to discharging in the Pinewood River. The text of the Final EA Report will be revised accordingly.</p>	<p>Complete</p> <p>Vol 2</p> <p>Sec 4.12.5</p> <p>Sec 4.12.6</p>

#	COMMENT	RESPONSE	STATUS*
20	<p>Section 4.12.7.1 – Preliminary Pond Designs; Pg. 4-30: In the 2nd last paragraph, the proponent indicates that the water discharge pond will receive decanted water from the water management pond and runoff from the local catchment area (100 ha). Since the decanted water from the water management pond is being diluted by runoff in the water discharge pond, the final discharge point should be considered to be at the water management pond, and hence, the constructed wetland would not be considered as part of the effluent treatment system. It is EC’s opinion that the final point of discharge for MMER monitoring will be at the water management pond (excluding the constructed wetland from the effluent treatment system). In the Final EIS please note the changes incorporated to address this decision.</p>	<p>The Water Management Pond, Water Discharge Pond and Constructed Wetland are all part of the proposed treatment facility integral to the TMA.</p> <p>As shown in Figure 4-10, the Water Discharge Pond will receive seepage from the eastern portion of the TMA. While the Water Discharge Pond will also receive natural runoff (as will the TMA itself to support a water cover over the tailings), it is not intended to hold non-contact waters, and is hence part of the treatment system.</p>	Complete

#	COMMENT	RESPONSE	STATUS*
21	<p>Section 4.12.7.2 - Runoff and Seepage Collection; Pg.4-31 – 4-32:</p> <p>Insufficient details are provided on the role and function of all of the water management components proposed for the site in terms of seepage and runoff. For example, the Proponent states that runoff and seepage collected in the ditches along the overburden and mine rock stockpiles will be retained in terminal collection ponds until it meets criteria and would then be discharged to the environment. It is not clear if the water from these collection points will be pumped to the water discharge pond for final discharge.</p> <p>1) EC recommends that a Figure be provided that shows all proposed drainage ditches for the mine site, including the ditches that divert runoff away from then site.</p> <p>2) EC requests more information about the Sediment Ponds 1 & 2. Provide clarification on whether effluent from the collection ponds will be pumped to the water discharge pond or if the effluent will be discharged to the receiving environment directly from the individual collection ponds.</p> <p>3) In the 2nd paragraph, it mentions runoff collection ponds. EC requests more information about these ponds and where they will discharge to.</p>	<p>Ditching around the mine waste facilities is shown in Figures 4-5 and 4-10. There is no intent to create ditches to divert runoff away from the overall mine site. Other minor ditching will be present around the mine site as appropriate to ensure runoff quality and sediment control, as is common with all development.</p> <p>The intent is to discharge treated effluent from Sediment Ponds 1 and 2 directly to the environment and not to the TMA or Water Discharge Pond. Details for these ponds are still being developed (i.e., required retention times, dividing the ponds into component parts, possible use of flocculants, etc.), but the intent is to meet the Metal Mining Effluent Regulation (MMER) effluent requirements and to maintain PWQO, or scientifically defensible equivalents, in the receiving water.</p> <p>Further detail regarding the sediment ponds will be provided in Appendix W of the Final EA Report.</p>	<p>Complete</p> <p>Vol 2 Sec 4.12.7.2</p> <p>App W-1</p>

#	COMMENT	RESPONSE	STATUS*
22	<p>Section 4.12.8 - Water Balance Overview; Pg. 4-35 and Table 4-4; Pg. Pg. 4-49:</p> <p>1) In the 2nd last bullet, the proponent indicates that surplus water from the TMA pond will be transferred to the water management pond from June through August where it will be allowed to age from a minimum of one month. However, the suggested plant discharge in Table 4.4 is for 60-day aging.</p> <p>2) The cyanide concentration at Time 0 is much less than the 3 to 6 mg/L mentioned in Section 4.7.6 (Cyanide Use and Destruction).</p> <p>3) It is helpful to have direct comparison in the Table 4-4 to the Canadian Environmental Quality Guidelines (CEQGs).</p> <p>1) EC requests further clarification is provided in terms of the aging period that effluent would be held in the water management pond. Additionally, if the retention time is only 1 month then Table 4.4 needs to be revised to show the discharge for 30-day aging.</p> <p>2) EC requests clarification on why the cyanide concentration is less at Time 0 then mentioned in Section 4.7.6</p> <p>3) EC recommends that it would be useful to incorporate CEQGs into Table 4-4.</p>	<p>Table 4-4 is based on aging in the laboratory. For the RRP, post-treatment effluent aging will occur within the TMA pond itself, as well as in the Water Management Pond. Collectively, effluent aging in these two ponds will occur over several months during the open water period. Also, effluent aging, especially in the Water Management Pond will be much more effective than in the laboratory, because of more active biological processes such as photosynthetic activity in the pond for nitrogen uptake which affects ammonia and cyanide species.</p> <p>The 3 to 6 mg/L values shown in Section 4.7.6 are erroneous and will be corrected in the Final EA Report. The SO₂/Air test work results presented in Table 4-4 show that much better results can be attained, and are attained in the industry.</p> <p>CEQG values will be incorporated into the table in the Final EA Report as suggested.</p>	<p>Complete</p> <p>Vol 2 Sec 4.7.6</p> <p>Table 4-4</p>

#	COMMENT	RESPONSE	STATUS*
23	<p>Section 4.12.8 – Water Balance Overview; Pg. 4-34 and Figure 4-12; Pg. 4-64:</p> <p>It is assumed that the numbers being presented here are based on annual averages. However, there are seasonal variations to precipitation as well as individual events of high precipitation and runoff. These variations do not appear to be considered in the EIS.</p> <p>EC recommends that analysis be provided that shows that water can be distributed throughout the year sufficiently and that infrastructure can be designed to use the water as indicated. Specifically, attention should be given to how much of the runoff will actually be useable in the water balance and how much may need to be “spilled” because infrastructure cannot handle high runoff events. Attention should also be given to seasonal variations.</p>	<p>The reviewer is correct that the water balance is based on annual averages. The system has a very large capacity: 3 Mm³ in the mine rock pond, 18 Mm³ in the TMA pond, and 6 Mm³ in the Water Management Pond. The 18 Mm³ in the TMA pond includes 12 Mm³ reserve capacity to accommodate sequences of high runoff years. Month to month variations in precipitation / runoff are not relevant to the system.</p> <p>Further details will be provided in Appendix W of the Final EA Report showing how sequences of high runoff years can be accommodated by the system.</p>	<p>Complete</p> <p>App W-1</p>

#	COMMENT	RESPONSE	STATUS*
24	<p>Section 4.19.3 – Tailings Management Area; Pg.4-42, Table 4-5, Pg.4-50 Section 6.19.4.1 – Alternatives; Pg.6-112, Figure 4-5, Pg. 4-42, Table 5-14: (Reoccurring topic in the report): Evaporation of water over the tailings during extended drought periods could significantly draw down the depth of water over the tailings. Based on the need for 2 m of water above the tailings, a greater depth than 2 m needs to be considered to account for loss of water during dry periods.</p> <p>Rationale should be provided for data inputs chosen for the analysis (e.g. evaporation, precipitation, and other pertinent climatic data). The analysis should include a broad range of seasonal and annual precipitation and evaporation data (well beyond annual mean values) to demonstrate that the system is robust enough to withstand a range of climate conditions including drought conditions.</p> <p>EC suggests that the proponent also conduct a sensitivity analysis using a multi-year period (EC suggests 7 years) using consecutive years with below average precipitation and above average evaporation in order to simulate the response to a lengthy (i.e. 7 year) drought condition.</p> <p>As well potential impacts of possible climate change on hydrology post-closure should also be considered. This analysis should incorporate the recommendations in Section 8.5 (Climate Change).</p>	<p>A water cover of 2 m depth is the nominal cover thickness proposed, recognizing that some variation is expected seasonally. The tailings will be maintained saturated and covered by water during operations.</p> <p>Precipitation data for Barwick (near the RRP site) for the period of 1979 to 2012 shows that the average annual precipitation value for the lowest seven year consecutive period on record is 553 mm. This value is less than the revised (see response to comment #53) annual lake evaporation value used for the site of 600 mm, and would result in a net pond surface reduction of 329 mm over the 7 year period. Which would in turn be offset (reduced) by runoff from that portion of the TMA watershed which is not ponded. Further detail on this aspect will be included in the Final EA Report.</p> <p>Further details will be provided in the Final EA Report; within the Main Text regarding climate change on hydrology post-closure. Evaporation-related aspects will be addressed in Appendix W.</p>	<p>Complete</p> <p>App W-2</p>
25	<p>Table 4-5 – Summary of RRG Ponds; Pg. 4-50: The Summary of RRG Ponds (Table 4-5) does not include all ponds that have been mentioned in the EIS that are to be built.</p> <p>EC requests revision of Table 4-5 to reflect the missing water features.</p>	<p>Table 4-5 will be revised to list all of the proposed water management ponds, rather than the primary ponds as currently listed.</p>	<p>Complete</p> <p>Vol 2 Table 4-8</p>

#	COMMENT	RESPONSE	STATUS*
26	<p>Figure 4-1 (Site Plan Ultimate Footprint); Pg. 4-53: The use of a natural water body frequented by fish for mine waste disposal requires an amendment to the <i>Metal Mining Effluent Regulations</i> (MMER) to add the waterbody to Schedule 2 of the MMER. Under the regulations mine waste is not restricted to waste rock and tailings only but also includes overburden, low grade ore stockpiles as well as liquid effluent from mine water management facilities (e.g., process water or water collected in seepage ponds and ditches). The Proponent's site plan shows a number of water management features (e.g., water management pond, water discharge pond, sediment pond, stockpile pond, and constructed wetland) that are under the mine footprint. It is not clear as to whether or not the locations and footprints of the above mine water management facilities would impact a natural water body frequented by fish.</p> <p>EC recommends that the information related to the potential for various solid mine wastes (other than tailings and waste rock) and liquid effluent associated with various mine water management facilities to impact natural waterbodies frequented by fish needs to be provided by the Proponent in the EIS.</p>	<p>Specific discussions on this topic have been held with Fisheries and Oceans Canada (DFO), based on the data available in the Draft EA Report, and materials being developed for the No Net Loss Plans (NNLP).</p> <p>The major portion of Clark Creek will be diverted, such that DFO does not regard the remaining lower portion of the Clark Creek channel as constituting waters frequented by fish; once the diversion is complete, remaining fish have been removed, and the channel abandoned to prevent fish from moving into the remnant channel section.</p> <p>DFO has indicated that Loslo Creek and Marr Creek would be considered as waters frequented by fish and would therefore require Schedule 2 listing under MMER requirements.</p>	<p>Complete</p> <p>App X-1, X-3</p>

#	COMMENT	RESPONSE	STATUS*
27	<p>Figure 4-12; Pg. 4-75, Table 5-14- Mean Evaporation Rate; Pg. 5-180: Based on a TMA area from Figure 4-5 and mean evaporation rate provided in Table 5-14 it may be possible to get evaporation volumes for the TMA up to 2 times greater than reported in Figure 4-12.</p> <p>EC requests that the proponent provide detailed calculations and rationale for all aspects of the water budget of the TMA.</p>	<p>Only a small portion of the TMA will normally be occupied by a ponded area as shown schematically in Figure 4-1. Evaporation rates modelled for the TMA water balance take into account pond surface area, wetted tailings beaches, and tailings beaches which are maintained in a relatively non-wetted state. The annual lake evaporation rate is being revised to 600 mm. This will be reflected in the Final EA Report.</p> <p>Currently there is an average annual operational water surplus of approximately 5.7 Mm³ that will need to be discharged from the site TMA water inventory. If evaporation rates within the TMA were to be greater than modelled values (which will be the case with the revised 600 mm value), this would be regarded as a positive change as it would reduce overall annual effluent discharge requirements.</p> <p>Further information will be provided in Appendix W of the Final EA Report.</p>	<p>Complete</p> <p>App W-1</p>
28	<p>Figure 4-12; Pg. 4-75, Table 6-5; Pg. 6-136, Table 7-12; Pg. 7-185: It is unclear how runoff was calculated throughout numerous sections of the EIS.</p> <p>EC requests that the proponent provide details explaining specifically how runoff was calculated, and this information should be included and referenced within the EIS.</p>	<p>Annual average runoff values for natural ground were developed from long term Pinewood River flow records which show an annual runoff value of approximately 195 mm as shown in Table 5-20 of the Draft EA Report. This value translates to an average annual runoff coefficient of approximately 30% given an annual average precipitation value for the area of approximately 695 mm (Table 5-10). Runoff coefficients for the developing portions of the mine site (open pit, ponded areas, tailings beaches, stockpiles, process plant yard areas, etc.) were developed from AMEC's experience with other similar mine sites and from literature values.</p> <p>Further information will be provided in Appendix W of the Final EA Report.</p>	<p>Complete</p> <p>App W-1</p>

#	COMMENT	RESPONSE	STATUS*
29	<p>General Section 5 and Section 7: Within the report usage of the common name “Northern Bat” is confusing as the more commonly used name (e.g. on COSEWIC) is “Northern Myotis”.</p> <p>EC recommends that the proponent change “Northern Bat” to “Northern Myotis” in the EIS.</p>	<p>This change will be made in the Final EA Report as requested.</p>	<p>Complete</p> <p>Vol 2 Sec 5 Sec 7</p>
30	<p>General Section 5 and Section 7: Presentation of data relating to Whip-poor-will and Common Nighthawk in Section 5 and Section 7. Throughout the EIS, there is a heavy weighting on Whippoor-will. Most of the content presented could also be used for Common Nighthawk.</p> <p>EC requests that the proponent include information relevant to Common Nighthawk (or nightjars) in the Whippoor-will sections where appropriate.</p>	<p>There is a heavy weighting on Whip-poor-will as it is a threatened species that requires <i>Endangered Species Act</i> (ESA) permitting. Whip-poor-will was the subject of three years of targeted studies within the natural environment local study area (NLSA); two of these years were through an intensive, collaborative research study between Rainy River Resources (RRR), the Ministry of Natural Resources (MNR), Trent University and AMEC.</p> <p>Whip-poor-will were considered as a specific component with the <i>Endangered Species Act Species VEC</i>; whereas Common Nighthawks were considered as a specific component with the <i>Species of Special Concern and Provincially Rare Species VEC</i>; and as such was given focused consideration in the VECs section, but not at the same intensity of discussion as for Whip-poor-will.</p>	<p>Complete</p>
31	<p>Section 5.2.11.1 - Aerial Surveys; Pg. 5-26: The EIS states that aerial surveys took place on February 20, 2013 and were used to detect, among other things, the presence of wolves which may indicate the location of rendezvous sites. The timing of these surveys likely does not allow the location of rendezvous sites to be inferred from wolf observations as these activities primarily occur in late summer early fall.</p> <p>EC requests that the proponent remove this inference unless supporting information can be presented to support the link between wolf observations and the location of rendezvous sites during the survey time period.</p>	<p>RRR and our consultant agree with this comment and will remove the inference regarding wolf rendezvous sites will be removed from the Final EA Report.</p>	<p>Complete</p> <p>Vol 2 Sec 5.2.11.1</p>

#	COMMENT	RESPONSE	STATUS*
32	<p>Section 5.2.12.1 - Breeding Bird Point Counts; Pg. 5-29 There were at least four different breeding bird point count surveys completed (BBS, FBMP, MMP, Nightjar) used to evaluate the breeding bird density in the NLSA. There were two different consultants which used different survey methodologies to estimate the breeding bird populations in the NLSA. This may lead to discrepancies between the different datasets and affect the breeding bird density estimates.</p> <p>EC requests that the proponent describe, in detail, if discrepancies exist and if so, how they were rectified.</p>	<p>The breeding bird densities used in the effects assessment come from AMEC's data collected in 2011 and 2012 (using identical survey techniques) so no discrepancies are expected.</p> <p>The general results from the KCB breeding bird surveys are similar to those from AMEC's surveys (species present / absent, Species at Risk; SAR) and help provide a comprehensive understanding of baseline conditions between years. However, raw data from KCB was not used to calculate average densities in the assessment.</p>	Complete
33	<p>Section 5.2.12.1 - Breeding Bird Point Counts; Pg. 5-29: The EIS states that survey "stations were selected using 1:20,000 scale satellite imagery". 2007 FRI information is available from the OMNR, covering the entire NLSA and is standardized across the province within all Forest Management Units. FRI information complies with, or can be converted to Ecosite (ELC) information.</p> <p>EC requests that the proponent describe the rationale for not using the FRI information (as was used for habitat summaries) to direct survey station selection.</p>	<p>High resolution satellite imagery provided the necessary information to choose survey stations. There were delays in receiving Forest Resource Inventory (FRI) and Ecosite information from the MNR (data sharing agreement issues) and this prevented the use of these sources of information during the breeding bird surveys. Once the FRI and Ecosite information was received it was plotted and used for habitat summaries.</p>	Complete
34	<p>Section 5.2.12.1 - Breeding Bird Point Counts; Pg. 5-29: The EIS states that "At each station, all birds seen or heard during a 10-minute period, rather than the suggested 5-minute listening period in OBBA (2001) were recorded on a datasheet". Were the surveys recorded in separate 5-min increments in order that they conform to FBMP standards?</p> <p>EC requests that the proponent describe how the data was recorded (methodology) with respect to the recording time.</p>	<p>Data was not separated into 3-5-10 minute increments as this was not necessary for the purposes of collecting baseline information on species present and on bird densities.</p> <p>The Ontario Breeding Bird Atlas (OBBA) is a standardized survey protocol used throughout Ontario and is approved by the MNR. This protocol was discussed with EC on July 18, 2012 and was approved by EC. During this discussion, EC complimented AMEC for using 10-minute survey periods rather than 5-minute periods (meeting minutes are available).</p>	Complete

#	COMMENT	RESPONSE	STATUS*
35	<p>Section 5.2.12.3 – Nightjars; Pg. 5-31: The EIS states that “KCB conducted two targeted whippoor- will surveys in June of 2010” and “AMEC recorded Eastern Whip-poor-will during the 2011 nocturnal owl surveys and initiated targeted whip-poor-will surveys in June 2012.”</p> <p>A previous EC request regarding the timing of these surveys was fulfilled, however no indication that the surveys took place during the appropriate time can be found in the EIS. EC requests that the proponent indicate the timing of these surveys in the EIS to avoid any confusion.</p>	<p>Detailed information on survey methodology, such as survey dates, is provided in the appendices of Draft EA Report (Appendices J-2, J-3, J-4, J-5, K-1, K-2, K-3 and N).</p>	Complete
36	<p>Section 5.2.12.4 - Marsh Birds; Pg. 5-31: The EIS states that “Surveys conducted by KCB followed methodology outline in the Marsh Monitoring Program...”</p> <p>EC requests that the proponent indicate the date these surveys took place along with a justification as to why the survey period was 10 minutes as opposed to 15 and why the 5th call was omitted.</p>	<p>Detailed information on survey methodology as available to RRR and its consultant is provided in the Appendix N.</p>	Complete
37	<p>Section 5.2.15 - Species at Risk; Pg. 5-34: The EIS states that “In Ontario, the Federal <i>Species at Risk Act</i> only applies on Federal lands and defers the responsibility of regulating SAAR on private lands the <i>Endangered Species Act</i>” SARA does not defer the responsibility of regulating SAR on private lands. SARA applies equally to private and public lands. For some species listed under both the SARA and the ESA, federal/ provincial cooperation takes place in developing a federal recovery strategy.</p> <p>EC requests that the proponent remove this statement and include a paragraph for SARA to accompany the existing paragraph for the ESA.</p>	<p>This statement will be removed and a new paragraph will be added regarding the <i>Species at Risk Act</i> (SARA) in the Final EA Report.</p>	Complete Vol 2 Sec 5.2.15

#	COMMENT	RESPONSE	STATUS*
38	<p>Section 5.6.2 – Surface Water Flows; Pg. 5-61, Table 5-20; Pg. 5-185: The EIS does not appear to provide the rationalization for why prorating flows from WSC station 05PC023 upstream, that has data year round, to WSC station 05PC011 downstream is applicable. Noting that the watershed area of WSC station 05PC023 is 233 km² and WSC station 05PC011 is 461 km², proration of flows may not be appropriate (please refer to previous EC comments submitted on Baseline report for Low Flow Surface Water).</p> <p>EC requests that the proponent provide the rationalization for prorating flows and the verification that the additional watershed area included in WSC station 05PC011 responds similar to the watershed of WSC station 05PC023 should be documented and/or undertaken if it is identified that a more accurate estimation of the flow is required.</p>	<p>Monthly flow distributions presented in the right hand column of Table 5-19 for Station 05PC023 provide the best estimate of flow proportions for the missing months of January, February, November and December for Station 05PC011. These values were used in Table 5-20. As a cross check, the resulting calculated annual average runoff value for Station 05PC011 of 195.8 mm, agrees well with the 200 mm annual runoff value for this region shown in the Hydrological Atlas of Canada.</p> <p>Further information will be provided in Appendix W of the Final EA Report.</p>	<p>Complete App W-1</p>
39	<p>Section 5.6.2 – Surface Water Flows, Paragraph 3; Pg. 5-61, Table 5-21; Pg. 5-186: “To estimate annualized...the derived mean monthly flows shown in Table 5-21...” Mean monthly flows are not shown in Table 5-21.</p> <p>EC recommends that the proponent ensure that this is the correct reference.</p>	<p>The reference should have been to Table 5-20. The reference will be corrected in the Final EA Report.</p>	<p>Complete Vol 2 Sec 5.6.2</p>

#	COMMENT	RESPONSE	STATUS*
40	<p>Section 5.7.2.1 – Overburden and Shallow Bedrock; Pg. 5-69 and Appendix H, Figure 2-2: Regional Overburden Geology: The glaciolacustrine clay at the site is varied in places and contains sand lenses and gravel. There is also some bedrock exposure that may provide paths of high permeability due to fractures in the rock.</p> <p>EC recommends that the proponent complete local soil investigation to ensure that the soils at the TMA are relatively impermeable before the use of the TMA. If they are not additional, alternate mitigation may be required.</p>	<p>AMEC has completed extensive investigations of the subsurface materials at the RRP site. Some of this is described in Appendix H (Hydrogeology Baseline) of the Draft EA Report which shows a dominant silty-clay till in the borehole logs across the property. This information has been used to support the project design, including the hydrogeological model. The Draft EA Report provides only a summary of the engineering design, to support the assessment of potential environmental effects.</p> <p>Investigations to date indicated that the TMA area is, in general, blanketed by medium to highly plastic silty clay till of Keewatin origin. The thickness of clay till varies from 3 to 18 m. A thin surficial varved silty clay layer overlies Keewatin clay till. Test results indicated the hydraulic conductivity of the clay till varies from 1×10^{-8} m/s to 5×10^{-7} m/s. Bedrock outcrops are present in some areas, mostly at the west side. Bedrock is of low permeability. The hydraulic conductivity of upper weathered bedrock / basal till unit varies from 2.8×10^{-7} m/s to 2.6×10^{-6} m/s.</p>	Complete
41	<p>Section 5.9.2.1 - Species at Risk; Pg. 5-104: (Third paragraph)The EIS states that “Black Ash Hardwood Forest (B089, B105 and B130) covers just 401.5 ha of the NLSA and represents 0.01% of the total area.” The value listed here is incorrect (ha or percentage).</p> <p>EC requests that the value be adjusted accordingly.</p>	This value will be clarified / corrected in the Final EA Report.	Complete Vol 2 Sec 5.9.2.1

#	COMMENT	RESPONSE	STATUS*
42	<p>Section 5.9.2.2 – Coniferous Swamp; Pg. 5-105: (Second paragraph)The EIS states that “Most swamps within the NLSA occur in close proximity to each other (about 1 km apart) and are hydrologically connected to permanent or intermittent watercourses. Such features may make them significant for wildlife movement and distribution of plant species.” As stated in the EIS, swamp habitat is important for wildlife, yet there is no reference to how swamp habitat will be restored or rehabilitated upon site closure. This habitat type is particularly difficult to restore given that swamps rely on an interaction between water, soil and vegetation.</p> <p>EC requests that the proponent either acknowledge the difficulty in restoring this habitat type or describe, perhaps in the reclamation section, what approach and techniques would be taken or applied to ensure this habitat type exists on the site footprint upon closure.</p>	<p>Coniferous swamp habitat is the second most common vegetation community type in the project site area (18.3% of the landscape), and is common and widespread though the surrounding area. This habitat type develops where there is poor drainage, but not so wet as to preclude forest development. The prevalence of flat terrain and clay soils in the area facilitates development of this community type.</p> <p>Lowland areas which are converted to mineral stockpiles would be difficult to develop as coniferous swamp habitat, as suggested by the reviewer. There are some areas that would be expected to evolve into this habitat type at closure. These include margins of the constructed wetland and margins of the flooded TMA.</p> <p>RRR will be working with MNR and other stakeholders through the closure planning process to develop habitat types at closure which are suitable for wildlife, with a focus on SAR and ungulates.</p>	On-going
43	<p>Section 5.10.1.2 – Birds (Migratory Breeding Birds – Colonially nesting Birds); Pg. 5-118: The EIS states that “Ecosite data indicates that 101 habitat features covering 16,325 ha of forested habitat are present in the NLSA which may provide suitable tree / shrub colonially-nesting bird breeding habitat.” These species have very specific nesting requirements and therefore the generalized area listed here could have been refined to reduce the area of potential habitat (i.e. proximity to a stream or hardwood swamp).</p> <p>EC requests that the proponent either refines the area estimate or note that the habitat features are specific and could be found with the general forested area.</p>	<p>The text in the Final EA report will be revised to note that the habitat features are specific and could be found with the general forested area</p>	<p>Complete</p> <p>Vol 2 Sec 5.10.1.2</p>

#	COMMENT	RESPONSE	STATUS*
44	<p>Section 5.10.1.2 - Birds (Migratory Breeding Birds – Shrub / Early Successional Birds); Pg. 5-120: The EIS states that “A Provincial species of Special Concern, the Golden-winged Warbler...” The Golden-winged Warbler is listed as Threatened under the Federal Species at Risk Act.</p> <p>EC requests that the proponent refer to both the provincial and federal listing for this species.</p>	The Provincial listing will be added to the Final EA Report.	Complete Vol 2 Sec 5.10.1.2
45	<p>Section 5.10.1.5 - Species at Risk and Provincially Rare Species Pg. 5-125: The EIS states that “On private land, these prohibitions apply only to listed aquatic species and migratory birds that are also listed in the <i>Migratory Birds Convention Act</i>. In Ontario, the <i>Federal Species at Risk Act</i> only applies on Federal lands and defers the responsibility of regulating SAR on private lands to the <i>Endangered Species Act</i>.”</p> <p>EC recommends that the proponent remove this statement and include a paragraph for SARA to accompany the existing paragraph for the ESA.</p>	This statement will be removed and a new paragraph for SARA will be added to the Final EA Report.	Complete Vol 2 Sec 5.10.1.5
46	<p>Section 5.10.2.4 – Species at Risk or Provincially Rare Mammals; Pg. 5-129: In the EIS the following title heading is confusing “SAR or Provincially Rare Mammals” as the paragraph following only concerns the Little Brown Myotis and Northern Bat which have only been assessed in COSEWIC and is not federally listed as a SAR.</p> <p>EC requests that the proponent correct the heading or add text as indicated.</p>	This heading was used in order to remain consistent with similar headings for plants and other groups of wildlife, grouping species that are listed Provincially or Federally as SAR, or are considered to be provincially rare by the MNR. Little Brown Myotis and Northern Myotis are both Provincially listed as endangered.	Complete

#	COMMENT	RESPONSE	STATUS*
47	<p>Section 5.10.3.3 - Species at Risk and Provincially Rare Species; Pg. 5-134 and Section 5.10.6 - Species at Risk and Provincially Rare Species; Pg. 5-136: In the EIS (Sections 5.10.3.3 and 5.10.6) the title heading “Species at Risk and Provincially Rare Species” is confusing as it does not correctly reflect what is contained within. These titles should be changed to “Federal Species at Risk and Provincially Rare Species” for clarification.</p> <p>EC requests that the proponent correct the heading.</p>	<p>These sections group species that are listed Provincially or Federally as SAR, or are considered to be Provincially rare by the MNR.</p>	<p>Complete</p>
48	<p>Section 5.10.3.3 – Species at Risk and Provincially Rare Species; Pg. 5-134 and Section 5.10.6.2 – Threatened Species; Pg. 5-137 & Section 5.10.6.3 – Special Concern Species; Pg. 5-139:</p> <p>In te EIS each of the introductory paragraphs for Section 5.10.3.3 and Section 5.10.6.2 do not clearly identify the federal status of the birds Each paragraph needs to be re-written to present the listed status more clearly for the birds (both federally and provincially).</p>	<p>The Federal and Provincial status for each species is provided in their respective sections / paragraphs presented below these three introductory paragraphs (Section 5.10.3.3, 6.10.6.2 and 5.10.6.3). Repetition has been avoided where possible.</p>	<p>Complete</p>
49	<p>Section 5.10.3.1 – Aerial Insectivores; Pg. 5-133: The EIS states that “Olivesided Flycatcher is a SAR and is addressed further in Section 5.9.5.” It should be noted that COSEWIC has assessed Eastern Wood-Pewee as Special Concern and it is currently under consideration for listing under SARA.</p> <p>EC requests that the proponent also include Eastern Wood-Pewee in its own section as is done with other SAR.</p>	<p>A paragraph on the Eastern Wood-Pewee will be added in the Final EA Report.</p>	<p>Complete</p> <p>Vol 2 Sec 5.10.3.1</p>

#	COMMENT	RESPONSE	STATUS*
50	<p>Section 5.10.6.2 - Eastern Whippoor-will; Pg. 5-138: The EIS states that “This species shuns both wideopen spaces and dense forest...” and “Whip-poor-will surveys conducted by KCB and AMEC between 2010 and 2012 have recorded a total of 51 observations during the 2012 surveys.”</p> <p>EC suggests that “shuns” is not really the right word for this sentence. Were the 51 observations recorded in 2012 or from 2010 and 2012? EC recommends that the proponent choose another word than “shun”. Also to please clarify whether the survey period identified was in either 2012 or from 2010 and 2012.</p>	<p>RRR and our consultant acknowledge this typographic error. "...during the 2012 surveys" will be deleted from this sentence in the Final EA Report and the text will be revised to replace the word "shun".</p>	<p>Complete</p> <p>Vol 2 Sec 5.10.6.2</p>
51	<p>Section 5.10.6.2 - Golden-winged Warbler; Pg. 5-140: The EIS states that “It is apparent that this species prefers larger tracts of forest habitat that contains.” This sentence is incomplete.</p> <p>EC requests that the proponent add additional content to complete this sentence.</p>	<p>RRR and our consultant acknowledge this typographic error. This sentence will be changed to: "<i>It is apparent that this species prefers large tracts of <u>regenerating forest or forest habitat that contains shrubby openings or shrub borders.</u></i>"</p>	<p>Complete</p> <p>Vol 2 Sec 5.10.6.3</p>
52	<p>Section 5.10.6.2 – Common Nighthawk; Pg. 5-140: The EIS states that “Common Nighthawk is Federally designated as Threatened...”</p> <p>EC requests that the proponent be consistent with wording throughout the document correcting the terminology to reflect that a species is “designated” under COSEWIC and “listed” under SARA.</p>	<p>The appropriate changes will be made throughout the Final EA Report.</p>	<p>Complete</p> <p>Vol 2 Sec 5.10.6.3</p>

#	COMMENT	RESPONSE	STATUS*
53	<p>Table 5-11; Pg. 5-178 and Table 5-14; Pg. 5-180: Minimum annual precipitation values (475.8 mm) and mean annual evaporation (538 mm) indicate that short term water deficits could result in exposure of tailings to the atmosphere and/or short term water shortages. For comparison purposes evaporation rates for the Lake Superior basin can be greater than 700 mm per annum. Losses due to evaporation and their impacts to short term water shortages are underestimated.</p> <p>EC recommends that the proponent complete an assessment of the impacts of drought conditions (e.g. the representative 7 year drought).</p>	<p>On reviewing the original source data, it was determined that a transcription error occurred. Table 5-14 of the Draft EA Report listed an annual value of 538 mm for lake evaporation at Atikokan. The correct value is 560 mm as presented in Table 4 of Appendix F (Climate, Air Quality and Sound Baseline Study). This 560 mm value is from Environment Canada for the period 1966 through 1988. The Hydrological Atlas of Canada (1978) shows computed lake evaporation isopleths for all of Canada based on data from 1957 through 1966. These data indicate a lake evaporation value of approximately 580 mm for Atikokan, and a value of approximately 650 mm for the RRP site, as there is a westward increasing trend to the data. The 650 mm value is closer to the 700 mm lake evaporation value suggested by Environment Canada.</p> <p>More lake evaporation data for the region are available from Dadaser-Celik and Stefan (2008), for Minnesota. These authors reviewed data from six climate stations across Minnesota for the period of 1964 through 2005. The closest station to the RRP site was International Falls. Four different lake evaporation models were applied to these sites, with the average value for International Falls being 580 mm (model average values were 463, 572, 634 and 650 mm). No preference was expressed by the authors for any particular model, and no significant long term temporal trends were indicated by the data.</p> <p>Based on these results a new lake evaporation rate of 600 mm is being applied to the RRP site, as a reasonable best estimate and will be utilized in the Final EA Report as applicable.</p> <p>Further information will be provided in Appendix W of the Final EA Report.</p>	<p>Complete</p> <p>App W-1</p>

#	COMMENT	RESPONSE	STATUS*
54	<p>Table 5-27; Pg. 5-199: The “Likelihood of Potential SAR occurring within the NLSA” table uses the term “Statistics Canada”.</p> <p>It is assumed that this typo should instead use the term “Special Concern”.</p> <p>EC recommends that the proponent remove “Statistics Canada” and replace with “Special Concern” where appropriate within the document.</p>	<p>This occurred inadvertently during editing and will be revised in the Final EA Report.</p>	<p>Complete</p> <p>Vol 2 Table 5-27</p>
55	<p>Figure 5-16; Pg. 5-200: In reviewing the Breeding Bird Survey Locations map a deficiency was noted. There is a significant gap in bird survey locations shown particularly in the southwest portion of the transmission corridor.</p> <p>EC requests that the proponent indicate why these sections were not surveyed and describe any effect on the breeding bird density estimates.</p>	<p>Some areas were inaccessible due to the lack of roads, the presence of wetlands, or were bounded by private lands where permission to access these lands was not able to be obtained. Therefore, desk-top analyses were completed. The habitat types located within the transmission corridor gap have been well surveyed elsewhere in the footprint and species lists and densities for these habitats have been calculated.</p>	<p>Complete</p>
56	<p>Section 6.5 – Mine Rock and Overburden Management; Pg. 6-27 and Section 6.8.1 – Alternative C; Pg. 6-47: The EIS states in the evaluation of Alternative C and E “As long as Schedule 2 can be obtained within approximately 10 months following the completion of the Environmental Assessment”. The details and timing for MMER and Schedule 2 Amendments are outlined in the “MPMO Agreement for the Rainy River Gold Project” and “Short Companion Document” (to be posted on the MPMO’s webpage www.mpmobgpp.gc.ca).</p> <p>EC recommends that this understanding of the details and timing be indicated by the proponent.</p>	<p>The text of the Final EA Report will be revised to reflect this information.</p>	<p>Complete</p> <p>Vol 2 Sec 6.5</p>
57	<p>Section 6.8.1 – Alternative C; Pg. 6-45: The first paragraph of Alt. C states “...the title to which has already been acquired by RRR. Alternative B has a footprint...Typo – it should read Alternative “C”. EC requests that the proponent correct the typo.</p>	<p>This typographic error occurred inadvertently and will be corrected in the Final EA Report.</p>	<p>Complete</p> <p>Vol 2 Sec 6.8.1</p>

#	COMMENT	RESPONSE	STATUS*
58	<p>Section 6.11.1 – Alternatives; Pg. 6-62: (First paragraph) Runoff coefficient values for predevelopment condition is given as 0.028 and developed as 0.446 but no rationale was given for these numbers.</p> <p>EC requests that the proponent provide the rationalization in developing the coefficient values.</p>	<p>As the site is developed and surface areas take on a greater slope (stockpiles) and a more compact and / or regular surface, without vegetation cover, runoff coefficients will increase compared with natural terrain.</p> <p>Further information will be provided in Appendix W of the Final EA Report.</p>	<p>Complete</p> <p>App W-1</p>
59	<p>Section 6.19.4.3 – Summary Evaluation; Pg. 6-115: It is not clear how the proposed option of partial cover and flooding will completely prevent the formation of ARD. Complete flooding will prevent ARD by limiting the diffusion of oxygen to the tailings. Complete cover of the tailings with low permeability overburden will limit ARD by limiting the amount of water that reaches the tailings. A combination of the two could leave potential for significant ARD due to gaps and edges as it is unclear how the two mitigations will work in combination. With rise and fall of water levels in the proposed pond this could result in wetting and drying of at least a 100 m to 200 m perimeter of tailings around the pond with potential for ARD.</p> <p>EC recommends that the proponent reconsider full flooding or full coverage, or provide more rationale on how this combination of techniques will work. Also, consideration needs to be made as to whether the fluctuating water levels in the tailings will create unacceptable amounts of ARD. This comment should also be considered with the comment above.</p>	<p>The cover of low permeability overburden will be constructed to extend below the low water mark of the tailings pond, so that no tailings will be directly exposed to the atmosphere as the pond fluctuates in size in response to normal climatic variations. Protection of this cover will be put in place as needed to address any wave action / erosion potential.</p> <p>Further, the low permeability overburden cover will ensure that the underlying tailings generally remain water saturated with little ability for oxygen to infiltrate.</p>	<p>Complete</p>
60	<p>Section 7.1.2 - Effects Analysis, Pg. 7-5: The last paragraph states “Summary tables of significance are presented at the end of this section (Tables 7-38 and 7-39)...” This information actually is presented in Table 7-47 & 7-48. EC requests that the proponent correct the last paragraph as follows: “Summary tables of significance are presented at the end of this section (Tables 7-47 and 7-48)...”</p>	<p>This typographic error occurred inadvertently and will be corrected in the Final EA Report.</p>	<p>Complete</p> <p>Vol 2 Sec 7.1.2</p>

#	COMMENT	RESPONSE	STATUS*
61	<p>Section 7.1.3 -Effects of the environment on the project; Pg.7-12 and Section 8.2 –Water Supply Availability; Pg.8-1 and Section 8.4 Nature Hazards Pg. 8-6 and 8-7:</p> <p>The EIS Guidelines indicate that the EIS will take into account how local conditions and natural hazards, such as severe and/or extreme weather conditions and external events (e.g. flooding, ice jams, landslides avalanches, fire, outflow conditions and seismic events) could adversely affect the project and how this in turn could result in impacts to the environment (e.g., extreme environmental conditions result in malfunctions and accidental events). The EIS does not appear to assess the effect from ice jams / early spring melt conditions where there is the potential for flooding or water shortages at the site, including:</p> <p>1) It is not clear whether the method used to calculate the “Environmental Design Flood” takes ice into account. 2) The potential impact from ice hazard on the proposed soil cover in terms of erosion/damage from the ice on the remaining pond in the TMA does not appear to be assessed. The main EIS report (Section 8.4, page 8-7) indicates that “Other items identified in the EIS Guidelines as potential events (ice jams, landslides and avalanches) are not credible events for the RRGP”.</p> <p>EC suggests adding the information to address ice jam-related flooding events that will effect on the project operations, potential impact/damage to the TMA and the environment. The ice jam-related flooding events should be considered in natural hazards and the hydrological assessment. For example, snowfall on the Rainy and Namakan river basins during the winter of 1996-1997 was significantly above the average. An early spring (April 8-15) runoff in 1997 with accompanying warm temperatures resulted in an ice jam related flood threat to the Town of Rainy River, Ontario near the mouth of Rainy River. This event should be reflected in the EIS and Hydrology Appendix.</p>	<p>The method used to calculate the Environmental Design Flood did not take into account possible ice jam effects. The only potential for concern in such an instance would be for the integrity and function of the pit protection berm. An ice inspection and contingency plan will be developed to ensure that ice jams would not cause the Pinewood River to overflow the pit protection berm.</p> <p>The TMA will not be subject to ice jam effects as the TMA at closure will consist of an internal lake with insufficient wind fetch to generate an ice jam.</p> <p>Section 8.6 of the Final EA Report will be updated to reflect proposed controls for ice jam effects, and if applicable in Appendix W of the Final EA Report.</p>	<p>Complete</p> <p>Vol 2 Sec 8.7</p>

#	COMMENT	RESPONSE	STATUS*
62	<p>Section 7.6.1.1 – Water Flow Effects, Pg. 7-34 to 7-35 and Table 7-12, Pg. 7-185: The rationale for runoff calculations was not given; however, it would appear that evaporation of stored water on site is only considered at the average value. For comparison purposes, evaporation rates could be greater than 700 mm per annum in the Lake Superior watershed basin. This could be significant, especially in low precipitation periods. EC requests that the proponent provide rationale for runoff calculations and ensure that high levels of evaporation of ponded water on site is considered and accounted for.</p>	<p>As per the response to comment #53, above, the annual average lake evaporation value for the RRP site is being amended to 600 mm, recognizing that year to year values will fluctuate.</p> <p>Further information will be provided in Appendix W of the Final EA Report, and in relevant sections of the Final EA Report.</p>	<p>Complete</p> <p>App W-1</p>
63	<p>Section 7.6.1.1 – Water Flow Effects, Pg. 7-36: The EIS states “The majority of treated tailings management area effluent discharge will be by pipeline to the Pinewood River just downstream of the McCallum Creek outflow. The discharge will normally occur during the months of April, May, October and November, to take advantage of maximum receiving water assimilative capacity for water quality control. Greater river assimilative capacity is required during these discharges, because there will be no supplementary wetland treatment...” (Pg. 7- 36).</p> <p>Please note that MMER does not allow for mixing. EC requests that the proponent provide clarification text throughout the EIS where it mentions assimilative capacity and mixing that MMER does not allow for a mixing zone.</p>	<p>The MMER standards will be met prior to discharge to the environment, and are not dependent on mixing.</p> <p>RRR and our consultant respectfully request that EC clarify where in the MMER there is a prohibition against the use of mixing zones. Subsection 11(a) of the Regulation states “a description of the manner in which the effluent mixes within the exposure area, including an estimate of the concentration of effluent in water at 250 m from the final discharge point”. This subsection is not consistent with prohibition of a mixing zone.</p>	<p>Complete</p>
64	<p>Section 7.8.1 – Environmental Effects, Pg. 7-45: The EIS states that “Open country habitats are also typically artificial, created by human activity and tend to continue to be habitually disturbed by human activity. EC recommends that the proponent provide some supporting evidence of historical open country habitat (if available).</p>	<p>Farming and forestry activities have been occurring in the area since the 1800s. Providing an assessment of the historical dynamics of open country habitat (i.e., the creation of open country habitat and the natural regeneration of these areas) is not within the scope of this effects assessment. The habitat mapping outlines the open country habitat currently present and the Draft EA Report assesses the impacts on this habitat type and species that reside within it.</p>	<p>Complete</p>

#	COMMENT	RESPONSE	STATUS*
65	<p>Section 7.12.1.1 - Area Sensitive Woodland Breeding Birds; Pg. 7-61: The EIS states that “Most woodland sensitive songbird species are protected under the <i>Migratory Birds Convention Act</i>, ...”</p> <p>EC requests that the proponent use the same terminology as the heading “area sensitive woodland breeding birds”.</p>	<p>This will be changed in the Final EA Report so that “<i>area sensitive woodland breeding birds</i>” is used more consistently.</p>	<p>Complete</p> <p>Vol 2 Sec 7.12.1.1</p>
66	<p>Section 7.12.1.1 - Area Sensitive Woodland Breeding Birds, Pg. 7-62: The EIS states that “Vegetation removal from Woodlands 156 and 173 will be limited to the transmission corridor...”</p> <p>EC requests that the proponent evaluate the transmission corridor and new Highway 600 route as they relate to fragmentation effects.</p>	<p>The effects of fragmentation and edge are discussed throughout the Draft EA Report and have been considered in the overall effects assessment (Table 7-47). A statistical fragmentation assessment was not conducted as it was deemed unnecessary in a Municipal area that already has a high level of disturbance from roads, forestry, agriculture, cottages and an existing transmission line corridor.</p> <p>RRR and our consultants do not believe a fragmentation assessment would provide a different conclusion than the one reached.</p>	<p>Complete</p>
67	<p>Section 7.12.1.2 - Area Sensitive Marsh Breeding Birds, Pg. 7-62: The EIS states that “As a result, foraging waterfowl could potentially ingest sediments associated with such facilities.”</p> <p>EC requests that the proponent to provide evidence that such feeding activities do not adversely affect wildlife and / or including mitigation or monitoring programs to lessen or evaluate the effect on wildlife.</p>	<p>Monitoring of sediment uptake by waterfowl is not logistically feasible, particularly in aquatic habitats. The likely use of tailings and runoff RRP seepage collection ponds by waterfowl to any appreciable degree is considered to be low, given:</p> <ul style="list-style-type: none"> • the low numbers of waterfowl recorded during baseline studies; and • that there are numerous natural ponds in the area that will not experience mine equipment and personnel, and will thus be more attractive to waterfowl. 	<p>Complete</p>

#	COMMENT	RESPONSE	STATUS*
68	<p>Section 7.12.3 – Mitigation, Pg. 7-66: The EIS states that “Restoration of disturbed habitats at closure to habitats capable of supporting a diversity of wildlife species”.</p> <p>EC recommends that the proponent change the wording to something like “restoration to the pre-existing condition, where possible is the desired closure condition. Species population\ management concerns may present opportunities to deviate from this baseline condition where this may be of benefit to rare species or SAR.”</p>	<p>The RRP site has been heavily impacted by historic and ongoing, farming and logging operations. Restoration to the pre-existing condition is not practical where development will result in significant topographic changes and where the underlying substrate is altered.</p>	Complete
69	<p>Section 7.12.3 – Mitigation, Pg. 7-66: The EIS states that “Enforcement of speed limits along proposed mine access roads to reduce the potential adverse effects of increased vehicular traffic associated with RRGP...”</p> <p>EC requests that the proponent include monitoring activities where practical and beneficial for mitigation refinement.</p>	<p>A log of collisions will be kept to monitor effectiveness of proposed mitigation (and need if any, for additional mitigation measures). This will be more clearly stated in the Final EA Report.</p>	Complete Vol 2 Sec 7.12.3
70	<p>Section 7.12.5 – Significance Determination, Pg. 7-68: The EIS states that “Given the homogenous forest cover of the NRSA, these results indicate that abundant breeding habitat for woodland area sensitive songbirds will remain and that birds displaced by mine activities will colonize surrounding lands.”</p> <p>EC requests that the proponent provide a sound rationale for statement “Given the homogenous forest cover of the NRSA, these results indicate that abundant breeding habitat for woodland area sensitive songbirds will remain and that birds displaced by mine activities will colonize surrounding lands.”</p>	<p>The habitat mapping and high resolution satellite imagery show an abundance of forest cover within the natural environment regional study area (NRSA) that will not be cleared and these areas contain suitable habitat for woodland area sensitive songbirds. Density estimates from survey locations indicate that these habitats are not saturated and would be able to accommodate displaced individuals. Since direct mortality is not expected, it is assumed / predicted that displaced individuals will migrate to these nearby areas.</p> <p>RRR will also be securing an additional tract of land as part of the Provincial SAR approvals process.</p>	Complete

#	COMMENT	RESPONSE	STATUS*
71	<p>Section 7.15.1.1 - Environmental Effects, Pg. 7-78: The EIS states that “Mine construction and operation is anticipated to occur both night and day so that additional artificial lighting will be required”.</p> <p>EC requests that the proponent provide mitigation details or monitoring activities in order to minimize or evaluate the impact of additional lighting on aerial foragers.</p>	<p>Discussion regarding mitigation and monitoring impacts from additional artificial lighting are on-going with the MNR for ESA permitting. Current suggestions include angling lights away from forest edges where possible; however, worker and public, health and safety issues will need to be considered.</p> <p>Monitoring the effects of additional light on aerial foragers is not possible, as there are too many other independent variables involved with mine operations (traffic, noise) to isolate the effects of light.</p> <p>A monitoring program will be developed in consultation with the MNR that is designed to monitor the overall effects of mine activities on whip-poor-will. RRR would be please to provide EC with this monitoring program on completion for comments.</p>	On-going
72	<p>Section 7.15.1.1 – Environmental Effects, Pg. 7-78: The EIS states that “Road mortality could occur with increased traffic as whip-poor- wills are known to roost on gravel roads within their preferred habitat. Foraging individuals or displaying males may also collide with vehicles.”</p> <p>EC requests that the proponent provide mitigation details or monitoring activities in order to minimize or evaluate the impact of increased road usage on nightjars.</p>	<p>Section 7.15.1.3 of the Draft EA Report provides mitigation measures that will be used to reduce potential adverse effects to Eastern Whip-poor-will (a nightjar) and a monitoring plan will be developed through consultation with the MNR and ESA permitting. Common Nighthawks (also a nightjar) are not discussed specifically as they were not chosen as a VEC for the RRP. As the Common Nighthawk is a similar species and acts in a similar fashion as whip-poor-will (aside from foraging techniques), mitigation and monitoring for whip-poor-wills will also serve to minimize impacts on nighthawks (covering the two species of nightjars in the area).</p>	Complete

#	COMMENT	RESPONSE	STATUS*
73	<p>Section 7.15.1.1 – Environmental Effects, Pg. 7-78: The EIS states that “The MNR has expressed concerns... as well as in the ESA permit application”. The clearing activities must happen outside of the period when nighthawks are on site.</p> <p>EC requests that the proponent include references to SARA regarding Whip-poor-will.</p>	<p>A reference to SARA regarding whip-poor-will will be added.</p>	<p>Complete</p> <p>Vol 2 Sec 7.15.1</p>
74	<p>Section 7.16.1.1 – Common Nighthawk, Pg. 7-90: The EIS states that “Vegetation clearing for RRGP construction will remove 1,352 ha...”.</p> <p>EC requests that the proponent provide the vegetation clearing timing window or application of other mitigation.</p>	<p>The vegetation clearing window is stated in a number of locations in the Draft EA Report: “<i>Restricting the clearing of habitats to periods outside the breeding bird season which occurs from May 1 to August 15</i>”; for example, Section 7.12.3, Section 7.15.1.3 etc.</p>	<p>Complete</p>
75	<p>Section 7.16.1.1 – Common Nighthawk, Pg. 7-90: The EIS states that “Increased road mortality...” Monitoring should be considered to gauge the level of nighthawk activity on and in the vicinity of roads.</p> <p>EC requests that the proponent provide mitigation details or monitoring activities in order to minimize or evaluate the impact of increased road mortality on nighthawks.</p>	<p>Section 7.15.1.3 provides mitigation measures that will be used to reduce potential adverse effects to Eastern Whip-poor-will and a monitoring plan will be developed through consultation with the MNR and ESA permitting. Mitigation measures applicable to Common Nighthawks are described in Section 7.16.3. Monitoring measures applicable to Common Nighthawk are included in Section 13.7.</p>	<p>Complete</p>
76	<p>Section 7.16.1.2 - Golden-winged Warbler, Pg. 7-91: The EIS states that “Based on the results of 2011 and 2012 field studies, the removal of vegetation for RRGP components will likely displace approximately 15 to 17 Golden-winged Warbler pairs.”</p> <p>EC requests that the proponent provide additional details regarding the estimate of displaced Goldenwinged Warbler pairs.</p>	<p>Estimates for the number of displaced Golden-winged Warbler pairs were achieved through analysis of breeding bird point count data and incidental observations between 2010 and 2012. Numbers and locations of Golden-winged Warblers observed were mapped and compared in relation to the RRP footprint. It was assumed that three years of study within impacted lands would provide an adequate estimate of displaced pairs for the purpose of this study.</p>	<p>Complete</p>

#	COMMENT	RESPONSE	STATUS*
77	<p>Section 7.16.1.7 - Black-billed Magpie, Pg. 7-92:</p> <p>The EIS states that “The Black-billed Magpie is a Provincially rare species and is protected under the <i>Migratory Birds Convention Act</i>.”</p> <p>EC recommends that the proponent remove this reference.</p>	<p>This reference will be removed in the Final EA Report.</p>	<p>Complete</p> <p>Vol 2 Sec 7.16.1.8</p>
78	<p>Table 7-47 – Significance Determinations of Residual Effects after Mitigation – Natural Environment, Pg. 7-217:</p> <p>The EIS states that “Vegetation Communities and Rare Plants – Effects are reversible”.</p> <p>EC recommends that the proponent adjust the wording.</p>	<p>Further clarity is requested regarding the wording adjustment requested by EC.</p>	<p>On-going</p>
79	<p>Section 7.7.1 – Environmental Effects, Pg. 7-42 and Figure 7-11 - Model Predicted Drawdown in the PLGD/Shallow Bedrock, Pg. 7-247:</p> <p>In the EIS Section 7.7.1 (Environmental Effects on Groundwater) it does not evaluate any potential impact on vegetation (migratory bird habitat) over the 70+ years it will take before the drawdown has disappeared.</p> <p>EC requests that the proponent provide an assessment of the effect of this on vegetation.</p>	<p>The wetlands in the Pinewood River valley around the proposed mine are located in flat lying areas underlain by thick clay-rich overburden. Based on investigations to date, it is believed that these wetlands are sustained principally by seasonal inputs of water from snow melt; as they may become dry in some summers, and the lack of wet conditions in the summer is a strong indication that groundwater contributions to the wetlands are minimal.</p> <p>This is consistent with the site hydrogeology, where the clay underlying these wetlands prevents any significant groundwater contribution from the deeper aquifer. There is little expectation that changes in the very limited groundwater contributions to these features either during or after mining will affect the wetland communities.</p>	<p>Complete</p>

#	COMMENT	RESPONSE	STATUS*
80	<p>Section 8.5 – Climate Change, Pg. 8-9: The Proponent’s assessment of potential future climate change in the region does not represent the <i>range</i> of potential future climate change and related uncertainties. The proponent cites mean annual seasonal temperature and precipitation projections from Colombo <i>et al.</i> 2007. These projections are based on simulations from a single model for two emission scenarios. The Proponent also cites median annual precipitation and temperature increases from IEESC (2012).</p> <p>EC requests that the proponent provide seasonal and annual temperature and precipitation projections from a number of models for a range of emission scenarios (these can be obtained from the published literature). EC also requests that the proponent provide some discussion of projected temperature increases on evaporative processes and potential impacts of prolonged future dry spells on water balance particularly on the water cover for the TMA to prevent acid mine drainage in the post-closure period (see comment EC-20).</p>	<p>Additional information on climate change scenarios will be provided in the Final EA Report, recognizing that the primary concern is for maintenance of a water cover over the TMA, and that mitigation measures are available and have been proposed in the Draft EA Report to address long-term water cover deficits, should these occur.</p>	<p>Complete Vol 2 Sec 8.5.1</p>

#	COMMENT	RESPONSE	STATUS*
81	<p>Section 8.5 – Climate Change, Pg.8-9 to 8-10: The Proponent evaluated the linear trend in the observed stream flow record from Rainy River (at Manitou Rapids). They report that there is an uptrend if the full record is considered (1929 onwards) and that the trend from 1940 onwards is “virtually flat”. Based on this assessment, the Proponent states (p 8-10; bold emphasis added) that: “It would therefore appear on balance that runoff regimes in the region are likely to remain close to their current levels, with a high degree of year-to-year variability. Water balance determinations which have been used in the design the RRGP water management system and closure strategy (including flooding of the open pit), are unlikely to change during the life of the RRGP, and are unlikely to change appreciably over the longer-term, within the accuracy of predictive models”.</p> <p>EC notes that the Proponent does not provide sufficient support to convincingly demonstrate that this statement is correct. EC recommends that the proponent either remove or modify this statement or provide support, noting the anticipated range in future hydroclimate conditions, from the published literature (or undertake appropriate analyses).</p>	<p>Additional information on climate change scenarios will be provided in the Final EA Report, recognizing that the primary concern is for maintenance of a water cover over the TMA, and that mitigation measures are available and have been proposed in the Draft EA Report to address long term water cover deficits, should these occur.</p>	<p>Complete</p> <p>Vol 2 Sec 8.5.1</p>

#	COMMENT	RESPONSE	STATUS*
82	<p>Appendix G - Report of Metal Leaching/Acid Rock Drainage Characterization of Mine Rock and Tailings: The EIS has not provided rationale for not undertaking field kinetic tests for tailings. The proponent is requested to provide information on field kinetics tests on tailings samples.</p>	<p>The RRP currently has six tailings humidity cells in operation in the laboratory. Kinetic testing of tailings materials produced from a metallurgical testing program are generally done under controlled laboratory conditions.</p> <p>Compared to the field, laboratory testing conditions provide higher overall temperatures and resulting higher sulphide reaction rates; as well flushing of the sample with (mildly acidic) de-ionized water results in increased dissolution of the sample neutralization potential. These features (increased sulphide oxidation rate and increased neutralization potential depletion) result in an overestimate of the tailings reactivity which translates to a reduced lag time for acid rock drainage onset and an increased estimate of acidity / metal loading. This results in a more conservative estimate of the tailings reactivity and the potential for the tailings to produce metal leaching / acid rock drainage.</p>	Complete
83	<p>Appendix G - Report of Metal Leaching/Acid Rock Drainage Characterization of Mine Rock and Tailings: The Proponent has undertaken short-term leach tests for waste rock and tailings samples. However, the Proponent has stated in both cases that short-term leach results are not directly applicable to actual leaching conditions. Could the Proponent clarify as to what they mean by that statement and further indicate what the actual leaching predictions are for waste rock and tailings? The proponent is requested to provide a clarification on what the relationship is between the short term leach results and the actual leaching conditions. The Proponent is also requested to explain what the actual leaching predictions are for waste rock and tailings given the clarification on the relationship between the short term leach results and the actual leaching conditions.</p>	<p>Short term leaching tests such as the shake flask extraction test are used to determine if any readily soluble metals are present in the sample. They cannot be used to determine leaching characteristics over time; kinetic tests (such as humidity cells and field cells) are used to determine this characteristic.</p> <p>The phrase "<i>actual leaching conditions</i>" refers to how metals would be released from those materials in the field environment. Currently the actual leaching conditions are being measured through the use of 19 mine rock humidity cells, 6 tailings humidity cells and seven mine rock field cells.</p>	Complete

#	COMMENT	RESPONSE	STATUS*
84	<p>Appendix G - Report of Metal Leaching/Acid Rock Drainage Characterization of Mine Rock and Tailings: The EIS has indicated that the release of some parameters (e.g., aluminum) will be considered in more detail with the ongoing kinetic testing program; however no timeline has been given for the completion of this ongoing kinetic testing program? The proponent is requested to provide the timeline for the completion of the kinetic testing program.</p>	<p>The timeline for the kinetic testing program is typically extended, as it provides information that is utilized throughout the mine development process. Currently there is no schedule to terminate the entire testing program, but termination of some specific tests, and the initiation of new tests to address specific questions or concerns may occur during the future of the program.</p>	Complete
85	<p>Appendix G - Report of Metal Leaching/Acid Rock Drainage Characterization of Mine Rock and Tailings: The EIS has indicated that selenium is elevated in both the waste rock and tailings samples. For waste rock, the pH represents neutral to alkaline conditions. The Proponent has indicated that based on short-term leach tests, metal leaching under neutral pH conditions are unlikely to occur. No explanation has been provided as to when favourable conditions are present in the samples (e.g., elevated Se concentrations and neutral pH), why selenium metal leaching under neutral pH conditions would not occur.</p> <p>The proponent is requested to provide an explanation of when the favourable conditions are present in the samples and why selenium leaching under neutral pH is not expected to occur.</p>	<p>ICP-MS analysis of the mine rock and tailings samples used a high (1 mg/kg) detection limit for Se. These results were screened against an arbitrary 10x average crustal concentration of Se (equivalent to 0.5 mg/kg) to assess if this metal was "enriched" versus an assumed background concentration. This resulted in the appearance of "anomalous" Se values in the dataset. Based on the geology and mineralogy of the deposit, selenium is not considered to be a potential concern. The apparent "anomalous" concentrations are an artefact of the detection limit used for Se analysis.</p> <p>RRR will undertake re-analysis of a representative subset of the samples at a lower detection limit to reassess the selenium content of the mine rock and tailings.</p>	On-going
86	<p>EC has noted that the Assessment of Alternatives for Mine Waste Disposal has not been completed. The Proponent should provide an assessment of alternatives for mine waste disposal in accordance with EC guidelines. The Proponent has indicated that a draft will be provided to EC as soon as possible.</p>	<p>A draft Assessment of Alternatives for Mine Waste Disposal was provided to Environment Canada on September 3, in advance of the Final EA Report as initially proposed.</p>	Complete

#	COMMENT	RESPONSE	STATUS*
87	<p>Appendix Q – Air Quality Assessment Report: The proponent appears to have only conducted AQ assessment for the operation phase of the project and claims that activities in the construction phase use similar mining equipment as during operations (bounding/worse case phase). No specific construction phase AQ assessment appears to have been undertaken. EC recommends that the EIS assess AQ impacts from all phases of the project including assessment of short term AQ impacts from site preparation and construction activities with the main focus on NO_x, TSP, PM₁₀ and PM_{2.5}.</p>	<p>Construction activities are by their nature are highly varied in both timing and location. Numerous small operations such as construction welding, site preparation, road construction, site clearing, excavation, erection of structures, equipment shipping and handling, assembly, and inspection are all ongoing at various times in numerous locations. It is not possible to properly characterize or model the full range of activities that occur during construction. Many of the construction activities that are occurring are using equipment similar to the equipment used during operations. In addition, during full operations significantly more equipment will be used at site and the mine and processing plant will be operational. As such, impacts during construction will be less than during the full operations.</p> <p>It is our experience with EA work that quantitative assessment of construction impacts is not practical and that emissions are assessed and handled through appropriate construction emission Best Management Plans. The site Dust Management Plans discussed in the air quality report will also be applied to the construction and closure phases of the project.</p> <p>The Best Management Plan will be based on the "Best Practices for the Reduction of Air Emissions from Construction and Demolition Activities" (EC 2005).</p>	On-going

#	COMMENT	RESPONSE	STATUS*
88	<p>Appendix Q – Air Quality Assessment Report: As part of the AQ assessment for operation phase, the proponent has identified sources of air emissions (section 5.2) that are included in the dispersion modeling assessment but does not appear to include exhaust emissions from mining equipment and heavy machinery such as bulldozers, loaders and trucks. EC recommends that the EIS should assess all sources of emissions including non-point sources including compounds like PM₁₀ (which was identified in the EIS Guidelines).</p>	<p>Particulate emissions from mobile vehicles are part of, and included in, the emission factors for road emissions. In assessing compliance, MOE does not consider mobile emissions for NO_x, CO and SO₂.</p> <p>For comparison against Ambient Air Quality Criteria, RRR will provide further assessment of NO₂, CO and SO₂ to include the mobile sources. The results will be provided in the Final EA Report.</p>	<p>Complete App Q-2</p>
89	<p>Appendix Q – Air Quality Assessment Tables 5 and 6, Pg. 25: Maximum gust wind speed listed in Tables 5 and 6 (Appendix Q, page 25) is actually maximum hourly wind speed rather than wind gusts. Maximum gust wind speed should be about doubled the listed values. EC recommends that if the maximum gust wind speed data were used in air quality dispersion modeling, the air quality assessment should be rerun using correct wind gust data. Otherwise, the wind speed values listed in Tables 5 and 6 should be replaced by maximum gust wind speed.</p>	<p>Table 5 and 6 of Appendix Q will be clarified in the Final EA Report. The data in these tables was not used in the air quality modelling.</p> <p>The Ontario MOE five year meteorological data sets for the area were used for the dispersion modelling as is standard practice in Ontario.</p>	<p>Complete App Q-2</p>

*As of submission of the Final Environmental Assessment Report. Reference is made to where the comment has been closed in the report where appropriate.

References:

Dadaser-Celik, F. and H.G. Stefan. 2008. Lake Evaporation Response to Climate in Minnesota. Project Report No. 506. University of Minnesota, St. Anthony Falls Laboratory, Engineering, Environmental and Geophysical Fluid Dynamics; Prepared for the Legislative Citizens Committee on Minnesota Resources, St Paul, Minnesota.

Stakeholder: Ministry of Natural Resources
Point of Contact: Rachel Hill, District Planner; John Van den Broeck SAR Biologist; Christopher Martin, Biologist; Melissa Mosley Management Biologist; Marney Brown; Kevin Brown; P. Cooze, Forester;
Comments received: September 6, 2013
Comments regarding: Rainy River Project, Draft Environmental Assessment Report (Rev. 2)

#	COMMENT	RESPONSE	STATUS*
1	EA Overall: The report is put together in a format that was clear and easy to follow. The report described the project in pretty good detail that provided the reader with a fair understanding of what was being proposed. However the report review would have been more complete with full appendices. Final Report to be complete	The Final Environmental Assessment (EA) Report will include all of the listed appendices.	Complete Vol 3+
2	EA Overall: Throughout the document there is confusion on the status of SAR, It is important to consistently and accurately portray the status of various – some examples to follow. Review the document to ensure that the correct status is applied to all species.	Rainy River Resources (RRR) and our consultant appreciate the identification of any instances where the status of Species at Risk (SAR) has been incorrectly stated. The document will be reviewed and adjusted as appropriate.	Complete Vol 1 Vol 2
3	EA Overall: Definitions are missing. The EA needs to have a section that provides for a glossary of terms.	A Glossary and Abbreviations section has been provided following the preface of Volumes 1 and 2. Efforts have been made to write the Draft EA Report and its appendices in a technical but clear language. In the event that individual expressions are used that are not common language (such as mining expressions) then attempts have been made to explain the expression within the body of the text.	Complete

#	COMMENT	RESPONSE	STATUS*
4	EA Overall: The graphics that were provided were good, but more of them are needed. Provide additional maps for the diversions and for the entire project.	RRR and our consultant have used figures and maps to graphically present data not readily described or analyzed in textual formats. Assuming the diversions referred to in the comment relate to the watercourse diversions associated with West Creek and Clark Creek, additional mapping will be provided in the draft fisheries No Net Loss Plan (NNLP) documents to be appended to the Final EA Report; and subsequently in Provincial approval applications. Requests for specific maps or graphics by the Ministry of Natural Resources (MNR) can be provided in the Final EA Report if appropriate, or subsequently to assist the MNR.	Complete App X-1, X-2, X-3
5	Vol 1 Section 5.1, Pg 9 And Fig 1-2 of Vol 2: A description of the various land tenures that are described is needed: Patented whole, surface rights only, mineral rights only, leasehold only, unpatented mining claims, and license of occupation. Please describe what these types of land tenure mean.	A brief description of the land tenure designations will be provided in the Final EA Report.	Complete Vol 1 Sec 6.1 Vol 2 Sec 1.5
6	Volume 1. pg. 15: Statement regarding lake sturgeon in lower Pinewood River should clarify that only 1 sturgeon was found by RRR. Otherwise the statement fails to acknowledge that 3 adult lake sturgeon in total were captured in the lower Pinewood River in 2013. Either acknowledge lake sturgeon netted by MNR or revise to “ ... a single fish was netted during Rainy River Resources’ baseline studies in the lower reaches of the Pinewood River.”	The statement in this section as well as in other sections of the Final EA Report will be revised to clarify that three adult sturgeon (one sturgeon captured by RRR and two sturgeon by the MNR) were captured in the lower reaches of the Pinewood River.	Complete Vol 2 incl. Sec 5.8.19 Sec 7.2.1 Table 5-24 Table 7-3 App I-1
7	Volume 1. Pg. 16: Column titles of species at risk table are not strictly comparable – confusing to include Ontario species list (SARO) but federal legislation (SARA). Under ESA, Peregrine Falcon is currently listed as SC and both bat species are listed as END. Consider replacing SARO with ESA and removing COSEWIC column. Revise conservation status for Peregrine Falcon and 2 bat species.	The suggested changes will be included in the Final EA Report.	Complete Vol 1 Table S-5

#	COMMENT	RESPONSE	STATUS*
8	Vol 1, Pg 25: Clay till is considered an aggregate under the ARA. The issue of whether or not aggregates is subject to the ARA depends on the land tenure. (see table provided as a separate attachment) Given the delay in the mining lease application, the proponent should reassess the aggregate sources and land tenure using the information provided.	RRR appreciates the advice from MNR. The majority of the clay till extracted as part of the project development and mainly from stripping the open pit to access the ore, will be re-used in order that additional fresh aggregate sources are not required. RRR and our consultants understand from a number of previous Ontario mining projects, that materials extracted for other purposes (such as stripping of an open pit) that are re-used as for aggregate purposes (but not are extracted specifically for use as aggregate), are not considered aggregate under the <i>Aggregate Resources Act</i> . Advice will be sought from the MNR regarding approval requirements for any fresh aggregate sources, including clay till, if dedicated extraction is proposed.	Complete
9	Vol 1, Pg 25: The description presented on water supply needs to include the contingency plan of the 25 km pipeline to Off/Burditt. The report needs be clear on whether or not the suggested plan for taking water from Off/Burditt lakes or any other lakes is being presented.	Further engineering has determined that neither lake will be carried forward as a Project option as they are not viable contingency supply options. There is no intent to take water from either lake as a contingency measure. This will be clarified in the Final EA Report.	Complete Vol 1 Sec 8.2.9 and others
10	Vol 1, Page 29: The summary states there were a number of alternatives considered for reclamation and closure, but they are not presented any where in the report or the Conceptual Closure Plan. Please identify when these alternatives were considered, and provide details in the report consistent with other alternatives.	Reclamation and closure alternatives are provided in Section 6.19 of the Draft EA Report.	Complete
11	Vol 2 section 4.3.3: Need a better description of the open pit, (figures 4-1,4-2, 4-3 do not have scales.) Figure 4-10 – please provide information on the reclaim barge and label mine rock pond. Please provide the missing information.	The open pit has been described in terms of surface dimensions, slopes and depth, with figures showing location and size to scale in Figure 4-1. The bar scale (representing 10 km) for Figure 4.1 is located at the bottom left of the figure. Figures 4-2 and 4-3 will be revised to include scales in the Final EA Report. The reclaim barge is minor floating structure to support the reclaim pumps a few metres square in size, and is not drawn to scale, in order that it is identifiable. The mine rock pond in Figure 4-10 will be labelled in the Final EA Document.	Complete Vol 2 Fig 4-1, 4-2, 4-3, and 4-10

#	COMMENT	RESPONSE	STATUS*
12	Vol 2 section 4.3: Section 1 describes an area that has been selected for tailings management (Pg 1-3), that measures approx 1500ha but it is not shown where this is. The Figures show the 750ha proposed TMA. Please provide clarification or additional description/maps of the area selected for the TMA.	The bullet point in section 1 (page 1-3) will be modified to be consistent with the proposed tailings management area (TMA).	Complete Vol 2 Sec 1.3
13	Vol 2 section 4.3: It is not entirely clear the difference between site water management and mine water management. More description is required.	A description of the difference between site water and mine water will be added to Section 4.3.2.2.	Complete Vol 2 Sec 4.3
14	Vol 2 section 4.6.2: Please confirm that additional monitoring and possible treatment will be needed for the water collected in the ditches around the NPAG rock stockpile, and not the AGP stock pile. Confirm if this is correct.	Collection ditches will be monitored to ensure water quality meets compliance requirements as applicable. There is no AGP stockpile listed in Section 4.6.2. Ditches will be placed around the West Mine Rock Stockpile, Overburden Stockpiles, Low Grade Ore Stockpile and East Mine Rock Stockpile to collect surface runoff and seepage, and if required, direct for additional treatment (such as in the proposed seepage collection ponds).	Complete
15	Vol 2 Pg 4-20: It is stated that details of potential remedial measures for the TMA construction will be presented later, based on performance observations and monitoring data. It is not understood what remedial measures during construction are. And a better time estimate is required. Please provide more details and a better description of what this means and a better timeline of when it is expected to be presented.	Potential remedial measures during construction will be presented during the detailed design and in the permit application documents being prepared pursuant to the <i>Lake and Rivers Improvement Act</i> . Examples of remedial measures will be provided in the Final EA Report.	Complete Vol 2 Sec 4.8

#	COMMENT	RESPONSE	STATUS*
16	<p>Vol 2 section 4, 6 and 8: The description for a plan for additional water supply needs to be provided up front. Especially since it is identified there is concern for water supply during start up, during winter months and during drought. It is confusing that the plan to take water from nearby lakes is not identified in section 4. But is identified in section 6, and in Appendix O8 where the alternative is concluded to be unacceptable. Water supply issues are presented in section 8 as potentially having significant impacts to the project and the contingency plan of a pipeline to Burditt and Off Lakes was identified as an option. MNR has concerns that this was not presented in the Terms of Reference and various pipeline routes presented for comment.</p> <p>1) MNR requires a complete picture of the water supply issues be addressed in one section as this element has a great deal of importance to the project, the agencies and the public.</p> <p>2) MNR requires that the report identify alternatives for the pipeline (ie graphics that show alternative locations for the pipeline as well as alternative comparisons of the selected lakes.</p> <p>3) MNR requires an assessment of impacts to drawing of water from Burditt lake by 10 cm during low water events, as well as drawing of water from Off Lake, and any other lakes that are selected as alternatives.</p> <p>4) please identify how the details on all aspects of water supply were presented to the public, (ie were the contingency plan and the alternatives assessment presented at the public meetings)</p>	<p>Further engineering has determined that neither lake will be carried forward as a Project option as they are not viable contingency supply options. There is no intent to take water from either lake as a contingency measure.</p> <p>This will be clarified in the Final EA Report.</p>	<p>Complete</p> <p>Vol 2 Sec 6.11</p> <p>App O</p>

#	COMMENT	RESPONSE	STATUS*
17	Vol 2 , s.4, s.4.5, s.4.12: There are no figures showing the infrastructure for the water intake from the Pinewood River below McCallum Creek and for the effluent discharge into the River below the Creek, nor details of the pipelines (ie buried or above ground?) Aboveground pipelines may negatively impact wildlife movement in the area, especially near the Pinewood River corridor. Please provide figures showing the location and associated infrastructure of these 2 pipelines. Please provide details on the type of pipelines to be constructed.	The location of the water intake and discharge is shown in figure 7-9. The detailed design of the structures will be determined, consistent with Fisheries and Oceans Canada (DFO) and MNR requirements, and will be included in subsequent approval applications. A description of the pipeline construction methodology (above ground or buried) will be provided in Section 4 of the Final EA Report.	Complete Vol 2 Sec 4.12.1
18	Vol 2, s.4.6.2, p. 4-12, Figure 4-1: It is unclear how runoff from the west mine rock stockpile and overburden stockpile will be contained within ditches and not run directly into Loslo Creek. There does not appear to be sufficient distance between these features for adequate separation for a diversion ditch. There also exists the potential for the Creek to exceed it's channel under flood conditions and mix with the stockpile runoff. Please provide a revised description and drawing.	The separation between the diversion channel and the other two features is feasible and can be designed to accommodate a storm event while maintaining isolation of flows. Further information will be provided in associated environmental approval applications.	Complete
19	Vol 2, s.4.6.2, p. 4-12, Figure 4-1, 4-10: It is unclear which ponds are being referred to in the text here. Figures 4-1 and 4-10 show labeled ponds Sediment Ponds 1 &2, and Stockpile Pond, but the pond below the low grade ore stockpile is unnamed. A reference to Figures 4-1 and 4-10 would be helpful here to understand the description given of the stockpile ponds and runoff. Label the pond below the Low Grade Ore Stockpile in all appropriate figures.	A reference to figures 4-1 and 4-10 will be added to the Final EA Report text as suggested. The pond associated with the low grade ore stockpile will be labelled appropriately.	Complete Vol 2 Sec 4.6.2

#	COMMENT	RESPONSE	STATUS*
20	Vol 2, s.4.6.2, p. 4-12, Figure 4-1, 4-10, 4-12: It is unclear how water from Sediment Ponds 1&2 will be managed. No water balance is given in later text/figures, as is given for the Mine Rock Pond (assumed to be the pond below the Low Grade ore Stockpile). Include information on water management for Sediment Ponds 1 & 2	Further information will be provided in the Final EA Report as suggested by the reviewer with design details to be provided in the permit applications to MNR and the MOE. Sediment Ponds 1 & 2 will collect runoff from non-reactive materials: overburden and non potentially acid generating (NPAG) mine rock; and will therefore discharge directly to West Creek as the receiving water, and will not form part of the greater Project water inventory that reports to the TMA. Runoff reporting to these ponds will include clay / silt materials. The ponds will be sized to settle clay fraction suspended solids and will be constructed as multi-celled systems, with provision for flocculent usage if needed. Further test work is currently underway to determine detailed needs.	Complete Vol 2 Sec 4.6.1 Sec 4.6.2
21	Vol 2, s.4.7.1, p. 4-13, Figure 4-1, 4-10: The Process Plant appears to be constructed on top of a tributary to the West Creek Pond. How will this be dealt with? It is unclear if the trib will be diverted around the process plant. Please clarify if the Process Plant will be constructed overtop of the tributary to West creek Pond. If yes, please provide detail on how the trib will be dealt with (diverted, etc)	The tributary of West Creek will be blocked and diverted to the north (blue arrow in Figure 4-1) into another tributary of west creek before flowing into the West Creek Pond. Once the creek has been diverted, the processing plant will be constructed over the former channel. The diversion of the tributary will be a component of the overall fish habitat offset plan under discussion with DFO (and MNR).	Complete Vol 2 Sec 4.12.7.4
22	Vol 2, s. 4.12.4 p.4-27, Figure 4-11: General Flow direction arrows indicate water from the West Creek diversion channel draining into the constructed wetland. However the text states that there will be no contact between these 2 water sources. It is unclear whether or not water from these 2 sources will be in contact or not. Please correct map arrows and clarify if water from the West Creek diversion channel will be in contact with the constructed wetland.	There will be no contact between the West Creek Diversion and the constructed wetland. Arrows on the Figure 4-11 will be adjusted to better represent the proposed water management approach.	Complete Vol 2 Sec 4.12.7.4 Fig 4-11
23	Vol 2, s. 4.12.4 p.4-27: "Other" water needs have not been accounted for in the water balance. These needs could be significant and not able to be met by the described sources. Please include estimates of "Other" water needs, and whether the source is fresh water or not.	The Rainy River Project (RRP) water balance includes these minor water uses as part of the freshwater supply, but they are not shown in detail in the water balance figures. The overall site water balance is being updated for the Final EA Report.	Complete App W-1

#	COMMENT	RESPONSE	STATUS*
24	Vol 2, s.4.12.5 p. 27: There is no information on strategies to prevent use of the TMA by wildlife, including waterfowl. Wildlife may be attracted to the open expanses of water. Please include information on wildlife aversion strategies to ensure wildlife do not use or enter the TMA.	<p>Fencing will be placed around the TMA as shown on Figures 4-5 and 4-11. It is not feasible nor is it standard practice to attempt wildlife exclusion measures over such a large area. During operations there will be a considerable amount of activity associated with the TMA, and little in the way of naturalized habitats that would attract waterfowl.</p> <p>Effluent will be treated in the processing plant using the SO₂/Air process to reduce cyanide and associated metals to levels which are well below wildlife toxicity thresholds, including for waterfowl, as described in a number of sections, including Section 7.9.1.</p>	<p>Complete</p> <p>Vol 2 Sec 4.8</p>
25	Volume 2, Project Description, Section 4.12.7.2, pg. 4-31: First paragraph suggests runoff from west mine rock stockpile is captured by the mine rock pond adjacent to the east mine rock stockpile. Clarify if 'west' is a typographical error or if there are plans to divert/pump west rock stockpile runoff to the mine rock pond.	The text will be revised for clarity in the Final EA Report.	<p>Complete</p> <p>Vol 2 Sec 4.12.7.2</p>
26	Vol 2, s.4.12.7.2, p.4-32 Figure 4-1: It is unclear what "terminal collection ponds" are being referred to in Figure 4-1. If these are the Sediment Ponds in Fig 4-1, then labels should be included showing how water from these ponds fit into the overall water management plan, and if water from these ponds will be released directly into the environment or not. Please clarify what is being referred to as what "terminal collection ponds" in the text and figures. Include these ponds in the overall water management plan (text and figures).	<p>The terminal collection ponds refer to Sediment ponds 1 and 2, and the text will be adjusted accordingly in the Final EA Report. The expectation is that water will be discharged from the sediment ponds directly to the West Creek diversion channel and Loslo Creek.</p> <p>A flow (ditch) directional arrow shows a connection between sediment pond #1 and the West Creek diversion in figures 4-1 and 4-10. An arrow showing the flow connection between sediment pond #2 and Loslo Creek / Cowser Drain will be added to Figures 4-1 and 4-10.</p>	<p>Complete</p> <p>Vol 2 Sec 4.12.7.2 Fig 4-1, 4-10</p>

#	COMMENT	RESPONSE	STATUS*
27	<p>Vol 2, s.4.12.73, Pg 4-32: Details regarding the utility of the constructed wetland are missing. There is no information on how long it will take before the wetland has suitable vegetation for water treatment, or whether it will be functional for the start of mine production and treatment of tailings effluent. An expected time frame of wetland construction, natural/planted vegetation establishment, etc is needed.</p>	<p>The main water quality function of the wetland will occur through nutrient (nitrogen) uptake by naturally occurring algae and bacteria, as well as volatilization of residual ammonia to the atmosphere. Use of this natural cleansing system has been well received by both First Nations and members of the general public. The wetland will also provide a water balancing / mixing function, as the treated effluent flow-through rate 10,000 m³/d is a small fraction of the aggregate wetland volume (300,000 m³).</p> <p>The development of vascular vegetation is largely incidental to the overall wetland function (but it will help with minor residual metal uptake), such that development of a vascular vegetation community is not relevant to the overall wetland function.</p> <p>Additional information will be provided in the Final EA Report as suggested.</p>	<p>Complete</p> <p>Vol 2 Sec 4.12.7.3</p> <p>App W-1</p>
28	<p>Vol 2, s. 4.14, p.36: No area has been identified for a potential landfill site on any of the maps. This should be displayed. There is no discussion of strategies to prevent / reduce attracting wildlife to the non-hazardous waste onsite. Potential site for landfill site should be displayed on maps. Infrastructure associated with a potential landfill should be discussed, as should strategies to prevent attracting wildlife to the site.</p>	<p>RRR is working closely with the Township of Chapple to assess local landfill capacity, and has partly funded the studies recently completed on the Township of Chapple, Richardson and Shenston Landfills by K. Smart and Associates. These studies determined that there is sufficient existing capacity in the Township landfills to support the RRP, while retaining capacity for other users. Further information will be provided in the Final EA Report.</p> <p>Commitment to managing food wastes to prevent the attraction of wildlife (mainly furbearers in the broader sense) is provided in Section 7.10.3 of the Draft EA Report. Section 13-13 of the Draft EA Report commits to the development of an Environmental Management System which will include individual management plans to address general waste management and wildlife management (among others).</p>	<p>Complete</p> <p>Vol 2 Sec 4.14</p>

#	COMMENT	RESPONSE	STATUS*
29	Volume 2, Description of the Environment, S5.1.1; pg 5-2: Recognizing that it is a safe assumption migratory corridors exist within the NLSA, how was it determined there were migratory corridors 'associated with aquatic systems and associated riparian habitats'? Baseline studies generally did not involve tracking fish or wildlife movements. Present evidence for use of watercourses as migration routes. If the precautionary principle is used to assume migratory corridors for fish and aquatic wildlife, also apply it to terrestrial wildlife.	The use of aquatic systems and their associated riparian corridors by wildlife (aquatic and terrestrial) for local and regional migration is generally accepted by wildlife managers. RRR agree that terrestrial wildlife should also be assumed to use the riparian habitats associated with aquatic systems as migratory corridors.	Complete
30	Volume 2, Description of the Environment, S5.2.1; pg 5-5: The spatial coverage of most baseline studies did not include the area of all transmission line alternatives. Provide rationale for not conducting baseline studies in area of all transmission line corridor alternatives.	Per the RRR response to the MNR comments on the Draft Proposed Terms of Reference (Table J-2 of Appendix D-1 of the Draft EA Report): " <i>Detailed desk-top studies (including habitat assessments and likely wildlife associations, as well as the potential presence of Species at Risk; SAR) and an aerial survey have been conducted on all alternatives and this will be presented in the EA. Due to the size of the project it was not economically or logistically feasible to conduct ground surveys on all alternatives (transmission line and other) so careful due diligence and screening were employed in order to select a preferred powerline route and then ground surveys were conducted along that route,...</i> <i>The powerline alternatives considered were all located within a 7 km wide area running east of the proposed mine site to an existing powerline. Due to the close proximity of the powerline alternatives to each other, they all pass through similar habitat types and any ecological concerns are likely to be the same for each.</i> "	Complete
31	Volume 2, Description of the Environment, S5.2.1; pg 5-6: It would be helpful to provide a comprehensive list of environmental baseline studies used to inform the draft EA. Consider changing list of 'primary environmental baselines studies' to 'all environmental baseline studies' and include list of all studies used to inform the draft EA.	The text of the Final EA Report will be revised for clarity.	Complete Vol 2 Sec 5.2.1

#	COMMENT	RESPONSE	STATUS*
32	<p>Volume 2, Description of the Environment, S5.2.11.1; Pg. 5-26: Ability to observe muskrat houses, wolf and bear dens during an aerial survey seems very limited. Animal movement corridors may not be determined by incidental observations. The specific criteria used to identify seasonal concentration areas and animal movement corridors were not provided. Provide support to concept that aerial surveys are suited to recording muskrat houses, wolf and bear dens. Provide criteria used to identify seasonal concentration areas and animal movement corridors.</p>	<p>While it is agreed that the ability to observe muskrat houses, wolf and bear dens during an aerial survey can be limited (i.e., bear dens are difficult to locate in thick forest habitat) and some may be missed, AMEC staff involved in the survey have conducted aerial surveys for dens in Ontario, Alberta, British Columbia, Yukon, Alaska and Nunavut over the past 23 years. By using a helicopter it is possible to slow down, circle back, hover and even land when certain features require a closer look. The 2012 aerial survey was conducted in April when black bears are emerging from their dens and we believe that this was an acceptable survey format that adds to data collected during the 2009 to 2012 desktop and ground based surveys.</p> <p>The 2013 aerial survey was conducted while snow was still present in order to record tracks and to locate seasonal concentration areas and animal movement corridors. The intent of the 2013 aerial survey was to confirm the presence / absence of mammal species within the natural environmental local and regional study areas (NLSA and NRSA) and to identify the locations of habitat areas used by these species (based on the presence of tracks). Identifying the locations of animals and their tracks adds to data collected during the 2009 to 2012 desktop and ground based surveys and helps to provide evidence of the presence of significant wildlife habitat within the NLSA.</p> <p>There are limited survey options available to determine animal movement behaviour within the scope of baseline surveys, particularly for large mammals. While an aerial survey has inherent limitations, it allows larger areas to be surveyed and provides regional context to tracks observed in the winter.</p> <p>Criteria outlined in the Significant Wildlife Habitat Technical Guide (MNR 2000) was used to identify seasonal concentration areas and animal movement corridors. This will be clarified in the Final EA Report.</p>	<p>Complete</p> <p>Vol 2 Sec 5.2.11.1</p>

#	COMMENT	RESPONSE	STATUS*
33	<p>Volume 2, Description of the Environment, S5.2.11.3; Pg. 5-28: Franklin’s ground squirrel, American Badger, Grey Fox and Eastern wolf may be more readily observed/recorded using live traps (e.g. Sherman live-trap), and sand-trap or hair-trap scent stations. Limitations of survey methods used were considered during MNR’s review of sections 6 and 7. No action needed</p>	<p>Agreed. We appreciate the comment.</p>	<p>Complete</p>
34	<p>Volume 2, Description of the Environment, S5.2.12.1; Pg. 5-28: While considerable breeding bird survey effort was applied, notable gaps in coverage of the RRGF footprint remain, including the southwest section of the preferred transmission line corridor, all other transmission line corridor alternatives, portions of preferred Hwy 601 reroute and water management pipeline, Hwy 601 re-route alternatives, east section of the tailings management area, explosives facility, overburden stockpile, low grade ore stockpile and mine rock pond. 1) In areas of RRGF footprint where spatially distinct alternatives do not exist, provide rationale for decision not to survey breeding birds and information used to determine likelihood of bird species at risk presence. (In areas of apparently similar habitat - possibly TMA - a species accumulation curve may help to demonstrate the surveys conducted captured most species) 2) In areas of RRGF footprint where spatially distinct alternatives do exist, provide rationale for decision not to apply equal survey effort to all areas impacted by alternatives.</p>	<p>As noted by the reviewer a considerable amount of survey effort was utilized to compile a comprehensive species list for the RRP property. Although it is not feasible nor typical to sample 100 percent of large sites such as the RRP, the principle of representative sampling has ensured that reasonable representation of all habitat types in the project area were sampled. This enables the project team and reviewers to infer potential species usage of the remaining areas, and or alternative alignments.</p> <p>SAR sampling consisted of multiple years of effort and included planning and consultation with MNR to ensure appropriate scales of effort were implemented.</p>	<p>Complete</p>

#	COMMENT	RESPONSE	STATUS*
35	<p>Vol 2 s5.2.12.7 p5-32: No SWH Ecoregion criteria schedules have been developed for Ecoregion 5S yet. Use of SWH Ecoregion 3E Criteria Schedules for the NRSA is inappropriate here..Please remove references to this criteria schedule.</p>	<p>An e-mail communication about using 3E Criteria Schedules occurred between AMEC (Matt Evans) and the MNR (Chris Martin, with John Van den Broeck, Matt Myers and Rachel Hill copied). AMEC stated that "<i>in light of the fact that Significant Wildlife Habitat Ecoregion Criteria Schedules have not yet been released for the RRGP study area, AMEC is using the Criteria Schedules from the next closest ecoregion available, 3E in Northeastern Ontario, to guide its assessment of SWH in the RRGP area.</i>" There was no objection from the MNR with regards to this approach. AMEC asked a number of questions related to using 3E Schedules and these questions were answered by the MNR, with no objection to the use of 3E Schedules.</p> <p>The MNR's Significant Wildlife Habitat Technical Guide (MNR, 2000) was the main source of evaluation criteria for determining significance of various habitats. The 3E Schedules were used occasionally when looking for more detailed (i.e., ELC codes specified) and more recent (MNR 2012 versus MNR 2000) information.</p> <p>AMEC is well experienced with assessing wildlife habitats for various projects across the province and using both the Significant Wildlife Habitat (SWH) Technical Guide and various SWH Ecoregion Criteria Schedules, and we believe that reference to the 3E Schedules was done in a appropriate / cautionary fashion since many species and wildlife habitat types found in 3E are present in 5S making its use appropriate for many species, and that it adds value to the assessment of habitats.</p> <p>Since the evaluating criteria often overlaps between the SWH Technical Guide and the 3E Schedules, we will remove reference to the 3E Schedules and replace it with the SWH Technical Guide (as suggested by the reviewer in comment 48).</p>	<p>Complete</p> <p>Vol 2 Sec 5.2.12.7, 5.9.1, 5.10.1, 5.10.1.1, 5.10.1.2, 5.10.1.3, 5.10.1.4, 5.10.1.6, 5.10.6</p>

#	COMMENT	RESPONSE	STATUS*
36	5.2.12.6 (5-32): As per MNR comment 2, Barn Swallow and Chimney Swift are Threatened species , Not special concern. Please amend.	The title of this section will be revised in the Final EA Report to "Species at Risk, Species of Special Concern, and Provincially Rare Species", and will therefore appropriately include the threatened Barn Swallow and Chimney Swift.	Complete Vol 2 Sec 5.2.12.6
37	Volume 2, Description of the Environment, S5.2.13; Pg. 5-33: The specific criteria used to identify seasonal concentration areas were not provided. Reptile and amphibian species of conservation concern expected to be encountered in NLSA were not identified. Provide criteria used to identify seasonal concentration areas. Report the reptile and amphibian species of conservation concern that were potentially expected in the NLSA.	Criteria outlined in the Significant Wildlife Habitat Technical Guide (MNR 2000) were used to identify seasonal concentration areas. This will be clarified in the Final EA Report. Section 5.2 summarizes baseline study methodologies and does not list species of conservation concern expected to be encountered in NLSA as this list is provided in the appendices (baseline reports). Species of conservation concern encountered in the NLSA are discussed throughout the EA (no amphibian species of conservation concern were expected to be encountered in NLSA. Snapping turtles are a species of Special Concern and are discussed in the EA and in the appendices).	Complete Vol 2 Sec 5.2.13
38	Volume 2, Description of the Environment, S5.2.13; Pg. 5-33: The specific criteria used to identify amphibian movement corridors were not provided. Baseline studies did not involve tracking amphibian movements. Limitations of survey methods used were considered during MNR's review of sections 6 and 7.No action required.	Agreed. We appreciate the comment.	Complete
39	Volume 2, Description of the Environment, S5.8.2; Pg. 5-83 : Walleye and northern pike are classified as keystone species without supporting references. Provide supporting references for statement that walleye and northern pike are keystone species.	Both Pike and Walleye are top level predators in coolwater systems that can have significant effects on the abundance and distribution of other fishes. As such RRR and our consultant consider them keystone species.	Complete

#	COMMENT	RESPONSE	STATUS*
40	<p>Volume 2, Description of the Environment, S5.8.2; Pg. 5-83 and Table 5-24 S5.8.19 Pg 5-100 S5.8.19 Pg 5-100: Lake sturgeon, THR (ESA), were not included on the list of fish species in the Pinewood River. Catch of lake sturgeon in the Pinewood River in 2013 is missing from these sections. Catch of lake sturgeon in the Pinewood River in 2013 is missing. Statement “Sampling in the vicinity of the RRGP...” is vague. The Lake of the Woods-Rainy River population of lake sturgeon is designated as Special Concern by COSEWIC (2006). It is not yet regulated under SARA. Include lake sturgeon in Pinewood River fish list, reflecting 2013 AMEC and MNR netting results. Please include catch of lake sturgeon in text. Please update statement re: catch of SAR accordingly. Please update table to include lake sturgeon and include COSEWIC lake sturgeon designation. Please clarify if statement applies to NRSA or NLSA.</p>	<p>The statement in this section as well as in other sections of the Final EA Report will be revised to clarify that three adult sturgeon (one sturgeon captured by RRR and two sturgeon by the MNR) were captured in the lower reaches of the Pinewood River.</p> <p>The description of COSEWIC status for this population of Lake Sturgeon will be clarified. The text will also clarify that the Lake Sturgeon were captured in the NRSA and not within the NLSA.</p>	<p>Complete</p> <p>Vol 2 Sec 5.8.19</p>
41	<p>S5.9.1.1, P5-101: The NRSA lies within ecoregion 5S, and immediately adjacent to ecoregion 4S not 4W. Use of SWH Ecoregion Criteria Schedules for 3E is inappropriate for this ecoregion. Species composition is markedly different in 5S than either 4W or 3E. Please correct ecoregion type and remove references to SWH schedule 3E. Please review literature for ecoregions 5S and 4S and update this section accordingly.</p>	<p>Ecoregion 4W will be replaced with 5S.</p> <p>Please see response to Comment #35 regarding the use of SWH Ecoregion Criteria Schedules for 3E for this ecoregion (i.e., many species and wildlife habitat types found in 3E are present in 5S making its use appropriate for many species).</p> <p>The Significant Wildlife Habitat Technical Guide (MNR 2000) was our main source of evaluation criteria for determining the significance of various habitats. Reference to the 3E Schedules will be removed and replaced with the SWH Technical Guide (as suggested by the reviewer in comment 48).</p> <p>Literature for 5S and 4S will be reviewed and updated where necessary.</p>	<p>Complete</p> <p>Vol 2 Sec 5.9.1.1, 5.10.1</p> <p>Vol 2 Sec 5.2.12.7, 5.9.1, 5.10.1, 5.10.1.1, 5.10.1.2, 5.10.1.3, 5.10.1.4, 5.10.1.6, 5.10.6</p>

#	COMMENT	RESPONSE	STATUS*
42	Volume 2, Description of the Environment, S5.2 and S5.9.1.1; Pg. 5-102: Results of wildlife habitat screening exercise in S5.9.1.1 is referenced under a number of subsections in S5.2. The screening exercise should be described first under S5.2.10. Describe wildlife habitat screening exercise under Baseline Study Methodology, S5.2.10. In Sections 5.2.11 – 5.2.15, please clarify when and how wildlife habitat screening was used to focus the location of field surveys.	Section 5.2 summarizes baseline study methodologies described in detail in the appendices (Appendix J-2, J-3, J-4, J-5, K-2, K-3 and N as relevant). RRR and our consultant disagree with the reviewer's comment that results of the wildlife habitat screening exercise in Section 5.9.1.1 is referenced under a number of subsections in Section 5.2. In a few instances it is necessary to justify why a particular species was targeted or a particular method was employed and these may result in some minor discussion of habitat types present in the NLSA, but these do not constitute a thorough discussion of the habitat screening results.	Complete
43	Volume 2, Description of the Environment, S5.9.1.1; Pg. 5-103: MNR's ecosite data may or may not indicate presence of rare vegetation communities. Suggested wording change: "The ecosite data provided by MNR suggests that no rare vegetation communities exist within the NLSA."	The suggested text revision will be made in the Final EA Report.	Complete Vol 2 Sec 5.9.1.1
44	Volume 2, Description of the Environment, S5.9.1.2; Pg. 5-103: Considerable amounts of rare plant survey effort have occurred on Rainy River, Rainy Lake and Lake of the Woods; survey effort elsewhere in Fort Frances District has not been thorough enough to conclude that the "species are associated with ... the watercourse/waterbodies of Rainy River, Rainy Lake or Lake of the Woods." Remove inference that rare plants 'associated with' Rainy River, Rainy Lake or Lake of the Woods are unlikely to occur in the NLSA.	The text will be revised in the Final EA Report as suggested.	Complete Vol 2 Sec 5.9.1.2

#	COMMENT	RESPONSE	STATUS*
45	<p>Volume 2, Description of the Environment, S5.9.3.: Among other habitats, MNR suggested rare plant surveys be focused in “Ecosite 12/open canopy forest with shallow soils over bedrock” (ELC B012) as per Nov. 22, 2012 e-mail and Vandenbroeck (2006). B012 habitats in area of preferred transmission line corridor proximal to the mine site were not surveyed. Explain why rare plant surveys were not focused in ELC=B012 habitats.</p>	<p>As noted by the reviewer, a considerable amount of survey effort was utilized to compile a comprehensive species list for the RRP property. Although it is not feasible nor typical to sample 100 percent of large sites such as the RRP, the principle of representative sampling has ensured that reasonable representation of all habitat types in the project area were sampled. This enables the project team and reviewers to infer potential species usage of the remaining areas, and or alternative alignments.</p> <p>SAR sampling consisted of multiple years of effort and included planning and consultation with MNR to ensure appropriate scales of effort were implemented.</p>	Complete

#	COMMENT	RESPONSE	STATUS*
46	<p>Volume 2, Description of the Environment, S5.10.1.1; Pg. 5-110, 5-115.: MNR e-mails (Oct. 10 and Nov. 20, 2012) did not specifically identify forests that support winter deer yards or area-sensitive bird species as significant wildlife habitat (SWH), though such areas do require consideration. SWH is not mentioned further in sections 6.0 and 7.0, so its emphasis in section 5.0 is puzzling.</p> <p>Recognizing significant wildlife habitat has legal implications only in the context of Ontario's Planning Act, 1990, please clarify importance/relevance of SWHs in the context of this environmental assessment. Remove reference to MNR's identification of SWH and/or provide SWH definition specific for this environmental assessment.</p>	<p>Deer yard delineation shapefiles were provided to RRR by the MNR in February, 2013 (see Comment #52). According to the SWH Technical Guide (MNR 2000) winter deer yards are considered to be SWH (Habitats of Seasonal Concentrations of Animals; Comment #60). Therefore, the MNR provided information on SWH as stated in the Draft EA Report. In a meeting on February 13, 2013, the MNR (Matt Myers) stated that the MNR wished to be cited when RRR or AMEC use data provided by the MNR. Therefore, it is stated in the Draft EA Report that the MNR provided the information on SWH deer yards. This statement can be removed if desired.</p> <p>Section 5 provides a summary of baseline / existing conditions and the description of SWH is part of this process (habitat screening) and can be useful in identifying areas that may require detailed field investigations. AMEC regularly relies on the MNR SWH Technical Guide when conducting baseline studies and when describing habitat types found within a study area. Information presented in Section 5 was carried forward to the effects assessment in Section 7 only if it was deemed to be a valued ecosystem component (VEC).</p> <p>In the October 10, 2012 e-mail from the MNR (Chris Martin) it was stated that: "<i>the Significant Wildlife Habitat Technical Guide (MNR 2000) and Forest Management Guide for Conserving Biodiversity at the Stand and Site Scales (MNR, 2010) will largely guide our comments and concerns.</i>" This is another reason why SWH is described in the baseline reports and in Section 5 of the Draft EA Report. The November 20, 2012 e-mail from the MNR (Chris Martin) discusses area-sensitive woodland breeding bird habitat (SWH) but RRR and our consultant have not stated in the Draft EA Report or appended baseline reports that the MNR identified these areas in the NLSA or NRSA.</p>	Complete

#	COMMENT	RESPONSE	STATUS*
47	Vol 2, S5.10.1.1, P5-110: Table 12.6 indicates 22 species of mammals exist within the NLSA. Revise text.	The text and table in the Final EA Report will be reviewed for consistency and adjusted as necessary.	Complete Vol 2 Sec 5.10.1.1
48	Vol 2, S5.10 (entire section) : As above. Remove all references to SWH Ecoregion Criteria Schedule 3E. Optional- replace with reference to Significant Wildlife Habitat Technical Guide (2000).	References to SWH Ecoregion Criteria Schedule 3E will be removed and replaced with reference to the SWH Technical Guide (MNR 2000) in the Final EA Report.	Complete Vol 2 Sec 5.2.12.7, 5.9.1, 5.10.1, 5.10.1.1, 5.10.1.2, 5.10.1.3, 5.10.1.4, 5.10.1.6, 5.10.6
49	Vol 2, S5.10.1.1, P5-111: Deer are abundant in both anthropogenically-disturbed and undisturbed habitats in the Rainy River/ Fort Frances District. Update wording to reflect abundance of deer in areas other than agricultural or anthropogenically-influenced habitats.	The text will be revised in the Final EA Report to reflect the MNR observation that deer are also abundant in areas other than agricultural or anthropogenically-influenced habitats.	Complete Vol 2 Sec 5.10.1.1
50	Vol 2, S5.10.1.1, P5-111: Moose occur in many other habitats other than boreal- it is not a strictly boreal species. Update wording to reflect occurrence of moose in Great-Lakes St. Lawrence forests (deciduous, mixed-wood habitats), in addition to boreal.	The text will be revised in the Final EA Report to reflect the reviewers comment.	Complete Vol 2 Sec 5.10.1.1

#	COMMENT	RESPONSE	STATUS*
51	<p>Vol 2, S5.10.1.1, P5-111: A Provincial Elk summary report is available for reference, as is additional occurrence information from the Lake Of the Woods Elk Committee. Elk from the Lake of the Woods release population have been documented immediately on, as well as south, east, west and north of the NLSA. Elk have been confirmed and have potential to occur within the NLSA. Update text to reflect distribution of LOW elk in the NLSA/NRSA.</p>	<p>The text will be updated in the Final EA Report to reflect elk occurrence in the NLSA / NRSA.</p> <p>RRR and our consultants are aware of the presence of elk within the Rainy River District resulting from the release of 104 animals near Cameron Lake. The Chronicle Journal reported on October 20, 2012 that elk had been seen as far east as Barwick, Ontario. Local farmers have told AMEC staff that elk have occurred within a few kilometres of the western boundary of the RRGP footprint, but they have not been observed east of North Branch. The Provincial elk summary report (2013 Ontario Elk Research and Monitoring Update; MNR, 2013) states "<i>MNR Fort Frances reported that a farmer in the North Branch area, in the Rainy River area reported elk in a field. This is in the area where elk have been reported and observed in the past. This group is likely made up of 10 or less animals.</i>" However, RRR and our consultant were unable to find any information that supports the comment that this group is likely made up of 10 or less animals.</p> <p>The MNR 2012 aerial survey for elk that is described in the 2013 Ontario Elk Research and Monitoring Update did not record any elk within the NLSA. Baseline studies for the RRP (2009 to 2012) indicated that the NLSA is largely unsuitable as habitat for moose, elk and caribou. No elk were seen in the NLSA nor was any evidence of this species (i.e. droppings) recorded between 2009 and 2012.</p>	<p>Complete</p> <p>Vol 2 Sec 5.10.1.1</p>

#	COMMENT	RESPONSE	STATUS*
52	<p>Vol 2, S5.10.1.1, P5-111: Deer wintering areas and winter deer concentration areas (yards) are identified through aerial surveys, not desktop exercises with ecosite data. These areas have been previously identified by MNR and provided in shapefile format to the proponent. Winter deer concentration areas (yards) are sub-categorized based on usage. The largest and most contiguous area of high-usage deer concentration areas in WMU 10 occurs in and immediately adjacent to the NLSA. The footprint of the mine and infrastructure will directly affect and destroy a portion of this habitat. There is less than 10 000 ha of winter deer concentration area (Stratum 1, rank 3&4) in the Pinewood R watershed, and less than that within the NLSA Remove reference to Crossroute Forest Management Plan. Remove reference to deer winter habitat based on ecosite data. Correct text to reflect true area of winter deer concentration areas (yards) (Stratum 1, rank 3&4) within the NLSA.</p>	<p>The text in the Final EA Report will be revised as suggested.</p> <p>Page 22 of the Significant Wildlife Habitat Technical Guide (MNR 2000) describes three methods to locate and delineate deer yard habitat. One of these methods is a desktop exercise: <i>"Use FRI maps in conjunction with aerial photographs to help to find other potential areas. Locate areas consisting of preferred tree species such as hemlock, white cedar, pines, and white spruce. Use aerial photographs to verify existence of potential sites and to assess the apparent canopy closure and features of the surrounding landscape"</i> and it also states on page 22 that <i>"Deer yards consist of a core area of mainly coniferous trees (pines, hemlock, cedar, spruce) with a canopy cover of more than 60%."</i> Further, on page 67 it states <i>"Deer yard quality is determined from field investigations. Deer yard surveys can be used to determine the quality and extent of the conifer cover, the amount of food available and the relative density of the deer population with respect to the carrying capacity of its habitat."</i></p> <p>Desktop identification was combined with ground based studies (2009 to 2012) and two aerial surveys. Also, deer yard delineation shapefiles were provided by the MNR in February, 2013 (see Comment #52) and this data was compared to that collected by KCB and AMEC.</p>	<p>Complete</p> <p>Vol 2 Sec 5.10.1.1</p>
53	<p>Line blank in original comments.</p>		
54	<p>Vol 2, S5.10.1.1, P5-111: The Crossroute FMP does not indicate that MAFA's are not present within the NLSA. MAFA surveys have not been conducted by the MNR within WMU 10, therefore there is the potential for MAFA's still to exist there. Revise text to clarify that MAFA surveys have not been conducted in WMU 10.</p>	<p>The text in the Final EA Report will be revised as suggested.</p>	<p>Complete</p> <p>Vol 2 Sec 5.10.1.1</p>

#	COMMENT	RESPONSE	STATUS*
55	Vol 2, S5.10: There is no mention throughout this section of the Ecological Zones or Wildlife Management Units the NLSA and NRSA fall within. There is no mention of how big-game- deer, elk, bear, and moose species are managed within these Zones and WMU's, nor what MNR's management objectives for these species are within the Zones and WMU's. Please update section with information on Ecological Zones (Black bear and Cervid) and WMU's, and management strategies and population objectives for deer, elk, bear, and moose within these Zones and WMU's.	RRR and our consultant do not believe this request is relevant to the baseline information provided in Section 5, nor is it relevant to the overall effects assessment for the RRP. The Provincial Approved Terms of Reference and the Federal Environmental Impact Statement Guidelines do not request / require a discussion of these topics.	Complete
56	Vol 2, S5.10.1.1, P5-114: Three additional bat species are known to occur in the Rainy River/Fort Frances District: the eastern red bat, northern myotis, hoary bat, and silver-haired bat. Please update this section with the additional bat species.	The text in the Final EA Report will be revised to reflect the known presence of these three additional species (Eastern Red Bat, Hoary Bat and Silver-Haired Bat) within the district (Northern Myotis is already discussed in the Draft EA Report).	Complete Vol 2 Sec 5.10.1.1
57	Vol 2, S5.10.1.1, P5-114: Use of the SWH Ecoregion 3E Criteria Schedule is incorrect, and should not be used as the basis for not identifying bat habitat within the study area. Please amend.	All references to SWH Ecoregion Criteria Schedule 3E will be removed from the Final EA Report and replaced with reference to the SWH Technical Guide (MNR 2000). As well, the Bats and Bat Habitats: Guidelines for Wind Energy Projects (MNR 2011) will also be included as a reference used to identify bat habitat. Ground surveys for bat roosting habitat and hibernacula were conducted in June and July of 2013 (methodology was reviewed by the MNR and approved on June 7, 2013). The results of these surveys will be added to the Final EA Report.	Complete Vol 2 Sec 5.2.12.7, 5.9.1, 5.10.1, 5.10.1.1, 5.10.1.2, 5.10.1.3, 5.10.1.4, 5.10.1.6, 5.10.6 App K-4, K-5
58	Vol 2, S5.10.1.2, P5-118: Double-crested cormorants also nest near the NRSA. Add double-crested cormorant to the list of colonial ground-nesting bird species.	Double-crested cormorants will be added to the list of bird species in the Final EA Report.	Complete Vol 2 Sec 5.10.1.2

#	COMMENT	RESPONSE	STATUS*
59	Vol 2, S5.10.1.2, P5-121: Records from the Atlas of Breeding Birds of Ontario show many more raptor and owl species near the NRSA than stated in the EA. Please amend	Section 5.10.1.2 of the Draft EA Report states that the Atlas of Breeding Birds of Ontario reported eight diurnal raptor species and six owl species in the NLSA (and not the NRSA). Section 5.10.1.2 discusses woodland raptors species only, and not all raptors expected to occur within the NRSA (that information is provided in the appendices). Other raptors such as open country species (Northern Harrier and Short-eared Owl) are addressed separately in Section 5.10.3 under the heading Open Country Birds.	Complete
60	Vol 2, S5.10.1.6, P5-125: Paragraph 2 onwards under s5.10.1.6 belongs under s5.10.1.5. Move text to s5.10.1.5	The text will be reviewed and moved as appropriate in the Final EA Report.	Complete Vol 2 Sec 5.10.1.5

#	COMMENT	RESPONSE	STATUS*
61	Vol 2, S5.10.2.1, P5-126: It is important to note the distinction between deer wintering areas (Stratum 2) and winter deer concentration areas (yards) (Stratum 1). Stratum 2 areas can be thought of as the winter concentration area in its entirety, while Stratum1 is the core of the winter concentration area, where deer will be restricted to under severe winter conditions. Winter concentration areas (yards) are sub-categorized based on usage. MNR considers ranks 3 and 4 to be the most important core concentration area, as these areas have demonstrated use during severe winter conditions. The largest, and most contiguous area of high-usage deer concentration areas in WMU 10, and the FF District, occurs in and immediately adjacent to the NLSA. Deer winter concentration areas are considered by MNR to be Significant Wildlife Habitat. It is incorrect to conclude that due to the high concentration of deer seen in the NLSA that winter deer concentration areas (yards) are widespread across the region. Field investigations merely confirmed the usage of high usage Stratum 1 habitat within the NLSA. Revise text to indicate presence of deer Significant Wildlife Habitat in and adjacent to the NLSA. Remove reference to ‘habitat features... indicate likely suitable yarding habitat’. Remove reference to widespread deer yarding habitat. Include text reflecting importance of Stratum 1, rank 3 and 4 deer winter concentration areas in and adjacent to the NLSA.	The text will be revised in the Final EA Report as suggested.	Complete Vol 2 Sec 5.10.2.1 <i>Note: shapefiles of deer wintering areas do not distinguish between Stratum 1 and 2. Files provided by MNR categorize the quality of the deer wintering areas as "very high / high / moderate / low".</i>
62	Vol 2, S5.10.2.1, P5-127: MAFA surveys have not been conducted in WMU 10, therefore it is incorrect to state that there are no possible moose movement corridors in the NLSA. Revise text.	The text will be revised in the Final EA Report as suggested.	Complete Vol 2 Sec 5.10.2.1
63	Vol 2, S5.10.2.2, P5-127: Table 12.6 indicates 22 species of mammals exist within the NLSA. Revise text.	The text and table will be reviewed and revised accordingly in the Final EA Report.	Complete Vol 2 Sec 5.10.2.2

#	COMMENT	RESPONSE	STATUS*
64	Vol 2, 5.10.3.1 (5-132): It is unclear how significance is being assessed in terms of SC species –ie GWWA habitat – see 7.16 (7-89). Please clarify	Clarification regarding significance will be made in Section 5.10.3.1 of the Final EA Report. Significance for Special Concern species (Section 7.16) is being assessed in a similar fashion as for all other wildlife VECs (see Sections 7.1.2 and 7.16.5). Impacts on Special Concern species are described individually for each species; but mitigation measures, residual environmental effects, and significance determination are presented for the group as a whole in order to prevent repetition for each species.	Complete <i>There is no assessment of significance in Section 5.</i>
65	Vol 2, 5.10.3.3 (5-134): The list of Avian SAR and Provincially rare species is incomplete. (eg Barn Swallow, Whip-poor-will ect). Update list	These omissions were intentional as only Special Concern and Provincially rare birds were listed. Threatened species will be added to the Final EA Report to avoid confusion.	Complete Vol 2 Sec 5.10.3.3
66	Vol 2, 5.10.4 (5-135): While no nest were observed it is suspected that Snapping turtle nesting occurs with the NLSA. Outline that Snapping turtle are SC	Agreed. Snapping turtles are likely to nest in the NLSA. The Final EA Report will state that they are classified as Special Concern (and as listed in the appendices)	Complete Vol 2 Sec 5.10.4
67	Vol 2, 5.10.6 (5-136 to): Under Threatened add 'Lake Sturgeon'. Under SC 'Rusty Black Bird has no Provincial status – Federally listed'. The list of Provincial Rare species excludes the plant species observed. (New England violet, Field sedge) Also, through further record review muskroot was identified within the NLSA. Please amend	The presence of Lake Sturgeon is addressed in Section 5.8.19 under Aquatic SAR. The other species will be addressed in the Final EA Report as commented.	Complete Vol 2 Sec 5.9.3, 5.10.6
68	Vol 2 Table 5-27: This table represented preliminary scoping of the project in advance of field assessment work – many of the “Likelihood of Occurrence data should be updated with assessment results (ie Confirmed within the NLSA or not detected, likelihood remains low ect.). Table also requires updating with additional species (ie bats). Please update table.	The table will be updated in the Final EA Report as suggested.	Complete Vol 2 Table 5-27

#	COMMENT	RESPONSE	STATUS*
69	Vol 2 S5.10.6.2 P5-137: Trapping records do indicate that grey foxes occur in the NLSA, as the trapline from which they were trapped overlays the east mine rock stockpile and transmission corridor. It is therefore logical to conclude that grey foxes are present. Revise text to reflect occurrence of grey fox.	The text will be revised in the Final EA Report to reflect the occurrence of grey fox, as suggested.	Complete Vol 2 Sec 5.10.6.2
70	Vol 2 s.5.12.2.4 p5-149: The baitfish industry is a commercial fishery in Ontario, as defined by the Fisheries Act. The use of the area by baitfish harvesters therefore constitutes a commercial fishery. Revise text to indicate presence of a commercial fishery (baitfish harvest).	To be consistent with the wording proposed by MNR in review of the baseline and fisheries offset plan documents, the following statement will be used in the Final EA Report: "while limited bait fishing does occur with certain project area streams, the area does not support a significant commercial or recreational fishery."	Complete Vol 2 Sec 5.13.2.4
71	Vol 2 s.5.12.2.4 p5-149: Lake sturgeon are present in the Pinewood River (NRSA). Please clarify area referred to by "RRGP site". NLSA or NRSA?	The statement in this section as well as in other sections of the Final EA Report will be revised to clarify that three adult sturgeon (one sturgeon captured by RRR and two sturgeon by the MNR) were captured in the lower reaches of the Pinewood River; and within the NRSA.	Complete Vol 2 Sec 5.13.2.4
72	Vol 2 s.5.12.2.4 p5-149: Detailed habitat investigations for lake sturgeon have not yet occurred in the Pinewood River, therefore it is incorrect to state "... no specific habitat was identified...". Revise text to clarify no known habitat has been identified.	The text in the Final EA Report will clarify that no known habitat has been identified.	Complete Vol 2 Sec 5.13.2.4, 7.2.1 and others App I-4

#	COMMENT	RESPONSE	STATUS*
73	<p>Volume 2, Evaluation of Alternatives, S6.1.2; Pg. 6-2 and Table 6.1.: Evaluation of 'alternatives to' the project did not strictly follow criteria in the Approved ToR. Rather, many criteria (environmental components in Table 6.1) appear to have been adopted from MNR's Class EA for Resource Stewardship and Facility Development Projects. Clarify reference to use of criteria developed in the ToR.</p>	<p>The reviewer is correct that the assessment of alternatives "to" the Project used the MNR criteria developed for Class EA documents. This methodology is less complex but consistent with the ToR methodology. The MNR criteria which are used across Ontario, were thought to be more transparent for a general audience understanding of the overall merits of undertaking the Project as a whole, which does not require the reviewer to go to the appendix for further detail.</p> <p>Clarification will be provided in the Final EA Report as to the use of this approach, and the MNR source of the method will be acknowledged in the Final EA Report.</p>	<p>Complete</p> <p>Vol 2 Sec 6.1.2</p> <p><i>Note: an alternatives assessment of project alternatives has now been provided in Appendix O (Table O-0)</i></p>
74	<p>Vol 2 Pg 6-2 and 6-3: It is appreciated that RRR has demonstrated that some impacts will be more significant than others and that an attempt to rank the significance from low to high. The proponent has identified 4 elements in section 6.1.3 that will have some degree of impact. However more clarity is needed for the numerical value of 4. The report should identify there will be impacts to the four areas identified as having a ranking of 4. It should be identified what the intermediate value of 4 is.</p>	<p>Intermediate values of 2 and 4 were defined in Section 6.1.2 of the Draft EA Report to allow for a finer scale interpretation of differences between alternatives, compared with a three-point system, recognizing that some elements are better classified as low to intermediate (Level 2), or medium to high (Level 4). This is a standard approach to such classifications.</p>	<p>Complete</p>

#	COMMENT	RESPONSE	STATUS*
75	<p>Vol 2 section 6.8.2 Pg 6-46: Alternative B has been selected as the preferred alternative, based on human environment/socio economic perspective. But has the highest significance to the environment. It would appear the alternative was selected largely on cost. There needs to be a better description of how the performance objectives and evaluations were assessed.</p> <p>There is more clarification needed on:</p> <ol style="list-style-type: none"> 1) why Alternative A would not be feasible (ie pg 6-47 why there would be more difficulty obtaining environmental approvals, 2) why there is an unfavorable tailings storage to dam fill ratio when it appears to be comparable to B 3) why the land tenure would be an issue when there is a very small portion of area that is not RRG that could not be purchased or avoided). 4) why the cost estimate for alternative A is stated to be 60M on pg 6-49 but only 46M for the dam cost differential, 5) why there is not a breakdown of the 60M estimated on Pg 6-49. 6) And why there is no cost estimate for option B. From the analysis in the report, it does not seem to justify environmental impacts. 	<p>Alternative B was selected primarily on the basis of costs and socio-economic factors, much of which are also related to cost and the ability of the Project to move forward to create economic opportunities for the local area and the region. Alternative A was rated as "preferred" from an environmental perspective, but Alternative B was rated as "acceptable" for environmental effects. Alternatives A, C and D all achieved "unacceptable" ratings for one of more performance objectives, and were therefore rejected.</p> <p>The potential difficulty in obtaining environmental approvals for Alternative A relates to possible noise (and perceived dust) issues for adjacent residents in Dearlock which could complicate obtaining an Environmental Compliance Approval (ECA) for air. Air ECA approvals are very time consuming, and AMEC has faced extensive delays on another Ontario mining project over related air issues. Approval complications may also arise over a further re-routing of Highway 600, when other reasonable alternatives are available. This situation is unlike that of re-routing Highway 600 around the open pit, because the highway currently passes through the open pit and there is no alternative except to re-route the highway. In public meetings local citizens have stressed the importance of maintaining local access.</p> <p>Dam construction volumes are sensitive to the natural terrain and to overall dam height, because of the low slope angles required for working with clay fill materials to construct the dams. Section 6.8.1 shows that the dam fill differential between Alternatives A and B is 4.6 Mm³, which with an estimated \$10/m³ placement cost (all-in), results in a base cost differential of \$46 M. The \$60M cost differential between Alternatives A and B estimated includes the \$46 M dam costs; \$8 M to re-align Highway 600; costs for longer tailings pipelines; additional land acquisition costs; and an allowance for increased haul distance for dam fill. Most of the material for dam construction will derive from the open pit. The cost differential of \$60M is sufficient to give Alternative A an unacceptable rating for costs.</p>	<p>Complete</p> <p>Vol 2 Sec 6.8.2</p> <p>App P</p>

#	COMMENT	RESPONSE	STATUS*
		<p>Further information on the environmental approval and cost differentials will be provided in the Final EA Report.</p> <p>Additional information will also be provided in Appendix P of the Final EA Report, which will contain the Assessment of Alternatives for Tailings and Mine Rock Storage, prepared pursuant to the Federal Metal Mining Effluent Regulation (MMER).</p>	
76	<p>Vol 2 Section 6.10.2 Pg 6-56-61: Whether or not aggregate sources are subject to the ARA depends on 1) land tenure (if under a mining lease or under a mining claim) 2) reservations for private patent (sand and gravel). Refer to attached table provided with these comments. Given the delay in the mining lease application, the proponent should reassess the aggregate sources and land tenure using the information provided.</p>	<p>RRR appreciates the advice from MNR and will continue discussions with MNR and the Ministry of Northern Development and Mines (MNDM) regarding land tenures aspects.</p> <p>For clarity, the majority of the material planned to be used onsite for construction purposes will be materials extracted as part of the project development and re-used, rather than fresh aggregate. RRR and our consultants understand from a number of previous Ontario mining projects, that materials extracted for other purposes (such as stripping of an open pit) that are re-used as for aggregate purposes (but not are extracted specifically for use as aggregate), are not considered aggregate under the <i>Aggregate Resources Act</i>. Advice will be sought from the MNR regarding approval requirements for any fresh aggregate sources, if dedicated extraction is proposed.</p>	Complete

#	COMMENT	RESPONSE	STATUS*
77	<p>Vol 2 section 6.18, Pg 6-89 and Appendix O Table 0-13: Alternative A has been selected as the preferred alternative. Although the report identifies it was the preferred alternative in all 5 categories, it would appear the preferred alternative was based on cost. Table O-13 Pg 150 does not include maintenance in the analysis.</p> <p>1) There needs to be a better description of the transmission line (ie what is the ROW required for a 230KV line) how the performance objectives and evaluations were assessed.</p> <p>2) Please better describe the topography and the forest composition of each alternative (ie forest composition, vol of merchantable timber to be harvested, area of wetland to be crossed, and number and width of water crossings)</p> <p>3) Please provide details on maintenance requirements. The assessment has not included whether or not chemical tending will be needed and the associated effects as well as cost. Chemical tending is a common application for control of tree growth.</p> <p>4) Please provide references/information to support the statement on pg 6-93 that suggests there is an effect/concern to humans from electromagnetic field exposure.</p> <p>The statement on Pg 6-92 requires more clarity. A) If chemical tending will be used for maintenance the assessment needs to include impacts to fish habitat. B) which SAR are being referred to in the context of a adverse impact? And more description is needed on how the potential benefits of the transmission line to Whip-poor-will, Boblink, and Barn Swallow. MNR does not agree there will be any benefits to Boblink and Barn Swallow, and it is a extremely low probability that there will be benefits to Whip-poor-will.</p>	<p>A description of the transmission line is provide in Section 4.16 of the Draft EA Report: one- or two-pole wooden structure; nominal 40 m wide right-of-way (ROW). Further design details would be provided in permit applications to the MNR once design details are finalized, including pole positions, etc.</p> <p>Additional detail on the topography / forest compositions / wetlands / stream crossings for the four alternatives will be provided in the Final EA Report, as suggested.</p> <p>Maintenance requirements were considered to be similar for all transmission lines. As the transmission line is expected to remain owned by RRR, RRR is willing to commit to manual vegetation management to eliminate potential concerns related to chemical tending.</p> <p>The electromagnetic radiation effects reference is provided on Pg 158 of Appendix O, and is listed in the reference list to Appendix O of the Draft EA Report. This reference will also be added to the summary text, as suggested.</p> <p>While Bobolink and Barn Swallow prefer open and fragmented habitats, we would agree that 40 m wide linear corridors may not be sufficiently wide so as to provide a tangible benefit to these two SAR species. The statement regarding these two species will be removed from the Final EA Report. Whip-poor-will are however, known to use and prefer forest edge environments, so AMEC believes that the statement "could potentially benefit" is a fair statement with regard to Whip-poor-will.</p>	<p>Complete</p> <p>Vol 2 Sec 6.18.1 Table 6-9 Fig 6-5, 6-6</p> <p>Vol 2 Sec 4.16 Sec 6.18.1</p> <p>Vol 2 Sec 6.18.2</p> <p>Vol 2 Sec 6.18.2</p>

#	COMMENT	RESPONSE	STATUS*
78	<p>Volume 2, Evaluation of Alternatives, Table 6.1 – Fish, aquatic resources and habitats, Terrestrial Wildlife and Natural Heritage Features: At minimum, mine development is expected to ‘threaten the ... distribution ... of the component’ (fish, terrestrial wildlife, natural heritage features) which is not consistent with a significance level 3. Given historical and current impacts of previous mine developments on local fish and wildlife populations, level 3 appears overly optimistic. Consider assigning significance level 4 for impacts to fish, aquatic resources and habitats, terrestrial wildlife and natural heritage features. If the ‘natural heritage feature’ component is redundant with others, remove it.</p>	<p>AMEC agree that the effects to terrestrial wildlife could reasonably be interpreted as a level 4 effect, recognizing that habitat rehabilitation at closure will take some time, and that a level 4 rating for this environmental component would be more consistent with the level 4 rating assigned for vegetation and habitat. We do however, believe that a level 3 rating is appropriate for fish, aquatic resources and habitat is appropriate recognizing that: Loslo Creek and Marr Creek are small intermittent systems; fish habitat compensation will be provided; and that the quality of downstream waters will be managed to protect aquatic life.</p> <p>Ratings for terrestrial wildlife and to natural heritage features will be changed in the Final EA Report to level 4 values.</p>	<p>Complete</p> <p>Vol 2 Table 6.1</p>
79	<p>Volume 2, Evaluation of Alternatives, Table 6.1 – Ecological Integrity: It seems extremely difficult to justify ranking impacts to ecological integrity, as defined in the Provincial Parks and Conservation Reserves Act 2006, less than level 5. Maintaining ecological integrity is not a management priority outside of provincial parks and conservation reserves in Ontario. Suggest removing ecological integrity as an environmental component from Table 6.1.</p>	<p>It could reasonably be argued that Provincial Parks and Conservation Reserves present a special case, where ecological integrity would be more highly valued than for other areas, especially areas with considerable disturbance. Nevertheless, to avoid potential conflict concerns, and recognizing that ecological integrity is redundant to other listed environmental components, the "ecological integrity" component will be removed from the table as suggested.</p>	<p>Complete</p> <p>Vol 2 Table 6.1</p>
80	<p>Volume 2, Evaluation of Alternatives, Table 6.1 – Vegetation and habitat: Agree with assessment, and suggest opportunities may exist to design habitat for various wildlife (e.g. amphibians, bird species at risk) in proposed West Creek Pond and Clark Creek Ponds. Please contact FF District MNR office to discuss further.</p>	<p>The ultimate design of the West Creek pond and the Clark Creek pond will occur as part of the fisheries NNLP development. RRR and our consultant will ensure that the MNR is involved in the designs for the ponds through the review process associated with these plans. Draft copies of the plans will be appended to the Final EA Report.</p>	<p>Complete</p> <p>App X-1, X-2, X-3</p>

#	COMMENT	RESPONSE	STATUS*
81	Volume 2, Evaluation of Alternatives, Pg. 6-7, Appendix O: Many environmental baseline study results are not mentioned in descriptions of advantages and disadvantages of the alternatives. As one example, the "... type and quality (functionality) of terrestrial habitat that would be displaced or altered" is rarely addressed. Provide further details of important wildlife and vegetation components impacted by alternatives (including process plant and explosives facility) within 6.0 Evaluation of Alternatives and Appendix O. Also see comment 82.	The alternatives section (including Appendix O) is already very lengthy. RRR and our consultant believe that sufficient information has been presented to justify the alternatives considered in a reasonable manner.	Complete
82	Volume 2, Evaluation of Alternatives: As recorded in the September 21, 2012 baseline meeting between MNR and AMEC (point 7 of minutes), showing the spatial relationship of project footprint alternatives and specific environmental 'values' would allow reviewers to better visualize and understand impacts. As in Figure 6-3 (and to some degree Figure 7-12a), provide maps showing the spatial relationship of project footprint alternatives (including process plant and explosives facility) to specific environmental 'values' deemed important to conserve (e.g. woodlands supporting area-sensitive birds, rare plant occurrences, etc.).	Figure 6-3 will be amended in the Final EA Report to show alternatives considered for both the processing plant and explosives facilities as suggested, together with additional environmental values related to these facilities.	Complete Vol 2 Fig 6-3
83	Appendix J-1, Table J-2; pg. 14, 16-18: The Ontario Herpetofaunal Atlas is used as a reference for bird observations and Christmas Bird Count is used as reference for herptile observations. It is surprising that Common Redpoll was observed during a Breeding Bird Survey. Correct use of footnotes 9 and 10 and clarify observation of Common Redpoll during Breeding Bird Survey in Appendix J-2.	Footnote numbers will be corrected in Appendix J-1 of the Final EA Report.	Complete App J-1

#	COMMENT	RESPONSE	STATUS*
84	Appendix O. Effect on resource management objectives: There is no mention of MNR resource management objectives related to fish and fish habitat, deer, moose, bear, species at risk and Crown forest management. Include opportunities or challenges related to MNR resource management objectives under the appropriate indicator for all project alternatives.	Additional discussion will be provided on MNR resource management objectives, where appropriate in Appendix O.	Complete App O
85	Appendix O. Table 0-2, Effects on terrestrial species and habitat: Baseline studies generally did not involve tracking fish or wildlife movements or plant dispersion (see MNR-5). Cite evidence “that open pit would not negatively influence plant dispersion and wildlife movement corridors”. If this claim is speculated due to existing and ongoing disturbance of the proposed open pit area, clarify.	The statement is based on the consideration that RRP development does not encroach on the immediate Pinewood River corridor; and that otherwise habitats in and surrounding the RRP site do not define any other obvious corridors, as evidenced by Figures 5-22a/b, that would be disrupted by open pit or other site developments.	Complete
86	Appendix O. Table 0-2, Effects on fish and aquatic habitat (and S7.5.1.3, pg. 7-29): Discussion of how 1,647m ³ of water taken daily from West Creek Pond for mineral processing operations may affect fish habitat offset is lacking. Provide more details on expected fluctuations in West Creek Pond throughout the year as a result of water management activities.	Additional description of the effect of water taking on the remaining West Creek channel will be summarized or referenced in the Final EA Report (Section 7.5.1.3) and detailed in the draft NNLP appended to the Final EA Report.	Complete App W-1 <i>Note: West Creek Pond no longer proposed for process water source.</i>

#	COMMENT	RESPONSE	STATUS*
87	<p>Volume 2, Evaluation of Alternatives S6.2.2, pg. 6-7. Appendix 0. Table 0-2, 0-6, 0-10: Both mine water management alternatives apply mitigation to minimize effects to the natural environment. A performance of 'preferred' is therefore inappropriate as per definition provided in S6.2.2, Effects to the Natural Environment. Comment also applies to Ore Processing Alternatives, Tailings Management Area Alternative A, Domestic Sewage Management alternatives 1 and 2, Transmission Corridor Alternative D, etc. For the first mine water management alternative, change effects to the natural environment summary rating from preferred to acceptable. Because most alternatives apply at least some mitigation to reduce environmental impacts, it may be more efficient to revise the definition of 'preferred' to 'requires least amount of mitigation to minimize adverse effects to the natural environment and is superior to acceptable alternatives.'</p>	<p>This change will be made to the Final EA Report to more accurately reflect the comparative analysis. The intent of the analysis would be preserved and best served by modifying the definition of "preferred", as suggested.</p>	<p>Complete</p> <p>Vol 2 Sec 6.2.2</p>
88	<p>Appendix 0. Table 0-3 and 0-6, Effects on terrestrial species and habitat: In S5.1.1, pg. 5-2 it was assumed there were migratory corridors 'associated with aquatic systems and associated riparian habitats'. Impacts of mine rock and overburden and tailings management areas on these potential movement corridors are not addressed. Either address potential negative impacts on assumed movement corridors or report 'none apparent or known' for this indicator for all project component alternatives in Appendix O.</p>	<p>We would be supportive of the latter suggestion of "none apparent or known", as this accurately reflects conditions, and the indicator does not materially affect any of the outcomes. This change will be made to the Final EA Report.</p>	<p>Complete</p> <p>App O</p>
89	<p>Appendix 0. Table 0-9, Effects on terrestrial species and habitat: Additional disadvantages of developing an onsite landfill include removal of additional terrestrial wildlife habitat, human-wildlife conflict and wildlife poisoning. Consider additional disadvantages of onsite landfills to the natural environment.</p>	<p>Modifications will be made to assessment in the Final EA Report to reflect these added aspects.</p>	<p>Complete</p> <p>App O</p>

#	COMMENT	RESPONSE	STATUS*
90	Volume 2, Evaluation of Alternatives, S6.15.1, pg 6-81; Appendix 0, Table 0-11: For 3 highway re-routing alternatives, description of water crossings and their potential environmental impacts is lacking. Describe water crossings and their potential environmental impacts for all highway re-routing alternatives.	The water crossing data will be added to the analysis as suggested in the Final EA Report. Different crossing locations may be more or less, amenable to bridge crossings than others for ease of construction and environmental effect.	Complete Vol 2 Sec 6.15.2 App O
91	Volume 2, Evaluation of Alternatives, S6.17-6.18. Appendix 0. Table 0-12 and 0-13. Effects on terrestrial species and habitat: In addition to positive effects on some wildlife, creation of forest edge habitat also has detrimental effects on forest-interior/area-sensitive species by rendering habitat unsuitable (Robbins et al. 1989) and reducing reproductive success(Askins 1994; Schlaepfer et al. 2002); creates a barrier to dispersal and gene flow in populations (Spellerberg 1998; Trombulak and Frissell 2000); and supports colonization of invasive species, particularly plants (Spellerberg 1998, personal observations). It is unlikely that bobolink and barn swallow will use the transmission line corridor as breeding habitat as these species are limited by field area/distance-to-edge requirements and presence of suitable nesting structures respectively.1. Consider additional disadvantages of power supply alternatives to the natural environment. Also see comments 81 and 82. 2. Address difference in magnitude of habitat removal and fragmentation impacts among transmission corridor alternatives. 3. See comment 87 regarding transmission corridor alternative D. 4. Given large magnitude of impacts, justify why an 'unacceptable' summary rating for effects to the natural environment was not applied to any of the transmission corridor alternatives.	<p>The evaluation of power supply alternatives does list adverse impacts related to forest clearing as a disadvantage to "woodland species that would be displaced as ROW cleared", along with disadvantages to ungulates related to greater ease of predator movement.</p> <p>The reference to potential advantages of corridor development to Bobolink and Barn Swallow will be removed in the Final EA Report pre response to comment #76.</p> <p>Relative to other mining and major infrastructure developments in Ontario, a 16.7 km transmission line is quite modest. For example, the Victor Mine required approximately 450 km of new transmission line, and the Detour Lake Mine required 185 km of new transmission line.</p> <p>The total ROW footprint of the proposed transmission line, at an average ROW width of 40 m, is 0.67 km². Such clearing would also be considered as modest within the context of any forest management plan. Moreover, the selected transmission line passes through considerable portions of bedrock and wetland terrain which would be subject to much lesser disturbance as groundcover along the length of the line would be left intact.</p> <p>Therefore none of the alternative routings would be considered unacceptable from a natural environment perspective.</p>	Complete Vol 2 Sec 6.18.2

#	COMMENT	RESPONSE	STATUS*
92	<p>Table 0-17, Effects on terrestrial species and habitat: Concerns related to quality of aquatic and wetland habitat in rehabilitated tailings management area. Include more detail on typical approaches to rehabilitating tailings ponds at other mine sites and expected quality of resulting aquatic and wetland habitats for wildlife. Will benthos, turtles, diving ducks, etc. likely be exposed to toxins? Will toxins bioaccumulate in food chains?</p>	<p>All alternatives are assessed as to achieving acceptable water quality condition at closure. The expectation is that post-closure TMA pond water will approach the Provincial Water Quality Objectives (PWQO) for the protection of aquatic life values within a period of five to ten years, and that wildlife would not be at risk during the intervening period.</p> <p>Detail regarding the proposed reclamation approach to TMA will be provided in the Draft Closure Plan being prepared pursuant to the <i>Mining Act</i> for submission in December 2013 as a draft for review by the MNDM.</p>	On-going
93	<p>Volume 2, Effects assessment and Mitigation, S7.0: Numerous statements are made in Section 7.0 about displaced wildlife expected to colonize new habitats in the NLSA and NRSA. Cite evidence that displaced wildlife do not experience resource competition, territorial aggression from conspecifics, dispersal-related mortality, or other fitness-reducing impacts. Otherwise, describe negative impacts experienced by displaced wildlife.</p>	<p>Baseline studies and habitat mapping using high resolution satellite imagery indicate that the habitat types removed from the RRP footprint are abundant nearby and within the region (much of the habitat removed consists of agricultural lands). Density estimates from survey locations indicate that these nearby suitable habitats are not saturated with competitors and would be able to accommodate displaced individuals. Since direct mortality is not expected, it is assumed / predicted that displaced individuals will migrate to these nearby areas. Some dispersal related impacts could occur but this is only speculative and could not feasibly be measured / monitored.</p> <p>Resource competition, territorial aggression from conspecifics, dispersal-related mortality, or other fitness-reducing impacts are already experienced on a daily / annual occurrence by all wildlife in the region. Removal of habitat particularly associated with the stockpile developments will be gradual over the course of several years and therefore, displacement of wildlife will also be gradual (of necessity certain areas, such as the TMA, will be cleared nearly fully early in construction). Our conclusions are based on the gradual loss of a relatively small amount of habitat (relative to what is available nearby) resulting in a low number of displaced individuals over time. The overall effects of this on local and regional reproductive output for each species will be negligible (undetectable).</p>	Complete

#	COMMENT	RESPONSE	STATUS*
94	<p>Volume 2, Effects Assessment and Mitigation, S7.1.2, pg. 7-4 and Table 7-2: Do not support the statement that “if a Level 1 rating is achieved for any of the attributes involving magnitude/geographic extent, duration or frequency ... then the effect is considered to be not significant”. This is an extremely conservative form of risk analysis, where Level 1 ratings have a disproportionate influence on the overall significance determination. Also do not support criteria used to rate magnitude and geographic extent effects on terrestrial habitat (including wetlands) and wildlife (including SAR). Given the large magnitude of proposed development (21.7 km² terrestrial habitat overprinted), an effect ‘confined solely to project lands’ can readily be of significant consequence. Recognizing that the RRGP is one of the single largest projects ever proposed in the Rainy River area: 1. Revise effects analysis methodology. 2. Revise criteria used to rate magnitude and geographic extent effects on terrestrial habitat and wildlife.</p>	<p>This methodology used for determining significance for the RRP (or similar methodologies) has been used for several other mines in Ontario, and elsewhere in Canada, and is consistent with general EA practices.</p> <p>The path to significance determination is an iterative one, wherein all reasonable attempts are made to mitigate adverse environmental effects in the initial project planning phases, and then refinements are made through further iterations and stakeholder involvement to further reduce environmental effects where reasonably feasible. If an effect is still considered to be significant, then further actions (mitigation / compensation) are required to further reduce effects until the assessed effect is determined to be not significant. This methodology was defined in the Provincially-approved ToR.</p> <p>The intent of the overall process is develop a project plan which reduces environmental effects to a reasonable level, recognizing that various stakeholders will have different views on what is a reasonable and acceptable environmental effect.</p> <p>The above notwithstanding, AMEC recognizes a need to modify the magnitude / extent criteria to accommodate relevant SAR species in a manner consistent with criteria used to assess aquatic habitat and fisheries resources with wording as per the following to be added to the Level 1 criteria:</p> <p>"or, in the case of applicable SAR species, where no net loss of the productive capacity of habitat is achieved (or anticipated to be achieved) through permits"</p> <p>This added criterion will be applied to Level 1 magnitude / extent criteria for: terrestrial habitat (including wetlands), and wildlife (including SAR).</p>	<p>Complete</p> <p>Vol 2 Table 7-2</p>

#	COMMENT	RESPONSE	STATUS*
95	<p>Vol 2 Section 7 Pg 7-108: The report does not mention the Crown Land Use Policy Atlas (CLUPA) Mine development is within the General Land Use Area (GLUA) G-2581 (Agricultural Hinterland). The primary land uses of this area are sport fishing, forestry and deer management. The Transmission line options A and D overlap with GLUA G-2601 (Nestor Falls/Morson) and G-2573 (Pipestone Chain of Lakes) both of which have a focus to protect existing tourist, recreational and cottaging interests. Provide a description in this section that speaks to the land use policies in MNRs CLUPA and provide reference to where/hoe they are addressed.</p>	<p>MNR policies will be referenced in the Final EA Report as suggested.</p>	<p>Complete</p> <p>Vol 2 Sec 7.18.1</p>
96	<p>Volume 2, Effects Assessment and Mitigation, S7.5.1.1, pg 7-27: It is stated that West Creek Pond will contribute limited to no flow to the West Creek diversion channel during low flow conditions. Explain why exacerbating low flow conditions in the West Creek diversion fish habitat offset is acceptable.</p>	<p>The existing West Creek and other similar tributaries, exhibit periods of limited to no flow, despite the main channel being classified as having a permanent flow regime. However, the constructed West Pond will have a shared purpose between providing fish offset habitat, and providing a fresh water source for the mine process, and as such temporarily exacerbating the low flows during mine life is unavoidable. The areas of deep water habitat provided by the pond are considered to greatly offset the increased periods of flow intermittency to which the fish community is acclimated to. The design of the pond and the diversion channel will take this increased intermittency into account, and the constructed channel will have enhanced pool sections that will ensure substantial refuge habitat between periods of flow.</p>	<p>Complete</p>

#	COMMENT	RESPONSE	STATUS*
97	Volume 2, Effects Assessment and Mitigation, S7.6.1.3, pg 7-39: Full evaluation of water crossings requires more details of watershed and proposed structure. Provide watershed size, slope and wetland area upstream of water crossing location and culvert or bridge sizing calculation. Propose specific culvert size(s) or bridge size for crossing. MNR recommends considering structure suitable for passing Q100 and installation of clear-span bridge to maintain natural channel width and substrate. Provide more details on short and long-term sediment control measures.	The details requested are typically derived at the detailed design stage for road crossings. The design team will refer to the Ministry of Transportation standards for the design and capacity requirements for the crossing of Highway 600, and to municipal requirements for the local access roads. In addition, this information will be provided in environmental approval applications to the MNR, as applicable.	On-going
98	Volume 2, Effects Assessment and Mitigation, S7.8.1, pg 7-46: Question the statement that “woodlands will retain their important ecological functions”. Include more detail on area-sensitive species observed in affected woodlands and habitat requirements of such species. See comment 82.	Area-sensitive species are addressed in Section 7.12.1.1 and residual effects experienced by area-sensitive species are addressed in Section 7.12.4.1.	Complete

#	COMMENT	RESPONSE	STATUS*
99	<p>Volume 2, Effects Assessment and Mitigation, S7.8.1, pg 7-46 and S7.8.5: With specific reference to New England Violet and Field Sedge, speculation about species' population sizes and/or describing impacts of mine development in the context of a larger landscape (NLSA, NRSA) is unconvincing justification for a significance determination. This comment also applies more generally throughout the EA. Either provide evidence that New England Violet and Field Sedge should not be considered rare plants; cite primary literature indicating removal of 3 or fewer occurrences of these species is unlikely to impact overall stability and/or genetic diversity of populations; or remove speculation about population size and draw conclusions accordingly.</p>	<p>Following the effects analysis methodology detailed in Section 7.1.2, it was concluded that the loss of a few occurrences of these species has limited potential to contribute to an overall significant environmental effect to these species within the region. The loss of three or fewer individuals has low magnitude and geographic extent relative to the distribution and reproductive viability of these species in the region.</p> <p>New England Violet and Field Sedge are rare plants but are not listed as SAR. There is no primary literature that describes the population-level effects of removing a few individuals of these species, but our conclusions are based on the best available information and on decades of professional experience with similar projects and with long term population dynamics studies. No other individuals for these species were found within the NLSA and therefore, it is unlikely that these few isolated individuals contribute to their respective regional populations' stability or genetic diversity.</p> <p>These species are not listed as SAR and are found in larger concentrations elsewhere in the region and in the Province. Therefore, the conclusion was made that the loss of a few individuals of these species has low magnitude and geographic extent relative to the distribution and reproductive viability of these species in the region and in the Province.</p>	Complete

#	COMMENT	RESPONSE	STATUS*
100	<p>Volume 2, Effects Assessment and Mitigation, S7.9.5: Impacts to deer are considered not significant because “winter deer yarding areas are abundant throughout the NRSA” and deer are “numerous” and “ubiquitous”. Impacts to moose are considered not significant “given the low density of moose in the region.” Apparently opposing rationale is used to justify non-significant impacts to ungulates. Describe circumstances under which the RRGP would have significant impacts to ungulates. See also comment #94.</p>	<p>Although it may be deemed opposing rationale, the circumstances warrant this assessment. One species (moose) was not observed and is therefore not expected to be impacted. The other species (deer) is present in such large numbers with habitat found throughout the NRSA, that removal of a small amount of deer habitat in the RRP footprint is not considered to be a significant loss of deer habitat. Page 67 of the MNR Significant Wildlife Habitat Technical Guide (MNR 2000) states: <i>"The significance of a particular deer yard depends on its context in the landscape. In areas where deer populations are high (and there are a number of large deer yards distributed across the landscape), some of the smaller yards may not be considered significant with respect to the application of the Natural Heritage Features and Areas Policy."</i></p> <p>There was little to no evidence of moose using the NLSA (only two moose were recorded between 2009 and 2012 and they were identified 12 km away from the proposed project footprint) and little to no moose habitat was recorded. Therefore, no impacts to moose are expected.</p> <p>The assessment therefore considered: presence / absence of species; amount of habitat lost in the footprint; and availability of alternative suitable habitat nearby (elsewhere in the NRSA).</p> <p>It is assumed and implied that significant project impacts to ungulates would include the loss of large amounts of critical habitat and/or significant declines in the local population; neither of these effects are expected.</p>	Complete
101	<p>No comment provided in original comments.</p>		

#	COMMENT	RESPONSE	STATUS*
102	Volume 2, Effects assessment and Mitigation, Table 7-18: Common gallinule are very rarely observed in Rainy River district. American Coot are regular breeders. Confirm that common gallinule were observed and that American coot were not observed.	The text of the Final EA report will be revised to replace Common Gallinule with Common Goldeneye.	Complete Vol 2 Table 7-18 No American Coots were observed
103	Volume 2, Effects assessment and Mitigation, S7.13.1, pg 7-69: Forest Management Guide for Conserving Biodiversity at the Stand and Site Scales (OMNR 2010) provides direction for conserving common raven, great-horned owl and American kestrel habitat. Consider OMNR (2010) as an additional useful reference.	RRR and our consultant appreciate the identification of the suggested reference and will consider it where appropriate in the Final EA Report.	Complete Vol 2 Sec 7.13.1
104	Volume 2, Effects assessment and Mitigation, S.7.8-7.16(Government, Aboriginal and Public Comments and Concerns): MNR has indicated that furbearer dens, beaver dams and raptor nests are protected by the Fish and Wildlife Conservation Act. MNR has also provided comments regarding additional specific wildlife habitats in need of consideration via e-mails (Oct. 10 and Nov. 20, 2012).Include protection of furbearer dens, beaver dams and raptor nests as specific concerns identified by MNR. Document additional MNR comments and concerns regarding various wildlife habitats in appropriate sections.	A review of the specific comments received will be undertaken and additional text added to the Government, Aboriginal and Public Comments and Concerns sections as appropriate. All comments and concerns, and RRR responses were tabulated in Appendix D of the Draft EA Report.	Complete Vol 2 Sec 7.10.2 Sec 7.13.2

#	COMMENT	RESPONSE	STATUS*
105	Volume 2, Effects assessment and Mitigation, S.7.13.3, pg. 7-73: Mitigation of impacts to nesting bald eagles lacks detail. Provide specific measures to be implemented to reduce adverse effects to bald eagle breeding success.	Bald Eagles were not recorded nesting within the RRP footprint but are known to use the area. Therefore, general mitigation measures were provided to prevent impacts to this species and are reasonably detailed (typical of an EA level discussion for a highly mobile species that was not recorded nesting within the area of impact). Should Bald Eagles be recorded nesting within the footprint in the future, the MNR and Environment Canada will be consulted in order to develop a proper and effective mitigation plan.	Complete
106	Volume 2, Effects assessment and Mitigation, S.7.14.3, pg. 7-77: Amphibians that move to tailings management area may experience reduced fitness and/or survival. Consider also placing silt fencing around the tailings management area to discourage amphibian immigration.	Similar to our response to Comment #24, it is not feasible nor is it standard practice to attempt wildlife exclusion measures over such a large area. Pre-treatment of the effluent in the processing plant using the CO ₂ /Air process to reduce cyanide and associated heavy metals to level which are well below wildlife toxicity thresholds.	Complete
107	Volume 2, Effects assessment and Mitigation, S.7.16.1.4, pg. 7-93: All breeding habitats of Canada Warbler require consideration. The observation that Canada Warblers occur at relatively low densities in the NRSA does not necessarily imply their habitats are not 'critical' or unimportant. Provide evidence that Canada Warbler populations are not limited by breeding habitat availability, remove statement that habitats within the NRSA are not critical, or otherwise clarify meaning of 'critical habitat'.	The wording will be revised in the Final EA Report as suggested.	Complete Vol 2 Sec 7.16.1.5
108	Volume 2, Effects assessment and Mitigation, S.7.17.5, pg. 7-106 and 7.18.7.1, pg. 7-120: Draft EA states "the local creeks that are present do not support a commercial or recreational fishery." Re-word consistently with amended baseline studies and draft fish habitat offset plan: "while limited bait fishing does occur within certain project area streams, the area does not support a significant commercial or recreational fishery."	The wording will be revised in the Final EA Report as suggested.	Complete Vol 2 Sec 7.17.5 Sec 7.18.7.1

#	COMMENT	RESPONSE	STATUS*
109	<p>Volume 2, Effects of the Environment on the Project, S8.4.2, pg. 8-7 (and S4.8): As extreme flood events may occur during the life of the mine it is important to ensure tailings management area dams are designed to minimize risk of downstream sediment loading. Provide more detail on layered composition of tailings management area dam and spillway (Are they capped with blast rock of sufficient size to withstand erosion during high flows? Will exposed clay till withstand erosion?). Describe sediment capturing capabilities of water management pond, in a flood scenario.</p>	<p>The tailings dams will be suitably protected to withstand erosional effects associated with extreme flood events. Tailings dam details will be provided to MNR (and MOE) in environmental approval applications. The tailings dams must be approved by the MNR regional engineer through the <i>Lakes and river Improvement Act</i> permitting process.</p> <p>Relative to the water management pond, virtually the entire pond footprint will be flooded at most times, with enough storage capacity always maintained to safely capture the design flood event. Sediment discharge concentrations are limited by Provincial and Federal regulatory instruments. The ECA issued by MOE for operation of the TMA and other site water management facilities will specify details of effluent limits and any associated operating restrictions.</p> <p>Additional wording will be added to the Final EA Report regarding sediment and erosion control for the site; recognizing that greater detail will be provided in the subsequent environmental approvals applications.</p>	<p>Complete</p> <p>Vol 2 Sec 4.8</p>

#	COMMENT	RESPONSE	STATUS*
110	Volume 2, Cumulative Effects, S10.1: Consistent with comments on the Terms of Reference, I do not support restricting the analysis of cumulative effects to the existing environmental baseline. Statement that “it would be the responsibility of the proponents of any such [future] projects to take the effects of the RRGP into consideration” is inconsistent with the approach taken in this EA. Baseline studies have not analyzed or modeled impacts of past projects and activities on the environment. As one example related to migratory birds, a more rigorous analysis of cumulative effects could model expected abundances of birds under historical (pre-agricultural clearing) landscape conditions within the RRGP footprint using already established bird-habitat relations. Then impacts of the RRGP on birds could be determined relative to historic conditions (cumulative effect). Likely, cumulative impacts to forest-interior birds will be more severe than reported in Table 7-18 while impacts to open-country and shrubland birds may be negligible, depending on expected historical forest age-class distribution.	<p>RRR and our consultant acknowledge the MNR comment herein, and that was it provided previously in response to the Terms of Reference.</p> <p>Per the RRR response to MNR's original comment on the Terms of Reference: <i>Past and current projects and activities (such as that reflected by the historical clearing of the area) is considered within the description of existing baseline condition and will be described in the EA Report.</i></p> <p><i>The approach to cumulative effects proposed is driven by the Federal requirements for addressing cumulative effects (CEA Agency 1999) and has been used recently for several mining and mining-related Individual and Class EAs within the Province of Ontario.</i></p> <p>We appreciate MNR's previous comment in follow up, that: "MNR states that while it does not support this approach to cumulative effects assessment, we will defer this component to the expertise of CEAA."</p>	Complete
111	Volume 2, Monitoring and Environmental Management Plans, S13.7.2, pg 13-18: Effects on mammals may also include road-related mortality. Consider documenting road-related mortalities of mammals and other species.	A log of collisions will be kept to monitor effectiveness of proposed mitigation (and need if any, for additional mitigation measures). This will be more clearly stated in the Final EA Report.	Complete Vol 2 Sec 13.7.2
112	Vol 2 s.6.2.2 p.6-7: Water flows or conditions suitable for spawning is an important criteria that needs to be considered as well. Maintenance of fish habitat does not necessarily accomplish this, nor does ensuring fish passage. The right flows at the right time of year are also crucial. Please revise text to include Maintenance of water flows or conditions suitable for fish passage and spawning activity.	We appreciate your comment and it will be considered in the draft NNLP, to be appended to the Final EA Report.	Complete App X-1, X-2, X-3

#	COMMENT	RESPONSE	STATUS*
113	<p>Vol 2 Section 6.11 Pg 6-64: MNR is concerned about the causal reference to other local water sources such as (Off Lake and Burditt Lake) being water sources for start up and low water events. This is an addition to the approved ToR and there are few details. Issues: public concern, lack of consultation during the ToR, 12-20km pipeline, location/alternatives. The report needs to confirm whether or not the plan to take water from Off Lake or Burditt Lake</p> <p>1) is a possibility, 2) as an alternative to water supply, 3) if is a potential plan then alternatives need to be provided, assessment of effects provided, and further consultation since it was not included in the ToR</p>	<p>There is no intent to take water from either lake. This will be clarified in the Final EA Report.</p>	<p>Complete</p> <p>Vol 2 Sec 6.11</p>
114	<p>Vol 2 7.15: The context of Lake Sturgeon should inform the reader that this threatened species has been confirmed in the receiving waters. This needs to be scoped out in 7.15 as was done for other Regulated SAR</p>	<p>Agreed. The Final EA Report will be revised to clarify three Lake Sturgeon were captured in the lower reaches of the Pinewood River during the spring 2013 sampling efforts.</p>	<p>Complete</p> <p>Vol 2 Sec 7.15</p>

#	COMMENT	RESPONSE	STATUS*
115	<p>Vol 2 S7.15.1.1; S7.15.1.5 7-82); Table 7-2: The EA states that RRGP –related effects on local or region Whip-poor-will populations are considered to be not significant. This assessment has been based on two of five variables (magnitude of extent and reversibility) being ranked as level 1. 1) The magnitude of the effect has been classified within the report as level 1, however, consistent with definition provided within the EA the magnitude of effect should be classified as a Level III given sound from the RRGP will likely disturb Eastern Whip-poor-will adjacent to project land (S7.15.1.1s.). Therefore, the RRGP is likely to meaningfully affect off-property species at risk, consistent with a Level III rating for magnitude and geographic extent criteria. Also see comment MNR-94. 2) Given the above, only 1 of 5 attributes is attributed to a level 1 ranking; reversibility. In this case there is no identified timeline when this would be achieved or necessarily any supporting, or refuting information to suggest that territorial reestablishment will or will not occur post development. 3) Importantly, the approach for assessment of significance has failed to capture the context of this species at the RRGP site as we currently understand it.</p> <ul style="list-style-type: none"> - Occupancy at this site is known for up to 70 years. - Apparently suitable areas remain un occupied - Home ranges of birds are significantly larger than reported elsewhere - Whip-poor-will populations are showing significant decline -2.6%/year (1968-2006) in Ontario. - Eco Region 5S2, in which the project lies, has been extensively surveyed and currently there are less than 100 known occupied territories, This would suggest that between 10-20% of the known territories in this Eco Region will be impacted. - Whip poor will are forest dependent. <p>The MNR requests that the factors outlined be considered in the assessment of Overall Significance.</p>	<p>Per the response to comment #93, it is recognized that there is a need to modify the magnitude / extent criteria to accommodate relevant SAR species in a manner consistent with criteria used to assess aquatic habitat and fisheries resources with wording as per the following to be added to the Level 1 criteria:</p> <p><i>"or, in the case of applicable SAR species, where no net loss of the productive capacity of habitat is achieved (or anticipated to be achieved) through permits".</i></p> <p>The assessment of magnitude and extent considers compensation such as no net loss and net benefit permits. In the case of Bobolink, Barn Swallow and Whip-poor-will, proposed mitigation measures consider developing proposals to achieve an overall net benefit to these species within the context of permits issued pursuant to the Ontario <i>Endangered Species Act</i></p> <p>Points listed by MNR will be added, as appropriate, to the discussion of context in Section 7.15.1 of the Final EA Report as suggested.</p>	<p>Complete</p> <p>Vol 2 Sec 7.15.1</p>

#	COMMENT	RESPONSE	STATUS*
116	Vol 2 S7.15.2.1: The area of Bobolink habitat impacted outlined in the EA is inconsistent with the requirement of the ESA – which identifies occupied contiguous habitat - Based on this criteria (Van den Broeck) the analysis has indicated that approximately 350 ha of habitat will be impacted and require authorization under the Act. This requires reassessment in the context of the revised footprint	The reviewer is correct. The text will be revised in the Final EA Report. In the sentence " <i>Development of the RRGF will result in the loss of 385 ha of open country habitat...</i> ", 385 ha will be changed to 350 ha.	Complete Vol 2 Sec 7.15.2.1
117	Vol 2 S7.15.2.1: The period of interest for Bobolink is to July 31st.not August 15 as outlined. Please amend	The period of interest will be reviewed and revised accordingly in the Final EA Report.	Complete Vol 2 Sec 7.15.2.3
118	Vol 2 S7.15.3.3(pg7-87): Under Barn Swallow mitigation is missing details. outline that the activity (removal of structures occupied by nest(s)) will be registered with the MNR as per ESA requirements of O. Reg 176/13	The mitigation measure will be added to the Final EA Report.	Complete Vol 2 Sec 7.15.3.3
119	Vol 2 S7.16 (7-89): Arrowhead spiketail identified within NLSA Green faced clubtail and Midland Clubtail were identified through the records review and have been omitted from the section Similarly, muskroot known with NLSA. Update section	The section in the Final EA Report will be reviewed and revised.	Complete Vol 2 Sec 7.16
120	Vol 2 S7.16.1.2 (7-91) : The analysis of impacts on Golden-winged warbler appears to exclude data (occurrences) provide by MNR – stand 80.Update impact assessment to include other occupied stands	AMEC was unaware of this data. If this data can be provided in a timely fashion, it can be incorporated into Section 7.16.1.2 of the Final EA Report. The following sentence will be updated if necessary " <i>...the removal of vegetation for RRGF components will likely displace approximately 15 to 17 Golden-winged Warbler pairs.</i> " RRR and our consultants do not expect the significance determination for this species will change, as the effects assessment included data from three years of breeding bird surveys conducted by KCB and AMEC. We therefore feel that although the MNR may be aware of additional occurrences, our assessment was based on solid, multi-year baseline data.	On-going Information requested from the MNR

#	COMMENT	RESPONSE	STATUS*
121	Vol 2, S7.16.1.2 (7-91): The statement that the removal of early succession habitat may provide potential habitat is in contradiction to habitat requirements for this species at this site... namely early succession poplar forest. Reconsider impact assessment	This statement will be revised in the Final EA Report as follows: <i>"Vegetation clearing for RRGF activities will include the removal of 79 ha of possible Golden-winged Warbler habitat in the form of early succession habitat, as well as 419 ha of woodland habitat..."</i>	On-going Note: Data requested from MNR
122	Vol 2, S7.16.1.5 (7-93): There is local information on Red-headed Woodpecker. Consider the following paper: Elder D.H and J. Van den Broeck, 2009. Red-headed Woodpecker Habitat Preferences in the Rainy River Area of Ontario. Ontario Birds Vol27 No.3	RRR and our consultants appreciate the identified reference and we will consider it in future documents.	On-going
123	Vol 2, S7.16.1.6 (7-94): It is legal to harvest and consume snapping turtles. Please identify if there are concerns with contaminants and consumption of snapping turtles.	Area waters that are not directly overprinted by site developments, and that constitute receiving waters (the Pinewood River) are expected to achieve water quality that is consistent with protection of aquatic life guidelines (or scientifically defensible alternatives), per Sections 7.5 and 7.6. Portions of the constructed wetland which will be developed as part of the overall treatment works, could contain water quality parameters that are slightly in excess of these guidelines, but not to levels that would provide a health risk.	Complete
124	Vol 2 Section 8.2.1 Page 8.3; second paragraph: This is understood to be a maximum of 0.214Mm3/month. Please confirm	This interpretation is correct	Complete
125	Vol 2 Section 8.2.1 General: If more than 0.375Mm3/month; notification to District crucial due to lake level management concerns. Comment on contingency scenario.	Comment noted with appreciation. There is no intent to take water from either lake as a contingency measure. This will be clarified in the Final EA Report.	Complete Vol 1 Sec 8.2.9 and others

#	COMMENT	RESPONSE	STATUS*
126	Vol 2 *Section 8.2.1: Page 8-3; fourth paragraph: States discharge water would have to be “exceptionally good.”Please indicate how this description relates to required specifications.	The final effluent would need to meet applicable MMER and ECA discharge criteria. In the case of ECA discharge conditions, we expect that there will be an allowable discharge ratio of approximately 1:1 to account for assimilative capacity of the Pinewood River. In the event that there is insufficient flow available to provide assimilative capacity, then the effluent would need to meet the discharge limits without the benefit of the mixing ratio. This explanation will be added to the Final EA Report.	Complete Vol 2 Sec 8.2.1
127	Vol 2 Section 8.2.1, Page 8-3, fourth paragraph: Speaks of “limited, if any assimilative capacity” referring to the Pinewood River. Later in section reader is informed “limited..assimilative capacity” is readily manageable. Please provide indication of how manageable a lack of assimilative capacity would be.	A description of how the lack of assimilative capacity would be managed will be provided in the Final EA Report.	Complete Vol 2 Sec 4.12.6 App W-1
128	Vol 2 Section 8.4.3: Consider implementation of additional design features to minimize risk of damage from encroaching wildfires. Should consider access to and from site, smoke impacts, risk to facility / structures, infrastructure. Mitigation strategies from above comment on 9.4.2.2 could also apply (ie. development of buffer areas to provide fire breaks around facilities),	RRR appreciates your comments and will consider in the Final EA Report as appropriate and in future management plans.	Complete Vol 2 Sec 8.4.3
129	Vol 2 Sec. 9.3.3, page 21-22: discussion of water management pipeline: Stated that WM Pipeline able to transfer both fresh water from Pinewood Rive to mine rock pond(pg. 21) and able to transfer excess treated water from water management pond to Pinewood River downstream of McCallum Creek. Please confirm how many water management pipelines will be located along water management pipeline route	A description of the water discharge pipeline and how it would be used to accommodate fresh water supply will be provided in the Final EA Report.	Complete Vol 2 Sec 4.12.1

#	COMMENT	RESPONSE	STATUS*
130	Vol 2 Sec. 9.3.3, page 21-22: discussion of water management pipeline: There is no information regarding location on Pinewood River where water management pipelines intersect. Please provide details of this site be provided (i.e. sketch and technical details of pipeline/river interface). Please confirm if the transfer site of fresh/excess treated water assumed to be on private land (Lot 36, PautilloTwp)	<p>The water management pipeline for initial taking of water from the Pinewood River, and for discharging water management pond water to the Pinewood River is shown as the (unlabelled) black dashed line extending to meet the Pinewood River to the west in Figure 6-4 of the Draft EA Report. The exact tie-in point and the method of tie-in to the river remain to be determined, and will be determined for the environmental approvals phase. The important consideration for the EA Report, is that the location is defined as occurring just downstream of the McCallum Creek inflow, such that the watershed contributions of both McCallum Creek and Tait Creek are included as Pinewood River catchments.</p> <p>Labelling of the pipeline will be added to Figure 6-4 of Final EA Report.</p>	<p>Complete</p> <p>Vol 2 Fig 6-4</p>
131	Vol 2 Section 9.4.2.3: Clarify responsibilities / expectations of external fire response agencies. Clarify intent of statement and confirm whether separate agreement with FF municipal department is necessary (eg. For access to specific resources not available from other municipal departments).	Detailed arrangements with the Municipal departments in regards to fire and other emergency response will be developed outside of the EA process.	On-going
132	Vol 2 Section 9.4.2.2: Consider implementation of additional design features to minimize risk of fire spreading from facility. Need to consider potential risk of fire spreading to adjacent buildings / lands and develop mitigation strategies to limit spread. Consider additional design safeguards such as establishment of buffers areas around facilities.	RRR appreciates your comments and will consider in the Final EA Report as appropriate and in future management plans.	<p>Complete</p> <p>Vol 2 Sec 9.4.3.2</p>

#	COMMENT	RESPONSE	STATUS*
133	<p>Vol 2, S13.7.3: Further design work is likely required to assess impacts on Breeding Birds Figure 5-16 illustrates point count location, many of which will be directly impacted. Consequently it is unclear whether or not the remaining stations peripheral to the development are adequate to detect changes in occupancy that may occur as a result of disturbance. Please provide the adequate information.</p>	<p>Many of the current survey stations located outside of the footprint will remain and were specifically chosen to be used in a long term, post-construction monitoring program to be developed in association with the regulatory agencies. Removal of habitat particularly associated with the stockpile developments will be gradual over the course of several years and therefore, displacement of wildlife will also be gradual (of necessity certain areas, such as the TMA, will be cleared nearly fully early in construction). Therefore, many survey stations located within the footprint will remain intact for year or more and can also be used to detect changes.</p> <p>The monitoring plan will also involve new survey locations within, adjacent to, and away from impacted areas. RRR agree that further design work will be required as construction and operation progresses and we will consult with both the MNR and Environment Canada to develop an effective plan.</p>	On-going

#	COMMENT	RESPONSE	STATUS*
134	<p>Appendix J-5 2013 Winter Aerial Survey for Mammals Report s. 5. p4: Winter deer concentration areas (yards) are surveyed and identified by the MNR, and sub-categorized/ranked based on usage. This report did not adequately describe the extent of these areas in the project area, nor was it designed to determine preference by deer for these areas. The conclusion that the authors determined no pattern of preference, based on field observations, is not supported. The statement "...deer and moose typically benefit from some level of disturbance..." should be qualified. While these species do benefit from some level of forest disturbance, it is in conjunction with either natural or artificial regeneration of the forest shrub and tree species, not the absence of such as occurs during mine development and operation when habitat is cleared and removed from the landscape. Transmission corridors are unlikely to produce new browsing opportunities as they must be sprayed with herbicide or mechanically cut to reduce competing vegetation, thus eliminating the target browse species. Please remove conclusion that deer, and other species, showed no pattern of preference for habitat within the study area.</p>	<p>The delineation data for winter deer yard habitat was provided by the MNR and is presented in Figure 6 of the Draft EA Report. Therefore, a more detailed description of the extent of these areas in the NLSA / NRSA was not necessary and was not one of the objectives. A more detailed description and effects assessment is provided in the Draft EA Report.</p> <p>Land Information Ontario and the Forestry Management Plan for the Crossroute Forest indicate that Stratum I deer yarding areas exist within all intact forest communities occurring within the NLSA. The results of the aerial survey correspond to this Land Information Ontario distribution within forested areas. The results also indicate considerable use of open agricultural areas. Recorded data (this aerial survey plus four years of baseline surveys for the RRP) indicate that deer are abundant in the NLSA and that they utilize both forest and agricultural habitat even in mid-winter (February 2013).</p> <p>The statement "...deer and moose typically benefit from some level of disturbance..." will be qualified in an erratum to the report, as requested. It is anticipated that clearing of forest for the installation of the transmission line alignment to the mine may create modest browsing opportunities for moose and deer as woody browse vegetation will regenerate along this corridor. Herbicides are not proposed to be used along the transmission corridor and mechanical removal of vegetation will be infrequent enough to allow modest regeneration and therefore browsing opportunities.</p> <p>The conclusion that deer, and other species, showed no pattern of preference for habitat within the study area will be removed from the Draft EA Report.</p>	<p>Complete</p> <p>App J-5</p>

#	COMMENT	RESPONSE	STATUS*
135	Appendix E Section 1.3 Pg 1: Appreciate acknowledgement this needs to support the EA. Decommissioning (closure) should include an objective to address social, recreational and land use. A commitment to consult with the public , stakeholders and agencies to identify the preferred land use after closure, should be included in the report	Stakeholder consultation is a legally required component of the closure planning per the <i>Mining Act</i> .	Complete
136	Appendix E Section 2.3 Pg 4 : The description of the project components are slightly different than what is described in Section 1 of Vol 2: - the open pit is described as being approx 170ha in area vs 200ha. - the TMA selected is approx 800ha vs 1500ha Please amend.	The description in Appendix E and Volume 2 of the Final EA Report will be reviewed and adjusted accordingly.	Complete Vol 2 Sec 1.3 App E
137	Appendix E throughout : Re-vegetation of the mine site will need to have a separate plan developed once mine operations are complete. A better understanding of the site conditions will be evident at that time, as well as an understanding of newer technologies and success. The report should include a commitment to develop a vegetation plan at closure. The plan should include details such as how much area is to be re-vegetated, the objective of the re-vegetation (habitat restoration, aesthetics etc) the type of re-vegetation (seeding vs planting, species etc) the need for addition of treatments such as topsoil/fertilizers etc. The statement on pg 10 that native seed mixes might not be available at a feasible cost should not have an influence	A revegetation plan including an infield program is proposed by RRR and will be described in the in the Draft Closure Plan being prepared pursuant to the <i>Mining Act</i> for submission in December 2013 as a draft for review by the MNM. RRR has reached out to support the agricultural research site in Emo to assist with future seed trials in support of both progressive as well as final reclamation.	On-going
138	Appendix E Section 4.5.2 Pg 19: With regard to rehabilitation of aggregate pits and quarries, it would be most efficient if there was a commitment to be consistent with the rehabilitation standards under the Aggregate Resources Act. This is mandatory for any permits issued under the ARA and encouraged for those that are not. Please amend.	Reclamation will be completed consistent with the <i>Mining Act</i> standards and the intent of the <i>Aggregate Resources Act</i> . The text of the Final EA Report will amended accordingly. Any facilities permitted under the <i>Aggregate Resources Act</i> will comply with those standards.	Complete Vol 2 Sec 4.19 Appendix E

#	COMMENT	RESPONSE	STATUS*
139	<p>Volume 2, Appendix E. S4.6.1, pg. 21: Diversion of natural or other fish-bearing watercourses will further disrupt fish and fish habitat. It is MNR's preference that natural (Pinewood) or other fish-bearing watercourses (West Creek diversion) not be further diverted or manipulated at closure, provided the optimal pit filling rate may be achieved by other means.</p>	<p>RRR and our consultant appreciate your comment and agree with this approach objective, and subject to further input from the various stakeholders on the Draft Closure Plan being prepared pursuant to the <i>Mining Act</i> for submission in December 2013, we support this approach.</p>	<p>Complete App E</p>
140	<p>Appendix 0. Table 0-11, Effects on terrestrial species and habitat: Disadvantages of roads to natural environments also include road-related mortality of wildlife, barriers to dispersal and gene flow in populations and supporting colonization of invasive species, particularly plants. Consider additional disadvantages of road re-alignment to the natural environment.</p>	<p>As appropriate, these disadvantages will be incorporated into Section 6.15. The detailed tables in Appendix O are already very lengthy. RRR and our consultant believes that sufficient information has been presented to justify the alternatives considered in a reasonable manner.</p>	<p>Complete Vol 2 Sec 6.15</p>

#	COMMENT	RESPONSE	STATUS*
141	<p>Appendix O: There is no consistent point of reference for advantages and disadvantages – some comparisons are made relative to an undisturbed environment while other comparisons are made relative to other alternatives. This makes interpretation of advantages and disadvantages extremely difficult.</p> <p>Use the undisturbed environment as a consistent point of reference for comparing advantages and disadvantages of alternatives. ‘No effect’, “maintaining protection of aquatic life standards”, etc. should not be considered an advantage or disadvantage to the environment. Minimizing, mitigating or downplaying negative environmental impacts [e.g. “all habitats that would be displaced are extensive and commonplace within the NLSA”, “no (or very minor) displacement of wetlands”, etc.] should not be listed as advantages relative to an undisturbed environment.</p>	<p>RRR and our consultant were specifically requested to use the terms "advantages" and "disadvantages" in the assessment of alternatives for the RRP. As indicated in the approved Amended ToR, a comparative evaluation of alternative methods has been conducted. The intent of Appendix O is to provide a more detailed explanation and comparison of the alternatives relative to one another, without requiring the reader to rely on the main text of the EA Report, to ensure clarity in the public review.</p> <p>The assessment of advantages and disadvantages of the alternatives is therefore largely a relative assessment of the merits of the alternatives to one another; recognizing that there are some absolutes, such performance objectives being assessed as 'unacceptable' for some alternatives, which is an absolute. It is therefore appropriate, and not misleading, to state that an advantage of one alternative might be that it has a lesser environmental impact, compared with the other alternatives being considered, or that the overall environmental effects are similar among the alternatives. Conversely, it would not be helpful to list as a 'disadvantage' the fact that a given alternative had a lesser effect on the environment compared with other alternatives. This does not mean that the alternative with the least environmental effect has no adverse environmental effect. The absolute assessment of environmental effects of the selected alternative is appropriately considered in the effects assessment of the selected Project package.</p>	Complete
142	<p>Dams are classified under the Hazard classification system in the CDA and or Ontario Dam Safety Guidelines. This classification would determine which “flood” event” they would be designing to. A little premature at this time to state that they are designing to a 100 yr flood event.</p> <p>Design limits/flood limits would be determined in accordance with the hazard classification</p>	<p>As part of the Feasibility Study and engineering design a hazards classification has been completed by Professional Engineers. Further information will be provided in the Provincial approval applications related to the <i>Lakes and Rivers Improvement Act</i>.</p>	On-going

#	COMMENT	RESPONSE	STATUS*
143	Wood harvest on Crown Land: Some overlap with the planned allocation (both harvest and contingency blocks) associated with the 2012-2017 Phase 2 Operational plan for the 2007/2017 FMP for the Crossroute Forest. One planned harvest block overlaps with the preferred transmission line route. Two contingency blocks also overlap: one with the mining site and one with the preferred transmission line route. Information on forest resource licensing is provided as a separate attachment	Comment noted with appreciation.	Complete.
144	No comment provided in original comments.		
145	Volume 2 s. 7.9.1 p. 49: As commented on in s.5 previously, MNR identifies deer winter concentration areas through aerial survey by usage, not a desktop exercise. Remove statement regarding potential winter deer yarding areas based on ecosite data.	Comment will be removed.	Complete Vol 2 Sec 7.9.1
146	Volume 2 s. 7.9.1 p. 49: Figure 5-22 referenced here not included. Add Figures 5-22, 5-22-a.	Reference will be provided as suggested / appropriate.	Complete Vol 2 Sec 7.9.1
	Volume 2 s. 7.9.1 p. 49: Reference to the Crossroute FMP is used incorrectly. Remove reference to deer winter yards from Crossroute FMP.	Comment will be removed.	Complete Vol 2 Sec 7.9.1

#	COMMENT	RESPONSE	STATUS*
	<p>Volume 2 s. 7.9.1 p. 50: Mine development will remove approx 1300ha of deer winter concentration areas, or over 13% of winter concentration area in the NRSA, and a greater proportion in the NLSA, according to MNR analysis of Stratum 1, rank 3&4 winter concentration area data. Update text to reflect this amount.</p>	<p>According to MNR shapefiles / data on deer wintering habitat (presented in the attached Figure 5.9.1) there is very little deer winter concentration area within the footprint of the mine and an abundance of deer wintering habitat present throughout the NRSA (15,016 ha of deer wintering habitat in the NRSA). The attached figure shows that the footprint overlaps with some deer winter concentration areas on the eastern portion of the mine rock stockpile, the western portion of the TMA, and along the transmission line corridor (total loss = 1,265 ha of 15,016 ha or 8.4% of the NRSA).</p> <p>When RRR received shapefiles / data on deer wintering habitat from MNR, rankings for these areas were not provided and therefore, calculation for Stratum 1, rank 3 and 4 were not included. If detailed aerial surveys have been conducted by the MNR in the NLSA subsequently and information is immediately available regarding Stratum and rankings for deer yards in the footprint, we would be willing to incorporate this information in the final EA.</p>	On-going
	<p>Volume 2, s.7.9.5 p.7-53: Do not agree with conclusion that RRG effects on deer are not significant, nor level 1 designation for magnitude/extent, and reversibility (level 1). Loss of up to 13% of core deer winter concentration area is significant, and will have an impact and affect deer beyond the project footprint. Effects are not easily reversible, as much of the lost winter habitat will be replaced by the TMA, and suitable forest types are key to use of winter concentration areas. Suitable forest cover takes decades to develop. Revise text and tables to reflect higher environmental effect ratings for magnitude/extent, and reversibility. Revise text and tables to reflect significant impact to deer populations.</p>	<p>The loss of deer habitat is considered to be Level I for magnitude/extent because the loss is contained within a relatively small area (RRP footprint) relative to the availability of similar habitat in the NRSA or within the larger regional area; and will not have an overall significant environmental effect on the sustainability of the deer population in the area. It is acknowledged that the reversibility of deer habitat loss will take time after closure but with proper reclamation efforts and natural ecological succession, the effect will in time be reversed.</p> <p>It is also acknowledged that deer will be displaced from the RRP footprint area for the life of the project but there is no evidence that the RRP will have significant impacts to deer populations in the region after mitigation and reclamation.</p>	Complete

*As of submission of the Final Environmental Assessment Report. Reference is made to where the comment has been closed in the report where appropriate.

Additional Attachment to Ministry of Natural Resource Response:

Deer Wintering and Moose Late Wintering Areas

Stakeholder: Ministry of Tourism, Culture and Sport
Point of Contact: Jim Antler, Policy Advisor
Comments received: September 6, 2013
Comments regarding: Rainy River Project, Draft Environmental Assessment Report (Ver. 2)

#	COMMENT	RESPONSE	STATUS*
1	Vol. 2, Section 5.12.2.4 (page 5-148): References that four Bear Management Areas (BMA) overlap the Human Environment Local Study Area (HLSA). Did not find information about how potential loss of access for hunting area would be addressed for the tourism operators holding the areas. Further discussions with the Ministry of Natural Resources and the operators in question to address any potential impacts (if not already occurred).	The Rainy River Project (RRP) is situated primarily on private lands on which hunting was not allowed during exploration and will not be allowed in the future due to safety concerns with workers etc. There may or may not be a decline in access for bear hunting, as Rainy River Resources (RRR) and our consultant do not have detailed information regarding hunting results.	Complete
2	Vol. 2, Section 5.13.3.3 (page 5-153) and Vol. 3, Appendix L (pages 22-23): Report presents tourism data for 2009 for the Rainy River District. Our Ministry has data available for 2010. The attached document provides tourism data for the Rainy River District from 2006-2010.	Thank you for this additional information. The report was based on the information available at the time of preparation.	Complete
3	Vol. 2, Section 7.2.2 (page 7-9) and Section 7.18.5 (pages 7-116 to 7-118): Selected Valued Socio-economic Components (VSEC) does not include one for tourism. It is recognized that no tourism facilities are located within the HLSA. Section 7.18.5 relating to the VSEC for “hunting” does not reference the commercial BMA areas that are identified in Section 5.12.2.4 (Outdoor Recreation). While no specific “tourism” VSEC may be necessary, the section dealing with assessing effects for the hunting VSEC should at least acknowledge the existence of BMAs in the HLSA.	As requested, Section 7.18.5 will be revised to acknowledge the existing of bear management areas in the Human Environment Local Study Area.	Complete Vol 2 Sec 7.18.5.1

#	COMMENT	RESPONSE	STATUS*
4	<p>Vol. 2, Section 6.11.1 (page 6-64) and Section 8.2.1 (page 8-3): We understand that there are tourism facilities on both lakes. The operators of those facilities may have concerns with any draw down of the water levels on these lakes. We acknowledge that at least one operator on Off Lake has been consulted with according to the draft EA report (Gateway North Outfitters). Another (Ross' Camp) attended a meeting on December 10, 2012 to discuss accommodation of workers. However, other operators on the lake are not referenced. If not already done, the proponent could provide targeted information to the tourism businesses on Off and Burditt Lakes regarding the use of the two lakes as proposed contingency water sources in order to seek comments. Tourism facilities to be contacted include True North Outposts and Cabins, Hideaway Lodge, Little Moose Lodge, Ross' Camp and Trails End Lodge.</p>	<p>Further engineering has determined that neither lake are not viable contingency supply options. There is no intent to take water from either lake as a contingency measure. The Summary and Final EA Report main text will clarify this aspect.</p>	<p>Complete Vol 2 Sec 6.11.1 Sec 8.2.1</p>

*As of submission of the Final Environmental Assessment Report. Reference is made to where the comment has been closed in the report where appropriate.

newgoldTM Rainy River Project

Stakeholder: Ministry of Energy
Point of Contact: Cheryl O'Donnell
Comments received: September 6, 2013
Comments regarding: Rainy River Project, Draft Environmental Assessment Report (Ver. 2)

#	COMMENT	RESPONSE	STATUS*
1	We have no comments	Thank you for taking the time to review the Draft Environmental Assessment Report.	Complete

*As of submission of the Final Environmental Assessment Report. Reference is made to where the comment has been closed in the report where appropriate.

Stakeholder: Ministry of the Environment: Environmental Monitoring and Reporting Branch
Point of Contact: Dr. Robert Bloxam and Dr. Jinliang (John) Liu
Comments received: September 6, 2013
Comments regarding: Rainy River Project, Draft Environmental Assessment Report (Ver. 2)

#	COMMENT	RESPONSE	STATUS*
1	The model input and out files listed AERMOD version 12345 as the version used in the assessment. Since version 12345 is not the currently approved version of AERMOD in Reg. 419 the proponent will need to submit a section 7 application prior to submitting the application for an Environment Compliance Approval (ECA) and as long as no non-default options were used, the application could be approved.	Rainy River Resources (RRR) and our consultant are aware of this requirement, and appreciate your guidance.	Complete
2	The model runs did not use either the LOWWIND1 or the LOWWIND2 beta options in version 12345 however for the PM and Mill model runs particle deposition option was used which turns on plume depletion option since the options for no plume depletion (i.e. NODRYDPLT and NOWETDPLT) were not invoked. The use of the plume depletion option results in lower (and non-conservative) predicted air point of impingement concentrations. For an ECA approval, MOE's concurrence would be required to allow the use of the plume depletion option, and without this concurrence the subsequent model runs to obtain an ECA would result in higher concentrations for particulate species.	RRR and our consultant appreciate your guidance. All sources were modelled in the Draft Environmental Assessment (EA) Report. Fugitive dust from sources such as roadways will not be included in the modelling assessment for the Provincial Environmental Compliance Approval (ECA) as has been the accepted approach. Particle deposition and plume depletion will not be used for the ECA assessment.	Complete
3	Table A3 included source emissions for PM10 and PM2.5 while the model results in Table 13 did not include PM10 and the electronic modelling files were not posted for either PM10 or PM2.5.	This information will be provided in the Final EA Report. Electronic modelling files will be provided to the Ministry of the Environment (MOE) after issuance of the Final EA Report.	On-going App Q-2
4	The source characteristics for point, area and volume sources included in the electronic files matched the data in Table A7, with the exception of the length and width of the pit which has not been included in Table A7.	This information will be provided in the Final EA Report.	Complete App Q-2

#	COMMENT	RESPONSE	STATUS*
5	Model files were not provided for any of the metals and it was unclear what the footnote in Table 13 meant e.g. did it mean that the results of the unit emission (1 g/s) model run for the Mill (PLANT) source were multiplied by the facility emission rates to produce modelled concentrations? The Mill model output file gave a 24 hour average emission factor of 8.96 ($\mu\text{g}/\text{m}^3$) per (g/s) which for the CaO and CuSO ₄ facility emission rates results in the modelled concentrations in Table 13. However for the metals, multiplying the emission rates by the emission factor of 8.96 resulted in much higher concentrations than those given in Table 13. If a different model file was used to model the metals the file should be provided.	Metals were assessed as a fraction of total suspended particulate. A representative maximum ore and rock concentration was assumed as the metal concentration in the total suspended particulate. Since there are no processes enriching the metals (other than the gold in a wet process), the majority of the emissions are as a result of rock and ore handling; even particulate that is not from ore or rock (e.g. lime, diesel emissions) were considered to contain metals. This approach is considered conservative.	Complete
6	The Report did not include any information on the source of data used for the particle size distributions and densities of the particulate species. Furthermore, the size distribution used for the Mill resulted in most of the mass being centred at 30 μm , which must be justified.	<p>Particle size was developed from the United States Environmental Protection Agency (EPA) AP42 emission factors and the Australian National Pollutant Inventory Emission Estimation Technique Manual for Gold Ore Processing, Version 2 (December 2006).</p> <p>Particle density was assumed as to be 2.2 g/cm^3; a standard density for granitic rocks. The mill size fraction was developed from U.S. EPA AP42 Chapter 11.19 for screening and crushing operations. These were assumed to be the dominant emissions from the mill area. It should be noted that for the "Mill" emission runs for other mill emissions (e.g. CuSO₄), no plume depletion or deposition was assumed (flag not set in model run).</p>	Complete

#	COMMENT	RESPONSE	STATUS*
7	<p>When the emissions by source included in Table A3 were compared with the data in the electronic model input files, the following was noted:</p> <p>a. The PM total emissions in the electronic model input files were approximately 10% lower than the information in Table A3, and</p> <p>b. The electronic model input files did not include NO_x, SO₂ and CO emissions for one of the PORT1 or PORT2 emission sources; however Table A3 listed emissions from all of the above contaminants. These sources did not appear to be significant, and thus these omissions would not have significantly affected the overall conclusions.</p>	<p>a. The operational scenario covers two different non potentially acid generating (NPAG) deposition areas; one for daytime operations and a second area for night time operations. The emissions for both scenarios are provided in Table A3 based on maximum hourly emissions over 24-hours. In the model file, the emissions are set as variable emissions for the appropriate day/night activity. As a result, the total emissions in Table A3 are greater than those modeled due to the time dependence of the emissions.</p> <p>b. Acknowledged. These are not significant sources and would not affect the overall conclusions if included. Appropriate justification of inclusion and exclusion of sources will be provided in the application for a Provincial ECA.</p>	On-going

*As of submission of the Final Environmental Assessment Report. Reference is made to where the comment has been closed in the report where appropriate.

Stakeholder: Ministry of Northern Development and Mines
Point of Contact: Neal Bennett, Mineral Exploration and Development Consultant
Comments received: September 6, 2013
Comments regarding: Rainy River Project, Draft Environmental Assessment Report (Ver. 2)

#	COMMENT	RESPONSE	STATUS*
1	MNDM agrees with EAB comments regarding the lack of detail provided on landfill assessments in the draft conceptual Closure Plan.	<p>The draft conceptual Closure Plan included in the Draft Environmental Assessment (EA) Report was intended to comply with the Federal Environmental Impact Statement Guidelines requirement: <i>a conceptual discussion on how decommissioning could occur will be provided for permanent facilities.</i></p> <p>Further detail will be provided in the Final EA Report regarding demolition waste management per Provincial comments.</p>	<p>Complete</p> <p>App E</p>
2	The Draft Conceptual Closure Plan (Appendix E) must follow Schedule 2 of Regulation 240/00 and note section 8.1 for Aboriginal Consultation.	<p>The draft conceptual Closure Plan included in the Draft EA Report was intended to comply with the:</p> <ul style="list-style-type: none"> • Federal Environmental Impact Statement Guidelines requirement of: <i>a conceptual discussion on how decommissioning could occur will be provided for permanent facilities.</i> • A commitment made in follow up to the Provincial Terms of Reference that: <i>Further details regarding closure and potential environmental impacts will be presented in the EA (and subsequent Closure Plan prepared pursuant to the Mining Act).</i> <p>Consistent with discussions held with Federal and Provincial regulators to date, a Draft Closure Plan pursuant to the <i>Mining Act</i> requirements will be submitted to the Province in late 2013 / early 2014 to facilitate subsequent review and certification as part of the Rainy River Project environmental approvals process.</p>	On-going

*As of submission of the Final Environmental Assessment Report. Reference is made to where the comment has been closed in the report where appropriate.

Stakeholder: Ministry of Environment, Environmental Approvals Branch
Point of Contact: Dale Gable, Senior Review Engineer
Comments received: September 6, 2013
Comments regarding: Rainy River Project, Draft Environmental Assessment Report (Ver. 2)

#	COMMENT	RESPONSE	STATUS*
1	<p>RRR has identified the preferred option for managing waste at the Site is to transport waste off-site for final disposal. There are no EA requirements for the transportation of waste. However, the preferred option assumes that the Township will be granted EA approval for an expansion to its landfill. The Township has yet to undertake the EA process for an expansion and there is no guarantee that they will be granted EA approval. Therefore, it is premature to identify this option as the preferred option or a viable option at this time.</p> <p>In the event, the Township is not granted approval for an expansion and RRRL determines that an on-site waste disposal site is required, then RRRL must follow the EA process as required by Ontario Regulation 101/07 (Waste Management Project) made under the Environmental Assessment Act</p>	<p>Rainy River Resources (RRR) and our consultant recognize the current environmental approvals process for development of an onsite landfill and expansion of an offsite landfill, and appreciate the advice from the Ministry of the Environment (MOE).</p> <p>RRR is working closely with the Township of Chapple to assess local landfill capacity, and has partly funded the studies recently completed on the Township of Chapple, Richardson and Shenston Landfills by K. Smart and Associates. These studies determined that there is sufficient existing capacity in the Township landfills to support the Rainy River Project (RRP), while retaining capacity for other users. Further information will be provided in the Final Environmental Assessment (EA) Report.</p>	<p>Complete</p> <p>Vol 2 Sec 4.14</p>
2	<p>In Section 4.0 of the draft EA, RRRL indicates that demolition waste was not considered in the waste management assessment. It was indicated that the waste will be stored/placed in a dedicated demolition waste landfill on-site. It is unclear why RRRL considers this type of waste and assessment requirements different and why it does not need to fully assess the impacts. Landfill requirements for construction and demolition waste are no different than domestic waste. Therefore, the assessment for waste management for the project is considered in-complete as the proposed on-site landfill is subject to Ontario Regulation 101/07.</p>	<p>Further information will be provided in the Final EA Report regarding the proposed demolition landfill. As this landfill will not be developed until closure of the property (approximately 18 years hence), RRR will complete the design of the landfill closer to that date, recognizing that the Provincial environmental assessment and environmental approvals process, and design requirements are likely to have changed by that time.</p> <p>This is consistent with the approach which has been followed for demolition landfills for a number of other mining projects approved in Ontario in the past.</p>	<p>Complete</p> <p>Vol 2 Sec 4.51</p> <p>App E</p>

#	COMMENT	RESPONSE	STATUS*
3	As the preferred option for waste management at the site was off-site disposal, the information contained in the EA does not adequately address the technical or environmental impact considerations that are needed for a waste disposal site to be located on-site. From this perspective, the assessment is deemed to be incomplete.	Further information will be provided in the Final EA Report regarding potential onsite waste management alternatives.	Complete Vol 2 Sec 6.13.1
4	<p>In the event RRR re-assesses the need for an on-site waste disposal site for domestic waste or for the proposed on-site waste disposal site for demolition waste then they will need to address the incomplete/absent assessments to be considered in the waste management project EA. The type of assessment to consider are identified in the document entitled "Landfill Standards: A Guideline to the Regulatory and Approval Requirements for New and Expanding Landfills (MOE June 2010)", specifically Section 6.</p> <p>These assessments include the following:</p> <ul style="list-style-type: none"> i. Hydrogeological Assessment; ii. Leachate Assessment; iii. Landfill Gas Assessment; iv. Landfill Capacity Assessment; v. Geotechnical Assessment; vi. Noise Assessment; vii. Contaminated Life Expectancy; and viii. Contingency Plans 	RRR and our consultant are aware of the current environmental approvals process for development of an onsite landfill and appreciate the advice from the MOE.	Complete

#	COMMENT	RESPONSE	STATUS*
5	<p>For the proposed on-site landfill site(s), RRRL did not provide sufficient detail on the conceptual design or the closure details of the site. RRRL will have to assess the capacity of the site and the site design (design concept, location, base footprint, slopes etc.) This information has not been provided in the EA. For the closure plan, it was indicated that a 1.0 m of cover and vegetation cover would be applied. RRRL should provide details on the regulatory requirements, design considerations (slope, stormwater management and vegetation considerations) and post-closure activities (i.e. environmental monitoring, inspection and maintenance). These items need to be discussed in the EA.</p>	<p>The draft conceptual Closure Plan included in the Draft EA Report was intended to comply with the:</p> <ul style="list-style-type: none"> • Federal Environmental Impact Statement Guidelines requirement of: <i>a conceptual discussion on how decommissioning could occur will be provided for permanent facilities.</i> • A commitment made in follow up to the Provincial Terms of Reference that: <i>Further details regarding closure and potential environmental impacts will be presented in the EA (and subsequent Closure Plan prepared pursuant to the Mining Act).</i> <p>Consistent with discussions held with Federal and Provincial regulators to date, a Draft Closure Plan pursuant to the <i>Mining Act</i> requirements will be submitted to the Province in late 2013 / early 2014 to facilitate subsequent review and certification as part of the Rainy River Project environmental approvals process.</p> <p>The Draft Closure Plan intended to meet Provincial environmental approval requirements will provide the details requested with regards to the closure of onsite landfill(s).</p>	On-going
6	<p>The draft EA indicates that RRRL would temporary store hazardous waste generated on the Site until it can be transported to a licensed facility. The storage facilities should meet the requirements of the Ministry's "Guidelines for Environmental Protection Measures at Chemical and Waste Storage Facilities" dated 2007.</p>	<p>RRR and our consultants are aware of the current environmental approvals process for temporary storage of hazardous waste. We appreciate the advice from the MOE. Approvals if any, will be sought from the MOE well in advance of proposed temporary storage of hazardous waste.</p>	Complete

#	COMMENT	RESPONSE	STATUS*
7	It was indicated that that petroleum - hydrocarbon contaminated soils would be treated at the Site. The report should clarify where these soils are being generated. This operation is considered waste processing and as a result on-site treatment process required an EPA approval.	<p>As indicated in the Draft EA report, <i>A bioremediation area may be developed for treatment of hydrocarbon affected soils rather than transporting these materials offsite. This need will be assessed during future engineering investigations.</i> This is intended should soil / overburden become contaminated during future RRP activities.</p> <p>RRR and our consultant are aware of the current Ontario process for approval of a waste processing facility and appreciate the advice from the MOE.</p> <p>Should a decision be made to treat petroleum hydrocarbon contaminated soils at the RRP site, such as in a bioremediation area, environmental approvals will be sought from the MOE, as applicable well in advance of proposed waste management activity.</p>	Complete
8	RRR should be made aware that any final disposal of waste through landfilling at the Site not exempted by Regulation 347 must be placed in the area approved by an Environmental Compliance Approval related to waste management. If the approval does not specifically approve solid non-hazardous waste, then the waste cannot be placed in that area.	<p>RRR and our consultant are aware of the current environmental approvals process for development and operation of a waste management landfill and further that disposal of waste cannot be conducted without prior approval (Environmental Compliance Approval). We appreciate the advice from the MOE.</p> <p>Approval(s) will be sought from the MOE well in advance of proposed waste disposal.</p>	Complete

#	COMMENT	RESPONSE	STATUS*
9	<p>Summary: [...] the information provided in the document at this time is considered incomplete and an assessment on the <i>Environmental Protection Act</i> approval related to waste cannot sufficiently be made at this time. As a result, RRRL will need to provide additional information and scope of any investigation(s) for the option of an on-site landfill to be assessed.</p> <p>Until RRRL has provided information on the landfill to determine the EA implications with regards to the on-site landfill or determination/decision that one is not required, the EA should be considered incomplete.</p>	<p>RRR and our consultant appreciate the advice of the MOE. The Draft EA Report was not intended to fulfill the requirements of the <i>Environmental Protection Act</i> approval. Comprehensive waste management approval applications will be submitted to the MOE at a future date, should they be deemed required (and in discussions with the MOE).</p> <p>Further information will be provided in the Final EA Report in regards to the onsite landfill alternative as requested, sufficient to support the EA requirements for the overall RRP.</p> <p>Per discussions with the Province to date, there has been no intent by RRR that the Final EA Report will fulfill the specific and detailed requirements of waste management EA per Ontario Regulation 101/07 (Waste Management Project) pursuant to the <i>Environmental Assessment Act</i>.</p> <p>Should the waste management requirements of the RRP change at a future date such that EA coverage is required to support an Environmental Compliance Approval (or other regulatory instrument), RRR will initiate the EA process required by Ontario Regulation 101/07 (Waste Management Project) or other regulatory instruments at the time.</p>	<p>Complete Vol 2 Sec 4.14, 6.13</p>

*As of submission of the Final Environmental Assessment Report. Reference is made to where the comment has been closed in the report where appropriate.

Stakeholder: Ministry of the Environment, Environmental Assessment
 Point of Contact: Sasha McLeod, Project Officer;
 Comments received: September 6, 2013
 Comments regarding: Draft Environmental Assessment Report (Ver. 2)

#	COMMENT	RESPONSE	STATUS*
1	<p>The EA uses a name for the proponent that may become outdated, which could cause confusion as to who the proponent is. Proponent has indicated the proponent name for the project may change. Change proponent and project names to new names as appropriate.</p> <p>Make a clear connection that the new proponent name is the same proponent that is bound to the Voluntary Agreement between MOE and the proponent.</p>	<p>The advice from the Ministry of the Environment (MOE) is appreciated. The Proponent remains Rainy River Resources Ltd.</p>	Complete
2	<p>Volume 1 – Summary 2.0 Participants in EA Page 5. Page 5 indicates MNDM provided provincial direction on the list of Aboriginal communities to consult. However, direction was also given by other ministries including MOE, MAA and MNR (see comment 9). Please clarify all agencies that were involved in determining the list of communities to consult. Proponents are required to work with MAA and AANDC, with assistance from MOE and agencies as necessary, to determine the list of Aboriginal communities to be consulted for the project, per MOE's ToR Code of Practice and general practice. The EA should state all provincial and federal agencies that were involved in developing the list of Aboriginal communities to consult.</p>	<p>The advice was provided to RRR from MNDM, co-ordinated with the MOE and the Canadian Environmental Assessment (CEA) Agency. We appreciate your additional detail and will clarify in the Final EA Report accordingly.</p>	Complete Vol 1 Sec 3
3	<p>Volume 1 – Summary 18 References Page 18-19. The reference MOE 2009a, Code of Practice: Preparing and Reviewing ToRs for EA in Ontario, appears to be incorrect and should be 2009d.</p>	<p>With apologies, this typographical error will be corrected in the Final EA Report.</p>	Complete Vol 2 Sec 18

#	COMMENT	RESPONSE	STATUS*
4	<p>1.3 Project Components, Page 1-3. Section 1.3 indicates that “Primary construction phase activities will include:</p> <ul style="list-style-type: none"> • Completion of engineering studies and environmental approvals process” <p>Please note construction may only begin after completion of the environmental approvals processes. Construction of certain works may not proceed without the appropriate approvals in place.</p> <p>Consider clarifying the project phasing to indicate that the appropriate approvals will be obtained prior to any construction that is subject to the approvals.</p>	<p>RRR and our consultants are aware that construction cannot start without applicable EA coverage and the associated construction-related environmental approvals being in place. That being stated; not all approvals are required to be in place at the start of the RRP construction; only those related to the work at hand. This will be clarified in the Final EA Report.</p>	<p>Complete</p> <p>Vol 1 Sec 1.3</p>
5	<p>1.6.2 Provincial Framework, Page 1-7. Section 1.6.2 indicates the ToR was approved in May 2013 but this should also indicate whether the EA was prepared in accordance with the ToR.</p>	<p>This will be clarified in the Final EA Report.</p>	<p>Complete</p> <p>Vol 1 Sec 1.6.2</p>

#	COMMENT	RESPONSE	STATUS*
6	<p>1.6.4 Other Regulatory Aspects, Page 1-8 -AND- 3.3.2 [Comments and Concerns] Received during the Preparation of the Draft EA Report, Page 3-10</p> <p>These sections states numerous times that stakeholders and Aboriginal groups have provided considerable support for the RRGP and that the evidence is in Appendix D-7. For example, page 1-8 states, “RRGP has received very strong support from Municipal and Provincial government, as well as First Nations to date.” Page 3-11 states, “RRR has received considerable support for the RRGP from stakeholders during this period, as demonstrated in part, by the letters of support provided in Appendix D-7.”</p> <p>While there are some letters in the appendix stating support for the project, there are also many letters stating concerns and providing comments that are not indicative of support. Please ensure summary statements about consultation accurately reflect the submissions received.</p> <p>The Ministry of the Environment is the approving body for the EA. As such, it is misleading and inappropriate to say that the province is providing strong support for the project while the EA process is underway. In addition, statements indicating that certain stakeholders provide strong support could be misleading or de-emphasize the fact that a number of stakeholders have raised concerns. The statements indicating that the provincial government supports the project should be removed. Statements indicating the project is receiving strong support from other stakeholders should be further clarified or justified.</p>	<p>RRR and our consultants will clarify such statements and ensure the support received from the Province, such as specific Ministries is clearly stated.</p> <p>RRR and our consultants believe that the summary statements are accurate regarding support for the RRP. From our collective experience, only a very small number of stakeholders will take the time to write a letter of support, but the individual records provided in Appendix D, including comment forms from open houses, clearly show an overwhelming support for the project.</p>	<p>Complete</p> <p>Vol 1 Sec 4.6</p> <p>Vol 2 Sec 3.6</p> <p>App D-1d, D-2f; D-3c,d,e; D-8</p>
7	<p>1.7.2 Volume 2: EA Report Page 1-10.</p> <p>In section 1.7.2, within the description of section 6 (Evaluation of Alternatives), please add references to the applicable appendices in order to aid the reader in finding this information. This was done for the description of section 5, which is helpful. Consider adding additional guides in the EA to help readers find related information.</p>	<p>Section 6 will be reviewed to ensure that should additional referencing to appendices etc. be appropriate, it will be added to assist readers.</p>	<p>Complete</p> <p>Vol 1 Sec 1.7.2</p>

#	COMMENT	RESPONSE	STATUS*
8	<p>2.1 Potentially Affected and Interested Stakeholders, Page 2-2 -AND- 3.3.1.1 Stakeholders, Page 3-8</p> <p>On page 2-2, the ministry is called the Ministry of Economic Development and Trade. On page 3-8, the ministry is called the Ministry of Economic Development and Innovation. Please change both references and any other references in the EA to the “Ministry of Economic Development, Trade and Employment.” The ministry’s name changed within the past year. Ministry names should be accurate and up to date.</p>	<p>With our apologies; the Ministry names were accurate the time of preparation, but were not specifically confirmed at the time of document issuance. All references to Ministries in the Summary and Main Text will be confirmed to accurate prior to issuance of the Final EA Report. Note that where past work is reference, the title of the Ministry at that time will be utilized.</p>	<p>Complete</p> <p>Vol 1 Sec 3</p> <p>Vol 2 Sec 2.1</p> <p>Various others</p>
9	<p>2.3 Potentially Affected and Interested Aboriginal Groups Page 2-3.</p> <p>Similar to comment EAS-2, Section 2.3 indicates MNDM was initially consulted to determine the list of Aboriginal communities to be consulted, and that “in May 2012, the Provincial government identified changes and considerably expanded the list of Aboriginal groups RRR is to consult or notify about mine development.” It is correct that in May 2012, a discussion involving MOE, MAA, MNDM and MNR provided further direction on the list of communities to be consulted. This information should be added. Further, Appendix D, Table I-2, page 8 recognizes MNDM, MOE and CEAA were consulted regarding the list.</p> <p>Proponents are required to work with MAA and AANDC, with assistance from MOE and agencies as necessary, to determine the list of Aboriginal communities to be consulted for the project, per MOE’s ToR Code of Practice and general practice. The EA should state all provincial and federal agencies that were involved in developing the list of Aboriginal communities to consult.</p>	<p>The advice was provided to RRR from MNDM, co-ordinated with the MOE and the CEA Agency.</p> <p>We appreciate your additional detail and will clarify in the Final EA Report accordingly.</p>	<p>Complete</p> <p>Vol 2 Sec 2.3</p>

#	COMMENT	RESPONSE	STATUS*
10	<p>3.3.2 [Comments and Concerns] Received during the Preparation of the Draft EA Report, Page 3-10.</p> <p>Section 3.3.2 presents comments received during preparation of the EA, including with local municipalities and government agencies (3.3.2.1) and Aboriginal groups (3.3.2.2). These sections provide a cursory overview of comments and do not provide responses to those comments. This section should be more descriptive and summarize specific comments received, indicate which agencies provided the comments, and indicate how the comments were addressed. These details are necessary in understanding what the stakeholder concerns are. Then the full details should be provided in an appendix.</p> <p>The main body of the EA should help reviewers and readers understand the key issues that have been raised during the EA process and how the issues have been addressed. MOE's Code of Practice for Preparing and Reviewing EAs, Section 4.3.7, sets out MOE's expectations on what should be reported in the consultation summary of the EA.</p> <p>Provide more detail in Section 3 about what concerns have been raised by specific groups and how the issues have been/will be addressed. A table summarizing this added text is also recommended within Section 3.</p>	<p>Section 3 will be revised in the Final EA Report to provide greater detail.</p> <p>It should be noted that Section 7 of the Draft EA Report, has sub-sections by Valued Ecosystem Component and Valued Socio-economic Component, indicating the comments and concerns expressed to date. For example, Section 7.5.2 provides a summary of Government, Aboriginal and Public comments and concerns related to Minor Creeks. It was felt that it was more transparent to list the comments and concerns in the impact assessment section, rather than solely in the consultation summary and appendix (Appendix D).</p> <p>This approach will also be referenced in the revised Section 3 of the Final EA Report.</p>	<p>Complete</p> <p>Vol 2 Sec 3</p>

#	COMMENT	RESPONSE	STATUS*
11	<p>3.2.2 [Consultation Activities] During Preparation of the EA Report , Page 3-7</p> <p>Section 3.2.2 indicates open houses were held but does not provide a summary of comments received during the open houses and proponent's responses to the comments. Also, under the subheading Community Open Houses on page 3-7, this mentions RRR held two open houses on November 10, 2012 and June 15, 2013, but then goes to say the second open house was held in Mitaaanjigaming on November 20, 2012. Is this an error? Please clarify where the June 15, 2013 open house was held.</p> <p>The EA must contain an accurate and complete Record of Consultation.</p> <p>Include within section 3 a summary of comments received during public events, including how many people attended, how many comments were received, what the issues were, and proponent responses, and clarify open house dates.</p>	<p>Section 3 will be revised to provide greater detail, as requested.</p>	<p>Complete</p> <p>Vol 2 Sec 3</p> <p>Tables 3-1, 3-2, 3-5, 3-6</p> <p><i>All comments and responses are provided in detail in Appendix D, including: App D-1b, D-2d, D-3c, D-11</i></p>
12	<p>3.3.3 [Comments and Concerns] Received During Preparation of the Final EA Report -AND- 3.4 Outstanding Issues and Concerns, Page 3-12</p> <p>As stated in the report, these sections are not complete. The EA must contain a complete Record of Consultation. Please ensure sections 3.3.3 and 3.4 are completed, including summaries of key issues that were raised by specific agencies and how they were responded to.</p>	<p>A complete Record of Consultation is provided in Appendix D of approximately 1,400 pages in length.</p> <p>Section 3 will be revised to provide greater detail summarizing these efforts, as requested.</p>	<p>Complete</p> <p>Vol 2 Tables 3-1 to 3-3, 3-5 to 3-8, 11-6</p> <p>AppD-1b, D-1e, D-2a, D2d, D-3a, D3-d</p>

#	COMMENT	RESPONSE	STATUS*
13	<p>4.19 Decommissioning and Reclamation Plan Page 4-41. Section 4.19 states that during the passive phase of post-closure (after 2034), “Environmental monitoring and potentially effluent quality management may occur during this passive period of reclamation.” This statement should clarify whether or not environmental monitoring will occur during passive reclamation. It appears that this monitoring will occur since Appendix E, Conceptual Closure Plan, indicates there will be long-term monitoring of the project site.</p> <p>The EA is required to include a monitoring framework, which should consider all phases of the proposed undertaking. Refer to section 4.3.5 of MOE’s Code of Practice for Preparing and Reviewing EAs. Clarify that environmental monitoring will occur in the passive reclamation phase and consider referencing Appendix E for further details on post-closure monitoring. Clarify that environmental monitoring will occur in the passive reclamation phase and consider referencing Appendix E for further details on post-closure monitoring.</p>	<p>This section will be revised in the Final EA Report to provide greater clarity. Monitoring will occur during the passive phase as required by environmental approvals and the follow-up monitoring program, but effluent quality management will only occur as needed.</p> <p>Details regarding the closure and post-closure monitoring will be provided in the Closure Plan being prepared pursuant to the Ontario <i>Mining Act</i>.</p>	<p>Complete</p> <p>Vol 2 Sec 4.19</p>
14	<p>6.9 Buildings, Facilities and Areas, 6.13.1 Hazardous Solid Waste, Pages 6-51 and 6-71 -AND- Appendix O Alternatives Tables. Section 6.9 provides two alternatives for buildings and facilities, the process plant complex and explosive facility. However, these alternatives are not included in Appendix O.</p> <p>Section 6.13.1 indicates two hazardous waste alternatives will be described in the EA. However, these are not assessed in either Section 6 or Appendix O. These alternatives need to be described as per commitments in sections 5.3.9 and 5.3.11 of the ToR.</p>	<p>Section 6 and Appendix O will be revised to correct this oversight, with apologies.</p>	<p>Complete</p> <p>Vol 2 Sec 6.9.2.2, 6.13.1</p> <p>App O-7, O-10</p>
15	<p>Clarify the methodology, including which criteria were used to determine overall significance. Provide reasons why certain criteria are not used to determine overall significance.</p>	<p>The methodology for determination of significance is described in Section 7.1.2, and is per the Approved Provincial Terms of Reference that was reviewed in detail with the MOE prior to approval of the Terms of Reference.</p>	<p>Complete</p>

#	COMMENT	RESPONSE	STATUS*
16	<p>Tables 7-47 and 7-48 Pages 7-216 and 7-223 Please explain why Table 7-47 (Significance Determination – Natural Environment) combines the columns Magnitude and Geographic Extent while Table 7-48 (Significance Determination – Human Environment) separates them? This could be interpreted that a finer grain/more detailed analysis was used for the socio-economic effects but a less detailed analysis was used for natural environment effects. The EA report should include a comprehensive analysis of effects and significance for all environmental components. Clarify the methodology used.</p>	<p>The methodology for determination of significance is described in Section 7.1.2, and is per the Approved Provincial Terms of Reference.</p>	<p>Complete</p>
17	<p>Table 7-48, Page 7-226 In Table 7-48, the box in row Human Health, column Socio-economic Context is missing text and the row Built Heritage Resources needs to be completed. The EA report must include a complete assessment of effects for all environmental components. Include the missing text.</p>	<p>With apologies, the table will be reviewed and missing text will be included in the Final EA Report as appropriate.</p> <p>Per Section 7.22.5, an assessment of effects on "Built Heritage" will be provided in the Final EA Report. This information was not available at the time of the Draft EA Report preparation.</p>	<p>Complete</p> <p>Vol 2 Tables 7-47 to 7-56</p>

#	COMMENT	RESPONSE	STATUS*
18	<p>13.1 Background, Page 13-2 Section 13.1 states, “RRR expects that it will be responsible to carry out the FMP and further, that the involved Federal and Provincial agencies and authorities will be responsible for ensuring implementation of the FMP.” The province is responsible for enforcing non-compliance with a proponent’s monitoring plans and commitments using appropriate levers. The proponent is responsible for ensuring that the monitoring plans get implemented in the time and manner that the proponent commits to in the EA. The proponent is responsible for implementing monitoring plans and reporting on progress and compliance to the government.</p> <p>The reviewer understands that federally, the implementation of a follow-up plan will be a condition of the EA decision statement. The proponent will be responsible for carrying out the plan and submitting the associated summary reports to the Canadian Environmental Assessment Agency, as well as MOE, for review. Similarly to the provincial authorities, it would also require RRR to take corrective action if issues relating to non-compliance arise.</p> <p>Revise text to read: “RRR expects that... the involved... agencies and authorities will have a review and monitoring role regarding RRR’s implementation of the FMP and require RRR to take corrective action for non-compliance as appropriate”</p>	<p>RRR and our consultants appreciate your advice. The text in the Final EA Report will be revised accordingly or similarly.</p>	<p>Complete</p> <p>Vol 2 Sec 13.1</p>
19	<p>15.1.2 Provincial Environmental Approvals Process, Page 15-1 Section 15.1.2 indicates there are 5 provincial agencies that could be involved with approvals/permits – MNDM, MOE, MNR, MTO and OEB, and includes bullet points for each to explain what types of approvals may be required. The next paragraph indicates MTCS may also be involved in permitting project components. A bullet point could be added to specify which MTCS permits might be required, in addition to listing those expected from MNDM, MOE, MNR, MTO and OEB.</p>	<p>RRR and our consultants appreciate your advice. The text in the Final EA Report will be revised to include this information.</p>	<p>Complete</p> <p>Vol 2 Sec 15.2</p>

#	COMMENT	RESPONSE	STATUS*
20	<p>15.1.3 Municipal Approvals Process Page 15-2 In section 15.1.3, please change the name Ministry of Municipal Affairs to “Ministry of Municipal Affairs and Housing.” Ministry names should be accurate and up to date.</p>	<p>With our apologies, the Ministry names were accurate the time of preparation, but were not specifically confirmed at the time of document issuance. All references to Ministries in the Summary and Main Text will be confirmed to accurate prior to issuance of the Final EA Report. Note that where past work is reference, the title of the Ministry at that time will be utilized.</p>	<p>Complete</p> <p>Vol 2 Glossary Sec 15.2</p> <p>Various others</p>
21	<p>Consider combining the following sections as they seem somewhat repetitive:</p> <ul style="list-style-type: none"> - 15.2 (Federal Approvals) with 15.1.1 (Federal Government Environmental Approvals Process) - 15.3 (Provincial Approvals) with 15.1.2 (Provincial Environmental Approvals Process) - 15.4 (Municipal Approvals) with 15.1.3 (Municipal Approvals Process) with 15.1.3 (Municipal Approvals Process) - Unless these sections need to remain separated, these sections could be combined for conciseness. Minor text streamlining. 	<p>RRR and our consultants appreciate your advice and this comment will be considered in preparation of the Final EA Report.</p>	<p>Complete</p> <p>Vol 2 Sec 15.1, 15.2, 15.3</p>
22	<p>Table 15-2 Anticipated Provincial Environmental Approvals Page 15-5 Please add to Table 15-2 that an EA approval (screening or individual EA) from MOE may be required under the waste management regulation, O. Reg. 101/07, for the proposed on-site demolition landfill. The proponent is required to specify other approvals that may be required after the EA process is completed.</p>	<p>Table 15-2 of the Final EA Report will be revised to address your comment.</p>	<p>Complete</p> <p>Vol 2 Table 15-2</p>
23	<p>Appendices: D-10, D-11, M-3, P, V The draft EA is missing appendices D-10 (Draft EA Public Notices), D-11 (Draft EA Handouts), M-3 (Cultural Heritage Assessment), P (Mineral Waste Alternatives Assessment) and V (Contingency Response). These appendices are required as part of the final EA. Ensure the final EA includes missing appendices, including public notices for the final EA, comments received on the final EA and the proponent’s responses.</p>	<p>The Final EA Report will be issued as complete.</p>	<p>Complete</p> <p>Vol 3+</p>

*As of submission of the Final Environmental Assessment Report. Reference is made to where the comment has been closed in the report where appropriate.

Stakeholder: Ministry of the Environment
Point of Contact: Joseph Tyance, Senior Advisor; Aboriginal Affairs Branch
Comments received: September 10, 2013
Comments regarding: Rainy River Project, Draft Environmental Assessment Report (Ver. 2)

#	COMMENT	RESPONSE	STATUS*
1	[...] the Aboriginal Consultation Record (repetitive notations) is so disjointed and very challenging to find actual issues raised by the Aboriginal groups.	<p>Records of consultation and engagement have been provided to the Canadian Environmental Assessment (CEA) Agency (and recently the MOE as requested) on an on-going, monthly basis since November 2012.</p> <p>Appendix D provides a comprehensive listing of all of the consultation activities to date, as required by the Federal and Provincial Environmental Assessment (EA) process, and is approximately 1,400 pages in length. The Provincial process required that a comprehensive listing of all of the consultation activities be provided earlier in 2013 to support the Terms of Reference process. All prior consultation efforts that were included in the Terms of Reference were included in the Draft EA Report as Appendix D-1: Amended Terms of Reference Record of Consultations, Discussions and Meetings. A decision was made not to include this as a sub-appendix of Appendix D so as not to duplicate that work, in thoughts that it would reduce the effort of reviewers who had already inspected that consultation record, and as discussed with the regulatory agencies prior to submission of the Draft EA Report.</p> <p>Appendix D-5 provides stand alone tables describing the consultation records for each Aboriginal group after the issuance of the Proposed Term of Reference. Appendix D-6 provides stand alone tables describing the comments and responses for each Aboriginal group after the issuance of the Proposed Term of Reference. Both of these appendices are referenced in the main text, and clearly indicated on the cover of Appendix D. In addition, Appendix D-7 contains copies of correspondence documents between Rainy River Resources (RRR) and Aboriginal groups.</p>	<p>Complete</p> <p>App D (App D-1)</p> <p><i>Volume 2, Tables 3-3 and 11-6 contain the summary of commitments arising from the independent review with their agreement.</i></p>

#	COMMENT	RESPONSE	STATUS*
	Cont'd	<p>Very few issues have been raised to date by the Aboriginal groups, and per the Draft EA Report have focused on employment and training, but recognizing that there is a genuine interest in ensuring that the project is designed and operated in such a way as to ensure the environment is protected.</p> <p>The consultation appendix will be reorganized in the Final EA Report, to list all consultation records and comments and responses for Aboriginal groups since the start of the RRGP EA process. Comments and recommendations received through the Independent Technical Review process will also be included in the Final EA Report.</p> <p><i>Appendix D has been revised for the Final EA Report. The new structure and content is outlined on the title page therein.</i></p>	
2	<p>I am impressed that RRGP logged meetings, emails, and some information in the appendices (D1-1400). Those records on a global basis do reference relevant meetings, public advertisements, presentations, emails etc. but nothing in away of identifying whether or not actual issues were raised by First Nations or Métis groups.</p>	<p>RRR appreciates your comment. As discussed above, all issues raised by Aboriginal groups have been tabulated in Draft EA Report as follows:</p> <ul style="list-style-type: none"> • Appendix D-1 (Amended Terms of Reference Record of Consultation, Discussions and Meetings - Appendix I-5 through I-22 therein); • Appendix D-2 (Comments and Responses on Proposed Terms of Reference - Appendix J-5 through J-17 therein); • Appendix D-5 (Contact Records - Table D5-5 through D5-19); • Appendix D-6 (Comments and Response, November 10, 2012 to June 15, 2013 - Tables D6-5 through D6-16 therein); and • Appendix D-7 (Correspondence Documents, November 10, 2012 to June 15, 2013). <p>In all instances, the Aboriginal groups are clearly identified in the title of the individual record tables. While the volume of information is very large, RRR and its consultants believe that the records and comments made by Aboriginal groups to date are well recorded and identifiable in the Draft EA Report.</p> <p>Comments and recommendations received through the Independent Technical Review process will be included in the Final EA Report.</p> <p><i>Appendix D has been revised for the Final EA Report. The new structure and content is outlined on the title page therein.</i></p>	<p>Complete</p> <p>App D-1</p> <p><i>Note: Volume 2, Tables 3-3 and 11-6 contain the summary of commitments arising from the independent review with their agreement.</i></p>

#	COMMENT	RESPONSE	STATUS*
3	I am assuming that the advanced copy (Draft EA May, 17, 2013) that was provided to the 14 Aboriginal groups was meant to facilitate whether or not any of these Aboriginal groups had concerns and issues (maybe that is why I didn't see any issues and concerns).	<p>Yes, RRR made the extra voluntary effort not required by the Federal and Provincial EA process to provide an advance copy of the Draft EA Report to Aboriginal groups, recognizing that receiving a very large technical document poses a challenge for Aboriginal communities to comment on effectively.</p> <p>Both the Federal and Provincial agencies were made aware at the start of 2013 that RRR had offered to fund an independent technical review of the Draft EA Report in support of the collective First Nations review. This process was successfully initiated on May 19, 2013 after the Province had approved our EA Terms of Reference and is now culminating with a list of commitments to be undertaken as part of the project implementation for First Nations review. We are pleased that the Independent Report was issued out to the Federal and Provincial agencies via the First Nations. A similar process is also underway with the Métis Nation of Ontario as lead by the Region One Métis Nation of Ontario Consultation Committee.</p> <p>Comments and recommendations received through the Independent Technical Review process will be included in the Final EA Report.</p> <p><i>Appendix D has been revised for the Final EA Report. The new structure and content is outlined on the title page therein.</i></p>	<p>Complete</p> <p>Vol 2 Sec 3.3.2</p> <p><i>Note: Volume 2, Tables 3-3 and 11-6 contain the summary of commitments arising from the independent review with their agreement.</i></p>
4	Throughout this EA process, it is assumed that certain presentations were offered as to solicit feed back from various Aboriginal groups but what is lacking (the appendices) is whether or not actual issues were raised by them, and for that matter, recorded or foot-noted. Further, we have been alerted that the Independent Technical Review was funded by RRGF and is therefore forth-coming at the end of this EA process.	<p>The reviewer is directed to the Record of Consultation as noted in regards to comment 2, which directs the reviewer to the appropriate locations in Appendix D, as referenced in the main text, as well as the Table of Contents and cover page of Appendix D itself.</p> <p>RRR was informed by the MOE that the entire Provincial review team, including Aboriginal Affairs, received a copy of the Independent Review conducted on behalf of the Aboriginal communities in advance of the release of the MOE Aboriginal Affairs Branch comments being received by RRR.</p> <p>RRR and our consultants are therefore confused by the last statement and would appreciate further clarification.</p>	<p>Complete</p> <p>Vol 2 Sec 3</p> <p>Tables 3-1, 3-2, 3-5, 3-6</p>

#	COMMENT	RESPONSE	STATUS*
5	<p>I am also assuming once submitted, the MOE will be made aware of any discrepancies or issues at that time. An ideal world, it would have more convenient/appropriate to be aware of those actual issues or concerns before, instead after.</p> <p>Similarly, I also understand that some First Nations were granted funds to undertake Aboriginal Traditional Knowledge gathering, and I am not entirely confident that this was referentially incorporated to any of the baseline studies.</p>	<p>RRR was informed by the MOE that the entire Provincial review team, including Aboriginal Affairs, received a copy of the Independent Review conducted on behalf of the Aboriginal communities in advance of the release of the MOE Aboriginal Affairs Branch comments being received by RRR.</p> <p>RRR and our consultants are therefore confused by the last statement and would appreciate further clarification.</p> <p>Traditional Knowledge / Traditional Land Use (TK / TLU) data collected thus far indicates little if any, natural resource use (fish, wildlife, plants) by Aboriginal peoples within the Natural Environment Local and Regional Study Areas (NLSA and NRSA). It was nevertheless made clear through various discussions with Aboriginal peoples potentially affected by the RRP that the natural environment is highly valued and that RRR should be respectful of the environment and take reasonable measures to minimize adverse effects to the environment.</p> <p>Section 5.2 of the Draft EA Report describes methods used to collect TK / TLU data for the RRP. Section 5.11 provides results of TK / TLU studies conducted to date indicating very little if any Aboriginal TLU occurring within the NRSA within recent memory. As appropriate, this information was incorporated into Section 5 of the Draft EA Report, and is clearly identified as such in individual baseline topics.</p>	Complete

#	COMMENT	RESPONSE	STATUS*
6	<p>In regards to this specific undertaking, I would love to have seen reference note somewhere in the appendices or in the main body to demonstrate that RRGP did hire several EA monitors during their field study exercises. This would have demonstrated that issues/concerns were potentially addressed through a phased approach.</p>	<p>All Aboriginal engagement efforts are being coordinated and directed by the RRR Vice President of Environment and Sustainability based in Thunder Bay Ontario, supported by the First Nation Engagement Specialist and Community Coordinator based in Emo, Ontario. The First Nation Engagement Specialist was selected jointly with the Fort Frances Chiefs Secretariat. That position is funded by RRR but reports jointly to the local tribal council Executive Director (Pwi-Di-Goo-Zing-Ne-Yaa-Zhing Advisory Services) and RRR Vice President of Environment and Sustainability. Consultation and engagement with all other First Nation and Métis groups is being led by the RRR Community Coordinator.</p> <p>While RRR respects your opinion, this is not the approach that was taken as discussed previously with the Federal and Provincial representatives. RRR instead continued its ongoing open discussions with the local Aboriginal groups and funded an Independent Review of the Draft EA Report (Ver. 1). This report was issued in advance to the Aboriginal groups to facilitate their ability to effectively review and comment on the RRGP.</p> <p>RRR and our consultants have prepared responses to each of the Independent Review recommendations that will be forwarded to each First Nation for their consideration and they will advise of next steps. We would hope that once we have agreement on the responses to the Independent Review recommendations that we can provide the completed table to the government for consideration.</p>	Complete
7	<p>In other cases, while RRGP undertook initiatives to interview Aboriginal groups on the matter related to socio-economic analysis, it becomes challenging to determine whether or not this material made its way through the report or whether or not issues were raised by various Aboriginal groups.</p>	<p>RRR and our consultants respectfully request that you identify any specific concerns. All information provided to RRR or our consultants was incorporated in the Draft EA Report, unless we were requested to hold the information in confidence.</p>	Complete

#	COMMENT	RESPONSE	STATUS*
8	In sum, I guess most of the current issues and concerns were actually related to perceived benefits like employment and training and not to mention the signed IBA. Other concerns were referenced like fish and wildlife, environment management, water resources, and traditional culture and land use.	As a summary comment, RRR and our consultants agree. These have been the overall findings from our discussions with Aboriginal groups to date.	Complete

#	COMMENT	RESPONSE	STATUS*
9	<p>Again, it was challenging to cross reference from the appendices, or whether or not these were addressed in the main report.</p> <p>My major concern is related to the organization of the Aboriginal Consultation Record (disjointed). I will have a more fulsome comment once the outstanding issues and concerns have been addressed in the final EA report.</p>	<p>Records of consultation and engagement have been provided to the CEA Agency (and recently the MOE as well, as requested) on an on-going, monthly basis since November 2012. To date, RRR has not received feedback on the summaries or activities described.</p> <p>While RRR and our consultants agree that it could have been challenging as Appendix D which provides a comprehensive listing of all of the consultation activities to date is approximately 1,400 pages in length (and as compliant with the information required by the Federal and Provincial EA process), we do not believe that the record is disjointed. As discussed with the regulatory agencies prior to submission of the Draft EA Report, a decision was made to keep the records from the Terms of Reference process intact, in thoughts that it would reduce the effort of reviewers who had already inspected that consultation record.</p> <p>As discussed above, all issues raised by Aboriginal groups have been tabulated in Draft EA Report as follows:</p> <ul style="list-style-type: none"> • Appendix D-1 (Amended Terms of Reference Record of Consultation, Discussions and Meetings - Appendix I-5 through I-22 therein); • Appendix D-2 (Comments and Responses on Proposed Terms of Reference - Appendix J-5 through J-17 therein); • Appendix D-5 (Contact Records - Table D5-5 through D5-19); • Appendix D-6 (Comments and Response, November 10, 2012 to June 15, 2013- Tables D6-5 through D6-16 therein); and • Appendix D-7 (Correspondence Documents, November 10, 2012 to June 15, 2013. <p>In all instances, the Aboriginal groups are clearly identified in the title of the individual record tables. While the volume of information is very large, RRR and its consultants believe that the records and comments made by Aboriginal groups to date are well recorded and identifiable in the Draft EA Report.</p> <p><i>Appendix D has been revised for the Final EA Report. The new structure and content is outlined on the title page therein.</i></p>	<p>Complete</p> <p><i>Appendix D has been revised for the Final EA Report. The new structure and content is outlined on the title page therein.</i></p> <p>App D-1</p>

*As of submission of the Final Environmental Assessment Report. Reference is made to where the comment has been closed in the report where appropriate.

Stakeholder: Ontario Ministry of the Environment
Point of Contact: Guowang Qui
Comments received: September 19, 2013
Comments regarding: Rainy River Project, Draft Environmental Assessment Report (Ver. 2)

#	COMMENT	RESPONSE	STATUS*
1	With regard to air quality monitoring conducted by KCB in the RRGp on page 5-43, I was not aware that the company consulted with the MOE regarding the monitoring, at least not with the technical support section of Northern Region. A monitoring plan was not submitted to the ministry for review, and the ministry did not perform any audits. As a result the ministry is not confident in the data quality that was collected.	Acknowledged. In the baseline assessment the KCB data is used only as indicative of the air quality as a confirmation of the background data developed from the more established Ministry of the Environment (MOE) / Environment Canada (EC) stations.	Complete
2	In Appendices F and Q, the report indicates that MOE air quality stations in Dorset, Parry Sound, and North Bay are representative of "rural" monitoring site. PM2.5 concentration from Dorset MOE air quality station was used as the background PM2.5 for this study as mentioned on page 7-14, and also in Appendices F and Q. A justification is required as to why PM2.5 data from this station is suitable for this study considering the distance between these two locations.	The Rainy River Project (RRP) site is a remote site. Other MOE stations that are nearer to the site are heavily influenced by urban activities. These sites were chosen as being representative of 'rural' Ontario locations purposefully. Given that a significant fraction of PM2.5 in southern Ontario is due to transboundary (i.e. United States) sources, it is expected that the Dorset station will be a conservative measure of potential air quality near a northern Ontario rural site.	Complete

#	COMMENT	RESPONSE	STATUS*
3	On page 7-14, 90th percentile background PM2.5 from Dorset air quality station was used as the background PM2.5 level for this study. CWS of PM2.5 is based on 24-hour average, 98th percentile ambient measurement annually, and averaged over three consecutive years. I think 98th percentile instead of 90th percentile would be more appropriate for the background concentration for this case.	<p>The best estimator of the background concentration for a location would be the average concentration. However, to be conservative, the 90th percentile concentration was used. Use of the 90th percentile is outlined in the Ministry of Transportation's guidance document for assessing the air quality impacts of transportation projects (MTO 2012).</p> <p>The 90th percentile value is a value that for 90% of the time, the actual concentration will be less than this value and will be exceeded only under adverse meteorological conditions. Given the nature of the modelling assessment (i.e. the maximum emission rate for the worst case meteorological period during a five year meteorological data set), it would be unreasonably conservative to use the 98th percentile as a baseline under all conditions.</p>	Complete
4	On page 7-14, it states that the PM2.5 is typically 25% of the total suspended particulate matter (TSP). References should be provided if the result was taken from other studies. The variance on the ratio between PM2.5 and TSP is always expected. An analysis and discussion on this should be provided, which may significantly affect the local air quality considering cumulative effects with background.	<p>The various ratios for PM2.5, PM10 and TSP have been used and accepted by the MOE in previous studies. The origin of the ratios comes from a number of sources: MOE (1999) specifically and Brook, Dann and Burnett (1997).</p> <p>AMEC agrees that ratios can be variable, but that using established ratios with the most recent PM2.5 data available is more accurate than using historical TSP data. (Note: MOE no longer measures TSP at their stations).</p>	Complete
5	For the background air quality, metals concentrations in air were not mentioned in anywhere, neither in Sections 5.2.2 and 5.3.3, nor in Appendices F and Q. An evaluation of the background metals concentrations is also important for this project since the operations of this project will produce metals.	Background air quality for the metals will be developed and discussed in the Final EA report.	Complete App Q-2

#	COMMENT	RESPONSE	STATUS*
6	<p>On page 13-3, two monitoring stations were proposed by RRR shown in Figure 13-1 to monitoring fugitive dust from the project, and the monitoring will follow the Operations Manual for Air Quality Monitoring in Ontario (MOE 2008) as indicated in the report. A justification is required as to how the locations were chose, and why two sites and sampling period proposed is adequate for this project. I would expect more details will be provided in the monitoring plan later on. Just as a reminder, a monitoring plan is required to submit to MOE for review.</p>	<p>The current locations are provided as being reasonable to assess upwind and downwind air quality impacts from the site. These are proposed locations that will be detailed in the Ambient Air Monitoring Plan.</p> <p>Rainy River Resources (RRR) and our consultant acknowledge that any monitoring required as a condition of an Environmental Compliance Approval (ECA) would require preparation of an Ambient Air Monitoring Plan to be submitted and accepted by MOE. RRR will commit to submit a monitoring plan for MOE review, even if monitoring is not required as a condition of their ECA.</p>	On-going
7	<p>On page 13-4, passive SO₂ and NO₂ samplers were also proposed for the same sites. As mentioned in the report, there are no standards or guidelines to compare with the results from the passive samplers. An explanation is needed to justify that passive samplers are appropriate for SO₂ and NO₂ monitoring for this project.</p>	<p>Passive monitoring for a variety of compounds is suitable for long duration measurement; the data is typically compared to monthly or annual air quality objectives.</p> <p>Though currently not included in the MOE Operations Manual for Ambient Monitoring (2008), these have been used for airshed monitoring in Alberta. Passive samplers have also been used at other Ontario sites as a reasonable approach to assessing NO_x and SO₂ levels in remote situations where other monitors cannot be readily located or managed.</p> <p>RRR and our consultant would refer to Alberta's guidance materials and other jurisdictions to establish appropriate screening levels for measured passive results. The use of passive sampling methodologies for NO₂ and SO₂ would be proposed in the Ambient Air Monitoring Plan submitted to the MOE for review and comment.</p>	Complete

#	COMMENT	RESPONSE	STATUS*
8	Also with regard to reporting on page 13-4, the reporting of air monitoring results to MOE should follow the guidelines outlined in the Operations Manual for Air Quality Monitoring in Ontario (MOE 2008).	Acknowledged.	Complete

*As of submission of the Final Environmental Assessment Report. Reference is made to where the comment has been closed in the report where appropriate.

References:

Brook J.R., Dann T.F. and Burnett R.T. 1997. *The Relationship Among TSP, PM10, PM2.5 and Inorganic Constituents of Atmospheric Particulate Matter at Multiple Canadian Locations*. Journal of the Air & Waste Management Association, Vol 47, pages 2-19.

Ontario Ministry of the Environment (MOE) 1999. *A Compendium of Current Knowledge of Fine Particulate Matter In Ontario*. PIBS3798e.

Ontario Ministry of the Environment (MOE) 2008. *Operations Manual for Air Quality Monitoring in Ontario* PIBS# 6687e.

Ontario Ministry of Transportation (MTO) 2012. *Environmental Guide for Assessing and Mitigating the Air Quality Impacts and Greenhouse Gas Emissions of Provincial Transportation Projects*. Environmental Policy Office. January.



APPENDIX D-2b

GOVERNMENT COMMENTS AND RESPONSES ON BASELINE STUDIES

Stakeholder: Fisheries and Oceans Canada
 Point of Contact: c/o Stephanie Davis, Project Manager, Canadian Environmental Assessment Agency
 Comments received: May 8, 2013

#	COMMENT	RESPONSE	STATUS*
B16: Rainy River Gold Project, 2012 Aquatic Resources Baseline Report			
1	Page 2, 1.3 Spatial Boundaries, 1st paragraph – the creeks and streams may not support a commercial (no bait harvesting?) or recreational fishery, but do the fish in the creeks and streams support a downstream fishery by providing a food source?	<p>The RRGP is somewhat unique from an environmental perspective in that there are no lakes located within, or adjacent to, the main RRGP site. While limited bait fishing does occur within certain project area streams, the area does not support a significant commercial or recreational fishery. In addition, the creeks present within the RRGP site often encounter zero flow during dry periods.</p> <p>However, it is acknowledged that these creeks are valuable with respect to the fish community of the mainstem Pinewood River through the downstream provision of flow, nutrients, organic inputs and primary forage biota (fish and invertebrates).</p> <p>An erratum will be issued with the baseline report to reflect the above and for consistency with the Environmental Assessment Report and No Net Loss strategy documentation.</p>	Erratum to be issued with baseline report

#	COMMENT	RESPONSE	STATUS*
2	Page 10, 2.6 Fisheries Resources, 1st line – fish samples were collected in July, August and September, but none were collected in May to June. Is it possible that some streams reported as fishless, could in fact have supported fish in the spring?	<p>Smaller intermittent tributaries of the Pinewood River are expected to be inundated during the spring as a result of snow melt and precipitation, and are assumed to have the potential to support a fish community similar to that described for other permanent Pinewood River tributaries during periods of flow. However, the dry (intermittent flow) characteristic of the channels still present, limitations of those channels to sustain permanent direct fish habitat.</p> <p>The streams and drainages reported as not bearing fish during the 2012 field survey will not be directly impacted by project development.</p> <p>A spring fish community survey was undertaken in May 2013 to provide further information and was focussed on watercourses which may be potentially affected by project development. Data specific to this survey will be provided to augment past baseline information.</p>	<p>In progress</p> <p>Further information to be provided in 2013 Aquatic Baseline Report</p>
3	Page 37, 3.4.5 Fisheries Resources for Unnamed Tributary 1 system – would the channel have been dry if sampled in the spring?	Smaller intermittent tributaries of the Pinewood River are expected to be inundated during the spring season as a result of snow melt and precipitation and are assumed to have the potential to support a fish community similar to that described for other permanent Pinewood River tributaries during periods of flow.	Complete
4	Page 41, 3.6.5, Fisheries Resources for Unnamed Tributary 2 system – would fish have been present if the sampling was conducted in the spring?	Smaller intermittent tributaries of the Pinewood River are expected to be inundated during the spring season as a result of snow melt and precipitation and are assumed to have the potential to support a fish community similar to that described for other permanent Pinewood River tributaries during periods of flow.	Complete

#	COMMENT	RESPONSE	STATUS*
5	Page 42, 4th paragraph – any thoughts on why the August pH at Loslo Creek was so acidic (5.45)? Isn't that at a level where some fish species disappear?	<p>A pH value of 5.45 was recorded by <i>in situ</i> measurement on August 29, 2012. It is believed that this value is a result of field equipment error as analytical results of surface water quality from grab samples collected from the same location on the same date indicate a pH of 7.16 (Table 3-2).</p> <p>The grab sample is within the range specified by the Provincial Water Quality Objective and Canadian Environmental Quality Guideline for the protection of aquatic life.</p>	Erratum to be issued with baseline report
6	Page 49, 3.9.3 Fisheries Resources for West Creek Tributary 1 – could the low captures of baitfish be attributed to the low oxygen levels of 1.57-3.56 mg/L recorded for West Creek tributary 1 (page 47)?	Reduced dissolved oxygen during the low flow period may have provided some limitation to forage fish dispersal in West Creek Tributary 1.	Complete
7	Page 50, 3.10.3 Habitat Type Availability, 2nd paragraph – is the lower reaches of Clark Creek referred to as the Teeple Drain and thus the reason why the lower reaches are more channelized?	<p>Yes. A number of the watercourses have been altered to act dominantly as agricultural drains, with two at the RRGF site being specifically designated as Municipal drains under the <i>Drainage Act</i>.</p> <p>The lower approximately 3.3 km reach of Loslo Creek and lower 2.3 km of Clark Creek leading to the outflow into the Pinewood River were constructed in 1980 and 1994 respectively, and have been previously designated as the Cowser Drain and the Teeple Drain.</p>	Complete

#	COMMENT	RESPONSE	STATUS*
8	Page 57, 1st paragraph – how do these mercury levels in walleye relate to the 'Guide to Eating Ontario Sport Fish'?	<p>Mercury body burdens in Walleye from the Pinewood River are discussed within the context of the Ministry of the Environment (MOE) Guide to Eating Ontario Sport Fish in Section 4.0, page 94, paragraph 3.</p> <p>Walleye sampled had mercury concentrations above 0.52 ppm and therefore above the upper threshold recommended for total restriction for women of child-bearing age or children under 15.</p> <p>The three largest and oldest Walleye (aged 9 and 15 years) had mercury body burdens above the lower threshold for the general population of 0.61 ppm.</p> <p>One of the 15 year old Walleye had a mercury level that approached the total restriction advisory of 1.84 ppm, having a concentration of 1.8 µg/g.</p> <p>These individuals were captured in lower sections of the Pinewood River in closer proximity to the Rainy River and indicate relatively elevated mercury levels in longer-lived individuals in the population.</p>	Complete
9	Page 92, 2nd paragraph, 2nd last sentence – isn't an increase in phosphorus levels also due to animal manure as well as the long term agricultural use of mineral fertilizers? Cattle excrement is mentioned on page 98 in the phosphorus discussion.	Agreed. The increased phosphorus levels within the Pinewood River watershed are likely to have resulted from inputs to watercourses derived from both the long term agricultural use of mineral fertilizers and live stock excrement.	Complete

#	COMMENT	RESPONSE	STATUS*
10	Table 3-14, Species Distribution across the study area between 1997 and 2012 – this table should either reference the discussion on page 93, 4th paragraph or provide more details in the table on what it means. Do we have the fish sampling results from the MNR/Rainy River FN and KCB sampling efforts – areas and date sampled?	<p>A reference to Section 4.0, page 93, paragraph 4 will be added to an Erratum per Table 3-14 to provide context with the Baseline Report. Results from previous sampling surveys conducted by the MNR / RR FN and KCB are included in Table 3-14. As this baseline report was prepared so as to focus on the information collected during the 2012 field survey locations and efforts pertaining to past surveys were not specifically included.</p> <p>Further detail on these studies along with figures showing the location and year of sampling efforts for all surveys conducted within the study area is provided in Section 5.0 of the Environmental Assessment Report.</p>	Erratum to be issued with baseline report
11	Page 93, 2nd paragraph – not only could low levels of benthic invertebrate density be attributed to the drought conditions in the summer and fall of 2012, but it could also explain why fish were not present in some of the tributaries. Fish sampling in the spring is needed to confirm whether those fishless streams are in fact devoid of fish.	A spring fish community survey was undertaken in May 2013 to provide further information and was focussed on watercourses which may be potentially affected by project development. Data specific to this survey will be provided to augment past baseline information.	In progress

* refers to response to comment

Stakeholder: Environment Canada
Point of Contact: c/o Stephanie Davis, Project Manager, Canadian Environmental Assessment Agency
Comments received: May 8, 2013

#	COMMENT	RESPONSE	STATUS*
B8: Rainy River Gold Project, Climate, Air Quality and Sound Baseline			
1	<p>Wind Climate Baseline: It is not appropriate to use Environment Canada's Wind Energy Atlas (CWEA) as a wind climate baseline for the project since the CWEA provides the results of the wind numerical model simulations. The CWEA modeled baseline could potentially affect on the accuracy/reliability of environment assessment on air pollution dispersion modeling. Furthermore, the modeled wind data are not suitable for the references to compare with on-site wind data monitored by Klohn Crippen Berger (KCB).</p> <p>Suitable wind climate baseline information should be derived by a long-term observed wind data record nearby the project site. Suitable stations include Kenora A (Climate ID: 6034075), Atikokan (Climate ID: 6020379) and Atikokan (AUT) (Climate ID: 6020LPQ), which possess hourly wind observations for the periods 1953-present, 1966-1988 and 1994-present, respectively.</p>	<p>Please see attached Tables 1 and 2 with wind summary data for Atikokan (ID 6020379) and Kenora A (ID 6034075). The period covers 1917 to 2000. There is no wind data for the Barwick site.</p> <p>The data at the two stations indicates an average wind speed ranging from 7.7 to 13.8 kph, with the highest average wind in fall and spring (14.8 and 8.6 kph, respectively) and the lowest mean wind speed in summer (6.8 kph). At the Kenora station the winds are predominantly from the S and at the Atikokan site predominantly W/NW.</p> <p>For the air dispersion modelling, we will not be using the climate data stations. We will be using the Ministry of the Environment (MOE) recommended meteorological data set for the area. The data set is the required quality controlled data set required by MOE.</p>	Complete
2	<p>Table 7: NO₂ concentrations under AAQC are wrong, the correct standards are: NO₂ concn for 24 hr avg 200 and for 1hr avg 400 ppb. Also PM_{2.5} mean concn is 30 ug/m³ based on 24 hrs, and its not indicated in the table.</p>	<p>Response acknowledged. A revised Table 7 is attached and an errata will be issued with the document.</p>	An erratum will be issued with the document.

#	COMMENT	RESPONSE	STATUS*
3	<p>Table 8: provides rural AQ data based on MOE stations in 3 locations and the data from these stations are used to develop background condition for the project, but the report does not indicate how they would use these numbers as the concentrations of different pollutants are different at each station (for example would they use avg form 3 station?). Also since KCB has conducted PM monitoring in the site area, it would be reasonable to use these data for PM10 and PM_{2.5} instead of PM data from monitoring stations but the report does not explain. What is the distance of each of these 3 stations to the project site?</p>	<p>As noted in Item 4, the KCB data did not meet standard protocols for sample collection. As noted in AMEC's baseline report, the KCB data was used only as an indicator to compare against the full MOE data. The MOE data from the three sites is fully quality controlled and is available for longer time periods.</p> <p>The three MOE stations were chosen as being representative of areas impacted in similar ways to the study area (i.e. rural locations, with no major industries or urban areas proximate to the stations) rather than by location. As such, these stations are representative of the area; with the KCB data showing a reasonable confirmation in comparison.</p> <p>The specific use of the data will be developed and provided in the air quality impact section of the Environmental Assessment Report.</p>	Complete
4	<p>Table 9: Provides background PM in the site based on KCB monitoring, but the results are not directly comparable because reported numbers was averaged over 3 hours rather than 24 hrs (page 10). What is the rationale of not monitoring or averaging for 24 hrs period in order to be able to make direct comparison with the stds?. It would be useful to provide a map/figure of project site and the 3 locations of KCB PM monitoring stations.</p>	See above.	Complete
5	<p>It is assumed that information related to climate change scenarios and the models being used will be presented as part of the impacts assessment. Climate change could adversely affect the project and this in turn could result in impacts to the environment.</p>	Climate change will be addressed in the EA Report per the EIS Guidelines	To be addressed in EA Report

* refers to response to comment

Table 1: Climate Normals 1971-2000 - Kenora A (Climate ID: 6034075)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year
Wind speed (kph)	13.3	13.3	14.1	14.4	14.3	13.5	13.1	12.9	14.2	14.8	13.9	13.2	13.8
Direction	NW	S	NW	S	S	S	S	S	S	S	S	S	S
Max gust (kph)	58	51	56	53	56	68	64	64	57	64	58	59	

Table 2: Climate Normals 1971-2000 - Atikokan (Climate ID: 6020379)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year
Wind speed (kph)	7.2	6.9	8.3	8.6	8.3	8.2	7.1	6.8	7.8	8.5	7.9	6.9	7.7
Direction	W	W	W	NW	NW	NW	W	S	W	S	W	W	W
Max gust (kph)	42	42	52	44	42	43	45	42	39	58	46	42	

http://climate.weatheroffice.gc.ca/climate_normals/index_e.html



Table 7: Mean Annual Regional Background Air Quality Data

Parameter	AAQC	AAQO (Desirable / Acceptable)	Thunder Bay, Ontario (AQI Station 63203)					ELA, Ontario (NAPS Station 64001)					Winnipeg, Manitoba (NAPS Station 070119)				
			2006	2007	2008	2009	2010	2002	2003	2004	2005	2006	2002	2003	2004	2005	2006
NO ₂ (ppb)	200 (24 hr) 400 (1 hr)	30 / 50	8.1	8.7	8.1	8.4	7.8	-	-	-	-	-	14 (8)	14 (8)	13 (9)	12 (8)	13 (9)
NO (ppb)	9000 (µg/m ³)	-	6.1	5.4	5.1	5.7	4.6	-	-	-	-	-	9 (16)	9 (15)	9 (16)	8 (13)	7 (12)
O ₃ (ppb)	80	50 / 80	23.5	24.2	23.0	24.2	25.7	33 (9)	31 (11)	30 (10)	32 (11)	33 (10)	20 (11)	21 (12)	17 (10)	19 (11)	21 (12)
PM _{2.5} Mean (µg/m ³)	30 (24 hr)	-	4.8	4.4	4.2	3.8	4.1	-	-	-	-	-	6 (6)	5 (5)	4 (4)	5 (7)	5 (5)
PM _{2.5} 98 th / 99 th ** Percentile (µg/m ³)	-	-	22	21	21	17	17	-	-	-	-	-	21	14	13	15	14
CO (ppm)	13 (8 hr) 30 (1 hr)	-	-	-	-	-	-	-	-	-	-	-	0.5 (0.3)	0.5 (0.3)	0.4 (0.2)	0.3 (0.2)	0.4 (0.2)

Sources: Environment Canada (2012); Ministry of the Environment (2010)

Notes: ppb: parts per billion

AAQC: Ministry of the Environment (Ontario) Ambient Air Quality Criteria

AAQO: National Ambient Air Quality Objectives

* Standard deviations (+/-) given in brackets

** 99th percentile for Thunder Bay AQI Station, 98th for Winnipeg NAPS Station

Stakeholder: Environment Canada
Point of Contact: c/o Stephanie Davis, Project Manager, Canadian Environmental Assessment Agency
Comments received: May 8, 2013

#	COMMENT	RESPONSE	STATUS*
B16: Rainy River Gold Project, 2012 Aquatic Resources Baseline Report			
1	<p>3.2 Pinewood River System: It appears that Station Pin-7 (located on the Pinewood River) was dropped from routine monitoring. Pin-7 had previously shown in the 2011 monitoring report unusually high concentrations of: aluminum, iron, cobalt, copper, vanadium and zirconium and is located downstream of the project as discussed in the RRGp comment table August 2012. It is in the proponents' best interests to better understand the unusually high concentrations of metals and low dissolved oxygen at this location, rather than characterizing it less. Fully characterizing existing degraded conditions will help the proponent to demonstrate in the future that the area was previously impacted.</p>	<p>Comment acknowledged with appreciation.</p> <p>The Pin-7 station reported in 2011 was a temporary spot sampling station used to support 2011 aquatic studies, and is not part of the permanent water quality monitoring network. A permanent water quality monitoring station (SW 3 - monthly sampling) is positioned on the Pinewood River approximately 1 km downstream of the Pin-7 station. Metals were elevated for the Pin-7 station because of exceptionally high total suspended solids for this sample (41 mg/L). The results for this single sample are therefore anomalous. Reliance is placed on monthly data from the SW 3 station to characterize the Pinewood River downstream of the RRGp site.</p>	Complete

* refers to response to comment

Stakeholder: Environment Canada
Point of Contact: c/o Stephanie Davis, Project Manager, Canadian Environmental Assessment Agency
Comments received: November 2, 2012; May 8, 2013

#	COMMENT (abbreviated)	RRR RESPONSE	EC ADD'L COMMENTS	RRR ADD'L RESPONSE	STATUS
B4: Rainy River Gold Project, Surface Water Low Flow Survey Reports					
1	The methodology adopted by the proponent in both the 2011 and 2012 field observations appears to be adequate,.... The aforementioned reports do not provide the level of detail with regards to sampling and data treatment to directly verify this point, but we assume that industry standards for hydrological measurement were followed during the field observations.	Appropriate industry standards were followed during the 2011 and 2012 flow surveys as identified within <i>Manual of British Columbia Hydrometric Standards</i> (March, 2009). RRR is not however, proposing to rely on short term site hydrological monitoring stations for determining water balance and flow conditions, because: (1) two long-term Water Survey of Canada (WSC) stations exist on the Pinewood River, including one near the site, which provide better data; (2) the local creeks are of small size, are low gradient, exhibit intermittent flow, and are interrupted by numerous beaver dams, making it nearly impossible to get reliable flow data; (3) no statistically reliable data can be derived from the local site stations because of the above limitations.	It should be noted that since the data (from the currently discontinued WSC gauge) was seasonal, it will not be representative of the full range of flow data. In particular the low flow data which primarily happens through the winter (or non-operational) time period. The nearer and active Hydrometric site has only been in operation for 7 years, but only has 5 years of verification of the stage-discharge relationship, and may not be appropriate to compute statistical hydrological parameters at this time (due to the very small sample set). In addition several problems have been experienced at this station including: considerable aggradation and erosion of materials resulting in shifts and changes to the stage-discharge relationship, and increasing unusable periods due to environmental effects. Hydrologically, the next closest Hydrometric gauge is La Vallee near Burriss and may provide additional data for comparison. Although, this station also has a similar short period of discharge data available.	Acknowledged. As appropriate additional data sources may be used for statistical analysis as needed. As the majority of the creek network will be impacted by mine development, the local site hydrology of the intermittent watercourses will change through mine construction and operation. Given these anticipated changes and the knowledge that these minor tributaries are intermittent additional study will not provide any greater significant information.	Complete
2	We assumed, based on Figure 2 of the TOR, that flows from creeks and small streams are in the direction of the Pinewood River.	The assumption is correct. All proposed Project developments excluding a portion of the transmission line are within the Pinewood River watershed; and all associated creeks (Clark, West, Marr, Loslo and Tait) drain to the Pinewood River.	Comment noted.	-	Complete

#	COMMENT (abbreviated)	RRR RESPONSE	EC ADD'L COMMENTS	RRR ADD'L RESPONSE	STATUS
3	The data collected during the 2011 and 2012 field observations - and the decisions taken by the proponent in response to the location of flow measurement stations - seem incomplete,... The proponent should present a more comprehensive explanation for the decisions made to eliminate measuring stations.	See response to Comment #1 above. The small systems on site simply do not allow reliable measurement. The WSC flow monitoring stations on the Pinewood River provide better data that have been used to prorate flows for the site area. The WSC stations include Station 05PC011 further downstream on the Pinewood River (watershed area – 461 km ²) that operated from 1952 to 1998, and Station 05PC023 just downstream of the RRGP site area (watershed area – 233 km ²) that has operated since 2007 and is currently operating.	The pro-rating approach is an appropriate way to estimate the flows at an un-gauged location. If more complex data is required, then another model could be used to weight data from various localities that are hydrologically similar. The gauge station 05PC011 would have greater impacts from the other contributing branch, but it is not active at this time, and with 15 years of climate change, and only a seasonal record for back-up, it is less certain that a “pro-rating” approach is appropriate.	Agreed. Data collected from nearby hydrologically similar locations such as the EC referenced La Vallee River near Burriss site (Station ID 05PC022) could be used in the future if more complex data are required. With that noted, the La Vallee River station has had numerous issues leading to estimated flows during ice and ice-free periods.	Complete
4	We feel that, since hydrological data will be used to assess certain environmental concerns that will most-likely be relevant during the entire life-cycle of the project, a more-representative data set should be selected. Since 2011 was an exceptional year with limited rainfall, and that the 2012 survey was performed under frozen conditions, we question whether the data recorded are truly representative of the hydrology conditions on the site,... The distinction between continuous and manual (discrete) measurements is an important one, as flow is quite variable at certain points in the survey zone.	Please see responses to Comments #1 and #3, above.	Comment noted.	-	Complete

#	COMMENT (abbreviated)	RRR RESPONSE	EC ADD'L COMMENTS	RRR ADD'L RESPONSE	STATUS
5	<p>Methodology: The methodology adopted by the proponent for carrying out the September 2011 and March 2012 low flow field observations appears to be adequate, based on the information presented in the corresponding reports. However, the methodology for flow measurement is complex. Specific procedures are dictated for specific sampling conditions, and data review is performed following sampling. We assume that this methodology for the collection and treatment was followed in the generation of data for the 2011 and 2012 surveys.</p>	<p>Please see responses to Comments #1 through #3 above.</p>	<p>Responses to comments #1-3 do not appear to respond to this question.</p> <p>Please clarify whether the methodology for the collection and treatment was followed in the generation of data for the 2011-2012 survey. If not, what were the deviations?</p>	<p>Measurements were completed in agreement with the <i>Manual of British Columbia Hydrometric Standards</i> (MBCHS). Individual measurements were completed with the use of a Sontek Flowtracker (as identified within the MBCHS, this instrument can potentially increase data quality under very low flow conditions).</p> <p>Relative to the use of the Flowtracker, <i>Procedures for Conducting Discharge Measurements with Sontek Flowtracker Acoustic Doppler Velocimeters</i> (Water Survey Canada, 2008) were followed. The procedures within the WSC manual for the collection of the data were followed for those data collected.</p>	Complete

#	COMMENT (abbreviated)	RRR RESPONSE	EC ADD'L COMMENTS	RRR ADD'L RESPONSE	STATUS
6	<p>Hydrological Conditions: Rainy-Namakan basin for 2011 overall were dry: <i>'Inflows were near normal for the first part of the year, but conditions became progressively drier through the second half. 2011 precipitation for the Rainy-Namakan basin was 7th lowest in 102 years of records...'</i></p> <p>The Manual of British Columbia Hydrometric Standards recommends the selection of alternate sites in these cases. Was this recommendation followed systematically during the field surveys?</p>	<p>In completing the monitoring campaigns associated with 2011 and 2012, multiple sites within proximity to those depicted within the respective reports were evaluated, consistent with Section 2.1 of the <i>Manual of British Columbia Hydrometric Standards</i>, so as to determine whether more favourable measurement sections were available. In all cases the result of this additional investigation resulted in no more favourable section being identified to those identified within the reporting.</p> <p>However, as site hydrological data are being derived from the Pinewood River WSC stations, as per the above. These stations provide continuous, high quality flow data. With data available for several years, under all applicable flow conditions. The discontinued station (05PC011) was a seasonal station that did not collect winter data (i.e., there are no data from this station for November through February). The currently operating station closer to the site (05PC023) collects year round continuous data.</p>	<p>It should be noted that some of the WSC station's (05PC023) data was estimated under backwater due to ice conditions and for other reasons (such as a result of flooding and debris impacting our instrumentation). The data may be of high quality for those periods that are not estimated.</p> <p>It could be useful to access other seasonal (now discontinued) stations in the general area for a more average hydrological viewpoint (e.g. Sturgeon River near Barwick). As well as the other local station that is currently active though with a short time period (e.g. La Valee River near Burriss).</p>	<p>Acknowledged. Continued correspondence with WSC is required to determine additional information sharing with regards to measurement data and maintenance schedule of the 05PC023 station can provide more accurate / reliable data.</p> <p>Ice-induced backwater conditions are typically encountered throughout the winter and cannot generally be avoided as exemplified by WSC Station 05PC022.</p> <p>Additionally, for mine operations flow conditions during the open water period will be of concern as discharge and intake of surface waters from regional surface waterbodies will occur during this period.</p>	Complete

#	COMMENT (abbreviated)	RRR RESPONSE	EC ADD'L COMMENTS	RRR ADD'L RESPONSE	STATUS
7	<p>Procedures: Discharge measurements were carried out with hand-held equipment. The measurement procedure consists partly on the determination of stream depth and velocity at selected intervals across a stream and the measurement of stream velocity at each selected interval.</p> <p>It was not possible to verify whether all the recommendations related to the discharge measurement procedures in the B.C. Manual were followed by the proponent (section 4.2.5 - Discharge Measurement).</p>	<p>Thank you for your comments which have been reviewed. See response to comments above. It is only possible to get spot measurements for the smaller site creek system, for reasons detailed above under Comment #1.</p>	<p>It should be noted that it is very important with very low flows to follow recommendations, and also, if possible to use a tool that has no moving parts – in order to reduce the effects of friction on the measurement of flow.</p>	<p>Individual measurements were completed with the use of a Sontek Flowtracker. The Flowtracker does not consist of any moving parts. The <i>Procedures for Conducting Discharge Measurements with Sontek Flowtracker Acoustic Doppler Velocimeters</i> (Water Survey Canada, 2008) were followed in completing the individual measurements.</p>	Complete

#	COMMENT (abbreviated)	RRR RESPONSE	EC ADD'L COMMENTS	RRR ADD'L RESPONSE	STATUS
8	<p>Flow Monitoring Stations: The 2012 report mentions that all 2011 stations were monitored. But this was not the case: Loslo 1, Marr 2, Pine 1, Pine 3, SW 1A, SW 5 and Tait 2 were not included in the 2012 field report. The 2011 report recommends the removal and relocation of certain flow measurement stations for a number of reasons:</p> <ul style="list-style-type: none"> • No flow, or visible flow, or stream bed dry – unrelated to beaver activity; • No flow, or visible flow, or stream bed dry – related to beaver activity. <p>Due to the uncharacteristically dry conditions during the 2011 survey, we recommend future hydrological studies since this information is still required to characterise flow conditions in the study area and future local water management. In case where beaver activity certainly has redirected flow, additional stations could be added at appropriate location to measure this diverted flow.</p>	<p>As per the above, reliance is placed on WSC records and not site records for continuous data. Relative to representativeness, the entire site area is underlain by thick clay till deposits, except in localized headwater areas where there are local exposures. The lack of exposed granular soils has resulted in a very limited baseflow condition for local watercourses, such that the Pinewood River at 05PC011 has been observed to go to “zero” monthly average flows for just under 10% of the late summer months, and for about 25% of time for March. Frequent zero flow conditions have also been observed for the local site area creeks. Also, beyond flow measurement limitations described above for the local creeks, it is important to stress that site developments are expected to physically displace the majority of the local site area watersheds, such that even if reliable, continuous flow measures could be attained, these could not be attained over the longer period. Reliance is therefore placed on the WSC stations, and site spot flow measurements.</p>	<p>Was there any attempt to correlate the data collected on site by Rainy River dam, with the data at the WSC gauge? Even point data would confirm any “pro-rating” that is suggested as an alternative to more measurements.</p>	<p>Comparison to the Rainy River Dam was not completed due to the regulated nature of the station (05PC019).</p> <p>Additionally, the hydrological conditions of the system are not similar due to hydrogeological conditions (extensive upstream lake areas and very different terrain associated with the Rainy River system) and the general lack of base flow contributed from the groundwater system in proximity to the proposed mine development.</p>	<p>Complete</p>

#	COMMENT (abbreviated)	RRR RESPONSE	EC ADD'L COMMENTS	RRR ADD'L RESPONSE	STATUS
9	Sufficiency of Data: The data collected during the 2011 and 2012 field observations are useful but possibly not representative of normal flow conditions due to the abnormally dry conditions in 2011 and the presence of excessive amounts of ice in 2012.	Thank you for your comments which have been reviewed. Please see responses above.	Comment noted.	-	Complete
10	Supplemental notes: Note the following errors or missing data from the two reports: 2011 Report: <ul style="list-style-type: none"> • Pine 2 average discharge value: Table 6-1 reports this value as 0 m³/s whereas in the main text it is reported as 0.0062 m³/s. • West 2 station is not mentioned in Figure 1. 	An erratum will be issued with the baseline report to be submitted as part of the Environmental Assessment (EA) Report.	Comment noted.	-	Complete
11	2012 Report: <ul style="list-style-type: none"> • Table of contents – Photo 9: the station should be Jones 1 rather than Jones 2. 	An erratum will be issued with the baseline report to be submitted as part of the EA Report. Also please note that RRR has had a request from a local landowner to use the term McCallum Creek rather than Jones Creek. This will also be included in the erratum.	Comment noted.	-	Complete

#	COMMENT (abbreviated)	RRR RESPONSE	EC ADD'L COMMENTS	RRR ADD'L RESPONSE	STATUS
12	<p>According to the 2011 report,</p> <ul style="list-style-type: none"> • six stations were to be removed, namely Loslo 1, Marr 2, Pine 2, SW1, SW4 and Tait 2; • five stations were to be moved, namely Marr 1, Pine 4, SW1A, Tait 1 and West 1; • two stations were to be moved or removed, namely Jones 2 and SW5, and • twelve stations were to be continued, namely 05PC023, Clark 1, Jones 1, Pine 1, Pine 3, SW2, SW3, SW10, SW13, SW14, West 2 and West 3. <p>However, stations Pine 2, SW1, SW4 and Tait 2 were not removed from the 2012 campaign as was planned in 2011. On the other hand, stations Pine 1 and Pine 3 were not monitored in 2012 (this should have been done according to the 2011 planning). Was this due to an error or was it not monitored for some other reasons (no flow, no access, etc.)?</p>	<p>A decision was made during the March 2012 field program to retain stations Pine 2, SW1, SW4 and Tait 2 for the March 2012 flow measuring campaign. Time limitations did not allow stations Pine 1 and Pine 3 to be visited, but based on results obtained for other small drainages during early March, it was not anticipated that there would be any measurable flow in either station, as virtually all such stations surveyed in early March of 2012 were frozen to bottom.</p>	<p>It should be noted that this data would be hard to correlate with the discontinued dataset (Station 05PC011), since there was no data for the winter season collected there.</p>	<p>Acknowledged, as the 05PC011 was only a seasonal station.</p>	<p>Complete</p>

Stakeholder: Health Canada
 Point of Contact: c/o Stephanie Davis, Project Manager, Canadian Environmental Assessment Agency
 Comments received: May 8, 2013

#	COMMENT	RESPONSE	STATUS*
B8: Rainy River Gold Project, Climate, Air Quality and Sound Baseline Study			
Air Quality			
1	HC has no comments on the baseline air quality data provided in the report.	Response acknowledged with thanks.	Complete
Noise			
2	<p>The report does not identify existing human receptors in the area that may be influenced by project-related noise.</p> <p>The characterization of potential receptors would typically include the distance to the project's local study area (LSA) and regional study area (RSA) for each receptor, and a map illustrating modelled noise levels from the project at receptors in the study area.</p>	Response acknowledged. This information will be provided in the Environmental Assessment Report.	To be addressed in Environmental Assessment Report
3	<p>The baseline survey report (Draft Sound Monitoring Report 2012) highlights elevated night-time noise levels during exploration activities at three receptors: Unit 2A, Unit 2B, and Unit 4A. Unit 4A is described as being adjacent to a house, with "residences nearby".</p> <p>HC suggests that measured or valid estimates of baseline noise levels for both daytime (Ld) and night-time (Ln) at all representative receptor locations be assessed and reported in the EA. When baseline measurement is conducted, HC advises that the measurement be completed in accordance with ISO 1996-2:2007 at each representative receptor and that reports include the hours used to characterize these measurements.</p>	Response acknowledged. This information will be provided in the Environmental Assessment Report.	To be addressed in Environmental Assessment Report

#	COMMENT	RESPONSE	STATUS*
4	Table 3 of the report (page 14), titled "Human Perception of Sound" links increases in decibel level to human perception. However, people may respond to sound characteristics that do not necessarily increase the sound level appreciably. Therefore, in the context of EA, HC advises that statements relating to perceptibility or whether changes in noise are noticeable based solely on decibel levels be avoided, as these statements may be misleading.	Response acknowledged with thanks. References to perceptibility of sound within the Environmental Assessment Report if any, will not be linked solely to decibel level.	To be addressed in Environmental Assessment Report
5	HC advises the inclusion of the information listed in relevant sections of the recent publication entitled "Useful Information for Environmental Assessments".	The publication will be reviewed and applicable information provided in the Environmental Assessment Report.	To be addressed in Environmental Assessment Report

* refers to response to comment

Stakeholder: Ontario Ministry of Natural Resources
 Point of Contact: c/o Stephanie Davis, Project Manager, Canadian Environmental Assessment Agency
 Comments received: May 8, 2013

#	COMMENT	RESPONSE	STATUS*
1	<p>B13: Rainy River Gold Project, 2012 Species at Risk Report</p> <p>The 2012 SAR report provides a summary of field work undertaken and is generally satisfactory. As recently outlined, some survey approaches require reconsideration (i.e. timing of Whip-poor-will surveys and the ability to detect SAR using generic survey protocols).</p>	<p>Comment acknowledged.</p> <p>Three of the four AMEC Whip-poor-will surveys conducted in 2011 and 2012 were within the identified proper moon phase timing window. Two Whip-poor-will surveys conducted by Klohn Crippen Berger in 2010 were also during the proper moon phase timing window. In the Environmental Assessment (EA) Report, AMEC also presents Whip-poor-will survey data collected by the OMNR in 2010. During 2011 and 2012 AMEC and Rainy River Resources also participated in and funded a collaborative Whip-poor-will research study with the OMNR and Trent University. Observation/location data from these surveys is presented in the EA Report. Additional data were collected in the spring of 2013 to further ESA permit compensation requirements (data currently being complied).</p> <p>Since April 2011, AMEC has held 8 face-to-face meetings with the OMNR, and 3 conference calls, to discuss Whip-poor-will surveys, results, <i>Endangered Species Act</i> permits, and potential project mitigation measures. In these meetings, the OMNR has acknowledged the validity of the data that has been collected by all parties (AMEC / KCB / Trent / OMNR). The acquisition of four years of Whip-poor-will data collected by four separate parties, is a very considerable effort that goes well beyond normal protocols.</p>	Complete

#	COMMENT	RESPONSE	STATUS*
		<p>The generic survey methodology reference is believed to refer to Least Bitten surveys conducted during generic amphibian surveys.</p> <p>Extensive surveys for Least Bittern were conducted by Klohn Crippen Berger in 2010 using playback surveys and no individuals were recorded. Therefore, AMEC did not conduct playback surveys for this species in 2011 and 2012 but they did conduct auditory surveys in Least Bittern habitat while conducting amphibian surveys. Therefore, three years of surveys have been conducted for Least Bittern in the appropriate habitats and during the appropriate timing windows, and no individuals have been recorded.</p> <p>In follow up to the MNR March 14, 2013 comments, additional targeted playback surveys for Least Bitterns were conducted in 2013. No Least Bittern individuals were recorded during these 2013 playback surveys either.</p>	
2	<p>It is acknowledged that RRR has chosen not to conduct baseline studies for all project alternatives. The study area for the Species at Risk assessment has been limited to address the area of the preferred alternative. OMNR cautions there are risks in taking this approach and advise that should the result of the Environmental Assessment determine selection of another alternative, further baseline information may be need to be collected and assessed.</p>	<p>Open houses were held in 2012 as part of the consultation on the Terms of Reference. Comment acknowledged and understood.</p>	Complete

* refers to response to comment

Stakeholder: Ontario Ministry of Natural Resources
Point of Contact: c/o Stephanie Davis, Project Manager, Canadian Environmental Assessment Agency
Comments received: May 8, 2013

#	COMMENT	RESPONSE	STATUS*
B16: Rainy River Gold Project, 2012 Aquatic Resources Report			
1	The methods and effort used to capture the fish are well-documented and repeatable. The baseline studies appear to have thoroughly documented the fish species richness of the Pinewood River.	Comment acknowledged with appreciation.	Complete
2	A data gap remains regarding the use of potential northern pike spawning and nursery habitats in the Pinewood River and its tributaries. It is understood that RRR has intentions to confirm and document spawning and nursery habitats of northern pike, walleye and other large-bodied fish in the watershed this spring. We support this effort and confirm that MNR is considering undertaking a preliminary investigation of lake sturgeon (presence/absence) in the lower reaches of the Pinewood River this spring. Results of this effort, should it occur, will be shared with AMEC.	A spring fish community survey was undertaken in May 2013 to provide further information and was focussed on watercourses which may be potentially affected by project development. Data specific to this survey will be provided to augment past baseline information.	In progress Further information will be provided in the 2013 Aquatics Baseline Report

#	COMMENT	RESPONSE	STATUS*
3	<p>Section 1.3 Spatial Boundaries, page 2, lines 20-21: “the creeks and streams that are present in the local area do not support commercial or recreational fishery.” The report should provide supporting references or rationale for this statement. Creeks, streams and ponds in the area support commercial baitfish industry and is considered a commercial fishery for the purposes of section 35 of the <i>Fisheries Act</i>. Discussion whether fish in creeks and streams support the small but existent recreational fishery of the Pinewood River is also required.</p>	<p>This line will be altered as follows: <i>The RRGP is somewhat unique from an environmental perspective in that there are no lakes located within, or adjacent to, the main RRGP site. While limited bait fishing does occur within certain project area streams, the area does not support a significant commercial or recreational fishery. Additionally, the streams and creeks that are present often encounter zero flow during dry periods.</i></p> <p>It is acknowledged that the fish communities within the smaller tributaries of the Pinewood River provide a forage base to predators within the system. This is further discussed within the Environmental Assessment Report and No Net Loss Plan documentation.</p> <p>Further referencing / detail regarding fisheries will be provided in the Environmental Assessment report.</p>	<p>An erratum will be added to the 2012 Baseline Report for this correction.</p> <p>Referencing / further detail will be provided in the Environmental Assessment Report.</p>

* refers to response to comment

Stakeholder: Environment Canada
 Point of Contact: c/o Stephanie Davis, Project Manager, Canadian Environmental Assessment Agency
 Comments received: May 21, 2013

#	COMMENT	RESPONSE	STATUS*
B12: Rainy River Gold Project, 2012 Terrestrial Baseline Study			
1	4.1 - Avian Community: EC recommends that the avian community data be presented in the EIS in a standardized format, along with providing a regional context, in this case with respect to Bird Conservation Region 12 (BCR 12) Priority Species.	<p>The avian community data is presented in the Environmental Assessment (EA) Report (EIS) in a standardized format, using the guidance document provided by EC (<i>Mining Baseline Desktop Assessment and Survey Requirements</i>).</p> <p>A regional context is also provided in the EA report and all species of conservation concern (Species at Risk and Area Sensitive Species) are discussed, as per the EIS Guidelines.</p> <p>The Species at Risk and Area Sensitive Species presented in the EIS cover the Partners in Flight (PIF) Priority Species. Priority Species per se, as per the Ontario PIF are not discussed specifically as such (are not listed as Priority Species) as this was not requested in the EIS Guidelines.</p>	Complete
2	4.1 - Avian Community: EC recommends the following change (revised wording in red). "The avian species' mean numbers and percent of frequency found within the LSA reflect the area's mosaic of mixed, deciduous-dominated forest, shrubby wetlands, and open field habitats."	<p>Comment acknowledged. While we respect this suggestion, this proposed change is not material to the information contained in the report.</p> <p>Similar wording will be utilized in the EA Report and future documentation as appropriate.</p>	Revised wording in EA Report as appropriate

#	COMMENT	RESPONSE	STATUS*
3	4.1 - Avian Community: EC recommends the following change (revised wording in red) in Table 2. The header "Probability of Occurrence" and "Average Maximum Occurrence" be changed back to what was previously used in 2011: ``Mean #**`` and ``Frequency (%)`` (** the mean number of individuals seen across the 29 survey stations, over the two survey periods) as these headings more accurately represent what this data demonstrates.	Comment acknowledged. While we respect this suggestion, this proposed change is not material to the information contained in the report.	Complete
4	5.0 – Conclusion: EC recommends the following change (revised wording in red). ``The vast majority of the species observed in the LSA are migratory species and therefore, compliance with the <i>Migratory Birds Convention Act</i> (MBCA 1994), regulations and guidelines for vegetation clearing, as recommended by Environment Canada, needs to be considered during the project's construction and operation phases. In order to minimize the potential for incidental take of any nesting migratory birds, clearing of vegetation and any proposed work activities in migratory bird habitat should be undertaken outside of the active breeding season. Clearing is generally to be avoided from mid-May to August 8.``	Comment acknowledged with appreciation RRR would appreciate further direction in regards to the identification by EA at this time, of the August 8 end date, as we have been directed previously by the local OMNR office that the clearing avoidance period ends August 1.	Complete

* refers to response to comment

Stakeholder: Environment Canada
 Point of Contact: c/o Stephanie Davis, Project Manager, Canadian Environmental Assessment Agency
 Comments received: May 21, 2013

#	COMMENT	RESPONSE	STATUS*
B13: Rainy River Gold Project, 2012 Species at Risk Baseline Study			
1	<p>General Comment: Overall the SAR surveys appear thorough, however, EC would note that Western Silvery Aster, is easiest to identify in flower and thus, surveys may have been better timed in the fall period (this species is known to flower in early August to mid-September), but the species' silvery-hairy, lance-shaped leaves and rootstock do help distinguish it as well from other asters.</p> <p>Please confirm that the local OMNR office helped AMEC with regard to survey methods and best timing of surveys for this species.</p>	<p>AMEC's botanists are highly skilled and able to identify this species without the presence of a flower. The timing of the surveys for Western Silver-leafed Aster were not specifically discussed with the OMNR. Surveys for this species were also conducted by Klohn Crippen Berger in 2009 and 2010.</p> <p>The species was not recorded within the natural environment regional or local study area during any of the vegetation surveys and was not expected to occur there given the lack of habitat (prairie communities on mafic bedrock).</p>	Complete
2	<p>4.1 - Avian Community: EC recommends the following change (revised wording in red) "The avian species' mean numbers and percent of frequency found within the LSA reflect the area's mosaic of mixed, deciduous-dominated forest, shrubby wetlands, and open field habitats."</p>	<p>Comment acknowledged. The suggestion could add further clarity, but given that the baseline report was issued as a final report, we don't believe that it would be worthwhile to revise the report at this point to reflect the suggested change.</p> <p>Similar wording will be utilized in future documentation as appropriate.</p>	Revised wording in future documentation as appropriate

#	COMMENT	RESPONSE	STATUS*
3	<p>General Comment: EC recommends that the avian community data be presented in the EIS in a standardized format, along with providing a regional context, in this case with respect to Bird Conservation Region 12 (BCR 12) Priority Species.</p>	<p>The avian community data is presented in the EA Report in a standardized format, using the guidance document provided by EC (<i>Mining Baseline Desktop Assessment and Survey Requirements</i>).</p> <p>A regional context is also provided in the EA Report and all species of conservation concern (Species at Risk and Area Sensitive Species) are discussed, as per the EIS Guidelines.</p> <p>The Species at Risk and Area Sensitive Species that are presented in the EIS cover the Partners in Flight (PIF) Priority Species. Priority Species per se, as per the Ontario PIF are not discussed specifically as such (are not listed as Priority Species) as this was not requested in the EIS Guidelines.</p>	Complete
4	<p>4.1 - Avian Community (Table 2): EC recommends the following change (revised wording in red) in Table 2. The header "Probability of Occurrence" and "Average Maximum Occurrence" be changed back to what was previously used in 2011: ``Mean #***`` and ``Frequency (%)`` (** the mean number of individuals seen across the 29 survey stations, over the two survey periods) as these headings more accurately represent what this data demonstrates.</p>	<p>Comment acknowledged. The suggestion could add further clarity, but as the baseline report was issued as a final report, we don't believe that it would be worthwhile to revise the report at this point to reflect the suggested change.</p>	Complete
5	<p>4.1 - Avian Community (Table 2): EC recommends that a column be added to Table 2 indicating which species are suspected to be nesting in the LSA and a column to otherwise highlight SARA listed species.</p>	<p>Comment acknowledged. The SARA listed species are presented in Table 3 of the report.</p>	Complete
6	<p>4.1 - Avian Community (Table 2): Following the standard format in the guidance document from EC (<i>Mining Baseline Desktop Assessment and Survey Requirements</i>) previously provided to proponent will result in a more efficient review of the EIS by EC.</p>	<p>The <i>Mining Baseline Desktop Assessment and Survey Requirements</i> document was used as a guidance document for the EA Report.</p>	Complete

#	COMMENT	RESPONSE	STATUS*
7	3.1.3 - Nocturnal Bird Surveys (Owls, Whip-poor-will and Common Nighthawk): The poor timing/conditions of the June 2012 survey for Whip-poor-will should be referenced in the EIS and whether each site was visited during both survey periods.	<p>It is acknowledged that the timing of one of the surveys was not ideal. However, three of the four AMEC Whip-poor-will surveys conducted in 2011 and 2012 were conducted within the proper moon phase timing window. Also, two Whip-poor-will surveys conducted by Klohn Crippen Berger in 2010 also fell within the proper moon phase timing window.</p> <p>Whip-poor-will data that was collected in 2010, 2011 and 2012 is presented in the EA Report.</p> <p>During 2011 and 2012 Rainy River Resources with support from AMEC, participated in and funded a collaborative research study with the OMNR and Trent University. A Trent University graduate student conducted Whip-poor-will surveys throughout the entire summer in both 2011 and 2012 and the observation/location data from these surveys is presented in the EA Report.</p> <p>AMEC also presents Whip-poor-will survey data collected by the OMNR in 2010 in the EA Report.</p>	Complete
8	3.2 - Amphibian Surveys: The proponent should confirm that timing of the Marsh Monitoring Program surveys were discussed with the Ontario Ministry of Natural Resources.	Techniques used follow those outlined in the <i>Marsh Monitoring Program Amphibians Survey</i> protocols (Bird Studies Canada 2009) and the OMNR document titled <i>Wildlife Monitoring Programs and Inventory Techniques in Ontario</i> (OMNR 2009). The timing for the Marsh Monitoring Program surveys were not specifically discussed with the OMNR.	Complete

* refers to response to comment

Stakeholder: Environment Canada
 Point of Contact: c/o Stephanie Davis, Project Manager, Canadian Environmental Assessment Agency
 Comments received: May 21, 2013

#	COMMENT	RESPONSE	STATUS*
B14: Rainy River Gold Project, 2012 Aerial Nest Survey			
1	<p>3.2 Aerial Survey: The report states: "A spring aerial raptor nest survey was undertaken on April 5, 2012." The aerial nest survey seems to have taken place early in the breeding season especially considering that only one visit was completed. Thus, it will be important to keep in mind when completing the EIS that it may not present a complete picture. For example, Broad-winged Hawks may not have returned from migration at the time the surveys took place, unless 2012 was an exceptionally early spring. Merlin & Osprey were observed, however, they may have still been migrating through, thus the occurrences may not represent territory establishment / nest site selection.</p>	<p>The primary purpose of the 2012 aerial survey was to locate stick nests in the local and regional study areas prior to leaf-out and no empty Broad-winged Hawk nests were recorded during this survey. Three of the four stick nests located within the project footprint were occupied (Common Ravens) and the one empty nest was an obvious Bald Eagle nest. No potential Broad-winged Hawk nests or Osprey nests were found within the footprint (the Bald Eagle nest was not located near Osprey habitat). Only one unidentified empty nest was found outside of the project footprint but within the regional study area and it was an old / inactive nest (most likely a Common Raven nest) that was falling out of the tree.</p> <p>It is acknowledged that the 2012 aerial survey was conducted on a date that typically is considered early for Broad-winged Hawks. This species had not been seen in the project area during the extensive 2010 and 2011 avian studies and was not considered to be present.</p> <p>Opportunistic ground surveys for raptors and raptor nests were conducted in 2010, 2011, and 2012 during other surveys and no Broad-winged Hawks nor Ospreys nests were ever recorded; one Broad-winged Hawk individual was recorded flying over the study area in 2012.</p>	Complete

* refers to response to comment

ERRATUM

The following erratum has been prepared in response to comments received on the final Climate, Air Quality and Sound Baseline Study from regulatory agencies.

Table 7: Note corrections below (underlined)

Parameter	AAQC
NO ₂ (ppb)	<u>200</u> (24 hr) <u>400</u> (1 hr)
PM _{2.5} Mean (µg/m ³)	30 (<u>24 hr</u>)

ERRATUM

The following erratum has been prepared in response to comments received on the final 2012 Aquatic Resources Baseline Report from regulatory agencies.

Page i: Photo 8: Jones 2 test hole frozen, muck substrate, should read Jones 1.

Page 2, Section 1.3: the statement: "the creeks and streams that are present in the local area do not support commercial or recreational fishery" is replaced by: "*The RRGP is somewhat unique from an environmental perspective in that there are no lakes located within, or adjacent to, the main RRGP site. While limited bait fishing does occur within certain project area streams, the area does not support a significant commercial or recreational fishery. Additionally, the streams and creeks that are present often encounter zero flow during dry periods.*"

Page 42, Section 3.7.2: insert the following new line after "The pH at Loslo Creek sampling locations generally ranged from 6.84 to 7.87, however, the August 29, 2012 measurement at LOS-11 (5.45) fell outside the pH range specified in the PWQO for protection of aquatic life (6.5-8.5)": "*It is believed that this value is a result of field equipment error as analytical results of surface water quality from grab samples collected from the same location on the same date indicate a pH of 7.16 (Table 3-2).*"

Table 3-14: additional note required: "*Note: See Page 93, 4th paragraph for further context*".



APPENDIX D-2c

**GOVERNMENT COMMENTS AND RESPONSES
ON PROPOSED TERMS OF REFERENCE**



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGPs Responses

Stakeholder: Ministry of Economic Development and Innovation
Point of Contact: Michael Helfinger, Senior Policy Advisor
Comments Dated: November 26, 2012

#	COMMENT	RESPONSE
1	<p>MEDI is encouraged by the coverage of the mine site, processing facility, infrastructure and supply and service facilities site by a single EA, which should facilitate the timely launch of the Assessment and, ultimately, project approval. Overall, the Terms of Reference appear to commit to a comprehensive assessment of the environmental, social, cultural and economic impacts of the proposed developments. MEDI looks forward to reviewing the completed EA, containing a detailed discussion of the impact of the proposed project on local, regional and provincial economic development.</p>	<p>Noted. RRR appreciates the comment provided by MEDI. RRR believes that the Rainy River Gold Project will provide a significant economic boost to the region. RRR is committed to this development and that it occur in a sustainable manner. This approach will be supported the proposed comprehensive EA.</p>



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGP Responses

Stakeholder: Ministry of the Environment
Point of Contact: Alisdair Brown, Regional Hydrogeologist
Comments Dated: November 8, 2012

#	COMMENT	RRR RESPONSE	MOE RESPONSE	RRR REVISED RESPONSE
1	In order to quantify the potential groundwater impacts, adequate work must be completed to properly establish the baseline (pre-development) groundwater conditions at and surrounding the proposed mine and associated facilities and services. The Proposed ToR has identified that a baseline study is being completed. At a meeting on July 18 in Thunder Bay, AMEC and Rainy River Resources provided a summary of the baseline work that has been completed or is planned. It is understood from the meeting that the baseline work for groundwater will include a comprehensive field program, development of a conceptual model, and development of numerical models. The MOE provided some comment on the baseline program at the meeting. Provided below is an outline that Northern Region Hydrogeologist's have developed that provides our minimum expectations for baseline studies for mining developments:	Noted. Please see responses below.	MOE is satisfied with response.	Acknowledged with thanks.
2	The purpose of baseline groundwater monitoring programs for proposed new mines is to define pre-development hydrogeological conditions. This information will be subsequently used by the proponent to develop conceptual and numerical groundwater models and to predict potential impacts of the mine as the project progresses towards environmental assessment and permitting. This assessment also provides the framework for on-going groundwater monitoring during site development, operation, and closure. Lack	RRR has completed comprehensive environmental baseline studies for the RRGP. Personnel are familiar with MOE requirements based on previous projects and the baseline study was designed accordingly. These aspects will be addressed in the Hydrogeology Baseline Report, which will be appended to the EA Report, and/or EA Report as appropriate. It is expected based on other projects, that the specific location of the future monitoring wells will be identified in association with the	The proponent should confirm that the baseline study work has included the installation and sampling of monitoring wells at the site. The reference in the response to future monitoring wells with respect to the approvals stage implies otherwise.	New groundwater monitoring wells were installed at the site and incorporated into the baseline studies, along with existing monitoring wells and private wells to which RRR had access. These wells were used to provide water level and water quality information for baseline reporting. Additional wells will be installed as the project design becomes firm through the EA process. Those existing wells that lie within the proposed open pit footprint or other facilities will require decommissioning prior



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGPs Responses

#	COMMENT	RRR RESPONSE	MOE RESPONSE	RRR REVISED RESPONSE
	<p>of comprehensive baseline information may cause significant site development delays. To effectively address these uses, the baseline groundwater monitoring program for the site must meet the following requirements:</p> <p>Determine groundwater flow paths; establish hydrogeological properties (i.e. hydraulic conductivity) of aquifers, aquicludes and aquitards; identify potential receptors (e.g. surface water, wetlands, wells, etc.); estimate subsurface travel times (including potential seasonal hydraulic gradient fluctuations); and characterize groundwater quality. The location of the monitoring wells must be selected to define existing conditions and also in anticipation of potential changes in groundwater gradients during all phases of the project (e.g. mounding, lowering, flow direction changes, etc.). The groundwater monitoring should take into consideration the effects of groundwater to surface water discharge, and enough information must be collected so that potential impacts of dewatering on surface water and wetland features can be evaluated. Nested and multi-level groundwater monitoring wells should be used where appropriate to assess both shallow (overburden) and deep (bedrock) groundwater flow systems, as well as vertical gradients.</p>	<p>Ministry of the Environment during the environmental approvals stage.</p>		<p>to construction of the mine.</p> <p>As part of the EA and permitting process, new monitoring locations will be proposed outside the footprint of the mine infrastructure to serve as long term monitoring locations, in addition to those that are not overprinted by construction of the mine. Section 8 of the Amended Proposed ToR has been revised to reflect this response.</p>
3	<p>Collect whatever information will be later required to identify groundwater impacts that may occur as a result of the undertaking, assess contaminant attenuation capacities, and ensure that the proposed mine and associated facility</p>	<p>RRR has an extensive network of groundwater level and quality information already in place as will be described in the Hydrogeology Baseline and EA Report as appropriate. The location of the monitoring wells to assess the operations stage will be</p>	<p>No further response required, assuming that as per the previous comment, monitoring wells have been installed for the baseline study.</p>	<p>Per the above response, there are a very large number of wells at the RRGPs site (approximately 100 + wells) that were installed to support baseline investigations and have been monitored with data extending back to 2009 in some locations.</p>

COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGPs Responses

#	COMMENT	RRR RESPONSE	MOE RESPONSE	RRR REVISED RESPONSE
	designs incorporates appropriate mitigation measures. Groundwater monitoring and groundwater quality data should be collected up-gradient, cross-gradient, and down-gradient from all relevant facilities which have been sited at the time of the baseline survey. This includes potential groundwater seepage locations, rates and quality into or from facilities such as: open pits, underground developments, tailings, stockpiles, collection ponds, processing facilities, and loading areas.	<p>developed through the environmental approvals process in conjunction with the Ministry of the Environment.</p> <p>Potential water quality impacts from mine rock and tailings will be addressed in the EA Report as appropriate.</p>		<p>Samples have been collected from 29 of these locations, with water quality data extending back to 2010 in some locations.</p> <p>RRR propose to install a number of new wells to replace existing wells likely to be in conflict with proposed RRGPs facilities and infrastructure, to be defined through the EA and subsequent environmental approvals process.</p>
4	Identify potential compliance points and compliance criteria (e.g. Reasonable Use, Provincial Water Quality Objectives, etc.) and ensure that sufficient information is available in the future to produce statistically sound assessments of potential mining and associated facility impacts. The baseline survey should include installation of monitoring wells at potential compliance points and within the footprint of the planned operation works with an aim of having most wells remain in-place during all phases of the project to provide consistent temporal analysis points;	<p>Compliance aspects will be addressed in the EA Report. Dedicated wells are anticipated to be required for compliance purposes.</p> <p>RRR has an extensive network of groundwater level and quality information already in place as will be described in the Hydrogeology Baseline and EA Report as appropriate.</p>	This should be reflected in the TOR. No further response required.	Section 8 of the Amended Proposed ToR has been revised to reflect this response.
5	<p>The output of the hydrogeology baseline survey should include the following:</p> <p>a. conceptual hydrogeological model with a written expert opinion summarizing groundwater flow paths, identification of potential receptors, travel times, and water quality;</p> <p>b. hydrogeological maps and cross-sections showing: 1) the location of relevant features, including surface water features, water</p>	<p>a) This will be included in the Hydrogeology Baseline report, and will be addressed in the EA Report as appropriate.</p> <p>b) Many of these items will be included as figures in the Hydrogeology Baseline report. The location of future monitoring wells will be identified at the environmental approvals stage in association with the Ministry of the Environment, but otherwise will be addressed in the EA as appropriate.</p>	With respect to b), the proponent indicates that "many of these items will be included". From the MOE perspective, this is not acceptable, as "all" of these items are required. This should be reflected in the TOR. Otherwise, no further response required.	Section 6.5.2 of the Amended Proposed ToR has been revised to include the entire list of information required to be included in the EA and/or baseline report by the MOE.



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRR Responses

#	COMMENT	RRR RESPONSE	MOE RESPONSE	RRR REVISED RESPONSE
	<p>supply wells, and other potential receptors; 2) location of groundwater monitoring wells with respect to proposed facilities/works, stockpiles, potential seeps of contaminated groundwater, surface water features and other potential receptors; 3) the extent of overburden and bedrock aquifers, including bedrock contact/fracture zones; 4) groundwater contours (potentiometric surfaces); and 5) groundwater flow directions including location of all groundwater divides;</p> <p>c. groundwater analytical results provided in tabular format with ion balances and also presented with ion plots. Laboratory Certificates of Analysis shall be available upon request; and</p> <p>d. identify the need for additional monitoring and assessment to address potential facility development impacts that had not been defined at the time of the baseline survey.</p>	<p>c) This will be included in the Hydrogeology Baseline report and addressed in the EA Report as appropriate.</p> <p>d) RRR acknowledges that modification and/or additional monitoring will be required and will be identified at a preliminary level within the EA Report. Further detail is expected to be required and will be provided during the environmental approvals stage guided by directed discussions with the MOE.</p>		
6	<p>With respect to the timing of the baseline studies, it is recommended that this work should be commenced as soon as possible. To be comprehensive, it is important the baseline studies include monitoring through all seasons to ensure that a full range of conditions are reflected in the data. And monitoring frequency should be selected to account the potential for natural fluctuations in the baseline conditions.</p>	<p>Noted. Baseline studies were initiated in 2008 and remain in progress. Baseline Reports will be appended to the EA Report which will demonstrate lengthy and comprehensive, baseline investigations. The hydrogeological baseline report is in progress and has been modified as necessary to address comments provided by the MOE herein.</p>	<p>No further response required.</p>	<p>Acknowledged with thanks.</p>



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGPs Responses

#	COMMENT	RRR RESPONSE	MOE RESPONSE	RRR REVISED RESPONSE
7	With respect to Groundwater Impacts related to the mining development, the Proposed ToR has clearly identified that the effects of mine dewatering, including impacts to domestic wells and the potential to reduce water levels and flows in local surface water features, will be addressed in the EA. However, with respect to the potential for groundwater contamination, Table 14 specifically states under "Groundwater System" that "Groundwater quality is not expected to be affected". This statement is unsubstantiated, and I believe premature with respect to the EA. Waste rock stockpiles and the Tailings Management Area have a high potential to impact groundwater quality, and the EA must include assessment of groundwater quality impacts. The EA will need to address contaminant loading and transport from both the waste rock stockpiles and the tailings management area, as well as identifying other potential sources of groundwater contaminants. The assessment of groundwater quality impacts should look at contaminant loadings due to leachate, transport rates, attenuation effects, identification of receivers, the potential impact on the receivers, and appropriate mitigation measures. Numerical modelling will be required to assess contaminant transport.	Noted. The ToR guide indicates that the "proponent may wish to include,... a preliminary list of the potential environmental effects,... actual determination,... will be required for the environmental assessment". RRR included a preliminary assessment of effects after mitigation, per the suggestion of the MOE. Table 14 was not intended to be comprehensive or provide a full explanation / substantiation of comments. These aspects will be addressed in the EA Report as appropriate.	The TOR should be worded to indicate that groundwater impacts will be investigated. If Table 14 is to include a comment that "Groundwater quality is not expected to be impacted", it must be supported with an explanation that this may require mitigation measures. No further response is required.	Table 14 has been revised in the Amended Proposed ToR and reflects this request. Further information regarding preliminary potential environmental impacts is provided in Section 7.3. Section 7.2.2 of the Proposed ToR indicates that groundwater impacts will be investigated. This section of the Amended Proposed ToR has been revised to include groundwater quality, as well as the other aspects listed in the MOE initial comment.
8	The EA should include assessment of whether there are practical alternatives to dewatering, and should also look at options on how dewatering can be carried out. And the ToR needs to be clear in stating that the mine water from dewatering will be considered in assessing water supply	Noted. Minewater management alternatives in the EA Report will consider proven technologies other than dewatering, if any. Recycling of water has been identified in the Proposed ToR as the preferred option for water supply, and includes recycling of all	The TOR should state that dewatering alternatives will be addressed.	On further review, it has been determined that there are no feasible alternatives that allow development of the RRGPs without dewatering of the rock and overburden. Section 5.3.8 has been revised to clearly state this. The ore and surrounding rock is extremely



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRRP Responses

#	COMMENT	RRR RESPONSE	MOE RESPONSE	RRR REVISED RESPONSE
	alternatives.	contact water, including minewater. These aspects will be addressed in more detail in the EA Report as appropriate.		hard rock. There are no proven technologies to mine gold-bearing ore from hard rock without dewatering. The rock can only be extracted by blasting to break it up, which cannot be completed in the wet. Further, there is no means to extract the ore for this scale of an operation (ie. the ore body is too deep to extract working only from outside the mine) without entering into mine with equipment and people, which cannot be completed in a flooded environment and would pose an extreme safety concern in any case.
9	For assessment of effects on groundwater quality, the Proposed ToR has identified the use of the Provincial Water Quality Objectives and the Canadian Environmental Quality Guidelines. These are suitable for assessment of background quality. However, it is emphasized that these standards and objectives would be applied in the context of the Ministry's Reasonable Use Policy (Guideline B-7), which is applied to all regulated sources of groundwater contamination, and which incorporates the Ontario Drinking Water Standards.	Noted and agreed.	The MOE Guideline B-7 should be referenced in the TOR.	Section 6.6.3 of the Amended Proposed ToR has been revised to include reference to MOE Guideline B-7.
10	In discussion of the overburden storage area, the ToR notes that suspended solids are anticipated to be the only contaminant of concern. This assumption should be re-assessed, as overburden soils when removed and stockpiled can in some instances become a source for contaminated drainage, sometimes as a result of oxygen exposure resulting in generation of acid drainage. Excavated stockpiles can also result in a source of airborne dust contamination. The EA will be	Noted. Interim geochemical characterizations suggest that the majority of the overburden is non-acid generating. There is a much smaller volume of PAG overburden material which is thin, discontinuous, and located in close contact with bedrock. Storage options for this material will be considered in the EA Report. These aspects, including the potential to generate dust and mitigation measures if appropriate, will be addressed in the EA Report.	Response should be reflected in the TOR.	Section 6.4.3 of the Amended Proposed ToR has been revised to indicate that the majority of the overburden is non-acid generating. Section 5.3.4 of Proposed ToR indicates that storage options for overburden will be considered in the EA. Section 7.3 of the Amended Proposed ToR identifies in the Preliminary Description of Environmental Effects:



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRRP Responses

#	COMMENT	RRR RESPONSE	MOE RESPONSE	RRR REVISED RESPONSE
	required to address the potential for the overburden stockpiles to act as a source of contaminants other than just suspended solids, and should look at the need for mitigation to address potential airborne dust emissions.			<ul style="list-style-type: none"> Potential effect on water quality in the Pinewood River from the release of treated runoff and/or seepage from the stockpiles. <p>Groundwater has been identified as a preliminary VEC and is expected to be defined as a VEC. Accordingly, Section 7.2.2 indicated that mitigation measures will be presented in the EA.</p>
11	In summary, the Proposed ToR has identified that a Hydrogeology Study will be conducted to both establish baseline conditions and to estimate the impacts that the project will have on the natural groundwater conditions at and surrounding the site. The Hydrogeology Study as described should adequately address the impacts of dewatering on the local groundwater system and surface water features. However, it is my recommendation that the ToR needs to be revised to include full assessment of the potential impacts of the project on groundwater quality. The ToR should also clearly identify the assessment of mine dewatering and water supply alternatives; that the baseline studies should incorporate the use of more local domestic wells for assessment of the regional groundwater regime; and that groundwater impact assessment will require consideration of the MOE's Reasonable Use Policy. It is further recommended that the proponent should review the MOE's recommendations regarding Baseline Studies to ensure that our requirements are being addressed. These recommendations should be referenced by the proponent	<p>The Proposed ToR includes a commitment to assess environmental impacts of the entire project in a comprehensive EA Report, using the methodology identified in Section 7. Groundwater systems have been identified at this preliminary stage as one of the potential Valued Ecosystem Components that will guide the framework of assessing impacts in the EA Report.</p> <p>The Proposed ToR itself, is not intended to identify or assess environmental impacts, but provide the framework for inclusion of those aspects in the EA Report.</p> <p>The Proponent has fully considered MOE's recommendations regarding Baseline Studies to ensure that the MOE needs are met, and these recommendations will be referenced as appropriate in the EA Report and/or Hydrogeology Baseline Study.</p>	No further response required.	Acknowledged with thanks.



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGPs Responses

#	COMMENT	RRR RESPONSE	MOE RESPONSE	RRR REVISED RESPONSE
	when developing the details of the baseline studies. The Hydrogeological Study shall establish baseline conditions; assess all potential impacts to groundwater quality and quantity which may result from the proposed project; and propose mitigation measures as required including monitoring provisions.			



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGP Responses

Stakeholder: Ministry of Energy
Point of Contact: Andrea Stoiko
Comments Dated: November 27, 2012

Green: MOE comments to AMEC/RRR's response

#	COMMENT	AMEC RESPONSE	MOE Response	ADDITIONAL AMEC RESPONSE
1	<p>The proponent should describe the anticipated power needs of the project in ToR or say they will describe the anticipated power needs of the project in the EA. The power requirements for the project are usually described for each phase of the project (i.e. construction, operation). The information would support the need for the 230 kV transmission line connection.</p>	<p>Preliminary engineering completed to the time of the Proposed ToR submission indicates that a 230 kV transmission line is required and as described in the document. Further information regarding the RRGP power needs will be provided in the EA Report (and will be detailed in submissions to the Ontario Energy Board).</p> <p>The mine has a planned power requirement of 54 megawatts (MW) when in full production. About three quarters of the power requirement is for the processing plant, with the balance required by the mine itself, along with ancillary needs such as dewatering, administration, etc. The choice of a 230 kV connection is driven by a combination of the level of anticipated demand, supply reliability and technical requirements associated with the drives for the large mill motors.</p> <p>During construction, electrical power demand is expected to be relatively low, at around 2 to 3 MW or less for most of the construction period, rising to around 5 MW prior to commissioning of the processing plant. The current schedule anticipates the 230 kV connection will be in service for the later stages of construction.</p>	<p>MOE to AMEC: Please specify where in the ToR it states that a 230kV transmission line is required? Please be specific.</p>	<p>Page 24, Section 5.4.11, Power Supply Alternatives as well as Appendix B (Page B-1). Additional information will also be provided in the Amended ToR.</p>



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGPs Responses

Stakeholder: Ministry of Natural Resources
Point of Contact: Greg Chapman, District Manager
Comments Dated: November 26, 2012

#	COMMENT	RRR RESPONSE	MNR Response	RRR REVISED RESPONSE
1	Description and Rationale for Alternatives: There needs to be additional explanation to this section of the report. It is not understood if the alternatives selected for this ToR have been screened as per the framework identified in section 5.1 of the ToR. A summary of information that was collected during the screening for these alternatives should be presented in the ToR and further details provided in the supporting documentation.	This section was prepared and revised based on the comments received on the draft ToR and additional explanation provided regarding the alternatives per discussions with the Ministry of the Environment. Appendices B and C provide further detail regarding the transmission line and Highway 600 re-alignment alternatives. The assessment of alternatives will be fully addressed in the EA Report. Under guidance from the MOE EA Branch Section 5 regarding alternatives assessment in the Amended ToR has been revised to more clearly meet the MOE Code of Practice. The title of Section 5.1 in the Amended ToR has been revised to more clearly state this is background information.	MNR satisfied with response.	Response acknowledged with thanks.
2	It is expected that the supporting documentation will include details such as: The method to determine the relative desirability of alternatives from an environmental perspective should be detailed and based, at least in part, on an evaluation of indicators. This evaluation should reflect the degree to which alternatives are expected to conflict with the intention of relevant laws, regulations and policies while considering proposed mitigation measures. For environmental components or processes that may not be specifically protected by laws, regulations or	Applicable laws, regulations and government policies will be fully considered during the selection of a preferred alternative, as suggested by MNR and as per industry practice. Where such instruments are not available, such as in the case of adverse effects to general wildlife habitat and species, best professional judgement and the input of stakeholders will apply. The assessment of alternatives at an appropriate level of detail will be provided in the EA Report. Under guidance from the MOE EA Branch	MNR satisfied with response.	Response acknowledged with thanks.



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRRP Responses

#	COMMENT	RRR RESPONSE	MNR Response	RRR REVISED RESPONSE
	policies (e.g. many invertebrates, reduction in bird abundance due to habitat loss or conversion), expert judgment will be required to 1) predict the relative impacts of different alternatives and 2) determine whether any individual alternative is likely to cause significant adverse effects to the natural environment that cannot reasonably be mitigated (unacceptable) (ToR, pg. 17) and therefore inconsistent with the purpose of the Environmental Assessment Act.	Section 5 regarding alternatives assessment in the Amended ToR has been revised to more clearly meet the MOE Code of Practice.		
3	Section 5.2.3 states it may be that one or two performance objectives are more important and override all other objectives Effects (adverse) to the natural and human environments and amenability to reclamation are relatively more important performance objectives. This valuation should be stated explicitly in the ToR and future environmental assessment.	As described in the assessment methodology (Section 5.2) all of the performance objectives are considered essential to the selection of a preferred alternative. The relative importance of each performance objective will differ according to the Project component being assessed. As such it would be premature to state that a subset of performance objectives, such as adverse effects to natural and human environments, is always more important than other performance objectives for every component. Also, different stakeholders will have different perspectives on the evaluations. The balanced approach proposed to the assessment considers all of the important factors and will be utilized in the evaluations in the EA Report.	The MNR remains concerned about the flexibility allowed in the ToR regarding the relative importance of performance objectives, with regard to: "It may be that one or two performance objectives are more important and override all other objectives, so long as a minimum rating of acceptable is attained for the less important objectives" (Section 5.2.3 of Amended Proposed Terms of Reference). MNR would like to be assured that assigning greater relative importance to non-environmental considerations (e.g. cost-effectiveness and to some degree technical applicability ...) over environmental considerations will not be supported by regulatory agencies. To ensure this approach for the forthcoming environmental assessment is understood by all parties, including Rainy River Resources, we request including the following phrase at the end of the statement quoted above: '... <u>and the relative importance assigned to performance objectives is supported by provincial and federal regulatory agencies.</u>	Section 5.2.3 of the Amended Proposed ToR will be revised to include the requested phrase: "and the relative importance assigned to performance objectives is supported by provincial and federal regulatory agencies."



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRRP Responses

#	COMMENT	RRR RESPONSE	MNR Response	RRR REVISED RESPONSE
4	It is expected the EA will provide details of the alternatives to be examined but the ToR should set out a reasonable range of those alternatives that will be examined and how they will be selected for further study. The alternatives identified in 5.4.1 would appear to have the methods identified for each undertaking and this would be logical. However, this is not carried through consistently through the rest of the document and lends to some confusion. That is, in Table 1, it should be clearly identified what is the project undertaking, the project elements and the alternative methods of those project elements. Each project element should clearly identify the method (i.e. the undertaking of Highway 600 alignment should identify the 4 alignment options).	<p>As per its title, Table 1 Summary of Alternatives to be Considered in the EA, is intended only as a summary. The individual subsections (Sections 5.4.2 through 5.4.12) describe which alternatives will be assessed in the EA Report in more detail.</p> <p>Per your example, Section 5.4.12 states A number of routing alternatives for Highway 600 have been identified and will be described and assessed in the EA (Figure 3, Appendix C). Figure 3 shows four potential routes and Appendix C provides considerable detail about the alternative routings. We believe this fully identifies the alignment options under consideration.</p> <p>Table 1 has been revised to more clearly identify the aspects requested in the Amended Proposed ToR, and the alternative routings.</p>	MNR is satisfied that Table 1 has been revised in the amended ToR to include all alternative routings for the road and transmission line options.	Response acknowledged with thanks.
5	The ToR should better describe the screening process used to assess how the alternatives met the criteria identified in the framework. Section 5.2.1 states that alternatives will be evaluated at the EA stage based on the performance objectives and described indicators. However in Appendices B and C the proponent reached their conclusions on the alternative methods for the road alignment and transmission corridor without defining indicators.	<p>Under guidance from the MOE EA Branch Section 5 regarding alternatives assessment in the Amended ToR has been revised to more clearly meet the MOE Code of Practice.</p> <p>Appendices B and C provide preliminary assessments of routing alternatives in order to better inform the public at an earlier stage regarding the proposed transmission line and Highway 600. The performance objectives and evaluation criteria used therein are consistent with that proposed for the EA Report. The ToR states that indicators will be developed at the EA stage as appropriate to the specific evaluations.</p> <p>As indicated in the Proposed ToR, the</p>	The Appendices B and C identify there are preferred alternatives selected. MNR continues to have concerns that a conclusion has been reached before the process and adequate information is available to make that determination.	Appendices B and C will reviewed and revised as appropriate to ensure that the routings are clearly identified as only preliminary preferred routes and that the identification of the preferred route remains subject to review and revision through the EA process.



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGF Responses

#	COMMENT	RRR RESPONSE	MNR Response	RRR REVISED RESPONSE
		routing alternatives will be assessed in the EA Report, in part to ensure completeness with the anticipated Federal EIS guidelines.		
6	The proposed approach described in section 5.2.3 is quite confusing. It is not understood what is meant by relying on verbal distinctions inherent in the terminology of the criteria.	<p>With apologies, the proposed approach has been vetted through a number of public review processes in the past without difficulty.</p> <p>Under guidance from the MOE EA Branch Section 5 regarding alternatives assessment in the Amended ToR has been revised to more clearly meet the MOE Code of Practice.</p>	The MNR remains concerned about the flexibility allowed in the ToR regarding the relative importance of performance objectives, with regard to: "It may be that one or two performance objectives are more important and override all other objectives, so long as a minimum rating of acceptable is attained for the less important objectives" (Section 5.2.3 of Amended Proposed Terms of Reference). MNR would like to be assured that assigning greater relative importance to non-environmental considerations (e.g. cost-effectiveness and to some degree technical applicability ...) over environmental considerations will not be supported by regulatory agencies. To ensure this approach for the forthcoming environmental assessment is understood by all parties, including Rainy River Resources, we request including the following phrase at the end of the statement quoted above: ' <u>... and the relative importance assigned to performance objectives is supported by provincial and federal regulatory agencies.</u>	Section 5.2.3 of the Amended Proposed ToR will be revised to include the requested phrase: "and the relative importance assigned to performance objectives is supported by provincial and federal regulatory agencies."
7	The reference to other projects has limited relevance given the changes in regulatory requirements and differences in the scale and the processes of the projects.	RRR respectfully disagrees. The methodology that has been purposefully proposed herein for the RRGF EA Report, has been subject to considerable government, Aboriginal and public scrutiny through the approvals for other mining and non-mining projects of similar scale (and of both lesser and greater scale) and under the same provincial legislation (Ontario Environmental Assessment Act) and including meeting the Class EA	Approvals on this project will be based on the current EA process, the specific site and its environmental values, and today's regulatory requirements. The examples of projects RRG referenced are dated. MNR has no further comments.	Response acknowledged and RRR understand that approvals on the project will be based on current regulatory requirements.



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRRP Responses

#	COMMENT	RRR RESPONSE	MNR Response	RRR REVISED RESPONSE
		<p>requirements (for MNR Resource Stewardship and Facility Development Projects) for other recent projects with a shared Federal / Provincial EA document. As such, the methodology provides a demonstrated precedent that has been accepted by the public, Aboriginal groups and regulatory agencies. AMEC is willing to provide further details in this regard.</p> <p>Nonetheless, under guidance from the MOE EA Branch Section 5 regarding alternatives assessment has been revised in the Amended ToR to more clearly meet the MOE Code of Practice.</p> <p>RRR recognizes that the MNR has a unique screening approach to selecting and assessing Project alternatives within the Class EA process for MNR Resource Stewardship and Facility Development Projects. RRR proposes to utilize the MNR Environmental Screening Criteria to assess Project alternatives in the EA Report, in addition to the methodology in the Proposed ToR for assessment of alternative project means of carrying out the project.</p>		
8	<p>Some of the terms used are inconsistent and the meaning is not clear. In the term 'natural environment' is used to describe performance objectives in section 5.2.2, but in AppB-4 when describing performance objectives, the term 'biophysical environment' is used. It is not understood if these are to mean the same, or if they are different and if so why. Given the importance of these objectives, the ToR needs to provide definitions.</p>	<p>The term biophysical environment in Appendix B has been used interchangeably for natural environment. Care will be taken to ensure consistency in terminology in the EA Report. Acronyms and definitions will be provided in the EA Report as recommended.</p> <p>Appendix B has been revised accordingly in the Amended Proposed ToR.</p>	<p>MNR accepts the response and response should be included in the amended ToR.</p>	<p>Response acknowledged with thanks. The Amended ToR has been revised accordingly.</p>
9	<p>Regarding sections 5.4.4, 5.4.6 and 5.4.8,</p>	<p>Figure 2 provides only a preliminary</p>	<p>MNR is satisfied with response.</p>	<p>Response acknowledged with thanks.</p>

COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRRP Responses

#	COMMENT	RRR RESPONSE	MNR Response	RRR REVISED RESPONSE
	while it is recognized that adjusting general locations of these various components will be limited and alternatives to the general locations is not feasible. However it is suggested the ToR allow for some flexibility in configuration of these areas and placement of buildings. For example, slight re-configuration of the east mine rock stock pile boundary from that shown in Fig 1, may help avoid negative impacts to Golden-winged Warbler habitat.	conceptual site layout (and is titled accordingly) in order to allow the reader to better understand the Proposed ToR, and is intended to suggest flexibility in configuration. The final site design will continue to consider mitigation of environmental impact through avoidance as practical.		
10	It should be clarified that MNR will not engage in discussions around land tenure options (as identified on Pg AppB-1) until a preferred route is confirmed at the environmental assessment approval stage.	Noted and understood. RRR has a comprehensive lands database and other information to track land ownership aspects, including claims held by others, gathered in part from the Land Registry Office which is being used in the interim.	MNR's comment was in regard to disposing of land (i.e. land tenure options), not identifying land ownership.	Response acknowledged with thanks.
11	MNR has several questions and comments on Table AppB-1 Pg. AppB-9: <ul style="list-style-type: none"> • Effects on the Human Environment – a description of why Alternative A is expected to 'provide positive effects' is warranted. • Could Alternative D be considered 'preferred' under amenability to reclamation? • Does RRR plan to remove the transmission line following use? • The broad, 3-level evaluation criteria may mask some finer differences among the alternatives – e.g. effects on the biophysical environment are all ranked as 'acceptable' but some alternatives are likely 'preferable' within this ranking. • This preliminary assessment of transmission line routing alternatives is of some value, but a much more 	Noted and understood. <p>As indicated in Section 5.4.11 the potential routing alternatives will be considered in the EA Report. RRR will ensure that these comments will be addressed therein. Nonetheless, a brief discussion is provided below:</p> <ul style="list-style-type: none"> • This is a typographic error that has been corrected. • This alternative is not considered appreciably different in regards to reclamation; while it does afford more ready access, working off the road network could cause considerable disruption to local traffic flow • Yes - that is RRR's preferred approach • Understood - a more comprehensive assessment will be included in the EA report, including environment-related indicators (see Amended Proposed 	The MNR remains concerned about the flexibility allowed in the ToR regarding the relative importance of performance objectives, with regard to: "It may be that one or two performance objectives are more important and override all other objectives, so long as a minimum rating of acceptable is attained for the less important objectives" (Section 5.2.3 of Amended Proposed Terms of Reference). MNR would like to be assured that assigning greater relative importance to non-environmental considerations (e.g. cost-effectiveness and to some degree technical applicability ...) over environmental considerations will not be supported by regulatory agencies. To ensure this approach for the forthcoming environmental assessment is understood by all parties, including Rainy River Resources, we request including the following phrase at the end of the statement quoted above: '...	Section 5.2.3 of the Amended Proposed ToR will be revised to include the requested phrase: "and the relative importance assigned to performance objectives is supported by provincial and federal regulatory agencies."



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGP Responses

#	COMMENT	RRR RESPONSE	MNR Response	RRR REVISED RESPONSE
	detailed analysis is expected in the environmental assessment. Currently, the assessment does not suggest that there is very strong economic, social and/or technical rationale to reject alternatives B, C and D. These conditions were needed to justify lack of detailed baseline studies in the area of these alternatives.	ToR, Section 5. <ul style="list-style-type: none"> The primary rationale for the preferred route was avoidance of residences as demonstrated in Appendix B and avoidance of low-lying areas / requirements for turning points (both for technical and environmental reasons). In verbal discussions RRR has had with local landowners, it was very clearly stated as a preference that the transmission line avoid being proximal to residences as much as practical. 	<u>and the relative importance assigned to performance objectives is supported by provincial and federal regulatory agencies.</u>	
12	The ToR does not identify any potential or candidate alternatives (sites) for hazardous solid waste. It will be expected there will need to be sites identified in the EA.	Only a limited quantity of hazardous waste is expected to be produced by the Project. There are a number of licenced facilities in Canada that routinely accept the types of hazardous wastes expected to be produced by the RRGP. Development of permanent hazardous waste storage or treatment facility on the RRGP site does not meet RRR criteria and will not be considered. Detail regarding hazardous waste management will be provided in the EA.	MNR is satisfied with response and response should be included in the amended ToR.	Response acknowledged with thanks. The Amended ToR includes the information in the previous response.
13	It is unclear as to what the purpose of Table 15 is. The proponent needs to better describe how the EA will consider, evaluate and assess each criterion. The grouping of environmental components in this table again differs from the framework and from Table 14.	Table 14 was initially prepared to address a Canadian Environmental Assessment Agency comment regarding preliminary environmental effects. For consistency, it was provided in the same format as issued to regulatory agencies for the Federal Project Description in the Proposed ToR. This table has now been replaced in the Amended Proposed ToR to more clearly meet the MOE Code of Practice. Table 15 has been removed as it is not required with the revised Section 5.2 and 5.3 in the Amended Proposed ToR.	MNR is satisfied with response.	Response acknowledged with thanks.
14	The summary of Provincial and Federal	Golden-winged warbler is listed in Table 13	MNR satisfied with response and that	Response acknowledged with thanks.



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
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#	COMMENT	RRR RESPONSE	MNR Response	RRR REVISED RESPONSE
	<p>listings of species at risk (Pg 45) is incomplete. Golden-winged warbler is listed as a threatened species Federally and should therefore be included in the summary. It is suggested the legal status and designations of each species be included in the summary for clarity.</p>	<p>with all other Species at Risk known to be present and their Conservation Status.</p> <p>A summary of the species was inadvertently excluded and is presented below: The Golden-winged Warbler is federally designated as Threatened and listed as Special Concern in Ontario. As such, this species is not protected under the Ontario Endangered Species Act. The majority of Ontario's Golden-winged Warblers occur in southern Ontario along the Canadian Shield, yet a small geographically separated breeding population exists in the Rainy River District (Cadman et al. 2007). Although no Golden-winged Warblers were observed during the 2010 baseline studies (KCB 2011), a total of 23 individuals were observed at 16 point count stations by AMEC in 2011 and 2012. This species was most often observed in disturbed areas such as regenerating thicketed areas along Highway 600 and edge habitat along deciduous or mixed forests and rocky, open woodlands.</p> <p>This species has now been added to the Amended Proposed ToR.</p>	<p>summary will be added to section 6.6.4 with the addition to the amended ToR.</p>	
15	<p>It should be identified that RRR is one of three partners funding the study on Whip-poor-will. These partners are Trent University, MNR and RRR.</p>	<p>The text indicated that RRR is currently funding a two year study coordinated with the MNR and Trent University to study Whip-poor-will in the RRGP area in support of both species conservation and mine approval requirements; and could have more completely stated: RRR is currently funding a two year study coordinated with the MNR and Trent University, <u>and funded jointly by the MNR</u>, to study Whip-poor-will in the RRGP area in support of both species</p>	<p>MNR is satisfied with response.</p>	<p>Response acknowledged with thanks.</p>



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		<p>conservation and mine approval requirements. This change has been made in the Amended Proposed ToR.</p> <p>This clarification will also be provided in the EA Report, if applicable.</p>		
16	<p>In order to properly address the potential issues regarding impacts of the project to Whip-poor-will, MNR feels it is important to provide the public with a shared understanding of the species and its habitat. The ministry and RRG have been meeting to discuss ESA consideration for the file and have not reached consensus on the information presented in the ToR. RRG has proposed that there is abundant habitat surrounding the RRG project site which appears suitable based on an aerial flight around the project area. MNR, however, believes that there are additional factors and site fidelity considerations that are critical to the assessment of habitat suitability. It is apparent from information collected since 2010 that Whip-poor-will occurrences in the west end of Fort Frances District are best described as a 'pocket' distribution, and show a landscape pattern that cannot be fully explained by coarse scale habitat associations, as suggested by RRR. Despite what may appear as suitable habitat at a coarse scale (such as fly by), these areas are in many cases not occupied. Importantly, known sites, such as the RRR site have demonstrated long term occupancy. Land owners have reported Whip-poor-will use of these areas dating back 35 to 70 years. This important context information has been excluded from the Terms of Reference. The ToR instead</p>	<p>RRR is working diligently with the MNR and Trent University in support of both species conservation and mine approval requirements. Whip-poor-will are acknowledged in the Proposed ToR as a Species at Risk. The level of detail provided in the proposed ToR regarding Whip-poor-will is consistent with the level of detail provided on other aspects of the environment in the document, recognizing that this species will be emphasized more fully in the EA; and is compliant with the Code of Practice (MOE 2007) requirement for a general description of the social environment, cultural environment, economic environment, built environment and natural environment.</p> <p>As noted in the Proposed ToR (Section 6.1, p. 32 and 34), further detail will be provided in the EA Report, including the copies of all of the baseline reports completed to date (including those already provided to the MNR).</p> <p>RRR is working diligently with MNR regarding Species at Risk concerns, particularly with regard to Whip-poor-will, and despite some possible differences in data interpretation, a general path forward leading to a Species at Risk permit is coming together.</p>	<p>MNR states that efforts are acknowledged and are commended. But as the ToR is a public document, information regarding species at risk needs to be represented fully or not included. The summary provided in the ToR is a part explanation as it relates to Whip-poor-will, and a fuller disclosure is required. That is, RRG should be presenting both representations.</p> <p>RRR needs to either remove the details provided in the ToR around Whip-poor-will, or include MNR's information.</p>	<p>RRR fully respects the MNR's expertise and opinion in regards to Species at Risk. As this aspect remains under discussion with MNR and in recognition that there are ongoing meetings to more fully explore this aspect with MNR, RRR will remove these details regarding Whip-poor-will in the Amended Proposed ToR.</p>



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	focuses on coarse scale similarity of the surrounding area even though research discussions have revolved around the uncertainty of factors that are likely responsible for site selection of Whip-poor-will.			
17	In order to evaluate the alternatives to the project and alternative methods, the criteria, indicators and methods must be developed.	Under guidance from the MOE EA Branch Section 5 regarding alternatives assessment in the Amended ToR has been revised to more clearly meet the MOE Code of Practice.	MNR is satisfied with response.	Response acknowledged with thanks.
18	The ToR also should describe indicators and/or explain how indicators will be developed. Environmental components (e.g. aquatic invertebrate richness, snapping turtle abundance) predicted to be impacted by each alternative may be used as indicators. Indicators must be measurable in a rigorous qualitative (few, many) or quantitative (numerical) manner and be comparable to a pre-determined baseline, standard or target value.	Under guidance from the MOE EA Branch Section 5 regarding alternatives assessment in the Amended ToR has been revised to more clearly meet the MOE Code of Practice.	MNR is satisfied with response.	Response acknowledged with thanks.
19	As indicated for air quality, noise and water quality in Table 6, more specifics can and should be provided at this point concerning relevant legislation, regulation and policy that set limits to impacts on fisheries and aquatic resources, aquatic habitat, terrestrial habitat, wildlife, migratory birds and species at risk. As an example, the Fish and Wildlife Conservation Act, 1997, conserves terrestrial habitat, wildlife and some migratory birds by prohibiting destruction of beaver dams, furbearer dens, black bear dens and bird nests and eggs.	Table 6 provides baseline ambient air quality as currently documented. It is unclear how this relates to legislation, regulation and policy. RRR is committed to ensure that the RRGP complies with all relevant legislation, regulation and policies. As appropriate, these aspects will be referred to within the EA Report.	MNR is satisfied with response.	Response acknowledged with thanks.
20	The proponent should also state the potential data sources for the criteria and indicators. It is understood that some of	Under guidance from the MOE EA Branch Section 5 regarding alternatives assessment in the Amended ToR has been revised to	MNR is satisfied with response.	Response acknowledged with thanks.



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	these data sources are listed in Table 3. However, this necessary statement should be made explicitly in the ToR.	more clearly meet the MOE Code of Practice. Table 3 presents a summary of potential data sources as required by the Code of Practice (MOE 2007) and should not be considered to be exhaustive. These data sources and others will be used to inform the description of the environment in the EA Report.		
21	The proponent's current approach makes it difficult to identify how the proponent plans to address the criteria and indicators as laid out in section 4.2.7 of the Code of Practice. The framework presented and what it is being compared in the ToR is confusing. In section 7.2.1 the components are evaluated under another set of standards and ratings (different than 5.2.2) which will need to be divided further when evaluation potential environmental effects.	There was no intent to be unclear, as the methodology presented in section 5.2 has been used recently for several mining and mining-related EAs within the Province of Ontario, and is a methodology we have found is intuitive and understandable by the general public. Nonetheless, under guidance from the MOE EA Branch Section 5 regarding alternatives assessment in the Amended ToR has been revised to more clearly meet the MOE Code of Practice. Further detail will be provided in the EA Report, particularly in regards to the identification and assessment of the undertaking in regards to valued components, consistent with the Federal EA requirements.	The Appendices B and C identify there are preferred alternatives selected. MNR continues to have concerns that a conclusion has been reached before the process and adequate information is available to make that determination.	Appendices B and C will be reviewed and revised as appropriate to ensure that the routings are clearly identified as only preliminary preferred routes and that the identification of the preferred route remains subject to review and revision through the EA process.
22	The approach to restrict analysis of cumulative projects/activities is not supported. Awareness of past projects/activities may be an important consideration in cumulative effects assessment. As one example, recognizing that historical clearing of land and road construction in the study area has fragmented and reduced forest cover,	Past and current projects and activities (such as that reflected by the historical clearing of the area) is considered within the description of existing baseline condition and will be described in the EA Report. The approach to cumulative effects proposed is driven by the Federal requirements for addressing cumulative	MNR states that while it does not support this approach to cumulative effects assessment, we will defer this component to the expertise of CEAA	Response acknowledged with thanks.



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	alternatives that will fragment forests further (e.g. transmission corridor alternative A) will contribute to cumulative impacts on forest environments.	effects (CEA Agency 1999) and has been used recently for several mining and mining-related Individual and Class EAs within the Province of Ontario.		
23	In Table 14, the potential of effect described for large predators and furbearers is described as limited if any due to lack of presence. Since large predators and furbearers are notoriously difficult to observe/survey ie inactive during day light hours, and Table 11 identifies observations of 10 beaver dams, this is not an accurate statement. It must be corrected that effects on mammals may be limited for other reasons, which will need to be provided in the EA.	<p>The Code of Practice indicates that the "proponent may wish to include,... a preliminary list of the potential environmental effects,... actual determination,... will be required for the environmental assessment".</p> <p>RRR included a preliminary assessment of effects after mitigation, per the suggestion of the MOE. Table 14 was not intended to be comprehensive or provide a full explanation / substantiation of comments. This has been revised in the Amended Proposed ToR.</p> <p>The EA Report will further assess potential project effects on large predators and furbearers.</p> <p>The EA Report will also assess the presence / absence of habitat for these large predators and furbearers, and the likelihood that they occur but were not recorded during baseline studies.</p>	MNR is satisfied with response.	Response acknowledged with thanks.
24	The ToR needs to have a commitment that the effects analysis evaluation approach chosen will need to be further detailed in the EA and be accepted and approved by all applicable agencies.	The proposed effects analysis methodology to be used in the EA Report is detailed in Section 7.2 of the Proposed ToR and was subject to a 30-day government review period, as well as through the draft ToR review process. It is also been approved previously through a number of other EA processes in Ontario.	The MNR remains concerned about the flexibility allowed in the ToR regarding the relative importance of performance objectives, with regard to: "It may be that one or two performance objectives are more important and override all other objectives, so long as a minimum rating of acceptable is attained for the less important objectives" (Section 5.2.3 of Amended Proposed Terms of Reference). MNR would like to be assured that assigning greater relative importance to non-environmental	Section 5.2.3 of the Amended Proposed ToR will be revised to include the requested phrase: "and the relative importance assigned to performance objectives is supported by provincial and federal regulatory agencies."



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			<p>considerations (e.g. cost-effectiveness and to some degree technical applicability ...) over environmental considerations will not be supported by regulatory agencies. To ensure this approach for the forthcoming environmental assessment is understood by all parties, including Rainy River Resources, we request including the following phrase at the end of the statement quoted above: '... <u>and the relative importance assigned to performance objectives is supported by provincial and federal regulatory agencies.</u></p>	
25	<p>The Terms of Reference needs to provide more detail on the commitment of environmental effects and monitoring. This is an important section and it is expected the Environmental Assessment will have an Environmental Effects Monitoring Plan that will include:</p> <ul style="list-style-type: none"> a description of the potential negative environmental effect for each criterion. mitigation and protection measures planned for each criterion and performance measures. how the project will be monitored to ensure that mitigation strategies are meeting performance objectives. a contingency plan to be implemented should monitoring reveal that mitigation measures have failed. a description of frequency and duration of monitoring for each negative impact, for each phase of the project. a non-compliance strategy that will identify a plan of action for out of compliance situations. <p>The Terms of Reference should identify that</p>	<p>Section 8 (and as required by Section 4.2.8 of the Code of Practice, the Propose ToR) includes a commitment to develop during the EA, a monitoring framework for the post-EA phase, to address all stages of the proposed undertaking (design, construction, operation and decommissioning). It will include compliance and effects monitoring if appropriate, as well as any follow-up programs.</p> <p>The monitoring framework and specifics as appropriate will be included in the EA Report which will be subject to government review and comment. It is acknowledged that the details of the monitoring programs often result from approvals given from individual agencies for construction, operation and decommissioning.</p>	<p>MNR is satisfied with this response.</p>	<p>Response acknowledged with thanks.</p>



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	<p>an Environmental Effects Monitoring Plan will be prepared in the EA and approved by all applicable agencies.</p>			
26	<p>MNR has concerns on how the comments, as identified in the ToR and AppF-1 were addressed. Section 9.5.3 of the report identifies that the key comments raised by First Nations were focused in relation to employment and business opportunities. But the summary of comments in Appendix F suggests other concerns regarding environmental impacts were important concerns. The ToR should clearly identify that there were many concerns raised by First Nations around contaminants, fish, water quality and protection, wildlife, harvest food, medicines and future appearance of the site.</p> <p>ROC 73 question 1: how will fuel spills in water will be cleaned up? The response: the procedure for clean up is the same as at gas stations.</p> <p>ROC 73 question 4&5: will there be chemicals that could harm the animals? The response: RRR indicated there will be no chemicals used on the site.</p>	<p>RRR takes very seriously and attempts to respond fully to any and all comments raised in relation to the RRGP. The ROCs are brief summaries of comments that arise through a number of forums, from individuals of varied background.</p> <p>In some instances, such as when taken out of the context of the conversation, the responses provided in the ROC can appear non-responsive or too brief. MNR should be assured that full responses have been attempted to be given to all comments received and that all comments received (and particularly those received in writing) were considered in their entirety in preparation of the Proposed ToR and will be considered in the EA Report.</p> <p>In relation to ROC73, the original notes have been checked and the ROC modified accordingly:</p> <p>What about chemicals that could effect the animals? RRR noted that we are not currently using chemicals at the site. Any chemicals that would be used in the mining process would be managed and handled appropriately to mitigate any potential risks according to various existing laws.</p> <p>What about fuel that gets into the water; how do you clean it up? RRR noted that fuel spills would be handled much in the same manner as a spill at a gas</p>	<p>MNR is satisfied that the ToR and Record of Consultation are being amended to clearly and accurately summarize the comments and responses made during the preparation of the ToR as required in section 4.3.1 of the Code.</p>	<p>Response acknowledged with thanks.</p>



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRRP Responses

#	COMMENT	RRR RESPONSE	MNR Response	RRR REVISED RESPONSE
		station. Absorbent materials would be used to pick up the fuel – in the case of fuel spills on water, booms would be used to contain the fuel. Obviously, we do inspections and have safety plans to avoid spills		
27	<p>MNR has many concerns over Table AppF-1 (Comments and Responses).</p> <p>It is confusing as to why RRR identified only selected portions of MNR’s comments without adequate summary of the comments we provided. This results in the comment being read out of context and not fully understood (ie ROC 67 comment 1&2), as well as comments being described incorrectly. For example ROC 67, comment 8 was stated incorrectly. The correct comment MNR made was that the ToR should state an effectiveness monitoring plan will be required in the EA.</p>	<p>All of the MNR comments provided to date were fully considered in the preparation of the Proposed ToR. The comments on the Draft ToR provided were lengthy (seven pages of text) and were abbreviated, as were all comments received. There has been no intent to describe comments and responses incorrectly. RRR has issued the entire comment / response table related to the Draft ToR with this response table and will modify the ROCs accordingly for inclusion in the EA Report.</p> <p>In regards to comment 8, the comment was considered in the preparation of the Proposed ToR and that the EA Report will include an environmental effects monitoring plan.</p>	<p>MNR is satisfied that the ToR and Record of Consultation are being amended to clearly and accurately summarize the comments and responses made during the preparation of the ToR as required in section 4.3.1 of the Code.</p>	<p>Response acknowledged with thanks.</p>
28	<p>The responses in the table infer that RRR previously provided MNR responses in regard to comments of the review of the draft ToR (see ROC 67 response to comment 5 which suggests they are waiting for a response from MNR). MNR does not have a record of any response from RRR and there is nothing identified in Appendix E that a response was provided.</p>	<p>Comments provided on the draft ToR were fully considered in the preparation of the Proposed ToR and have been summarized in Appendix F along with the response and ToR reference location as requested by the Ministry of the Environment.</p>	<p>MNR is satisfied that the ToR and Record of Consultation are being amended to clearly and accurately summarize the comments and responses made during the preparation of the ToR as required in section 4.3.1 of the Code.</p>	<p>Response acknowledged with thanks.</p>



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGP Responses

#	COMMENT	RRR RESPONSE	MNR Response	RRR REVISED RESPONSE
29	The response to ROC 67 (comment 7) regarding MNR wanting a map of the footprint was incorrectly stated. Figure 2 in the draft ToR did not satisfy our concerns. The addition of Figure 4 in the proposed ToR has addressed the comment.	Noted and the record has been corrected.	MNR is satisfied that the ToR and Record of Consultation are being amended to clearly and accurately summarize the comments and responses made during the preparation of the ToR as required in section 4.3.1 of the Code.	Response acknowledged with thanks.
30	The table does not clearly present what the comments are and what the responses are. le ROC 58, (it is not evident the trapper has any issues). And ROC 177&180 are not comments.	<p>ROC 58 was reviewed. For clarity, the trapper did not have any stated issues regarding the RRGP and provided information to the study team regarding the nature of his trapping activities on the RRGP site. This information was recorded to ensure that it would be accurately reflected in the EA Report.</p> <p>The information provided in ROC 177 and 180 was to document that contact was made between RRR and the First Nation or stakeholder. As such it appears in the table in the 'comments' column to indicate the nature of the discussion or contact that was made. This information is a 'record of contact' rather than a comment per se. To prevent any future misunderstanding, the heading of this column in the table will be changed in the EA consultation documents to reflect the range of information that may be presented in this column.</p>	MNR is satisfied that the ToR and Record of Consultation are being amended to clearly and accurately summarize the comments and responses made during the preparation of the ToR as required in section 4.3.1 of the Code.	Response acknowledged with thanks.
32	There were an unacceptable number of comments and questions where the proponent did not answer the question: (ROC#58 (comment 18), 71(comment 5&7), 67 (comments 1,2,4,7&8), 60 (comments 3&4), 107 (comment 10), 259 (comment 14), 169 (comment 28&29). Responses provided must be directed to the question as best as possible.	RRR takes very seriously and attempts to respond fully to any and all comments raised in relation to the RRGP. As much as practical, all communication (either in writing or provided verbally) is recorded to ensure that all issues and interests are being captured for the record and considered fully in the project design and EA process. As noted above, lengthy comments were abbreviated and there has been no intent to describe the information incorrectly.	MNR is satisfied that the ToR and Record of Consultation are being amended to clearly and accurately summarize the comments and responses made during the preparation of the ToR as required in section 4.3.1 of the Code.	Response acknowledged with thanks.



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
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#	COMMENT	RRR RESPONSE	MNR Response	RRR REVISED RESPONSE
		<p>ROC 58 records the range of issues and concerns raised at the May open house events. Verbal comments and discussions (in addition to those specifically provided on comment sheets) were documented by RRR / AMEC staff as accurately as possible immediately after the open house, in order to ensure that verbal comments were included in the record. While it is the intent of RRR / AMEC to ensure accuracy in recording issues and responses, in some cases, the detailed response given during these discussions was not recorded in the summary of the event. The primary purpose of this ROC (and of the consultation conducted during this time) was to ensure that the full range of issues had been recorded so that they may be addressed in the EA Report and through the design, construction, operation and closure of the RRGP.</p> <p>ROC 71 - The response shown in this ROC was linked to several other questions and may not be clear when taken out of context / reorganized in the appendix. The power supply needs and availability will be assessed in the EA as indicated in the response (admittedly not with complete clarity).</p> <p>ROC 67 – Please see response to #27 above.</p> <p>ROC 60 – The response provided by RRR indicated that certain areas may require special management during construction, operation and after closure, and is complete.</p> <p>ROC 107 – this response was paraphrased</p>		



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
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#	COMMENT	RRR RESPONSE	MNR Response	RRR REVISED RESPONSE
		<p>for the record.</p> <p>ROC 259 – RRR has reviewed its original notes from the meeting. The question asked originally was what other RRR projects overseas had looked like upon completion. It was replied that individual executives attached to the project had worked on other successful projects. Kyle Stanfield was used as an example of one of the RRR executives who had worked overseas, and was now overseeing the development of comprehensive baseline studies of the project area, demonstrating how important the environment is to the company. RRR will continue to endeavour to make complete and accurate Records on meetings.</p> <p>ROC 169 – Responses to the DFO questions were reviewed and believed to be clearly stated. The response was truncated in error in the table presented. The response provided at the meeting was:</p> <p>MNR Provincial Digital Elevation Model Version 2.0.0, with 20 m grid resolution indicates that: a 1 m rise in the water level of the Rainy River would cause Pinewood a backup effect of the Pinewood River up to 5.8 km upstream of the confluence of these rivers; a 2 m rise in Rainy River water level may cause a back-up effect up to 6.8 km (total); and a 3 m rise may cause a back-up effect for up to 7 km (total). It should be noted that this model is limited with respect to accuracy and results interpreted with caution for use only as a general guide.</p>		



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
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#	COMMENT	RRR RESPONSE	MNR Response	RRR REVISED RESPONSE
32	<p>There are a few questions to the responses around the alternatives versus what is being presented in the body of the report. For example, ROC 91, comment 5, the response does not identify there are any alternatives to the road alignment of Hwy 600 but they are described in the ToR. Contrarily there is no reference to any alternatives to realign a section of the Pinewood River in the ToR but the response to ROC 92, comment 1 suggests there may be.</p>	<p>In ROC 91 reference was being made to the preferred alternative road alignment. The issue was not regarding road alignment alternatives, but rather that the realignment should maintain or enhance access for forestry companies. The response was that the proposed alignment utilizes existing road allowances and is designed to mimic the existing Highway 600 connectivity for the general area road network recognizing that the mine and associated facilities will occupy most of the existing Highway 600 section in question. RRR committed to work with Resolute Forest Products to ensure that wood allocations peripheral to the RRGP will have reasonable access. RRR believes that response to the issue was reasonable and that it was not considered necessary in response to the issue raised to indicate that there would be other alternatives for the road alignment.</p> <p>We do not agree with the interpretation of the comment/response to ROC 92 comment 1. This ROC comment relates to the size of the RRGP footprint. The stakeholder indicated that the footprint should be as small as possible and indicated that the current footprint which spans three watersheds is too large. The response does not, in our opinion, suggest that there are options for re-alignment of the Pinewood River, but indicates in response to the issue raised that efforts are being made to ensure the mine footprint is as compact as possible and that the EA will demonstrate that environmental effects are reduced and managed in a way that ensures the long-term viability of the surrounding natural</p>	<p>MNR is satisfied that the ToR and Record of Consultation are being amended to clearly and accurately summarize the comments and responses made during the preparation of the ToR as required in section 4.3.1 of the Code.</p>	<p>Response acknowledged with thanks.</p>



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
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#	COMMENT	RRR RESPONSE	MNR Response	RRR REVISED RESPONSE
		environment.		
33	ROC 58, comment 18, made a request for a copy of MNR report on Whip-poor-will. The individual should have been directed to MNR.	Noted. This will be the direction provided in the future.	MNR is satisfied with response.	Response acknowledged with thanks.
34	ROC 169, comment 36: the proponent responds with incorrect information. There had not been any discussions with MNR regarding baseline studies before the agency meeting held on July 18, 2012. Previous work with the proponent was specific to the collaborative research project on Whip-poor-will. This was clearly described in MNR's letter of response to the draft ToR.	<p>Meetings and discussions with government agencies (MNR, DFO and MOE) regarding baseline studies for the RRGp were initiated in July of 2009 by Klohn Crippen Berger and again in July of 2010. Final minutes for the latter inter-agency meeting were never finalized / issued by Peter Hinz of MNDM that RRR is aware (although they were requested for our records), so the minutes may not be in MNR files.</p> <p>For clarity, ROC 169 (Letter to RRR from Canadian Environmental Assessment Agency on August 17, 2012) comment 36 states that that Canadian Environmental Assessment Agency indicated a need to discuss Fish Management Objectives and the Fort Frances Fish Management Plan with MNR to ensure the plans are updated as necessary to assist with guiding compensation plans as well as determining the scale of various impacts against the management of the fishery.</p> <p>The RRR response to this comment was: Noted. Further discussion regarding objectives of the Fort Frances Fish Management Plan with the MNR within the context of guiding compensation plan will be undertaken. A meeting has been requested with DFO and MNR to further discuss baseline data collection for supporting the EA. This meeting has now been held and work is</p>	<p>Dec 12/12 MNR stated that this meeting was the first agency meeting for the advanced exploration project, it was not a meeting to discuss baseline studies for the mine development project.</p> <p>The first agency meeting to discuss baseline studies (outside of SAR) was July 18, 2012.</p> <p>MNR does not consider the presentations provided for the advanced ex project baseline studies for the RRG project.</p> <p>MNR does not have any minutes from MNDM from the agency meeting of July 2009.</p>	<p>Baseline discussions held previously were to assist the agencies in understanding the entire baseline program underway at those times and solicit input from various regulatory agencies. RRR apologies for the confusion and RRR does not suggest that the July 2009 or July 2010 interagency meetings were focussed on baseline studies required to support the development of the RRGp - only that an initial discussion regarding baseline studies for development occurred at that time.</p> <p>A copy of the minutes from the July 2010 meeting are attached as received from MNDM on December 4, 2012 (Attachment 2). Please note that RRR cannot confirm that meeting attendees were given an opportunity to comment on the meeting minutes.</p> <p>The aim of the July 2010 meeting was primarily to provide the various government agencies with an update on the status of the project (both advanced exploration and proposed future development) and ongoing baseline investigations in order to gain regulatory feedback. RRR respectfully disagrees with MNR regarding this ROC, but does not believe this disagreement is material.</p> <p>Considerable additional environmental</p>



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
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#	COMMENT	RRR RESPONSE	MNR Response	RRR REVISED RESPONSE
		progressing.		baseline studies have been conducted to support the proposed development, that have now completed or are nearing completion, and for which RRR appreciates the on-going guidance it has received from various regulatory agencies to date including the MNR.
35	Regarding ROC 67 comment 5&6, there are no formal names for Loslow, Jones and Clarke creeks. Geographic naming of creeks, rivers and lakes requires a formal process. It is suggested the proponent refer to them in generic reference is Creek A, Creek B, Creek C etc.	The naming of local minor creeks utilized in the figures was based on local knowledge as indicated on the figure and is consistent with all Project documentation produced to date. A statement will be provided in the EA Report stating that the creek names used in the documentation are local names used for ease of local recognition by stakeholders, and that these names are not geographically official names. Changing nomenclature at this point to generic reference terms would only add to public confusion in document review.	MNR is satisfied with response.	Response acknowledged with thanks.
36	<p>Pg vii – The rainy river gold project is not a 'gold exploration project'</p> <p>Pg viii – Reference to MOE (2007) should be MOE (2009).</p> <p>Figure 1 – Lount Lake should be 'Lac Seul'</p> <p>Figure 2 – Where will pondwater in the area of the 'Plant Site' needs explanation.</p> <p>Pg. 11 – Reference to MOE (2009)</p> <p>Section 5.4.1, pg. 16 – First statement somewhat repetitive with Section 5.1 and may be more appropriate under Section 5.1 (alternatives criteria).</p> <p>Sec 6.6.2, p. 43 – Suggest mention of</p>	<p>Pg vii - The Rainy River Gold Project is considered an exploration project as defined under the Mining Act and has been described accordingly for accuracy. The Preface has been deleted in the Amended Proposed ToR.</p> <p>Pg viii - The Preface has been deleted in the Amended Proposed ToR.</p> <p>Figure 1 - The MNR Land Information Ontario database does not include a name for this lake and inadvertently the name was included from an adjacent lake. This will be corrected in all future mapping including for the EA Report.</p> <p>Figure 2 - Comment is unclear.</p>	<p>MNR is satisfied with response.</p> <p>Ok, our comment will inevitably be addressed in the EA.</p>	<p>Response acknowledged with thanks.</p> <p>MNR is correct re: AMEC (2012): Rainy River Gold Project, 2011 Wildlife Baseline Study is the same report as AMEC (2012): Rainy River Gold Project, 2011 Terrestrial Resources Baseline Study.</p> <p>The title of the reference will be corrected in the Amended Proposed ToR (multiple locations).</p>



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#	COMMENT	RRR RESPONSE	MNR Response	RRR REVISED RESPONSE
	<p>AMEC's own effort in surveying rare plants.</p> <p>Pg. 51 - explain AMEC (2012) Rainy River Gold Project vs 2011 Terrestrial Resources Baseline Study equivalent to the 2011 Wildlife Baseline Study.</p>	<p>Page 11 - A typographic error was found in the References and has been corrected in the Amended Proposed ToR. MOE (2009a) should be: Ministry of Environment. 2009. Preparing and Reviewing Environmental Assessments in Ontario. October 2009.</p> <p>Section 5.4.1 - Repetition noted however, we believe the restatement assists the readers' understanding of Section 5.4.</p> <p>Section 6.6.2 - Noted. Further detail will be provided in the EA Report regarding baseline conditions.</p> <p>Page 51 - Comment is unclear. Table 3 is intended as a more descriptive data source rather than full bibliographic references. The 2011 data was issued in a report dated 2012.</p>	<p>MNR is satisfied with response.</p> <p>MNR is satisfied with response.</p> <p>MNR received a report called AMEC (2012): Rainy River Gold Project, 2011 Wildlife Baseline Study and were wondering if it was the same report as AMEC (2012): Rainy River Gold Project, 2011 Terrestrial Resources Baseline Study.</p>	

Reference:

- Canadian Environmental Assessment Agency. 1999. Cumulative Effects Assessment Practitioners Guide.
- Cadman, M.D., D.A. Sutherland, G.G. Beck, D. Lepage and A.R. Couturier. 2007. Atlas of the Breeding Birds of Ontario. Bird Studies Canada, Environment Canada, Ontario Field Ornithologists, Ontario Ministry of Natural Resources, Ontario Nature. 728 pp.
- Klohn Crippen Berger. 2011. Rainy River Gold Project Baseline Report 2008-2010.
- MOE 2007. Code of Practice: Preparing and Reviewing Terms of Reference for Environmental Assessments in Ontario.



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGP Responses

ATTACHMENT 1
DETAILED MNR COMMENTS AND RESPONSES ON DRAFT TERMS OF REFERENCE

Stakeholder: Ministry of Natural Resources
Point of Contact: Greg Chapman, District Manager, Fort Frances District
Comments received: June 15, 2012

[MNR did not review this table, as it was provided too late.](#)

DRAFT ToR COMMENT	RESPONSE	PROPOSED ToR REFERENCE	STATUS
<p>Overall there needs to be more detail in the ToR to adequately present how the Environmental Assessment (EA) will be prepared. Specifically for the components of the ToR such as: the project description, the description and evaluation of alternatives, the baseline data, the assessment and evaluation, the criteria, indicators and methods and the commitments and monitoring. The following comments provide details of where the ToR requires amendments, corrections of further detail.</p>	<p>The function of the ToR is to define how the EA will be conducted and the content to be included in the EA, such that potential stakeholders can judge their interest in the undertaking, and raise any additional items that should be included in the EA process. Additional information will be provided in the Proposed ToR as described below and consistent with the <i>MOE Guidelines for Preparing and Reviewing Terms of Reference for Environmental Assessments in Ontario</i>.</p> <p>Further detail will be provided in the EA document on various aspects as appropriate, including those identified by the MNR. It is intended that the EA will also include complete versions of environmental baseline studies completed to that date, including those related to biophysical and human environment aspects.</p>	<p>See below</p>	<p>See below</p>
<p>The Terms of Reference needs to identify the boundaries of the project footprint will be clearly identified on a map in the EA report.</p>	<p>The Project footprint is shown in Figure 2 of the Draft ToR as a preliminary site plan conceptual layout as discussed with the MOE and CEA Agency. This preliminary site plan schematic shows all of the major Project components and their relative location, recognizing that these components will be refined as a result of further planning, engineering and consultation with stakeholders. The Proposed ToR will indicate that an updated and more detailed site and infrastructure plan will be provided in the EA document; and that the updated site plan will reflect additional planning and engineering inputs, as well as input from the various stakeholders, where appropriate.</p>	<p>4.1 Figure 2</p>	<p>Complete</p>
<p>While it is recognized that the study areas have not yet been firmly defined, a number of alternative routings for the 230 kV transmission line have been determined. The transmission line to be constructed across 15.7 km – 19.2 km, some of which is Crown land, should have been included as part of the preliminary study area with alternative routes presented on a map.</p>	<p>The alternative transmission line routings that have been considered thus far will be included in the Proposed ToR as suggested, and will also be included in the EA.</p>	<p>5.4.11 Figure 3</p>	<p>Complete; to be considered in the EA as applicable</p>



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
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DRAFT ToR COMMENT	RESPONSE	PROPOSED ToR REFERENCE	STATUS
<p>The ToR should have a brief description of the project life cycle including intentions of the site at closure such as identifying the long term plan for the open pit workings (ie flooding or filling), above ground infrastructure, tailings management facilities and sites etc.</p>	<p>The Proposed ToR will include a discussion of alternative means of mine closure.</p>	5.4.13	Complete
<p>There needs to be additional explanation to this section of the report. It is not understood if the alternatives selected for this ToR have been screened as per the framework identified in section 5.1 of the ToR. A summary of information that was collected during the screening for these alternatives should be presented in the ToR and further details provided in the supporting documentation. It is expected that the supporting documentation will include details such as:</p> <ul style="list-style-type: none"> The method to determine the relative desirability of alternatives from an environmental perspective should be detailed and based, at least in part, on an evaluation of indicators. This evaluation should reflect the degree to which alternatives are expected to conflict with the intention of relevant laws, regulations and policies while considering proposed mitigation measures. For environmental components or processes that may not be specifically protected by laws, regulations and policies (e.g. many invertebrates, reduction in bird abundance due to habitat loss or conversion), expert judgment will be required to 1) predict the relative impacts of different alternatives and 2) determine whether any individual alternative is likely to cause significant adverse effects to the natural environment that cannot reasonably be mitigated (unacceptable) (ToR, pg. 17) and therefore inconsistent with the purpose of the Environmental Assessment Act. 	<p>The alternatives section of the Proposed ToR will be revised to more clearly identify the alternatives that will be carried forward into the EA for a more detailed evaluation in EA.</p> <p>Applicable laws, regulations and government policies will be fully considered during the selection of a preferred alternative, as suggested by MNR and per industry practice. Where such instruments are not available, such as in the case of adverse effects to general wildlife habitat and species, best professional judgement and the input of stakeholders will apply. The assessment of alternatives at this level of detail will be carried out in the EA.</p>	5	Complete
<ul style="list-style-type: none"> Section 5.2.3 states it may be that one or two performance objectives are more important and override all other objectives.... Effects (adverse) to the natural and human environments and amenability to reclamation are relatively more important performance objectives. This valuation should be stated explicitly in the ToR and future environmental assessment. 	<p>As described in the assessment methodology (Section 5.2) all of the performance objectives are considered essential to the selection of a preferred alternative. The relative importance of the each performance objective will differ with the Project component being assessed. As such it would be premature to state that a subset of performance objectives, such as adverse effects to natural and human environments, is always more important than other performance objectives for every component. Also, different stakeholders will have different perspectives on the evaluations. The balanced approach proposed to the assessment considers all of the important factors and will be utilized in the EA evaluations.</p>	5.2	Complete



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DRAFT ToR COMMENT	RESPONSE	PROPOSED ToR REFERENCE	STATUS
<p>Table 1 (and in general the ToR) does not adequately explain or provide reasons for the alternatives. The title of Table 1 indicates these are the alternatives that will be considered in the EA, but the column 'to be considered in the EA' identifies some alternatives that are not being considered. If alternatives have been identified as not meeting the proponent's criteria (ie are not within the scope of RRG to implement) they should not be identified as alternatives.</p>	<p>As indicated by the title, Table 1 provides a summary of the alternatives that will be considered in the EA document and was provided to facilitate public review. Table 1 will be revised in the Proposed ToR to more accurately and clearly identify options, such as development of an onsite hazardous waste management system, which do not meet the RRR criteria and as a result, are not acceptable to RRR and will not be considered in the Project design / EA evaluation step.</p>	Table 1	Complete
<p>The report needs to contain a better description of the following alternatives:</p> <ul style="list-style-type: none"> • Mining Alternatives that include re-routing of the Pinewood River. The text and map in the ToR does not clearly show the re-routing. As well, the safety concerns need to be explained (ie berm stability and breakage etc.) 	<p>Geotechnical and hydrogeological assessment work is ongoing to determine whether or not it would be necessary to re-route a portion of the Pinewood River further from the open pit, in order to develop a safe and economically viable operation. This alternative is identified in Table 1 and will be carried forward in the EA. Additional text will be added to the Proposed ToR to explain the possible need for re-routing a section of the river. Further detail will be provided in the EA.</p>	5.4.2	Complete
<ul style="list-style-type: none"> • Tailings Management – there is only one tailings management option presented (Figure 2). The other alternative needs to be defined on a map and better described with more detail. Tailings management areas are important components of mine development. 	<p>The Proposed ToR will indicate that a comprehensive assessment of mineral waste management alternatives will be provided in the EA, consistent with the alternatives assessment requirements associated with the Federal Metal Mining Effluent Regulations and in accordance with the <i>Guidelines for the Assessment of Alternatives for Mine Waste Disposal</i> (Environment Canada 2011). The EA (and associated technical documents if applicable) will include drawings showing other tailings management options.</p>	5.4.6	Complete
<ul style="list-style-type: none"> • Highway 600 re-alignment. The current alternatives are associated with a mine, or no mine, but there are no other alternatives presented. The alternatives should include the alternatives plans for the road re-routing for the project (mine development) and presented on a map. 	<p>A map of alternative Highway 600 routings will be provided in the Proposed ToR showing routing alternatives to be addressed in the EA.</p>	5.4.12	Complete
<ul style="list-style-type: none"> • Power supply: The ToR identifies two power supply alternatives but not an alternative that considers a combination of energy sources. 	<p>The Proposed ToR will consider the combination of energy source alternatives.</p>	5.4.11	Complete
<ul style="list-style-type: none"> • The map that was provided to MNR separate from the ToR shows 4 alternatives for a transmission line to link to the existing power line. This map needs to be provided as part of the ToR. 	<p>A map of alternative transmission line routings will be provided in the Proposed ToR showing routing alternatives to be addressed in the EA.</p>	Figure 3	Complete



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<ul style="list-style-type: none"> Hazardous waste: the offsite licensed landfill alternative should be assessed in this ToR before the EA. Existing landfills vary in their capacity and desire to accept this kind of waste. A site should be identified as soon as possible, specifically since the development of an onsite landfill is not an option. 	<p>Only a limited quantity of hazardous waste is expected to be produced by the Project. There are a number of licenced facilities in Canada that can accept the types of hazardous wastes expected to be produced by the RRGPs. RRR will commit to utilizing this approach in the Proposed ToR and EA. Development of permanent hazardous waste storage or treatment facility on the RRGPs site does not meet RRR criteria and will not be considered. Detail regarding hazardous waste management will be provided in the EA.</p>	5.4.10	Complete
<ul style="list-style-type: none"> Aggregates alternatives – the alternatives are not clearly identified. The definition of dedicated and commercial pits needs to be explained. The Fort Frances district of the Ministry of Natural Resources is not designated under the <i>Aggregates Resources Act</i>. Meaning that aggregate operations on private land are not subject to the act, but operations on Crown land are subject and a permit is required. 	<p>The terminology used will be clarified in the Proposed ToR. The identification of Project aggregate needs and sources is still under investigation and may include Crown resources. Aggregate alternatives will be evaluated in the EA document.</p>	5.4.9	Complete
<ul style="list-style-type: none"> Fresh water supply alternatives – the alternatives require more detail. For example, the area lakes and ponds being referenced need to be shown. The proponent has likely identified candidate sources; they should be included in the ToR. A description on the how groundwater will be accessed is needed, ie number of existing wells, required new wells, locations etc. It needs to be identified in the Terms of Reference that a complete description of water supply alternatives will be provided in the EA. The details will need to identify predicted volumes of water needs and uses such as the amount of water anticipated to be recycled, discharged and needed from fresh water sources. There should also be an additional alternative to address surface water shortfalls ie if the Pinewood River cannot provide enough water. An alternative showing a combination of sources including the purchasing of fresh water should likely be included. <p>It also would be expected that a hydrology baseline study would be an asset in evaluation the alternatives.</p>	<p>The wording of the Proposed ToR will be expanded upon to more clearly identify water supply alternatives that will be considered in the EA. A preliminary water balance will be presented in the EA.</p>	5.4.7	Complete



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
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DRAFT ToR COMMENT	RESPONSE	PROPOSED ToR REFERENCE	STATUS
<ul style="list-style-type: none"> More details of the Alternative Mine Rock Storage Plan needs to be identified. 	<p>The Proposed ToR will indicate that a comprehensive assessment of mineral waste management alternatives will be provided in the EA, consistent with the alternatives assessment requirements associated with the Federal Metal Mining Effluent Regulations and in accordance with the <i>Guidelines for the Assessment of Alternatives for Mine Waste Disposal</i> (Environment Canada 2011). The EA (and associated technical documents if applicable) will include drawings showing other mine rock storage options.</p>	5.4.4	Complete
<ul style="list-style-type: none"> More details of the Alternative Overburden Storage Plan needs to be identified. 	<p>The Proposed ToR will indicate that a comprehensive assessment of mineral waste management alternatives will be provided in the EA, inclusive of overburden storage, re-use during reclamation and other alternatives as appropriate.</p>	5.4.4	Complete
<p>The section that addresses Alternatives Evaluation Methodology (section 5.2) requires better explanation. The descriptions and content of this section is confusing. The purpose and how it is applied to the EA is not clear. This section needs to be amended to address these issues. [see comments below]</p>	<p>The methodology of alternatives assessment defined in the draft ToR has been used successfully by AMEC for several mining and mining-related EAs within the Province of Ontario. AMEC and RRR can provide these references accordingly on request. See also responses below.</p>	5.2	Complete
<p>In order to evaluate the alternatives to the project and alternative methods, the criteria, indicators and methods must be developed in the ToR. At minimum, the ToR should provide information on how these criteria, indicators and methods will be developed. Currently, the ToR lacks many of these details.</p>	<p>The criteria and method of alternatives assessment defined in the Proposed ToR will be revised to be more consistent with the <i>MOE Guidelines for Preparing and Reviewing Terms of Reference for Environmental Assessments in Ontario</i>. Further detail will be provided in the EA.</p>	5.1 5.2	Complete; to be considered in the EA as applicable
<p>As indicated for air quality, noise and water quality in Table 6, more specifics can and should be provided at this point concerning relevant legislation, regulation and policy that set limits to impacts on fisheries and aquatic resources, aquatic habitat, terrestrial habitat, wildlife, migratory birds and species at risk. As an example, the <i>Fish and Wildlife Conservation Act, 1997</i>, conserves terrestrial habitat, wildlife and some migratory birds by prohibiting destruction of beaver dams, furbearer dens, black bear dens and bird nests and eggs.</p>	<p>As required by the <i>MOE Guidelines for Preparing and Reviewing Terms of Reference for Environmental Assessments in Ontario</i> and as identified in Section 7, Table 6 provides a preliminary listing of potential evaluation criteria associated with the assessment of effects of the proposed undertaking (ie. preferred alternative). These will be defined in greater detail in the EA.</p>	5.1 5.2	Complete; to be considered in the EA as applicable
<p>It should be identified in the Terms of Reference there will be a commitment to prepare a study plan with agencies such as MNR, DFO, and Environment Canada for the Environmental Assessment. The proponent will need to work with these agencies in identifying the required studies prior to undertaking them. Fish Habitat Accounting procedures and a No Net Loss plan may need to be developed in consultation with DFO and MNR.</p>	<p>The Draft ToR and Proposed ToR present the study plan for the EA consistent with the <i>MOE Guidelines for Preparing and Reviewing Terms of Reference for Environmental Assessments in Ontario</i>.</p> <p>Baseline, engineering and other studies for the RRGP are well advanced. MNR has been provided with copies of the baseline studies completed to date. It is intended that the EA will also include complete versions of environmental baseline studies completed to that date, including those</p>	N/A	To be considered in the EA as applicable, or during other future activities



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
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DRAFT ToR COMMENT	RESPONSE	PROPOSED ToR REFERENCE	STATUS
	<p>related to biophysical and human environment aspects.</p> <p>From an EA perspective, these studies have been directed at developing an information base which is sufficient to evaluate alternatives, and to determine environment affects associated with the undertaking, as well as to develop mitigating measures and strategies consistent with reducing environmental effects to acceptable levels. RRR will be presenting information on the RRGF to the regulatory authorities (provincial and federal) at various stages in the execution of the EA, to obtain their input into Project planning and decision making. It is important that all information be considered in an integrated manner.</p> <p>Details relating to specific permits and approvals will be discussed with the appropriate agencies once Project details become more firm as a result of ongoing engineering and consultation activities.</p>		
<p>The ToR also must describe indicators and/or explain how indicators will be developed. Environmental components (e.g. aquatic invertebrate richness, snapping turtle abundance) predicted to be impacted by each alternative may be used as indicators. Indicators must be measurable in a rigorous qualitative (few, many) or quantitative (numerical) manner and be comparable to a pre-determined baseline, standard or target value.</p>	<p>Indicators selected for effects analysis will generally be those which can be applied at the system level of function, rather than selecting individual elements or species or species groups, as all biological organism are ultimately dependant on aspects of habitat availability, quality and access. Consequently and as examples:</p> <ul style="list-style-type: none"> • Air quality and water quality will be compared against applicable provincial standards; • Aquatic habitat will be assessed on the basis of water quality, flow volumes and riparian habitat; and • Terrestrial habitat will be assessed against physical displacement and nuisance effects such as dust and noise. <p>Table 6 provides a preliminary listing of potential evaluation criteria associated with the assessment of effects of the proposed undertaking (ie. preferred alternative) as required by the <i>MOE Guidelines for Preparing and Reviewing Terms of Reference for Environmental Assessments in Ontario</i> and as identified in Section 7. These will be defined in greater detail in the EA.</p>	<p>Table 15</p>	<p>Complete; to be considered in the EA as applicable</p>



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DRAFT ToR COMMENT	RESPONSE	PROPOSED ToR REFERENCE	STATUS
The proponent should also state the potential data sources for the criteria and indicators. It is understood that some of these data sources are listed in Table 3. However, this necessary statement should be made explicitly in the ToR.	The Proposed ToR will describe the evaluation criteria and performance objective for the alternatives evaluation.	5.2	Complete; to be considered in the EA as applicable
The ToR refers to extensive baseline studies conducted to date that were completed using standard field protocol and scientific methodology. It is important to note that MNR has not been involved in the collection of this baseline data (with exception of known species at risk), the protocol or methodology. The lack of detail regarding extent and boundaries of the study area and unknown content of a number of environmental studies currently in progress makes commenting on the adequacy of environmental studies conducted by Rainy River Resources difficult.	Local and Regional Study Areas will be defined in the Proposed ToR as committed to in the Draft ToR. Existing and developing baseline study information will continue to be shared with the regulatory authorities. RRR has held an intergovernmental meeting to update regulatory agencies on work completed to date.	6.1	Complete
MNR and the proponent have been working together in addressing the identified species of Whip-poor-will and Bobolink that are known to be present within the study area and are listed as threatened under the <i>Endangered Species Act</i> . The following list of species has been identified through a screening by MNR as possible Species at Risk within the study area: Monarch, Least Bittern, Eastern Meadowlark, Black Tern, Yellow Rail, American Badger, Grey Fox	The environmental summary provided in the Draft ToR was intended to provide a framework consistent with the <i>MOE Guidelines for Preparing and Reviewing Terms of Reference for Environmental Assessments in Ontario</i> and was not intended to be a comprehensive description of the natural environment. Further information will be provided in the Proposed ToR. A detailed description of the environment and associated baseline studies will be provided in the EA.	6.6.4	Complete
The Terms of Reference needs to provide more detail on the commitment of environmental effects and monitoring. This is an important section and it is expected the Environmental Assessment will have an Environmental Monitoring Plan,...	Section 8 of the Draft ToR commits to the development of a monitoring framework within the EA for the post-EA phase (ie. design, construction, operations and decommissioning) including compliance and effects monitoring as well as follow-up programs. Detailed monitoring requirements will be defined as conditions in environmental permits and approvals issued by the Federal and Provincial Governments for the construction, operation and closure of the RRGPs, including those issued by the MOE, MNR and DFO, and defined within the Closure Plan pursuant to the <i>Mining Act</i> .	8	Complete
The Terms of Reference should identify that an Environmental Effects Monitoring Plan will be prepared in the EA and approved by all applicable agencies.	The text presented in Section 10 of the draft ToR is consistent with the requirements of the <i>MOE Guidelines for Preparing and Reviewing Terms of Reference for Environmental Assessments in Ontario</i> . The Proposed ToR is intended to guide the EA and obtain early feedback, with the specifics presented in the EA.	10	Complete



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
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DRAFT ToR COMMENT	RESPONSE	PROPOSED ToR REFERENCE	STATUS
There should be a separate Record of Consultation for the public and First Nations.	A separate Record of Consultation document was issued with the Draft ToR in accordance with the <i>MOE Guidelines for Preparing and Reviewing Terms of Reference for Environmental Assessments in Ontario</i> . The Record of Consultation will be revised to reflect ongoing consultation activities with all stakeholders and Aboriginal Groups, and will be re-issued with the Proposed ToR.	Record of Consultation, Discussions and Meetings	Complete
Use of the term 'criteria' is not consistent throughout the ToR, (ie evaluation criteria in Section 5.2.1, referring to a reasoned judgement or decision, and selection criteria in Section 5.4.4, 5.4.6 referring to desired status or condition and preliminary criteria in Table 6, referring to predicted effects of an action/alternative). The variety of uses of this term presents challenges to understanding and interpreting the ToR. It is suggested the term be used in reference to predicted effects of an action/alternative which is more consistent with the MOE Code of Practise.	The use of the term criteria within the Draft ToR has been reviewed and will be clarified or revised in the Proposed ToR to be consistent with the <i>MOE Guidelines for Preparing and Reviewing Terms of Reference for Environmental Assessments in Ontario</i> .	5	Complete
It should be clearly stated the road alignment of Hwy 600 is proposed and included as part of this EA. The term <u>existing</u> road alignment needs to be identified. The ToR should identify that the movement of the road is first and foremost a requirement to mine development. If there are existing safety issues for the current road and the current use, then it should be identified how this was determined (ie confirmation from MTO, statistics of accidents etc) and how it has been handled in the interim. The ToR should at least identify the possible alternatives that were presented earlier with the understanding they may change for the EA. Highway 600 is classed as a Secondary Highway (not Tertiary).	The Project component list in Section 4.1 of the ToR clearly includes the Highway 600 re-alignment as part of the Project which will be assessed as part of the EA. Highway 600 has been re-classified and is officially classified as a minor secondary highway. The Proposed ToR will be revised accordingly.	4.1	Complete
Table 7: Ministry of Transportation of Ontario (MTO) needs to be included as an approving agency.	MTO will be included in Table 7 of the Proposed ToR.	Table 19	Complete
The recently prepared draft Official Plans for the local municipalities state that it is assumed 90% of Rainy River Resources mine jobs will be occupied by local residents. A rationale for a construction camp of offsite residence is suggested.	RRR has every intent of hiring locally as practical in order that the employment benefits remain in the region. Alternatives for accommodation have been identified in the Draft ToR for further assessment in the EA. Rationale for the preferred alternative will be provided in the EA.	5.4.8	Complete
The Conservation Reserves are incomplete in Figure 3 (ie Rainy Lake Islands, Pipestone are missing) and Seine River First Nation is identified incorrectly as a Conservation Reserve.	Figure 3 will be revised in the Proposed ToR.	Figures 5 and 6	Complete
The creek names Loslow, Jones and Clarke are not official names.	Noted. The naming of local minor creeks utilized in the figures was based on local knowledge.	N/A	Complete



**COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
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**ATTACHMENT 2
COPY OF MNDMF MINUTES OF JULY 13, 2010 MEETING REGARDING THE RRGP**

[included below exactly as provided to RRR on December 4, 2012; Please note that to RRR's knowledge, these minutes have not been reviewed / approved by the attendees at the meeting]

Rainy River Resources
Inter-Agency Meeting
Tuesday July 13, 2010
Ministry of Natural Resources, Fort Frances District Boardroom

Jim McKeever, MTO
David Laverdière, EnvCan
Drew Stajkowski, MOE
Garett MacDonald, Rainy River Resources
Kyle Stanfield, Rainy River Resources
Stacey Jack, Pwi-dii-ghoo-zhing Advisory Services
Debra Lamache, Klone Crippen Berger
Lee-anne Hollingsworth, Klone Crippen Berger
John Jemmett, Klone Crippen Berger
Tony Elders, MNR
Melissa Mosley, MNR
Jeff Wieme, MNR
Rachel Hill, MNR
John Vandenbroeck, MNR
Matt Meyers, MNR
Barb Ellis, MNR
Peter Hinz, MNDMF
Mike Grant, MNDMF

Start time: 09:15h CST

Peter – Welcome & introduction of the meeting goals.

All – round-table introductions.

Rainy River Resources – Garett – presentation of company/project overview

- RRR has spent >\$1M on baseline environmental studies to date
- ~320,000 metres of drilling to date from 1994 in ~ 740 holes
- ~100,000 metres of drilling planned for 2010

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- +5M oz of gold current resource
- Gold primary commodity, minor silver, zinc
- Current exploration down to 500 metre depth

Q. Tony – What is VMS?

A. Garrett – Volcanogenic Massive Sulphides

Q. Melissa – Is the two year timeline for the advanced exploration program to build the ramp or to do the sampling program or both?

A. Garrett – Both

Klone Crippen Berger – Debra – presentation on Environmental Baseline Study & Permitting

Q. Rachel H. – Where are the study areas?

A. Debra L. – The current slide (#5) shows the 2009 study areas. KCB are using a 5 kilometre radius from the deposit for the study

A. Kyle S. – The study has been expanded beyond the 5 kilometre with the last few months.

Q. Lyndon K. – Are encounter transects used for species other than birds?

A. Lee-ann H. – Pair with songbird and forest bird monitoring program, essentially walk transects through the bush and observe wildlife, songbirds and record incidental observations.

Q. John V. – Do you run a K analysis for flushing distances to estimate densities?

A. Lee-ann – Haven't yet, we've just tied up the last of the surveys. In the midst of doing that analysis.

Q. John V. – Do you have a list of targeted Endangered Species?

A. Lee-ann H. – Yes, KCB can provide MNR with their list, some include: the Whipporwill, Common Nighthawk, Red-headed woodpeckers to name a few.

Q. Jeff W. – If you have identified a number of species at risk how has that influenced your planning? Or is it currently only documentation?

A. Kyle S. – Company is considering the data in their planning. They are communicating with John V. to ensure their operations are not impacting the areas in question. RRR wants to be co-ordinating with MNR and respecting those sites. If a follow-up meeting with MNR concerning the environmental baseline studies & endangered species is needed the Company would be interested.

Q. John V. – Does the Company have a reasonable inventory of where the targeted species are within the 5 km radius? How might that information influence your work?

A. Kyle S. – The database has grown significantly in the last six months. Currently in the midst of scoping facility design, want to be able to design a facility commensurate with key habitat. RRR wants to work with all the agencies to design a project that respects all the new science available.

A. Lee-ann – It is an advantage to have engineering in-house so that new data accumulated during baseline environmental studies can be utilized in the development of the project.

Q. Lyndon – Where was electro-fishing undertaken?

A. John – The very head waters of West Creek above Rowan Road.

Kyle – northern pike have only been found in the Pinewood River, none in the tributaries or Pinewood Lake.

Q. Lyndon K. – How deep is Pinewood Lake?

A. John – Told by locals it is 40 feet in the middle, used to be able to catch pike in the lake but none were encountered during this study.



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
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Q. John V. – Has any aquatic invertebrate sampling been done? If so, has there been any consideration of correlating the new data with that of the program run by Rainy River FN in their 1997 survey?

A. John M. – KCB did invertebrate sampling last year and will be doing sampling this year, do not recall if the data has been compared with the 1997 data. KCB willing to do so if MNR feel it would be useful.

A. Lee-Ann – Believe that KCB has the 1997 data as part of their database.

Q. John V. – All the sampling that has been done has been within the Pinewood River headwaters, has there been any consideration of setting up a control site?

A. John M. – Yes, sampling in the Lake of the Woods watershed including Muskrat Lake and a number of creeks and beaver ponds have been sampled and will continue to be sampled.

Q. Melissa – How many sample sites are below/downstream from the project area?

A. Lee-Ann & Kyle – There are three.

Q. David L. – Where is the deposit in relation to the local watercourses? What is the scale of the image?

A. Debra – The deposit is in the centre of the study area. The circle is a 5km radius.

Q. John V. – Is all of the activity anticipated south and west of Highway 600?

A. Kyle – There is the potential for interest slightly north of the Highway but not a lot. It's good to have MTO as part of the group just incase there is a need to discuss re-alignment. The need is being assessed at this time. There have been discussions with MTO concerning the replacement of undersized culverts at various points on Highway 600.

Q. John V. – In regards to terrestrial studies, how far to the north beyond the identified study area (5 km circle) has KCB been looking, how far did you go?

A. Lee-Ann – Have concentrated studies within the 5km study area but have expanded out up to 20km from the project area. KCB has also looked at the watershed as a whole and have ground truthed areas.

Q. John V. – From a Species at Risk perspective you have a larger area of interest, within the 5km circle did you find any species at risk that have been targeted?

A. Lee-Ann – Yes, have found Whippor-will, Common Nighthawk, eagle stick nest, Canada Warbler, Olive-sided Flycatcher and Peregrine Falcon. The last three are migrants.

Q. John V. – When did you become aware of the Species at Risk in the area?

A. Lee-Ann – Starting from the beginning, became aware of the Whippor-will last year, did targeted studies this year, combined with Common Nighthawk survey this year. Covered the area quite extensively, concentrated surveys in the local study area and wanted to put it into context with the whole watershed.

Q. Kyle – Has John V. completed his survey of Whippor-wills?

A. John V. – The survey has been completed but not yet written up.

Q. John V. – Was the Whipporwill observation within the 5km study area in the area of impact?

A. Lee-Ann – It was within the 5km study area as well as outside.

Q. Kyle – Clarification, are you referring to mine infrastructure potential?

A. John – Yes, is there a value on the ground that is being implicated?



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
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A. Kyle – With respect to mine development the answer is No, because RRR is in the planning phase, plans are pretty fluid at this time. Able to manage around specific areas, need to co-ordinate with MNR, KCB and Northern Bioscience concerning specific areas to nail down the fluidity. Drilling program, not currently drilling in those areas. For mine development purposes RRR wants to co-ordinate with MNR to ensure they are identifying the same areas.

Q. Jeff – What about the advanced exploration program.

A. Kyle – The advanced exploration program is also pretty fluid. Garrett is working on the engineering side with SRK Engineering to select a site that makes the most engineering sense but also takes into consideration the baseline study results in order to minimize impact. Need to firm up SAR habitat concerns with respect to mine design, make sure we are co-ordinating properly so areas of concern are being identified so that RRR can design a project that is permissible.

Matt – Some of John V.'s data is considered sensitive, it would be worthwhile to develop some sort of a data-sharing agreement in order to facilitate an exchange of information.

Q. Drew S. – Has KCB done any noise assessment in the winter months when there is less foliage?

A. Debra – Haven't done this yet but will be doing a more fulsome noise assessment this year and will include the winter months.

Q. Rachel – Has KCB included any other economic sectors in their socio-economic assessment, such as baitfishers?

A. Debra – It will include any other economic sectors in the area, including baitfishers.

A. Lee-Ann – Yes, KCB has been working with the baitfishers in the area and have had them collecting samples.

Q. Matt – Would it be the same for trapping?

A. Lee-Ann – Yes, it is the same for trappers, using their data for small mammal study. KCB have been in close contact with Ken Angus, he is working on beaver management.

Jeff – A word of advice on BMAs and hunters as they bait bears and attract them into the area. It could be a health and safety issue, good to know where they are baiting.

Q. Peter – Has KCB or RRR been in contact with either the Rainy River Valley Field Naturalists or Rainy Lake Conservancy? They conduct natural science surveys and may be able to provide data to KCB.

A. Debra/Kyle – Not to date.

Matt – MNR supports a local Stewardship Council, they are interested the RRR project and have been asking questions. It would be worthwhile to communicate with them, they have monthly meetings.

Kyle – RRR feels its important to engage the local communities (aboriginal and non-aboriginal) to circumvent the rumour mill. Having the local office in Emo will be very important, it will allow local people an opportunity to drop in to chat and learn about the Company and the project.

Q. Melissa – Who will be working in the Emo office?

A. Kyle – Stacey and one other person will be located there working with the public on a regular basis and will be there to answer questions. Want RRR to be seen to be communicating with the public and open.

Q. Rachel – What prompted this meeting?

A. Kyle – As a follow-up to a teleconference call in May, MNR asked to engage through the One Window process. This meeting is primarily to exchange information and get feedback from the various agencies.

Debra – KCB can prepare a summary document of the baseline studies done to date and a listing of the surveys done and methodologies used to provide to MNR.



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
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Q. John V. – Has RRR thought about the international context in regards to the water quality in the Rainy River and what level of level of consultation will be required for an international body of water?

A. Kyle – Yes, I have direct experience in this and have worked with the US Department of Homeland Security and the Alaskan Department of Fish and Wildlife on the Galore Creek project in northern British Columbia. Will work with the Minnesota Department of Natural Resources to address cross-border issues and will engage stakeholders south of the border. The Trans-boundary Water Agreement will also come into play, the Company has a fiduciary duty to consult.

End of Presentation/Q&A



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Round-table

MOT – Jim McKeever

- Legislation requires certain permits for activities access to a provincial highway or activities adjacent to it
- Interested in a site plan, phasing of development, where entrances may occur, if drainage will be re-routed that may affect a highway, may require a traffic impact study, hydro location permits for certain hydro access.
- Can provide outline of permits that may be required and details in a letter to the proponent
- Interested in the possible re-routing of Highway 600.
- Kenora staff will issue the permits and review, Debbie Fairfield, Corridor Management Officer, should be included in project development meetings in future

EnvCan – David Laverdière

- With regards to AE program, when would RRR be in a position to submit a project plan to MNDMF?
 - o Kyle, anticipate NPS in the next 6-8 weeks.
- What type of EAs does RRR anticipate?
 - o Kyle, certainly a Class EA on the MNR & possibly MOE side. The CP being submitted to MNDMF for the mine development, RRR would be looking to harmonize with the Federal EA as best as possible so that the Company would be looking at a single submission EA. Depending on how the Company proceeds with facilities in respect to MMER may have DFO as the lead on the Federal side in particular related to facilities, tailings and waste management. The Company is hoping to avoid Schedule 2 under the Fisheries Act, looking at engineering to move this way.
- Suggest RRR pay close attention to Marathon PGM and Detour projects and their developments in regards to the waste rock stockpile issue. They may require their own Schedule 2 and/or Federal EA.
- All activities of exploration are subject to the Fisheries Act, as the project develops it may become under the MMER. Recommend examining the Environmental Code of Practice for Metal Mining in detail and consider it during project planning. May assist in developing a social licence to mine.
 - o John Vandenbroek, could David provide information on SARA?
- A bit out of David's expertise but should be considered.

MOE – Drew Stajkowski

- MOE has been doing tributary monitoring off the Pinewood and Rainy rivers closely focussed on phosphorous, report water quality to the International Joint Commission.
 - o Mike G. - Are samples analysed for broad spectrum or for a narrow range of elements?
- Samples are primarily analysed for nutrients and metals, field measurements for dissolved oxygen and conductivity.
- For permitting, Drew is OW for MOE, any questions regarding water quality science talk to staff (Hydrogeologist, Surface Water Specialist) in Thunder Bay.
- Water permits go through regional office, any other permits (OWRA, Section 53, sewage works) go through Toronto.
- Permitting requirements for the project Permit To Take Water, for the handling of mine water, OWRA Section 53 permits may be required.

DFO – Lyndon Kivi

- Where do you see the ramp being set? How much waste rock could be generated?
 - o Garrett, ~100,000 tons of waste rock. Showed on the map where a possible location may be. Discussion followed.
- Project now looking like an underground operation instead of an open pit?
 - o Garrett, results are getting better as the Company drills deeper, difficult to say for sure right now. The economics for an underground operation are looking better.
- In regards to the fisheries studies they look good, have covered the area pretty well. Would KCB consider doing bathymetry on Pinewood Lake?
 - o John J. would consider doing it if DFO requested.



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)

Comments Received from Government Agencies and RRRP Responses

- Does RRR have beaver management activities going on?
 - o Kyle. Yes, working with Tony Elders (MNR)
- Was there an engineering survey of West Creek?
 - o Yes, a survey down West Creek and part of the Pinewood was done last year, have put a hold on that pending revised project development plans

MNR – Jeff Wiume, Tony Elders, John Vandenbroeck

- Jeff Wiume
- MNR legislation that will likely have application *Lakes and Rivers Improvement Act, Public Lands Act, Crown Forest Sustainability Act, Fish and Wildlife Conservation Act* and *Endangered Species Act*,
- Most likely permitting requirements under some of these acts
- Tony Elders
- Since there is a lot of water on the site if there is the need for drainage and diversions RRR will need to consult early as the Regional Engineers will need to be involved.
 - o Lyndon, DFO would be involved as well through the *Fisheries Act*, authorizations and compensations would be required. Scheduling process would be triggered if tailings will be deposited in fish habitat.
- John Vandenbroeck
- Two acts involved, *SARA* – Federal, *ESA* – Provincial, *ESA* covers all lands in Ontario.
- The *ESA* is very specific in its protection for species and habitat.
- Whippoorwill has received automatic habitat protection.
- All permits issued by the Minister, two types, assisting recovery & overall benefit (17C).
- One red flag, that RRR is aware of a value that is protected by the *ESA*, have to be pretty confident that you have measures in place to protect the value.
- Another red flag, there is a whippoorwill cluster, RRR's property is within one of these clusters. Very interested in the noise studies.
- Need to categorize species based on the Federal and Provincial acts.
 - o Leanne, has there been any consideration as to noise regulations around the Whippoorwill?
- Not at this time, regulations are still being developed.
 - o Kyle, are there any precedents related to forest management planning in regards to the *ESA*?
 - o Melissa, because forestry activities and mining are two completely different industries with mining being much longer-lived we shouldn't be looking to forestry for guidance
 - o Kyle, because *ESA* is evolving and a very important piece of environmental management, RRR wants to be sure they are coordinating correctly with MNR.
- No rules on what a habitat regulation looks like, this is evolving. Regs will be updated as science and policy evolves.
- John V. sees a spatial context to the developing the Habitat Reg for the Whippoorwill.
 - o Kyle, has there been any thought of recommending certain studies (to industry) linked to specific species in order to facilitate the permitting process?
- Can't really answer that question, but funding projects is not considered providing "an overall benefit", the overall benefit has to be "realized" from a habitat perspective.
 - o Kyle, the six-month permitting process is purely an administrative timeline.
 - o Jeff, the six-month timeline is linked to the level of detail and completeness of the submission. If the submission is complete then it will take six-month.
 - o Kyle, the key point is that if we don't have proper communications to ensure all studies the necessary studies are included in the submission. Without proper co-ordination this could be a fatal flaw in the process.
- The 17C permits will need to go through public consultation and the EBR posting process.
 - o Drew, any permits from MOE like PTTW will be circulated to First Nations for comment.
 - o Jeff, should identify Rachel Hill as MNR point person for this project, also need to finalize a data sharing agreement in order to share data from both sides.
 - o Mike, MNDMF will send a letter to the partner agencies asking them to identify their point person for the OWCP.
- Kyle, as for work permits, RRR can continue to work through District Contacts for operational permits not linked to Advanced Exploration.



**COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
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MNDMF – Mike Grant

- pleased to see that RRR has engaged a wide-range of aboriginal communities and that RRR has hired an aboriginal liaison.
- Would like to see co-ordination amongst the Ministries as to aboriginal consultation.
- If the project moves to production CEAA has a similar approach.
- MNDMF has a new Sr. Aboriginal Liaison Office starting shortly, Melanie Mathieson.

End of Meeting – 12:25h CST (?)



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
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Stakeholder: Ministry of Environment
Point of Contact: Pierre Godbout, Senior Noise Engineer
Comments Dated: November 19, 2012

#	COMMENT	RESPONSE
1	<p>The following noise and vibration study items should be considered when preparing Environmental Assessment studies for mining activities undertaken by Rainy River Resources Ltd.</p> <p>Noise Limits: shall comply with the MOE noise limits in:</p> <p>a) Publication NPC-205, "Sound Level Limits for Stationary Sources in Class 1 & 2 Areas (Urban)", October, 1995 as amended; or b) Publication NPC-232, "Sound Level Limits for Stationary Sources in Class 3 Areas (Rural)", October, 1995 as amended; as applicable.</p>	<p>Noted. These items will be considered.</p> <p>AMEC's team is very familiar with the MOE requirements in regards to sound / noise aspects and will ensure that these needs are met in future documentation.</p>
2	<p>Noise Screening: shall be prepared in accordance with:</p> <p>a) Primary Noise Screening Process For S.9 Applications Supplement To Application For Approval b) Secondary Noise Screening Process For S.9 Applications Supplement To Application For Approval</p>	<p>Noted. These guidance documents will be followed as applicable.</p>
3	<p>Noise Reports: shall be prepared in accordance with:</p> <p>a) Publication NPC-233, "Information to be Submitted for Approval of Stationary Sources of Sound", October, 1995 as amended b) Supporting Information for the Preparation of an Acoustic Assessment Report</p>	<p>Noted. These guidance documents will be followed as applicable.</p>
4	<p>Vibration Limits: shall comply with the MOE vibration limits in:</p> <p>a) Publication NPC-207, "Impulse Vibration in Residential Buildings", November, 1983 as amended b) Publication NPC-119, "Blasting", Model Municipal Noise Control By-Law, Final Report, August 1978</p>	<p>Noted. These limits will be complied with.</p>
5	<p>Vibration Reports: shall be prepared in accordance with:</p> <p>a) Publication NPC-233, "Information to be Submitted for Approval of Stationary Sources of Sound", October, 1995 as amended</p>	<p>Noted. This guidance document will be followed as applicable.</p>



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGPs Responses

Stakeholder: Ministry of the Environment
Point of Contact: Sushant Agarwal, Senior Air Engineer
Comments Dated: November 23, 2012

#	COMMENT	RESPONSE (REVISED)
1	<p>The ToR Document should provide a description of the following:</p> <p>Identification of potential sources of air emissions and/or proposed criteria to identify these sources.</p>	<p>Noted. The Proposed ToR includes a list of preliminary environmental effects as was deemed appropriate based on the Code of Practice (MOE 2009), and does list air quality degradation as a potential effect.</p> <p>Further detail will be provided in the EA Report including identification of potential sources of air emissions. AMEC fully expects based on our extensive environmental approvals experience in Ontario, that a detailed air emissions assessment will be part of the ECA(Air) approvals application / approvals process.</p> <p>In general, the primary sources of air emissions will be as follows:</p> <ul style="list-style-type: none"> • Fugitive sources: dust from stockpiles, gravel road traffic, blasting in open pit, heavy equipment operations and general construction activities. • Point sources: may include, crusher, baghouse, underground ventilation, processing plant vents. <p>The sources will be identified in the EA based on our experience working with the MOE on industrial air approvals.</p>
2	<p>Proposed methodology to estimate air emissions from the identified sources.</p>	<p>The methodology used will be described in the EA Report as applicable. The methodology for estimating air emissions will follow all the required methods and requirements provided in guidance from the MOE ("Procedure for Preparing an Emission Summary and Dispersion Modelling Report Version 3.0" PIBS 3614e03).</p> <p>This proposed methodology has been included in the Amended Proposed ToR (Section 7.2.2).</p>



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGPs Responses

#	COMMENT	RESPONSE (REVISED)
3	Proposed methodology for predicting atmospheric effects of the air emissions.	<p>The methodology used will be described in the EA Report as applicable. Modelling (most recent version of the U.S.EPA AERMOD model) will be used to predict air quality impacts. The modelling will be done using the methods and requirements provided in the Ministry publication "Air Dispersion Modelling Guideline for Ontario" PIBS 5165e02 (ADMGO). Results of the modelling will be combined with baseline air quality data to provide predicted total ambient air quality. The ambient air quality will be compared against MOE ambient air quality criteria.</p> <p>This proposed methodology has been included in the Amended Proposed ToR (Section 7.2.2).</p>
4	Criteria to be used for evaluating effects for the identified project alternatives.	<p>The criteria used will be described in the effects assessment section of the EA Report as applicable. The alternatives assessment methodology has been revised per guidance from the MOE EA branch. With respect to air quality effects, the criteria has been changed "Effect on air quality and climate", with indicators of "Attainment or maintenance of air quality point of impingement standards, or scientifically defensible alternatives" and "Emission rates of greenhouse gases".</p>
5	Intended references for obtaining data needed for the above assessment emissions/effects assessment.	<p>The appropriate references will be cited in the EA Report.</p>

Reference:

MOE 2009. Code of Practice: Preparing and Reviewing Terms of Reference for Environmental Assessments in Ontario.



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGF Responses

Stakeholder: Ministry of the Environment
Point of Contact: Sandra Ausma, Air Quality Analyst
Comments Dated: November 26, 2012

#	COMMENT	RESPONSE
1	<p>Section 6.2.2 Air Quality discusses background air quality data that were collected by RRR to estimate background concentrations of particulate in proximity to the RRGF site. If the expectation is that RRR use the collected data as part of their air quality baseline within their Environmental Assessment (EA), the proponent should be engaging the ministry to ensure that any air quality monitoring meets the minimum requirements laid out in the Operations Manual for Air Quality Monitoring in Ontario (PIBS 6687e) (Manual) including approval of the air quality monitoring plan, review of sites, and audits of the equipment and monitoring stations. The purpose of this is to ensure that any collected data is scientifically sound and will meet the requirements of the ministry with respect to EA baseline estimation and discussions and other regulatory uses for which RRR may wish to use the data.</p> <p>Recommended modification: That Section 6.2.2 include discussion on how on-going air quality monitoring activities will meet the requirements of the Manual and ensure that the data is scientifically sound.</p>	<p>The air quality baseline work to date was discussed at an interagency meeting in Thunder Bay on July 18, with no concerns noted at that time. Ongoing and future air quality monitoring activities will be based on discussions with the MOE as requested and will follow the requirements in the Manual as applicable. The Manual has been reviewed and air monitoring requirements addressed in the EA Report.</p>
2	<p>Section 8.0 Commitments and Monitoring briefly mentions that a monitoring framework will be developed for the post-EA phase to address all stages of the proposed undertaking including compliance and effects monitoring if appropriate. The section does not indicate which environmental matrices will be monitored for effects.</p> <p>Recommended modification: That Section 8.0 be revised to include reference to ministry guidance documents for monitoring such as the Manual to ensure that any monitoring conducted will meet minimum requirements for data quality and ministry requirements.</p>	<p>Noted. The EA Report will make reference to applicable guidance documents for monitoring and will provide further detail as identified in the Proposed ToR.</p>
3	<p>Table 14 which is the preliminary summary of potential environmental effects only lists dust and products of petroleum hydrocarbon combustion as compounds that could be released and which impact human, plant and animal health. Since this is a metal mine site with a processing plant as well as explosive manufacturing and storage facilities, other compounds will be released that could have an impact. This includes metals, ore processing chemicals and by-products of explosives manufacturing.</p> <p>Recommended modification: That Table 14 be expanded to include other compounds that will be emitted from the RRGF site including metals, airborne emissions from any processing chemicals and by-products of explosives manufacturing.</p>	<p>Noted. Table 14 was intended only as a preliminary listing. It is anticipated that through the EA process and subsequent ECA approvals the effects from additional potential compounds will be assessed.</p> <p>Table 14 has now been revised per direction from the MOE EA Branch. Your information is appreciated and will be fully considered in the EA.</p>



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGP Responses

Stakeholder: Ministry of the Environment
Point of Contact: Lynda Mulcahy, Senior Review Engineer (waste)
Comments Dated: November 22, 2012

#	COMMENT	RESPONSE
1	Waste management is discussed in Section 5.4.10. The draft TOR appropriately evaluates solid waste management alternatives. Liquid wastes are not mentioned – these should be included, if required. Liquid hazardous wastes are subject wastes- requiring registration/manifesting for transport.	Liquid wastes will be discussed in the EA Report as applicable. Registration / manifesting requirements for liquid hazardous wastes are noted and will be followed during the environmental approvals stage.
2	If the Township of Chapple landfill cannot accommodate wastes from the project, and other off-site, approved disposal sites are not available, then it is strongly recommended that the establishment of an onsite licenced landfill be considered. Part V approval under the Environmental Protection Act will be required for any new onsite landfill. Depending on the proposed volume, separate environmental assessment requirements may be triggered. Rainy River is currently evaluating this option and alternative locations. Financial Assurance (FA) for the landfill should be included with the overall site FA that is provided to Ministry of Northern Development and Mines.	Noted and this additional information is appreciated. Alternatives for disposal of solid waste from the RRGP will be evaluated in the EA Report. Potential approval requirements are noted.
3	The draft TOR discusses hazardous wastes – what types of hazardous wastes are expected? It is understood that off-site transport and disposal is considered the best option for these – have potential disposal or treatment sites been identified- that are within reasonable distance to the site?	<p>Types of hazardous wastes will be discussed in the EA Report as appropriate, as will the quantities and selection of suitable licenced disposal facilities. In general, the wastes produced are typical of a large industrial / construction facility, with the primary industrial wastes being waste oil, waste lubricants and waste glycol.</p> <p>Special management wastes at the site are expected to include: waste petroleum products and packaging, waste glycol, petroleum contaminated soil, waste explosives and possibly small amounts of biomedical waste. All special management wastes will be stored in sealed containers in lined, bermed areas (or other means of secondary containment as appropriate), under appropriate environmental approvals / licensing.</p> <p>Off-specification petroleum products (and potentially waste oil) may be used as fuel for the diesel generators (if present and pending approvals) or heat generation, or transported off site. The quantities of used lubricating oils and other lubricants created on site will be minimized to the extent practical. Used glycol, lubricants and associated materials will be stored in tanks with secondary containment and shipped off site by a licensed disposal company.</p> <p>Small quantities of other spent or contaminated fluids, such as cleaning solvents and degreasing agents and waste paint, will be classified by type and either treated onsite if appropriate or stored and transported offsite to licensed processing facilities, according to applicable regulations and best management practices.</p>



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
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#	COMMENT	RESPONSE
		<p>Although every reasonable effort will be made to reduce the potential for spills to the environment, it is recognized that minor spills associated with heavy equipment usage (dominantly petroleum hydrocarbons and glycol) are likely to occur occasionally. Contaminated overburden and other materials, associated with any such spills, will be excavated and treated in an onsite remediation area, or transported off site to a licensed facility for disposal.</p> <p>Explosive waste will be destroyed according to an approved methodology by the explosives contractor or licensed personnel.</p> <p>Only very small quantities of biomedical waste are likely to be created on the site associated with first aid. Biomedical waste and other similar items, such as sharps and used needles, will be transported offsite to a licensed facility for proper disposal.</p> <p>During the construction phase, there may also be waste paint and similar substances.</p> <p>Potential disposal or treatment sites have not been fully identified as yet, but this is not expected to be of concern given the nature and quantities to be produced based on other similar Ontario mining operations. All storage, transportation and disposal will be fully compliant with MOE and other jurisdictions requirements.</p>
4	Interim storage will likely be required for these wastes – The storage area(s) should be identified and shown on site plans. Chemical storage facilities should meet the requirements of the Ministry’s “Guidelines for Environmental Protection Measures at Chemical and Waste Storage Facilities” 2007.	Noted and understood.
5	It is noted that petroleum- hydrocarbon contaminated soils would not likely be considered hazardous (under the definition in O.Reg. 347), unless they are leach-toxic under O.Reg. 347 Schedule 4. These could likely be included under non-hazardous wastes. Please note that any on-site treatment process for these soils (wastes) would require Ministry approval.	Noted. This topic will be discussed in the EA Report if applicable, and handled through the appropriate approvals process. AMEC has experience with on-site treatment processes and the approvals required.
6	The proposed mine decommissioning and Closure Activities are discussed in section 5.4.13. The Closure plan should include waste management activities, closure and any post-closure activities for the onsite landfill, if it is established.	Noted. These aspects will be included as part of the Closure Plan.



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRRP Responses

Stakeholder: Ministry of Tourism, Culture and Sport
Point of Contact: Paula Kulpa, Team Lead – Heritage Land Use Planning
Comments Dated: November 27, 2012

Red: AMEC/RR revised response to MTCS' comments
Green: MOE responds to AMEC revised response
Blue: MTCS responds to AMEC revised response
Purple: MTCS responds to AMEC' most recent response

#	COMMENT	RESPONSE	MOE/MTCS RESPONSE	ADDITIONAL RRR RESPONSE / MTCS COMMENT	FOLLOW UP RRR RESPONSE
1	Please note that the ministry's full-name and short form are incorrect in the Glossary included on Page v.	This error will be corrected in our stakeholder database and in the EA Report.	MOE: Because the ToR is being amended, this correction should be made in the ToR.	This correction has been made in the Amended Proposed ToR.	None required.
2	The ToR mentions that while most of the project will be located on privately owned land, it also indicates that the project could involve property that is or will be controlled by the Crown. This would include: <ul style="list-style-type: none"> The realignment of provincial Highway 600, which will be fully funded by the proponent, but will adhere to the Ministry of Transportation's (MTO) design standards and processes and will be assumed by MTO following an inspection and approval of the works undertaken by Rainy River. The disposition of Crown lands for the purposing of constructing or operating the project, which is usually under the jurisdiction of the Ministry of Natural Resources (MNR). Please note that the Standards	Noted. RRR is aware of these Standards & Guidelines and it understood that these apply on land owned or controlled by the Province.	MTCS: The ToR should include an acknowledgement of the proponent is aware of the Standards and Guidelines and that they could apply.	This acknowledgement has been made in the Amended Proposed ToR.	None required.

COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGP Responses

#	COMMENT	RESPONSE	MOE/MTCS RESPONSE	ADDITIONAL RRR RESPONSE / MTCS COMMENT	FOLLOW UP RRR RESPONSE
	<p>and Guidelines for Conservation of Provincial Heritage Properties (Standards & Guidelines), prepared pursuant to Section 25.2 of the Ontario Heritage Act, came into effect on July 1, 2010. The Standards & Guidelines apply should a property of cultural heritage value or interest be located on land owned or controlled by the Province.</p>				
3	<p>Table 2 within [Section 6.0] provides a summary of environmental components to be profiled. "Heritage and cultural resources" are included as a component under Socio-cultural Aspects, but are otherwise not discussed within subsection 6.7 Human Environment. Furthermore, the further detail provided in Table 2 only mentions archaeology and Traditional Knowledge studies and does not make reference to built heritage resources or cultural heritage landscapes.</p> <p>Table 3, which provides a summary of potential environmental data sources, lists the <i>Stage 1 Archaeological and Cultural Heritage Resource Assessment of the Rainy River Resources Advanced Exploration Project, northwest of Fort Frances, Rainy River District, Ontario (in progress)</i>. Archaeological assessments do not address</p>	<p>Built heritage resources and cultural heritage landscapes will be assessed in the EA Report as appropriate. The Amended Proposed ToR has been modified to more clearly state this aspect.</p>	<p>MTCS: The ToR should indicate that these types of resources will be considered during the EA, both in terms of describing the existing environment and in terms of evaluating project impacts on cultural heritage resources and providing mitigation strategies.</p> <p>MOE: AMEC does not provide a response to MTCS' recommendation that additional data be collected and technical studies be undertaken. MTCS also asks whether any of the buildings are over 40; however, AMEC does not provide a response to this question.</p>	<p>Table 2 of the Amended Proposed ToR has been modified accordingly.</p> <p>A Stage 2 Assessment has been conducted at the RRGP site and does include built heritage aspects. The scope of the assessment was defined in association with the MTCS. There are structures and buildings over 40 years old. To date there is no information that there are buildings that may be of potential cultural heritage value or interest, but the Stage 2 report remains in preparation. This information will be available to support the EA.</p> <p>MTCS – Built heritage resources and cultural heritage landscapes are not addressed as part of an archaeological assessment. Therefore it is inappropriate to rely on these studies to determine if any these potential resources exist. Any advice that MTCS gave</p>	<p>With apologies for our lack of clarity, we do understand the differences.</p> <p>The Amended Proposed ToR includes a commitment to conduct a specialized built heritage / cultural heritage assessment, with the results to be included in the EA report and utilized in assessing Project Alternatives.</p>



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRRP Responses

#	COMMENT	RESPONSE	MOE/MTCS RESPONSE	ADDITIONAL RRR RESPONSE / MTCS COMMENT	FOLLOW UP RRR RESPONSE
	<p>known or potential built heritage resources or cultural heritage landscapes. It is recommended that additional data be collected and technical studies undertaken to identify these types of cultural heritage resources. For example, the ministry notes that in Figure 2 which shows the preliminary site plan conceptual layout, that there are a number of buildings (both residential as well as those where the use is unknown) within the area. Are any of these building over 40 years old, or is there are information available indicating that they may be of potential cultural heritage value or interest?</p>			<p>with respect to the Stage 2 assessment would have been specific to addressing archaeology and not other cultural heritage resources.</p> <p>The proponent acknowledges that there are structures over 40 years old, but then states that “to date there is no information that there are buildings that may be of potential cultural heritage value or interest.” A 40 year old threshold is commonly used as an indicator of potential when conducting a preliminary survey for identification of cultural heritage resources. While the presence of a built feature that is 40 or more years old does not automatically signify cultural heritage value, it does make it more likely that the property could have cultural heritage value or interest. MTCS has included a checklist that helps identify other potential resources. These need to be addressed as part of the EA report and the ToR should include a commitment to undertake the necessary studies for all areas of the project (including the transmission corridors and highway alternatives).</p>	

COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRRP Responses

#	COMMENT	RESPONSE	MOE/MTCS RESPONSE	ADDITIONAL RRR RESPONSE / MTCS COMMENT	FOLLOW UP RRR RESPONSE
4	<p>On page 67 of the ToR it lists expected criteria for selecting Valued Socio-Economic Components. The second item listed is "Heritage or cultural resources (archaeology)". Cultural heritage resources include archaeological resources, built heritage resources and cultural heritage landscapes. Each of these categories of the cultural environment need to be considered when identifying environmental components and considering effects. Additionally, it is not clear what analysis supports the conclusion in Table 14 Preliminary Summary of Potential Environmental Effects that there is expected to be to effects to physical and cultural heritage or identified structures of sites, the latter of which is meant to refer to "Structures or sites of historical, archaeological, paleontological or architectural significance." Furthermore, it would appear that there is overlap between these two categories of components. It is suggested that they be combined into a single category that looks at cultural heritage resources, meaning specifically archaeological resources, built heritage resources and cultural heritage landscapes.</p>	<p>Noted. The Proposed ToR included only draft categories. The categories will be re-assessed in the EA Report as appropriate and have been revised in the Amended Proposed ToR (including Table 2 and Section 7.2.1). Your guidance is appreciated.</p> <p>In regards to Table 14, the ToR guide indicates that the "proponent may wish to include,... a preliminary list of the potential environmental effects,... actual determination,... will be required for the environmental assessment".</p> <p>RRR included a preliminary assessment of effects after mitigation, per the suggestion of the MOE. Table 14 was not intended to be comprehensive or provide a full explanation / substantiation of comments. The table has been revised based on subsequent guidance provided by the MOE. RRR is committed to assessment of the effects on cultural heritage resources in the EA.</p>	<p>MTCS: The definition of "environment" under the <i>Environmental Assessment Act</i> includes the cultural environment. Cultural heritage resources (archaeological resources, built heritage resources and cultural heritage landscapes) must be considered as part of the EA, both in terms of describing the existing environment and in terms of evaluating project impacts on cultural heritage resources and providing mitigation strategies. The ToR should make a commitment to undertake this work.</p>	<p>This clarification has been made in the Amended Proposed ToR.</p>	<p>None required.</p>
5	<p>On page 91 of the ToR it indicates</p>	<p>Noted and this information is also</p>	<p>MTCS: The ToR should</p>	<p>This has been included in the</p>	<p>None required.</p>



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
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#	COMMENT	RESPONSE	MOE/MTCS RESPONSE	ADDITIONAL RRR RESPONSE / MTCS COMMENT	FOLLOW UP RRR RESPONSE
	that the proponent is: “seeking information that Aboriginal people may have with respect to current populations of fish, wildlife and plants in the area to incorporate traditional knowledge into biological and physical studies for the area.” It is suggested that traditional knowledge should also be sought regarding cultural heritage resources and incorporated into related technical studies.	being requested, although it was not stated explicitly in the Proposed ToR.	acknowledge that this information is being sought with respect to cultural heritage resources.	Amended Proposed ToR.	
6	Neither [Appendix B nor Appendix C] includes a discussion of cultural heritage resources when considering effects on the human environment, which includes the cultural environment.	Noted. Cultural heritage resources as defined by MTCS will be considered in the EA Report. The work that went into the preparation of Appendix B and C did consider these aspects; however, the baseline documentation was not available to reference as it remains in progress. The routing assessment in the EA will include assessment of cultural heritage resources.	MTCS: The ToR should indicate that these types of resources will be considered during the EA, both in terms of describing the existing environment and in terms of evaluating project impacts on cultural heritage resources and providing mitigation strategies.	This is indicated in the Amended Proposed ToR. MTCS: It is not clear how impacts to cultural heritage resources could have been considered if there was not baseline documentation available. A preferred option was put forward in both appendices. It seems inappropriate to determine even a preliminary preferred option without having first gathered all the necessary baseline data. The ToR should include a commitment that will consider impacts to cultural heritage resources for all of the project components (i.e. transmission corridor and highway alternatives).	Amended Proposed ToR includes a commitment to conduct a specialized built heritage / cultural heritage assessment, with the results to be included in the EA report and utilized in assessing Project Alternatives. The preliminary assessment of transmission line and road routes in the Proposed ToR purposefully avoided all structures and none of the routes were expected to require demolition of any built structures (no matter the age). The preliminary routings will be re-assessed based on the results of the built heritage / cultural heritage resources investigation.



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#	COMMENT	RESPONSE	MOE/MTCS RESPONSE	ADDITIONAL RRR RESPONSE / MTCS COMMENT	FOLLOW UP RRR RESPONSE
7	We would also appreciate being kept informed regarding the manner in which MTCS' input has been considered, and wish to remain on the circulation list for this project.	Noted. RRR will ensure that MTCS' input is fully considered and they will be kept informed going forward. RRR has been in contact with Andrew Hinshelwood, Archaeology Review Officer in regards to the archaeological assessment.	<p>MTCS: All other documentation and correspondence regarding this project should be sent to: Paula Kulpa Team Lead – Heritage Land Use Planning Ministry of Tourism, Culture and Sport Culture Division, Programs and Services Branch Culture Services Unit 401 Bay Street, Suite 1700 Toronto ON M7A 0A7 Paula.kulpa@ontario.ca</p>	<p>Please confirm if this is a change to our existing GRT contact Laura Hatcher, or in addition.</p> <p>MTCS – This is a change. Please remove Laura Hatcher from the GRT for this project.</p>	<p>Thank-you for your information. Ms Hatcher has been removed from the GRT list going forward.</p>



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGP Responses

Stakeholder: Individual
Point of Contact: Jeffrey Leon
Comments Dated: December 6, 2012

#	COMMENT	RRR RESPONSE
1	As an Ontarian conscious of the wide-ranging benefits and pitfalls of large-scale mining, I am strongly in favour of the Rainy River Gold Project (RRGP) for its optimistic direction and bounty of economic benefits. Nonetheless, Rainy River Resources (RRR) must not lose focus on the potential environmental impacts that could burden the surrounding communities and natural habitat.	RRR appreciates your support, and agree that the potential environmental impacts should be considered in the EA Report as identified in the Proposed ToR, including in Section 7.2.
2	I was initially concerned about the possibility of tailings chemicals migrating through the regional watershed into the pristine wetlands of Lake Superior. A detailed look at the layout of neighbouring basins identifies more localized, westward flow of surface and groundwater, which should eliminate any detriment to the high quality water of this Great Lake.	The flow of surface water and groundwater as noted by Mr. Leon is indeed westward, as shown in part on Figure 2 of the Proposed ToR. Section 7.2.1 of the Proposed ToR indicates that the EA document will address potential impacts to surface water and groundwater.
3	Multiple stakeholders questioned the escape of cyanide and other toxic byproducts of mine/mill throughput at the public meeting held on September 1, 2012, since it could compromise the integrity of regional water sources. Representatives of RRR answered to these individuals with consistently vague replies, simply stating they have consultants assessing the potential risk.	For clarification, there were no public meetings held on September 1, 2012 (the Saturday of Labour Day weekend). RRR and its representatives always attempt to provide complete replies during all public meetings and attendees are encouraged to follow-up with RRR for more information / detail, if they feel they have been unable to obtain a satisfactory response (such as due to the number of people attending). RRR recognizes that the Environmental Assessment Report will need to demonstrate proper management of all reagents used at the mine processing facility to ensure environmental protection. Further information regarding potential environmental impacts is provided in Table 14 of the Proposed ToR (and as revised in the Amended Proposed ToR). Section 7.2.1 of the Proposed ToR indicates that the EA document will address potential impacts to surface water and groundwater.
4	I am concerned about proper regulation of local water resources due to these nondeterministic remarks combined with a lack of specific tailings management strategies in the project documentation. Will the entire tailings impoundment be lined with an impermeable material to prohibit the escape of toxins? I firmly believe that by conceding to this worthwhile investment, RRR can drastically reduce the concentration of local water-borne contaminants in the operation and decommissioning phases of monitoring the mine.	The function of the ToR is to define how the EA will be conducted and the content to be included in the EA, such that potential stakeholders can judge their interest in the undertaking, and raise any additional items that should be included in the EA process. The description of the undertaking as required by the Guide and as provided in Section 4.1 of the Proposed ToR is a "preliminary description (below is) provided in order to assist in the ToR review process, and should not be considered finalized." It is purposefully not definitive in regards to the tailings management area location. RRR proposes to use pre-treatment of effluent and tailings as its primary means of mitigation potential impacts from the tailings management area. The RRGP is very fortunate to be located within an area with vast resources of very low



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
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#	COMMENT	RRR RESPONSE
		<p>permeability clays. These materials will be utilized within the TMA to enhance containment of all tailings materials. Lining of the entire tailings management area with an impermeable geo-synthetic material is not an industry standard mitigation measures and would be economically prohibitive for the RRGP.</p>
5	<p>Additional public concern has been raised regarding water quality relating to the impacts on groundwater wells. I would like to expand on my previous statement by calling into question if RRR has created a directive to manage the effect of their tailings pond on the local watershed in response to flooding or heavy rainfall events. How is the proponent ensuring these potential risks will not degrade the surrounding aqueous environments that nearby communities are dependent on for a freshwater supply?</p>	<p>Thank-you for your comment, however as stated above, the function of the ToR is to define how the EA will be conducted and the content to be included in the EA, such that potential stakeholders can judge their interest in the undertaking, and raise any additional items that should be included in the EA process.</p> <p>The description of the undertaking as required by the Guide and as provided in Section 4.1 of the Proposed ToR is a "preliminary description,... provided in order to assist in the ToR review process, and should not be considered finalized." It is purposefully not definitive in regards to the tailings management area design in order that alternatives can be consulted upon, although the aspects raised by Mr. Leon are always considered seriously during the engineering process.</p> <p>The TMA is being designed for full containment – including for the maximum probable storm event. Further detail will be provided in the EA Report regarding the tailings management area design features to manage flooding / heavy rainfall events, if any.</p> <p>Section 7.2.1 of the Proposed ToR indicates that the EA document will address potential impacts to surface water and groundwater.</p>
6	<p>An additive impact of the RRGP's massive physical presence on the natural environment is that the open pit mine, waste stockpile, processing plants, tailings management areas, transmission lines, and new road network all directly encroach on the habitat of thirteen Species at Risk (SAR). The smaller tributaries in closer contact with the project area link up to the Pinewood River, a home to large-bodied fish with integral ecosystem importance. The forest and wetlands nearby are home to a variety of avian, mammal, amphibian and reptile species as well. Knowing that three of these species are classified as threatened, I would highly recommend obtaining the Provincial Species at Risk Permit to exercise environmental responsibility in anticipation that this project will likely harm these animals.</p>	<p>For clarity, the Proposed ToR does not indicate that the RRGP will directly encroach on the habitat of thirteen SAR, rather that there are thirteen SAR known to be present in the RRGP environs (Table 13).</p> <p>RRR is working closely with both the Ministry of Natural Resources and Trent University to study Species at Risk in support of mine development. Table 19 of the Proposed ToR indicates that a Species at Risk Screening is anticipated to be required related to management of activities associated with SAR. Through consultation with the local Ministry of Natural Resources, we understand that a Species at Risk Permit(s) are required.</p>



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGP Responses

#	COMMENT	RRR RESPONSE
7	The project motives are impressive for their negligible effect on human recreational activity and protected land infringement. The heritage centers, museums, campground and Rainy River boating ventures characteristic to the township of Chapple and the surrounding district appear to be unaffected by the mining operations. The pursuit RRR undertook in gaining insightful opinions from regional First Nations communities identifies the company as a dignified party serious about accounting for public views in their EA process.	Your acknowledgement of the considerable efforts made by RRR is appreciated. RRR will continue to work with all local and regional stakeholders to ensure project development supports long-term community sustainability.
8	While I stand in strong accord with the RRGP, the proponent must remain vigilant in protecting the local water quality and engage in more rigorous mitigation tactics to prevent a decline in SAR and threatened wildlife.	RRR appreciates your support, and agree that the aspects identified are important and will be fully considered in the EA Report as identified in the Proposed ToR, including in Section 7.2.



**COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGP Responses**

Stakeholder: International Joint Commission
Point of Contact: David Fay
Comments Dated: October 29, 2012

#	COMMENT	RRR RESPONSE
1	<p>Thank you for sending your memo of October 19,2012 and the enclosed documents regarding the proposed terms of reference for the Rainy River Gold Project to the attention of Mr. Bernard Beckhoff of the International Joint Commission. Mr. Beckhoff, the Commission's Public Affairs Advisor, has forwarded the documents to me for response.</p> <p>The International Joint Commission was established under the Boundary Waters Treaty of 1909 to help the United States and Canada prevent and resolve disputes over the use of the waters the two countries share. Its responsibilities include considering applications for projects that affect the natural levels and flows of boundary waters.</p> <p>The Commission will not be commenting on the Terms of Reference for this environmental assessment, however the proposed project within the Rainy River drainage basin may be of interest to the Commission and we would appreciate being kept informed of the progress of this EA.</p>	<p>Thank-you for your comments.</p> <p>RRR will continue to keep the IJC informed regarding the RRGP. Kyle Stanfield will be contacting Mr. Fay to provide him with a summary of the consultation activities RRR has completed with the IJC to date.</p>



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGP Responses

Stakeholder: Métis Nation of Ontario
Point of Contact: Brian Tucker, Acting Director, Lands, Resources, Consultations Branch
Comments Dated: January 8, 2013

#	COMMENT	RRR RESPONSE	MOE COMMENTS	REVISED RRR RESPONSE
1	Firstly, I would like to note that the term “Aboriginal” includes First Nation, Métis and Inuit people. In the context of this Project, “Aboriginal” should be taken to mean both First Nation and Métis people. This term should be defined/clarified somewhere in the TOR.	Thank-you for your comment. This is the manner in which the term Aboriginal has been used in the Proposed ToR. The Glossary of the Amended Proposed ToR has been revised to clarify the definition of the term Aboriginal accordingly.	Once amended ToR has been submitted, MOE can at that point, confirm that this has been done.	Response acknowledged with thanks.
2	AppD-6: It is stated that RRR “has negotiated or is in the process of negotiating various agreements with local First Nations and Métis groups to facilitate community involvement...”. However, despite the MNO tabling an MOU for discussion in 2010 that would provide support for consultation activities, including a traditional knowledge and land use study, RRR has not engaged in discussions regarding this proposed agreement. Although the discussions at a second meeting on November 30, 2012 seem somewhat encouraging toward the initiation of a consultation process, this occurred after the TOR was released. We would ask that RRR clarify its statements to reflect this lack of meaningful discussion/negotiation with the Métis community.	Rainy River Resources was pleased to attend a formal meeting with the MNO Region 1 Consultation Committee on November 30, 2012 in Kenora. Rainy River Resources was informed by the MNO during the meeting that a new proposed Memorandum of Understanding (MOU) including a revised request for funding would be forthcoming as part of a revised MOU to be shared with Rainy River Resources in the near future. The Company looks forward to receiving the revised proposed MOU and working towards a mutually agreeable document.	Q to RRR: What consultation occurred between 2010 and formal submission of the ToR, if any with MNO (Sunset County), including sending out project notices, invites to PICs. Why did RRR only meet with MNO on November 30, 2012 after formal submission of the ToR? A record of consultation that has transpired after formal submission of the ToR should be provided to the ministry for the project file.	Prior to the meeting in November 2012, RRR has had numerous communications (telephone and e-mail) to try and secure a mutually agreeable meeting time to discuss the RRGP and the ToR. RRR also sent notices as well as a copy of the Draft Terms of Reference to the MNO on May 16, 2012. As per direction from the Ministry subsequently in May 2012, RRR sent project notices to the Sunset Country Métis informing them of the commencement and submission of the proposed TOR. RRR has also extended invitation to the MNO Region 1 Consultation Committee to participate in ceremonial events held at the RRGP site. RRR has been in contact with the Sunset Country Métis as the local representative of the Métis. The local community consultation group has not directed RRR to the MNO for further representation. We can provide a copy of the November 30, 2012 meeting notes for your records on request.



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGP Responses

#	COMMENT	RRR RESPONSE	MOE COMMENTS	REVISED RRR RESPONSE
3	<p>p. AppD-8 – Aboriginal Treaty Rights Related to RRGP: This section discusses potential impacts on First Nations people, but it excludes potential impacts to the Métis community. RRR has not consulted the Métis community, has not provided capacity for a traditional knowledge and land use study, and has not requested information on potential impacts. Given this, this section of the TOR almost completely excludes the Métis people and is primarily relevant to First Nations communities. Further, it should also be noted that there are Métis in the region with treaty rights as a result of the Half-Breed Adhesion to Treaty #3, and there are also Métis in the region with Aboriginal rights. This is absent from the TOR as well.</p>	<p>Rainy River Resources is working with the MNO to understand how the Company can avoid project impacts to the Métis way of life. Rainy River Resources expects to address capacity for a Traditional Knowledge and Land Use study through MOU discussions.</p> <p>Appendix D of the Proposed ToR provides additional information specific to Métis people. As per Section 3.3 of Appendix D of the Proposed ToR, RRR has requested information from "First Nations and Métis on potential impacts, as well as current collection and consumption information on country foods and products from hunting, fishing and trapping. To date, community and band discussions have revealed little traditional use of the area and low reliance on hunting fishing and trapping within the Project area as a significant part of household consumption or economic reliance."</p> <p>Section 3.3 of Appendix D of the Proposed ToR, identifies Métis as part of Treaty #3 by means of an adhesion, and lists that Treaty #3 rights afforded to local First Nations and "half-breeds of Rainy River and Lake" included:</p> <ul style="list-style-type: none"> • Fishing and hunting throughout the tract; • Supplies to continue agricultural practices; • Harvesting rice and other plants; and • Entitlement to education, annual financial disbursements, clothing, lands and title to these granted lands. 	<p>Please confirm if RRR did consult with the MNO (Sunset County) during the development of the ToR and refer to appropriate sections of the ToR/Record of Consultation.</p> <p>RRR may want to consider saying that it continues to consider capacity of TK and land use studies with communities.</p> <p>When does RRR plan on meeting with MNO again? Is there a date set for the next meeting?</p>	<p>As described in the RoCDM, RRR provided a copy of the Notice of Commencement and Submission of the Proposed ToR to the Sunset Country Métis. RRR did not receive requests for further information or comments from the Sunset Country Métis on the draft TOR.</p> <p>RRR will consider TK/TLU information provided from communities and will consider providing capacity to communities as the need arises (as noted above). The discussions on the MOU and gathering information on the Métis way of life will continue when the Métis advise RRR.</p>



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGP Responses

#	COMMENT	RRR RESPONSE	MOE COMMENTS	REVISED RRR RESPONSE
4	The proponent should be required to integrate Aboriginal and public consultation outcomes into the consideration and mitigation of environmental effects.	<p>Understood. This is part of the environmental assessment process.</p> <p>Section 5.3 indicates that the evaluation of alternatives will be undertaken in consideration of comments received and the results of consultation and discussions with the general public, Aboriginal communities and government reviewers.</p> <p>Further, Appendix B, Section 5.1.2 and 5.2.2, indicates that objectives specific to Aboriginal Groups are to:</p> <ul style="list-style-type: none"> • Ensure Aboriginal groups have had an adequate opportunity to understand the RRGP and identify potential impacts to Aboriginal or Treaty rights and interests; • Demonstrate how the RRGP (or components of the RRGP) has been modified to reduce or avoid those impacts; • Provide an explanation of why the RRGP (or components of the project) cannot be modified to reduce or avoid the impacts; and • Provide an explanation of how the communities have been either accommodated or compensated for remaining impacts that cannot be avoided. 	MOE is satisfied with response.	Response acknowledged with thanks.



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGP Responses

#	COMMENT	RRR RESPONSE	MOE COMMENTS	REVISED RRR RESPONSE
5	The proponent should be required to work with Aboriginal communities to acquire traditional knowledge for consideration in the project.	Rainy River Resources has been working with local First Nation communities to understand traditional knowledge for project consideration. Rainy River Resources is looking forward to understanding how the Company can avoid project impacts to the Métis way of life. Per communications to date, we would appreciate the opportunity to further our discussions regarding this aspect.	As per section ??? and appendices ??? of the ToR, RRR has been working with local FN communities to understand TK for project consideration. RRR continues to work with local communities to address capacity for a TK study? Is there a commitment in the ToR that states that RRR is committed to working with local communities on address capacity to undertake a TK and land use study?	<p>As per Section 3.3 of Appendix D of the Proposed ToR, RRR has requested information from "First Nations and Métis on potential impacts, as well as current collection and consumption information on country foods and products from hunting, fishing and trapping."</p> <p>Rainy River Resources is working with the MNO to understand how the Company can avoid project impacts to the Métis way of life. Rainy River Resources expects to address capacity for a Traditional Knowledge and Land Use study through MOU discussions.</p>
6	The proponent should be required to take an approach that considers both scientific and traditional knowledge in the decisions related to the project. The Métis community must be included in such knowledge collection efforts as part of meaningful consultation.	Rainy River Resources welcomes additional discussions with the Métis community to ensure that Métis traditional knowledge can be integrated with the traditional knowledge study underway with several nearby First Nations communities. As per Section 3.3 of Appendix D of the Proposed ToR, community and band discussions have revealed little traditional use of the area and low reliance on hunting fishing and trapping within the Project area as a significant part of household consumption or economic reliance. Nonetheless, it is a standard protocol to consider traditional knowledge in both decisions related to the project as well as the assessment of project effects in the EA Report itself. The Amended Proposed ToR includes this commitment (in revised Table 3).	MOE is satisfied with response.	Response acknowledged with thanks.



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRRP Responses

#	COMMENT	RRR RESPONSE	MOE COMMENTS	REVISED RRR RESPONSE
7	Species being included in the VECs must include those of importance to health and socio-economic conditions, cultural heritage and the current use of land and resources for traditional purposes by Aboriginal persons, including the Métis community. It is essential that the species chosen for inclusion in the VECs include those that are important to Métis people. These species can only be identified through appropriate consultation with the Métis community.	<p>The Proposed ToR identifies VECs and VSECs as Valued Ecosystem (VECs) and Socio-Economic Components (VSECs) are those aspects of the natural and human environment that are particularly notable or valued because of their ecological, scientific, resource, socio-economic, cultural, health, aesthetic, or spiritual importance, and which have a potential to be adversely affected by Project development.</p> <p>Section 7.2.1 of the Amended Proposed ToR includes a stated (rather than as just implied in the Proposed ToR), commitment to consider aspects identified through TK or other means, and components valued by Aboriginal groups (including Métis) in the identification of VECs and VSECs.</p>	MOE is satisfied with response.	Response acknowledged with thanks.
8	It is essential to ensure that the TOR contributes to an understanding of how the project might affect the Métis community.	<p>The function of the ToR is to define how the EA will be conducted and the content to be included in the EA, such that potentially affected stakeholders and Aboriginal groups can judge their interest in the undertaking, and raise any additional items that should be included in the EA process.</p> <p>The EA process will include a commitments listing that will ensure any potential effects to Métis Community members that are identified are mitigated appropriately.</p>	A commitment in the ToR, along with the EA would be acceptable to the MOE.	Rainy River Resources is working with the MNO to understand how the Company can avoid project impacts to the Métis way of life. Rainy River Resources expects to address capacity for a Traditional Knowledge and Land Use study through MOU discussions. This commitment will be made in the ToR.



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGP Responses

#	COMMENT	RRR RESPONSE	MOE COMMENTS	REVISED RRR RESPONSE
9	The Métis community's perception of the adverse impacts (from the community's perspective, what are the potential impacts, how likely are they, how will it affect the community currently and in the future) should be included in the TOR. Such information would have to be collected by meaningful consultation with potentially affected Métis community.	<p>Thank-you for your comment. As identified above, the function of the ToR is to define how the EA will be conducted and the content to be included in the EA, such that potentially affected stakeholders and Aboriginal groups can judge their interest in the undertaking, and raise any additional items that should be included in the EA process.</p> <p>Nonetheless, the Proposed ToR does include a preliminary assessment of potential impacts in Table 14. This table has been expanded upon in the Amended Proposed ToR.</p>	<p>ToR is also supposed to list potential impacts that will be considered, assessed and mitigated in the EA.</p> <p>This is the answer to the concern, include the potential impacts listed in Table 14 that are specific for impacts on local Metis and First Nation communities.</p>	<p>RRR has not been provided any information from the Métis community in regards to specific potential impacts.</p> <p>Table 14 of the Amended Proposed ToR indicates impacts specific to local Métis and First Nations in regards to traditional land use etc.</p>
10	We feel that it is important that the proponent write out specific commitments to Aboriginal concerns.	<p>The EA process will include a commitments listing that will ensure any potential effects to Aboriginal Community members that are identified are mitigated appropriately. Section 8.0 of the Proposed ToR includes the following:</p> <p>"The EA will also include a comprehensive record of any commitments made through the public consultation process. These commitments may relate to the construction, operation or decommissioning phases of the RRGP and any of its constituent components."</p>	ToR should also include commitments specific to Aboriginal concerns that will be addressed in the EA.	The Amended Proposed ToR will include commitments to address specific Aboriginal concerns expressed to date in the EA

COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGP Responses

#	COMMENT	RRR RESPONSE	MOE COMMENTS	REVISED RRR RESPONSE
11	The TOR should clearly contain a clause requiring the identification of potential mitigation measures for impacts to Aboriginal communities in the case where a potential Aboriginal impact cannot be addressed by the mitigation of an environmental impact.	Appendix B, Section 5.1.2 and 5.2.2 of the Proposed ToR, indicates that objectives specific to Aboriginal Groups are to: <ul style="list-style-type: none"> • Demonstrate how the RRGP (or components of the RRGP) has been modified to reduce or avoid those impacts; • Provide an explanation of why the RRGP (or components of the project) cannot be modified to reduce or avoid the impacts; and • Provide an explanation of how the communities have been either accommodated or compensated for remaining impacts that cannot be avoided. 	MOE is satisfied with response.	Response acknowledged with thanks.
12	I must stress the importance of a follow-up program as it relates to the Métis community. It is essential that there is required follow-up on the implementation of mitigation and accommodation resulting from consultation with the Métis community.	Rainy River Resources will work with the Métis community during mine operations to ensure mitigation programs are reasonable. Section 8.0 of the Proposed ToR includes the following: "During the EA, a monitoring framework will be developed for the post-EA phase, to address all stages of the proposed undertaking (design, construction, operation and decommissioning). It will include compliance and effects monitoring if appropriate, as well as any follow-up programs."	Mitigation programs need to be determined in the EA. Additional language should be added there that a monitoring framework will be developed in consideration of comments raised by Aboriginal communities, public, stakeholders and government agencies.	The Amended Proposed ToR will include a similar statement as suggested.



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGP Responses

#	COMMENT	RRR RESPONSE	MOE COMMENTS	REVISED RRR RESPONSE
13	The TOR should explicitly require the inclusion of Aboriginal communities in the study of cumulative environmental effects.	<p>Cumulative effects analyses are conducted in standard manner across Canada. Section 7.2.3 of the Proposed ToR provides a description of the methodology proposed, which is consistent with the requirements of the <i>Canadian Environmental Assessment Act</i>.</p> <p>The text has been clarified in the Amended Proposed ToR as follows:</p> <p>"The cumulative effects analysis presented in the EA will therefore be restricted to the analysis of cumulative effects on the existing environmental baseline related to identified projects and activities that "will be carried out"; and to those projects of significance within the broader regional context, which may overlap the undertaking in regards to type of effect, time and space. The cumulative effects analysis may extend to projects located beyond the physical boundaries of the LSA and the RSA, if the there is a potential for the effects to overlap with the RRGP."</p> <p>RRR would welcome information from the Métis to identify project and activities that will be carried out and that may overlap with the RRGP, and should therefore be considered in the cumulative effects analysis.</p>	A commitment should be added in the ToR that the cumulative effects analyses will seek input from Aboriginal communities.	The Amended Proposed ToR will include a similar statement as suggested.



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGP Responses

Stakeholder: Ministry of Northern Development and Mines
Point of Contact: Julie McFarling, Lands Technician
Comments Dated: November 20, 2012

Red: RRR's revised response to MNDM's comment

Green: MOE's revised response to AMEC

Blue: MNDM's revised response to AMEC

#	COMMENT	RRR RESPONSE	MOE/MNDM Response	RRR REVISED RESPONSE
1	<p>Comments for the Rainy River Resources Ltd ToR:</p> <ul style="list-style-type: none"> Area of interest appears to be within several claims. These claims are held by Rainy River Resources. Area of interest may extend into claims that are not held by Rainy River Resources. It's difficult to tell from Figure 2 -Preliminary Site Plan Conceptual Layout. If they do, a surface rights compensation agreement with the claimholder would be needed. To make the determination of an exact location, a shape file or list of coordinates would be required. It's not possible for me to be exactly sure where the areas of interest are from the coordinates provided with Figure 2. Most of the area of interest falls within Mining and Surface Rights Patents and/or Mining Rights Leases, Surface Rights Patents ("private land"). Ownership information could be obtained from the Land Registry Office. 	<p>Noted. This information is appreciated. RRR has a comprehensive lands database and other information to track land ownership aspects, including claims held by others, gathered in part from the Land Registry Office.</p>	<p>MOE: Will AMEC revised Figure 2 to better identify the area of interest?</p> <p>MNDM: Satisfied with response regarding obtaining ownership information. Will AMEC be providing shape file or better identification of area of interest?</p>	<p>Figure 2 in the Proposed ToR shows the area of interest by the placement of the facilities on the figure. As previously discussed with and agreed upon by the MOE and the CEA Agency, there are a number of potential land transactions that are currently sensitive which does not allow RRR to provide greater detail at this time.</p> <p>We appreciate the offer of assistance from MNDM. Once land ownership aspects are better progressed, this information can be provided to MNDM, per their request, such that MNDM can provide better guidance in regards to compensation agreements etc. if needed, at a later date.</p>



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGPs Responses

Stakeholder: Ministry of Northern Development and Mines
Point of Contact: Jane Gillon, Northern Development Officer
Comments received: November 19, 2012

#	COMMENT	RRR RESPONSE	MOE/MNDM Response	RRR REVISED RESPONSE
1	<p>I have reviewed the socio economic areas of the “Proposed Terms of Reference” and offer the following:</p> <ul style="list-style-type: none"> The economy of the Rainy River District is in decline. The largest employer in the region Resolute Forest Products has had some market issues and has been shut down for market related reasons a few times over the past few years however is still in full operation and employs approximately 550 workers. The financial crisis of a few years ago saw US housing starts falter and Canadian exports to the US have slowed and this has impacted the economy of the area. Any diversification of the economy of the Rainy River District is positive and complements the Growth Plan for Northern Ontario and the mandated responsibilities of the Northern Development Division of MNDM. 	<p>Noted. This information will be used during preparation of the EA Report as appropriate.</p>	<p>MOE: Satisfied with response.</p>	<p>Acknowledged with appreciation.</p>
2	<p>The jobs that will come as a result of the Rainy River Resources gold mine and the mine construction will on the whole be welcomed by the Rainy River District residents; however the following information is suggested for inclusion in the EA.</p> <p>The socio economic impact of the project on the Municipality of Chapple where the gold project resides should be detailed specifically. Chapple is a stand alone municipality under the Municipal Act and will be the first to feel any impacts and/or</p>	<p>Noted. These aspects will be addressed in the EA. Based on the source information which is available and meetings with various organizations including your Northern Development Office, RRR believes that the socio-economic impact of the project will be overwhelmingly positive for the District.</p>	<p>MOE and MNDM are satisfied with response.</p>	<p>Acknowledged with appreciation.</p>



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGPs Responses

#	COMMENT	RRR RESPONSE	MOE/MNDM Response	RRR REVISED RESPONSE
	<p>potential benefits. The socio economic impact of the project on the municipalities and First Nation communities of Rainy River District also should also be detailed collectively, these items should be discussed:</p> <ul style="list-style-type: none"> • The number and distribution of people who could be affected • The social and economic impacts of the gold mine on the area, including • Local employment and training • Local procurement • Population changes • Demands on local services and infrastructure • Regional and provincial benefits • Trapping, hunting, fishing, agriculture, tourism, forestry and manufacturing 			
3	<ul style="list-style-type: none"> • Impacts of the potential project on local/area utilities, transportation and communication networks. • The economic impacts of the project on the Rainy River District and on Northwestern Ontario, having regard for capital, labour and other costs. In addition, discuss Rainy River Resource's policies and programs respecting the use of local, Ontario and Canadian goods and services. Provide an estimated breakdown of Ontario, other Canadian and non-Canadian industrial benefits from Project management/engineering, equipment and materials, construction labour and operations. Also provide a breakdown of the type of materials and services that will need to be acquired in the construction and operation of the mine and the opportunity that may exist for 	<p>Noted. These impacts will be assessed and/or provided in the EA.</p>	<p>MOE and MNDM are satisfied with response.</p>	<p>Acknowledged with appreciation.</p>



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGPs Responses

#	COMMENT	RRR RESPONSE	MOE/MNDM Response	RRR REVISED RESPONSE
	<p>the local/regional procurement of these items.</p> <ul style="list-style-type: none"> • The employment and business development opportunities the Project that may be created for First Nations, Métis, local communities and the region. Provide a breakdown of the type of employment and number of employees with respect to construction and operational workforces. Identify the source of labour for the project. Impacts of the project on potential shortages of skilled labour in the region. Identify and discuss plans to address these impacts. • Impacts of the project on potential shortages of affordable housing and the social ramifications. Identify and discuss the mitigation plans to address these impacts. Provide a summary of any discussions that have taken place with local municipalities. • A process is needed that provides a coordinated and effective channel through which regional and cumulative socio economic impacts can be addressed in a meaningful and demonstrable way. A system to adequately monitor and verify predictions with regard to socio economic and health issues. • Reliable source information that strategic decisions can be made is especially important in the socio economic area, given the expected growth the District could experience. 			



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGP Responses

#	COMMENT	RRR RESPONSE	MOE/MNDM Response	RRR REVISED RESPONSE
4	The last paragraph on Page 48 of the proposed ToR indicates that the Township of Emo has a water treatment plant with capacity. Emo has approached Ontario seeking funding for a new or expanded water treatment plant because they are at capacity.	Noted. This information is appreciated.	MOE: Will AMEC make appropriate revisions in the amended ToR given that information is incorrect?	This information has been removed from the Amended Proposed ToR (Section 7.8.3).
5	The second paragraph on Page 49 of the proposed ToR indicates that three dams and a generating station are owned and operated by Resolute Forest Products. The dams and generating stations were set up as a separate company some time ago. H2O power LP is the successor company to AbitibiBowater's ACH LP Operations. H2O Power LP was established in May 2011 on completion of the sale by AbitibiBowater LP of the ACH LP assets. The assets, among others, included the Fort Frances Generating Station on the Rainy River, the Squirrel Falls/Kettle Falls Control Dam at the outlet of Namakan Lake and the Calm Lake and Surgeon Falls Generating Station on the Seine River.	Noted. This information is appreciated.	MOE: Will AMEC make appropriate revisions in the amended ToR given that the information is incorrect?	The ownership of the facilities has been removed from the Amended Proposed ToR (Section 7.8.3).



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGP Responses

Stakeholder: Ministry of Northern Development and Mines
Point of Contact: Neal Bennett, Mineral Exploration and Development Consultant
Comments Dated: November 27, 2012

#	COMMENT	RRR RESPONSE	MOE/MNDM RESPONSE	RRR REVISED RESPONSE
1	The proponent should describe the anticipated power needs of the project in ToR or say they will describe the anticipated power needs of the project in the EA. The power requirements for the project are usually described for each phase of the project (i.e.construction, operation).The information would support the need for the 230 kV transmission line connection (comment submitted on behalf of Cisca McInnis from ENERGY)	<p>Preliminary engineering completed to the time of the Proposed ToR submission indicates that a 230 kV transmission line is required and as described in the document. Further information regarding the RRGP power needs will be provided in the EA Report (and will be detailed in submissions to the Ontario Energy Board).</p> <p>The mine has a planned power requirement of 54 megawatts (MW) when in full production. About three quarters of the power requirement is for the processing plant, with the balance required by the mine itself, along with ancillary needs such as dewatering, administration, etc. The choice of a 230 kV connection is driven by a combination of the level of anticipated demand, supply reliability and technical requirements associated with the drives for the large mill motors.</p> <p>During construction, electrical power demand is expected to be relatively low, at around 2 to 3 MW or less for most of the construction period, rising to around 5 MW prior to commissioning of the processing plant. The current schedule anticipates the 230 kV connection will be in service for the later stages of construction.</p>	MOE to AMEC: As described in the ToR? If so, please specify section of the ToR.	<p>Sections 3.1, 5.1, 5.2.1, 5.2.3, 6.3.12 and Table 1 indicate that the currently preferred option is the development of a 230 kV connection to the existing Ontario electrical grid.</p> <p>Section 6.3.12 of the Amended Proposed ToR has been revised to include the information provided in the original RRR Response.</p>



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGPs Responses

#	COMMENT	RRR RESPONSE	MOE/MNDM RESPONSE	RRR REVISED RESPONSE
2	On page 7 of the Record of Consultation document there is a list of the First Nation Communities and Métis identified to receive information on the project. On page 17 of the same document Rainy River Resources (RRR) lists who they distributed the ToR to. These lists do not match. The ToR should be distributed to all communities identified by the Crown. This ensures that the document is in a format that is accessible by the community and would ensure that they have had a sufficient amount of time to understand and comment on the document. These are commitments made by RRR throughout the draft ToR document.	Table 2 of the Record of Consultation, Discussions and Meetings contains the list of First Nation or Métis Group which RRR was instructed to consult or notify per direction of MNDM on May 17, 2012. The communities identified for consultation all received copies of the Proposed ToR. Those identified for notification were notified of the availability of the Proposed ToR and were provided with copies of the Notice of Submission (with links to where they can find the ToR?) (If so, AMEC please make this clear in your response.) The listing on Page 17 refers to those communities that received copies of the draft ToR. The draft ToR was issued prior to receiving this guidance from MNDM.	MNDM to AMEC: MNDM maintains that after RRR received the updated consultation/notification list (May 17, 2012) that all subsequent documents or information on where documents can be found. AMEC – please confirm this?	A summary of the proposed consultation on and issuance of the Proposed ToR is provided in Consultation and Engagement Plan (Appendix D) of the Proposed ToR. RRR/AMEC provided documentation to the MOE confirming the issuance of the Proposed ToR / RoCDM and Notice of Submission after completion of the issuances and can provide again on request.
3	RRR must ensure that all comments/concerns/meeting requests to talk about the project are documented. In a cursory review of the consultation record MNDM did notice that not all correspondences/comments/requests have been included. An example noted is within Appendix F-14, there should be a record that reflects the meeting requests from Nigoonsiminikaaning made outside of the Fort Frances Chief Secretariat (FFCS). The purpose was to discuss their individual community concerns with the project and agreement process with RRR. The record should also reflect the company's response and action. The Consultation Record must be all inclusive and after cursory review by MNDM it does not seem to accurately represent this.	All of the comments provided prior to the cut-off date stated in the Proposed ToR (September 1, 2012), including those received from the MNDM on the Draft ToR, were fully considered in the preparation of the Proposed ToR. MNDM comments were abbreviated, as were all comments received. There has been no intent to scribe comments and responses incorrectly. For transparency purposes, RRR has issued the entire comment / response table related to MNDM's comments on the Draft ToR with this response table and have modified the ROCs accordingly for inclusion in the Amended Proposed ToR and EA Report. In regards to the Nigoonsiminikaaning First Nation, there are records that reflect discussions and meetings; however, these activities occurred after September 1, 2012 (the cut-off date for the Proposed ToR as	MOE to AMEC: Based on our previous discussions, I believe the September 1, 2012 cut-off date has now been changed to include any comments and consultation on the ToR, including the PICs held in November? Please clarify. The consultation record is to document, at minimum the consultation efforts undertaken by the proponent during the development of the ToR. MOE to AMEC: To be clear, these records will now be added to the amended ToR and revised Record of Consultation?	Yes, the new records include everything that was done up to November 9, 2012 including the November 7 and 8, 2012 open houses.



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGPs Responses

#	COMMENT	RRR RESPONSE	MOE/MNDM RESPONSE	RRR REVISED RESPONSE
		<p>identified on the title page of Appendix F). The follow up is presented in records contained in the Amended Proposed ToR.</p> <p>Rainy River Resources has been meeting with this First Nation subsequent to the September 1, 2012 cutoff. The consultation record for the EA Report will reflect these activities.</p>		



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRRP Responses

ATTACHMENT 1
DETAILED MNDM COMMENTS AND RESPONSES ON DRAFT TERMS OF REFERENCE

Stakeholder: Ministry of Northern Development and Mines
Point of Contact: Neal Bennett, Mineral Exploration and Development Consultant, Mineral Development and Lands Branch
Comments received: June 15, 2012

General comment: It's not clear to MOE why MNDM's comments on the draft ToR are included as part of the comments received on the final proposed ToR? Please explain.
 The table below was specifically referenced in the MNDM comments / RRR responses above (the table below was provided in the Proposed ToR as well) and was provided for ease of review.

COMMENT #	COMMENT (as provided)	RESPONSE/ REVISED TEXT	PROPOSED ToR REFERENCE	STATUS
1	The Aboriginal Consultation and Engagement Plan (ACEP) should show that the Provincial government ¹ has delegated the procedural aspects of consultation to Rainy River Resources Ltd (RRR). It should explain what the procedural aspects are and how the Crown will be providing oversight to the process. It is important that this is stated overtly in the ToR but also cite MOE ToR guidance document.	Noted and will be revised in the Proposed ToR.	9.5.1 AppD, Section 3.1	Complete
2	The ACEP must document that the Crown has verified that a duty to consult has been triggered and who is owed the duty. It should also note that the scope of consultation is determined by the Crown and that it is assessed on an on-going basis throughout the EA and permitting/approval process. The updated Consultation list provided to RRR should be reflected in the ToR.	Noted and will be revised in the Proposed ToR.	9.5.1 9 AppD, Section 3.1	Complete
3	Assessment and oversight by the Crown is currently be provide on other mine development projects through the bi-weekly meetings between the proponent-CEAA-MOE-MNDM and documented through meeting notes. RRR should consider this approach. I suggest meeting with the relevant agencies to discuss.	RRR would welcome bi-weekly approaches to ensure alignment of all regulatory agencies and have requested regular meetings previously.	NA	Not established as yet
4	If community specific communications strategies are going to be used then that commitment should also be in the ACEP.	Noted and will be revised in the Proposed ToR if appropriate.	9.5.5 AppD	Complete
5	It should be noted that although organized bodies such as the Fort Frances Chief Secretariat (FFCS) exist the duty to consult lies with the individual communities.	Noted.	Table 18 Table AppD-1 RoCDM, Table 2	Complete



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRRP Responses

COMMENT #	COMMENT (as provided)	RESPONSE/ REVISED TEXT	PROPOSED ToR REFERENCE	STATUS
6	There should be a cross reference to the EIS guidelines and the Federal aboriginal consultation work plan and/or a confirmation that the commitments made in the ToR are in addition to any of the oRRRations contained in those documents.	Noted. EIS Guidelines were not available as of the preparation of the Draft ToR. The Draft ToR indicates that consultation efforts will be coordinated with those of the federal EA if possible. If the Guidelines are available as of the time of the preparation of the Proposed ToR and cross reference table will be provided.	NA	NA; EA Report will include concordance and commitment tables as appropriate
7	During consultation on other mine development projects in the regions the Crown repeatedly heard from communities that they would like the opportunity to verify that the proponent has accurately recorded their comments and concerns. For this reason RRR should include commitments to provide meeting notes so each community has the opportunity to verify for accuracy before they are finalized (10 day review period before they are finalized). The Crown should be cc'd on this correspondence. This process should continue throughout the EA. It is particularly important to do this for any issues related to concerns, options and potential mitigation measures contemplate during the next stage of the EA process.	Notes from meetings prepared of all relevant meetings. Where an identified individual is available to accept the draft notes, they will be provided with an opportunity to review a draft prior to finalization. RRR requires that the individual representing the Crown to be copied on this correspondence be identified.	AppD Section 5.1.3	Complete
8	Comments and concerns have been raised by the Aboriginal communities to date should be documented. The ToR should also establish a clear link between those comments and concerns and the commitments that will address them.	Further detail will be provided in the Proposed ToR.	AppF	Complete
9	MNDM recommends that RRR use the attached consultation /issues tracking table to aid the Crown in assessing the adequacy of consultation and impacts to rights.	A similar table will be provided with the Proposed ToR.	AppF	Complete
10	There should be a clear commitment in the ToR (ACEP) that when the EA report is prepared it will clearly document the following: <ul style="list-style-type: none"> • That the Aboriginal communities have had an adequate opportunity to understand the project and identify potential impacts • How the project (or components of the project) has been modified to reduce or avoid those impacts • An explanation of why the project (or components of the project) cannot be modified to reduce or avoid the impacts. • An explanation of how the communities have been either 	Meetings with both Aboriginal and non-Aboriginal groups will be documented as will commitments that may become necessary as a result of consultation and discussions.	AppE AppF	Complete



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGPs Responses

COMMENT #	COMMENT (as provided)	RESPONSE/ REVISED TEXT	PROPOSED ToR REFERENCE	STATUS
	accommodated or compensated for remaining impacts that cannot be avoided.			
11	It is recommended that both the Provincial and Federal representatives review the consultation record prior to the final submission of the ToR.	A revised Record of Consultation record will be provided in the Proposed ToR.	AppF RoCDM	Complete
12	Other proponents currently undertaking EA's are planning to include a Draft CP as part of their EA documentation. RRR can make a commitment in the ToR if this is going to be pursued.	Noted.	5.4.13	Complete; to be considered in the EA as applicable
13	Baseline studies should consider the requirements outlined in Ontario Regulation 240/00 of the Mining Act.	Noted. Requirements outlined in Ontario Regulation 240/00 of the <i>Mining Act</i> were considered in the design and implementation of baseline studies for the RRGPs.	NA; 6.2 to 6.7	Complete
14	For Closure Planning purposes, an important potential environmental impact that our Ministry will be interested in having quantified is the potential for waste rock and tailings to produce acid rock drainage (ARD) and/or metal leaching (ML). We will also want to know the mitigation techniques that might be employed to address any ARD/ML concerns. It would be helpful if the ToR specifically mentions this and describes in more detail the EA work that is planned to study ARD/ML potential.	Noted. Further details will be provided in the Proposed ToR and EA as applicable.	6.3.3	Complete
15	Another specific Closure Planning-related item that should be addressed through the EA is the final status of the pit lake that can be expected to develop after close-out. Key questions that should be answered include the expected time frame for the pit to fill with water (this can be done through the development of the groundwater flow model), the likely location(s) of overflow, and a prediction of possible pit lake water quality concerns (ARD/ML-related).	The Proposed ToR will be revised to include closure alternatives. Further details regarding closure and potential environmental impacts will be presented in the EA (and subsequent Closure Plan prepared pursuant to the <i>Mining Act</i>).	5.4.13	Complete; to be considered in the EA as applicable
16	I suggest that meeting be arranged between MOE, MNDM and RRR to discuss decommissioning/closure planning components of the EA before formally submitting the ToR.	Baseline inter-agency meetings underway. Additional pre-EA meetings will be scheduled in the future to discuss such issues.	NA	On-going
17	Explain that the ToR is in addition to the requirements of the EIS guidelines.	The function of the ToR is to define how the Provincial EA will be carried out and what will be included in the EA, such that potential stakeholders can judge their interest in the undertaking, and raise any additional items that should be included in the EA process. The Proposed ToR will be revised to clarify that the EA will also be intended to fulfill the EIS Guidelines, should a Federal EA be required.	Preface 2	Complete



COMMENTS AND RESPONSES ON PROPOSED TERMS OF REFERENCE (ToR)
Comments Received from Government Agencies and RRGPs Responses

COMMENT #	COMMENT (as provided)	RESPONSE/ REVISED TEXT	PROPOSED ToR REFERENCE	STATUS
18	More detail on land tenure could be needed for Provincial Ministries to fully understand and identify their potential permitting and approval roles. For example, does RRR own the right to aggregate, timber, etc... on all parcels of land to be developed?	Noted. This information will be provided during the environmental approvals process as needed.	NA	To be provided during environmental approvals processes

¹This has been jointly done by the Provincial ministries with a permitting or approval role. Includes; MNDM, MNR, and MOE. MAA provided input and advice to these ministries. These ministries worked with CEAA to ensure consistency with the Federal government (to the extent possible).



APPENDIX D-2d

**GOVERNMENT COMMENTS AND RESPONSES
(NOVEMBER 10, 2012 TO OCTOBER 7, 2013)**

Table D-2d: Comments and Responses - Federal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
Biophysical Environment							
Fisheries and Aquatic Resources	657	Letter	07/31/2013	Fisheries and Oceans Canada (DFO) provided comments on the RRGF Draft Fish Habitat Offset Strategy - Revision A (May 2013) and the Fish Habitat No Net Loss Plan (NNLP) MMER Schedule 2 Amendment Waterbodies - Draft (May 2013). RRR provided responses to the comments on 13-09-10.	Fisheries and Oceans Canada, Ministry of Natural Resources, Ontario Ministry of Natural Resources, AMEC Environment & Infrastructure	The discussion and figures in both documents identify Clark Creek as being overprinted by mine infrastructure and requiring scheduling under the Metal Mining Effluent Regulations (MMER). Please be advised that the proposed on-line dam/pond construction and subsequent relocation/diversion of Clark Creek to a nearby tributary of the Gallinger Creek system will be subject to authorization under subsection 35(2) of the Fisheries Act. The proposed dewatering of Marr Creek downstream the Tailings Impoundment Area will also be subject to authorization under subsection 35(2) of the Fisheries Act. Both the Offsetting Strategy and No Net Loss Plan reports will need to be adjusted accordingly.	The proponent appreciates the Fisheries and Oceans Canada (DFO) clarification that the proposed online dam construction and subsequent relocation/diversion of Clark Creek to a nearby tributary (Gallinger Creek) as well as the proposed dewatering of Marr Creek downstream of the Tailings Management Area (TMA) will be subject to authorization under subsection 35(2) of the Fisheries Act. Our understanding of this clarification, as expressed in email correspondence (Ruthven : Eddy August 23, 2013) and telephone conversations (Simms : Eddy August 28, 2013) is that the abandoned remnant sections of Clark Creek that will ultimately be overprinted by the West Mine Rock and East Mine Rock stockpiles respectively, would no longer be considered natural waters frequented by fish and as such would not require listing on Schedule 2 of the Metal Mining Effluent Regulation (MMER) prior to use as mine rock stockpiles. We further understand that a channel abandonment plan to salvage remaining fish to the extent possible from the remnant channel sections may be required as a condition of the Section 35 Authorization. Also clarified in our correspondence, is that Marr Creek is being overprinted by tailings / mine

Table D-2d: Comments and Responses - Federal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
							rock, without being diverted, and would therefore require Schedule 2 listing. Mapping and habitat accounting will be adjusted within the Offset Strategy document as well as in No Net Loss Plan (NNLP) reports (both MMER Schedule 2 waterbodies and Section 35 NNLP reports) to reflect this clarification.
Fisheries and Aquatic Resources	657	Letter	07/31/2013	Fisheries and Oceans Canada (DFO) provided comments on the RRGF Draft Fish Habitat Offset Strategy - Revision A (May 2013) and the Fish Habitat No Net Loss Plan (NNLP) MMER Schedule 2 Amendment Waterbodies - Draft (May 2013). RRR provided responses to the comments on 13-09-10.	Fisheries and Oceans Canada, Ministry of Natural Resources, Ontario Ministry of Natural Resources, AMEC Environment & Infrastructure	4.0 Offset Strategy - note that offset requirements for the infill in fish habitat from the construction of containment dams/berms for mine infrastructure components are subject to subsection 35(2) of the Fisheries Act; the Authorization for these impacts related to the Tailings Impoundment Area (TIA) containment berm(s) will only be issued following listing of the associated waterbodies under Schedule 2 of the MMER.	Agreed. The Section 35 NNLP will clearly specify that the authorization for the construction of the portions of the containment berms that overlay natural waters frequented by fish, and are related to the TMA, will not be received until after the listing of the associated waterbodies under Schedule 2. It would be proposed that any other Section 35 Authorizations not associated with containment of mine waste (i.e., West Creek, Clark Creek) could be Authorized immediately after completion of the environmental assessment.
Fisheries and Aquatic Resources	657	Letter	07/31/2013	Fisheries and Oceans Canada (DFO) provided comments on the RRGF Draft Fish Habitat Offset Strategy - Revision A (May 2013) and the Fish Habitat No Net Loss Plan (NNLP) MMER Schedule 2 Amendment Waterbodies - Draft (May 2013). RRR provided responses to the comments on 13-09-10.	Fisheries and Oceans Canada, Ministry of Natural Resources, Ontario Ministry of Natural Resources, AMEC Environment & Infrastructure	4.0 Offset Strategy - regarding the alternative approach to offsetting, DFO will need to see a scientifically defensible approach and quantifiable link to compensating for impacts to the fish communities affected by this project. More detail and discussion is required.	As part of the Rainy River Gold Project Fish Habitat No Net Loss Plan Fisheries Act Section 35 Authorizations report (currently under preparation) quantification of habitat loss using the same methodology, as presented and generally accepted by DFO, in the Rainy River Gold Project Fish Habitat No Net Loss Plan MMER Schedule 2 Amendment Waterbodies will be included. Through further discussion with DFO a defensible approach to offsetting using alternative

Table D-2d: Comments and Responses - Federal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
							approaches will be further developed for acceptance.
Fisheries and Aquatic Resources	657	Letter	07/31/2013	Fisheries and Oceans Canada (DFO) provided comments on the RRGF Draft Fish Habitat Offset Strategy - Revision A (May 2013) and the Fish Habitat No Net Loss Plan (NNLP) MMER Schedule 2 Amendment Waterbodies - Draft (May 2013). RRR provided responses to the comments on 13-09-10.	Fisheries and Oceans Canada, Ministry of Natural Resources, Ontario Ministry of Natural Resources, AMEC Environment & Infrastructure	1.0 Introduction - note that the new serious harm provisions of the Fisheries Act have not yet come into force.	Comment is acknowledged and the Offset Strategy document will be revised to reflect the provision's status (as in force or not) at the time of next revision.
Fisheries and Aquatic Resources	657	Letter	07/31/2013	Fisheries and Oceans Canada (DFO) provided comments on the RRGF Draft Fish Habitat Offset Strategy - Revision A (May 2013) and the Fish Habitat No Net Loss Plan (NNLP) MMER Schedule 2 Amendment Waterbodies - Draft (May 2013). RRR provided responses to the comments on 13-09-10.	Fisheries and Oceans Canada, Ministry of Natural Resources, Ontario Ministry of Natural Resources, AMEC Environment & Infrastructure	2.0 Overview of Approach to No Net Loss Planning - it is stated that not all losses will be immediate and that offset works are likely to be completed throughout the life of the mine and possibly through closure. Given that an approved habitat compensation plan must be in place prior to initiating deposits to a tailings impoundment area, please describe the timing of construction for the proposed off-setting measures in relation to project phasing.	We agree that in the case of the Schedule 2 NNLP that the compensation plan must be in place prior to the depositing of tailings in waters frequented by fish. A Project schedule and timing of compensation works will be provided in a subsequent draft of the Schedule 2 Waterbodies NNLP.
Fisheries and Aquatic Resources	657	Letter	07/31/2013	Fisheries and Oceans Canada (DFO) provided comments on the RRGF Draft Fish Habitat Offset Strategy - Revision A (May 2013) and the Fish Habitat No Net Loss Plan (NNLP) MMER Schedule 2 Amendment Waterbodies - Draft (May 2013). RRR provided responses to the comments on 13-09-10.	Fisheries and Oceans Canada, Ministry of Natural Resources, Ontario Ministry of Natural Resources, AMEC Environment & Infrastructure	3.4 Habitat Suitability - please provide a clear rationale for why Lake Sturgeon has not been considered further.	Traditional, historical and recent information was unable to substantiate modern occurrence of Lake Sturgeon within the Pinewood River and its tributaries. Fish community presence / absence records therefore did not include this species and as such it was not included within modelling exercises. Although Lake Sturgeon are opportunistic as a species with respect to habitat to fulfil life history criteria, the Pinewood River was still

Table D-2d: Comments and Responses - Federal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
							<p>considered as having a very low value with respect to Lake Sturgeon habitat (i.e., low gradient, generally shallow depth, lack of optimal spawning substrates etc.). Records of capture were obtained during spring of 2013 by both AMEC and the Ministry of Natural Resources (MNR). One specimen was captured by AMEC in the downstream section of the Pinewood River close to its confluence with the Rainy River. Records regarding the capture of Lake Sturgeon by the MNR have not been received in detail, but two specimens were captured during the spring somewhat upstream of the location of the AMEC capture. As such the Project team will continue to work with MNR to better define the upstream extent of sturgeon but based on the Catch per Unit Effort (CPUE) abundance of the species is considered quite low and their presence is not expected to extend to the immediate Project site. Overprinting of watercourses by Project components will only include a limited number of upper tributaries of the Pinewood River (not the Pinewood river itself) as presented in the NNLP document. As such impacts to Lake Sturgeon at the far downstream sections of the Pinewood River are expected to be minimal and restricted to a minor decrease in flow (less than 5% at Water Survey of Canada</p>

Table D-2d: Comments and Responses - Federal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
							Station 05PC023) based on subwatershed diversion/impoundment and supplementation scenarios. In light of the new records of capture (spring of 2013) and as suggested by the MNR, Lake Sturgeon has been added to fish community species lists in subsequent documentation.
Fisheries and Aquatic Resources	657	Letter	07/31/2013	Fisheries and Oceans Canada (DFO) provided comments on the RRGF Draft Fish Habitat Offset Strategy - Revision A (May 2013) and the Fish Habitat No Net Loss Plan (NNLP) MMER Schedule 2 Amendment Waterbodies - Draft (May 2013). RRR provided responses to the comments on 13-09-10.	Fisheries and Oceans Canada, Ministry of Natural Resources, Ontario Ministry of Natural Resources, AMEC Environment & Infrastructure	6.0 Measures to Mitigate Impacts to Fish Habitat during Implementation of the Plan - mitigation measures regarding intakes/outfalls, fish screens and fish salvage should be included.	Further mitigation measures specific to intakes / outfalls, fish screens and fish salvage will be included in the next revision of this document.
Fisheries and Aquatic Resources	657	Letter	07/31/2013	Fisheries and Oceans Canada (DFO) provided comments on the RRGF Draft Fish Habitat Offset Strategy - Revision A (May 2013) and the Fish Habitat No Net Loss Plan (NNLP) MMER Schedule 2 Amendment Waterbodies - Draft (May 2013). RRR provided responses to the comments on 13-09-10.	Fisheries and Oceans Canada, Ministry of Natural Resources, Ontario Ministry of Natural Resources, AMEC Environment & Infrastructure	7.0 Measures Taken to Monitor the Implementation of the Plan - last paragraph should note that the monitoring will be to ensure constructed habitat is consistent with the proposed plan and scheduling under MMER; please note that for waterbodies subject to MMER, subsection 35(2) Fisheries Act authorizations are not required.	Measures taken to monitor the implementation of the plan will be described specific to constructed habitats consistent with the proposed plan and scheduling under MMER.
Water Resources	641	E-mail	08/22/2013	AMEC, on behalf of RRR, provided the Canadian Environmental Assessment Agency (CEA Agency) RRR's response to Environment Canada's (EC) comments (received on 13-02-26) regarding the Conceptual Mine Closure Presentation and requested that they be forwarded to members of the government review team.	Canadian Environmental Assessment Agency, Environment Canada, AMEC Environment & Infrastructure, Rainy River Resources	EC is also interested in information on other potential contaminants of concern not identified in Schedule 4 of the MMER when evaluating the impacts of the project on water quality. Information on the predicted concentrations of all contaminants of concern will be useful in this regard for EC to advise on the potential water	Information regarding predicted contaminants of concern was provided in the Draft EA Report (Section 4.12 including Section 4.12.6). The information has been utilized in the development of the water management plan for the RRGF.

Table D-2d: Comments and Responses - Federal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
						quality impacts associated with the project. EC recommends that this information be integrated into a water management plan for the project.	
Water Resources	641	E-mail	08/22/2013	AMEC, on behalf of RRR, provided the Canadian Environmental Assessment Agency (CEA Agency) RRR's response to Environment Canada's (EC) comments (received on 13-02-26) regarding the Conceptual Mine Closure Presentation and requested that they be forwarded to members of the government review team.	Canadian Environmental Assessment Agency, Environment Canada, AMEC Environment & Infrastructure, Rainy River Resources	An assessment and prediction of water quality for seepage and runoff produced from major mine components (as defined in Section 6 "Scope of the Project" of the EIS Guidelines) and all site water discharges (including groundwater discharge points in lakes and streams, for all phases of the Project). EC recommends that this assessment include: an estimate of the seepage and runoff volumes from the mine component and/or discharge; water quality characterization of the seepage and runoff from the mine component and/or discharge with comparison to toxicity data; discharge structures and locations; potential effects on the receiving environment from all cumulative site water discharges; and, the description of any mitigation strategies and/or treatment processes implemented to manage effluent before it is released into the receiving environment.	This information has been provided in the Draft EA Report (Section 4.12 and Sections 7.5, 7.6 and 7.7) at a sufficient level of detail to be able to understand potential environmental impacts and to develop appropriate mitigation measures and/or contingency plans.
Wildlife	658	Meeting	06/07/2013	A meeting was held to discuss Species at Risk (SAR) and the RRG. RRR provided an update on New Gold's acquisition of RRR, the status of the Environmental Assessment (EA) Report and the anticipated timeline for the Environmental Site Assessment (ESA).	Environment Canada, Individual, Individual - GP, Ministry of Natural Resources, Ontario Ministry of Natural Resources, Trent University, AMEC Environment & Infrastructure, Rainy River Resources	Discussions related to field surveys and methodology as well as management and protection of potentially affected SAR.	Information discussed will be considered in the preparation of the final EA Report.

Table D-2d: Comments and Responses - Federal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
				Discussions also related to field surveys and methodology as well as management and protection of potentially affected SAR. The final meeting notes were distributed to participants on 13-08-22 and are considered confidential.			
Document Reviews							
Draft EA	680	E-mail	09/04/2013	The Canadian Environmental Assessment Agency (CEA Agency) provided comments on the RRGD Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of the Department of Fisheries and Oceans (DFO). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-26.	Canadian Environmental Assessment Agency, Fisheries and Oceans Canada, Ministry of the Environment, Ontario Ministry of Northern Development and Mines, Rainy River Resources	Comments provided by DFO can be found in Appendix D of the Final EA Report.	Formal responses to all written comments received during the consultation on the Draft EA Report (Ver. 2) can be found in Appendix D of the Final EA Report. All comments will be considered in the preparation of the Final EA Report.
Draft EA	704	E-mail	09/18/2013	RRR provided a copy of responses to comments received through the Independent Technical Review of the RRGD Draft Environmental Assessment (EA) Report (Ver. 1) conducted on behalf of various Aboriginal groups. Comments received related to Aboriginal consultation, Traditional Knowledge and Traditional Land Use, socio-economics, fish, wildlife, vegetation, surface water, groundwater, air quality, noise and vibration, and human and ecological health. Comments and responses are considered confidential but have been shared with the appropriate regulatory authorities.	Canadian Environmental Assessment Agency, Ministry of the Environment, Ontario Ministry of Northern Development and Mines, Rainy River Resources	Comments received related to Aboriginal consultation, Traditional Knowledge and Traditional Land Use, socio-economics, fish, wildlife, vegetation, surface water, groundwater, air quality, noise and vibration, and human and ecological health.	RRR provided a copy of responses to comments received through the Independent Technical Review of the RRGD Draft EA Report (Ver. 1) conducted on behalf of various Aboriginal groups.

Table D-2d: Comments and Responses - Federal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
Draft EA	681	E-mail	09/04/2013	The Canadian Environmental Assessment Agency (CEA Agency) provided comments on the RRGP Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of Natural Resources Canada (NRCan). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-20. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE. RRR responded to questions related to groundwater on 13-10-04.	Canadian Environmental Assessment Agency, Ministry of the Environment, Ontario Ministry of Northern Development and Mines, Rainy River Resources	Comments provided by NRCan can be found in Appendix D of the Final EA Report.	Formal responses to all written comments received during the consultation on the Draft EA Report (Ver. 2) can be found in Appendix D of the Final EA Report. All comments will be considered in the preparation of the Final EA Report.
Draft EA	682	E-mail	09/04/2013	The Canadian Environmental Assessment Agency (CEA Agency) provided comments on the RRGP Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of Transport Canada (TC). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-20. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE.	Canadian Environmental Assessment Agency, Ministry of the Environment, Ontario Ministry of Northern Development and Mines, Transport Canada, Rainy River Resources	Comments provided by TC can be found in Appendix D of the Final EA Report.	Formal responses to all written comments received during the consultation on the Draft EA Report (Ver. 2) can be found in Appendix D of the Final EA Report. All comments will be considered in the preparation of the Final EA Report.
Draft EA	679	E-mail	09/05/2013	The Canadian Environmental	Canadian Environmental	Comments provided by HC can	Formal responses to all written

Table D-2d: Comments and Responses - Federal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
				Assessment Agency (CEA Agency) provided comments on the RRGP Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of Health Canada (HC). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-26.	Assessment Agency, Health Canada, Ministry of the Environment, Ontario Ministry of Northern Development and Mines, AMEC Environment & Infrastructure	be found in Appendix D of the Final EA Report.	comments received during the consultation on the Draft EA Report (Ver. 2) can be found in Appendix D of the Final EA Report. All comments will be considered in the preparation of the Final EA Report.
Draft EA	683	E-mail	09/05/2013	The Canadian Environmental Assessment Agency (CEA Agency) provided comments on the RRGP Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of Environment Canada (EC). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-26.	Canadian Environmental Assessment Agency, Ministry of the Environment, Ontario Ministry of Northern Development and Mines, Rainy River Resources	Comments provided by EC can be found in Appendix D of the Final EA Report.	Formal responses to all written comments received during the consultation on the Draft EA Report (Ver. 2) can be found in Appendix D of the Final EA Report. All comments will be considered in the preparation of the Final EA Report.
Draft EA	684	E-mail	09/05/2013	The Canadian Environmental Assessment Agency (CEA Agency) provided comments on the RRGP Draft Environmental Assessment (EA) Report (Ver. 2). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-26.	Canadian Environmental Assessment Agency, Ministry of the Environment, Ontario Ministry of Northern Development and Mines, AMEC Environment & Infrastructure, Rainy River Resources	Comments provided by CEA Agency can be found in Appendix D of the Final EA Report.	Formal responses to all written comments received during the consultation on the Draft EA Report (Ver. 2) can be found in Appendix D of the Final EA Report. All comments will be considered in the preparation of the Final EA Report.
Draft EA	685	E-mail	09/05/2013	The Canadian Environmental Assessment Agency (CEA Agency) provided examples to RRR of how another proponent addressed the requirements set out in Section 9.2 of the Environmental Impact Statement	Canadian Environmental Assessment Agency, Rainy River Resources	Examples provided were from the Kitsault Mine Project in British Columbia.	Examples were received by RRR.

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Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
				(EIS) Guidelines.			
Other	604	E-mail	05/08/2013	The CEA Agency forwarded comments on several RRGp baseline reports on behalf of the Department of Fisheries and Oceans (DFO), Environment Canada (EC), Health Canada (HC), and Ministry of Natural Resources (MNR). Responses were provided to the CEA Agency on 13-06-13.	Canadian Environmental Assessment Agency, Ontario Ministry of Environment, Ontario Ministry of Northern Development and Mines, AMEC Environment & Infrastructure, Rainy River Resources	The comments provided by DFO, EC, HC and MNR were related to the following baseline reports: B15 Climate, Air and Sound Baseline; B16 RRGp 2012 Aquatics Baseline Report; and B8 AMEC Winter Low Flow 2012.	A request was made to the CEA Agency to forward the submitted responses to the appropriate individuals within the Government agencies on behalf of RRR.
Other	605	E-mail	05/23/2013	The CEA Agency forwarded comments on several RRGp baseline reports on behalf of the Ministry of Natural Resources (MNR) and Environment Canada (EC). Responses were provided to the CEA Agency on 13-06-13.	Canadian Environmental Assessment Agency, Ontario Ministry of Environment, Ontario Ministry of Northern Development and Mines, AMEC Environment & Infrastructure, Rainy River Resources	The comments provided by MNR and EC were related to the following baseline reports: B12 RRGp 2012 Terrestrial Baseline; B13 RRGp 2012 Species at Risk Report; and B14 RRGp 2012 Aerial Survey Report.	A request was made to the CEA Agency to forward the submitted responses to the appropriate individuals within the Government agencies on behalf of RRR.
Technical Comments	398	E-mail	11/27/2012	Environment Canada (EC) requested an unlocked copy of the RRGp Interim Geochemistry Report. RRR provided a copy of the unlocked report.	Environment Canada, Rainy River Resources	EC requested an unlocked copy of the RRGp Interim Geochemistry Report.	RRR provided a copy of the unlocked report.
Methodology and Process							
Environmental Assessment	624	E-mail	07/25/2013	RRR provided information to the Ministry of the Natural Resource (MNR) and the Canadian Environmental Assessment Agency (CEA Agency) on the alternatives assessment methodology for tailings and mine rock storage that will be used in the Environmental Assessment (EA).	Canadian Environmental Assessment Agency, Ministry of Natural Resources, Rainy River Resources	The CEA Agency requested information about the Assessment of Alternatives for Tailings and Mine Rock Storage to facilitate the review of the Draft EA.	RRR provided information on the alternatives assessment methodology for tailings and mine rock storage that will be used in the EA, noting that the alternatives assessment methodology which applies to all of the alternative methods is located in the Approved EA Terms of Reference, Section 5.2.
Regulatory	708	E-mail	09/25/2013	RRR sent the Cultural Heritage Assessment Report and mitigation recommendations prepared by Unterman McPhail Associates to the Ministry of Tourism, Culture and Sport (MTCS) as requested.	Ministry of Tourism and Culture, Rainy River Resources	RRR sent the Cultural Heritage Assessment Report and mitigation recommendations as requested by MTCS.	RRR offered to discuss the report and recommendations with MTCS.
Regulatory	657	Letter	07/31/2013	Fisheries and Oceans Canada	Fisheries and Oceans Canada,	4.0 Offset Strategy- note that the	Comment is acknowledged and

Table D-2d: Comments and Responses - Federal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
				(DFO) provided comments on the RRGP Draft Fish Habitat Offset Strategy - Revision A (May 2013) and the Fish Habitat No Net Loss Plan (NNLP) MMER Schedule 2 Amendment Waterbodies - Draft (May 2013). RRR provided responses to the comments on 13-09-10.	Ministry of Natural Resources, Ontario Ministry of Natural Resources, AMEC Environment & Infrastructure	serious harm provisions of the amended Fisheries Act have not yet come into force.	the Offset Strategy document will be revised to reflect the provision's status (as in force or not) at the time of next revision.
Regulatory	657	Letter	07/31/2013	Fisheries and Oceans Canada (DFO) provided comments on the RRGP Draft Fish Habitat Offset Strategy - Revision A (May 2013) and the Fish Habitat No Net Loss Plan (NNLP) MMER Schedule 2 Amendment Waterbodies - Draft (May 2013). RRR provided responses to the comments on 13-09-10.	Fisheries and Oceans Canada, Ministry of Natural Resources, Ontario Ministry of Natural Resources, AMEC Environment & Infrastructure	1.0 Introduction - note that the new serious harm provisions of the Fisheries Act have not yet come into force.	Comment is acknowledged and the Offset Strategy document will be revised to reflect the provision's status (as in force or not) at the time of next revision.
Indigenous Traditional Knowledge	718	E-mail	10/07/2013	Environment Canada (EC) provided comments on RRP Draft Assessment of Alternatives for Mine Waste Disposal. RRR responded on 13-10-11.	Canadian Environmental Assessment Agency, Environment Canada, Ministry of the Environment, Rainy River Resources	EC understands that the Proponent has undertaken consultations with Aboriginal groups and that they have not identified any traditional land uses within or adjacent to the project site. There is very little discussion provided on the consultations undertaken by the Proponent. Consideration of Aboriginal concerns with respect to the proposed mine waste disposal options, including the identification of relevant Traditional Knowledge should be incorporated into the alternatives assessment. Details on the Proponent's consultations with affected stakeholders and Aboriginal groups are necessary to demonstrate that the Proponent has undertaken a thorough assessment of mine	A detailed record of consultation, discussions and meetings with Aboriginal groups and the general public related to the Rainy River Project (RRP) is included as Appendix D in the Final EA Report. The Draft EA Report (Ver. 1) was issued to Aboriginal groups in May 2013 in order to allow sufficient time for comment. A subsequent independent technical review has not indicated problems with the storage locations. While a copy of the Assessment of Alternatives for Mine Waste Disposal was not available at that time, the Draft EA Report did include a comprehensive discussion of mineral waste alternatives in Section 4 of the report. RRR and our consultant will provide a copy of the extracted comments

Table D-2d: Comments and Responses - Federal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
						waste disposal options. EC requests that the Proponent provide more discussion on Aboriginal consultation activities, including any comments or perceptions on the project and in particular, any comments related to the alternatives for mine waste disposal.	received related to mineral waste management and alternatives on behalf of the Aboriginal groups on the draft EA Report along with the Rainy River Resources (RRR) response. A summary will also be provided of all comments received prior to the Draft EA Report issuance from Aboriginal groups on these aspects. The intent is that the final document will be appended to the Final Environmental Assessment Report in October as a supporting document to the overall report. Further detail will be provided in the Final Report.
Indigenous Traditional Knowledge	718	E-mail	10/07/2013	Environment Canada (EC) provided comments on RRP Draft Assessment of Alternatives for Mine Waste Disposal. RRR responded on 13-10-11.	Canadian Environmental Assessment Agency, Environment Canada, Ministry of the Environment, Rainy River Resources	The Proponent states that Aboriginal groups have expressed "a desire to protect the local and regional environments". Concerns raised by Aboriginal groups do not appear to be reflected in the MAA. Consultation with Aboriginal groups is an important part of the alternatives assessment process. Any concerns raised by Aboriginal groups should be reflected in the sub-accounts and indicators for the MAA. EC suggests that the Proponent add 'Aboriginal and Public Perception/ Opinion' as a sub-account under the 'Socio-economic Account', with additional indicators to rank the opinions of the Aboriginal groups and the public.	Further detail will be provided regarding consultation activities to date related to mineral waste management in the final document. No specific comments on mine waste alternatives have been received to date which would justify inclusion of a subaccount of 'Aboriginal and Public Perception/ Opinion'; i.e., there is nothing to differentiate the various alternatives, as per section 2.5.1 of the EC Guidelines for the Assessment of Alternatives for Mine Waste Disposal, and the inclusion of this sub-account would have no impact on the final assessment.
Regulatory	718	E-mail	10/07/2013	Environment Canada (EC) provided comments on RRP Draft Assessment of Alternatives	Canadian Environmental Assessment Agency, Environment Canada, Ministry of	EC understands that the Proponent has undertaken consultations with Aboriginal	A detailed record of consultation, discussions and meetings with Aboriginal groups and the

Table D-2d: Comments and Responses - Federal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
				for Mine Waste Disposal. RRR responded on 13-10-11.	the Environment, Rainy River Resources	groups and that they have not identified any traditional land uses within or adjacent to the project site. There is very little discussion provided on the consultations undertaken by the Proponent. Consideration of Aboriginal concerns with respect to the proposed mine waste disposal options, including the identification of relevant Traditional Knowledge should be incorporated into the alternatives assessment. Details on the Proponent's consultations with affected stakeholders and Aboriginal groups are necessary to demonstrate that the Proponent has undertaken a thorough assessment of mine waste disposal options. EC requests that the Proponent provide more discussion on Aboriginal consultation activities, including any comments or perceptions on the project and in particular, any comments related to the alternatives for mine waste disposal.	general public related to the Rainy River Project (RRP) is included as Appendix D in the Final EA Report. The Draft EA Report (Ver. 1) was issued to Aboriginal groups in May 2013 in order to allow sufficient time for comment. A subsequent independent technical review has not indicated problems with the storage locations. While a copy of the Assessment of Alternatives for Mine Waste Disposal was not available at that time, the Draft EA Report did include a comprehensive discussion of mineral waste alternatives in Section 4 of the report. RRR and our consultant will provide a copy of the extracted comments received related to mineral waste management and alternatives on behalf of the Aboriginal groups on the draft EA Report along with the Rainy River Resources (RRR) response. A summary will also be provided of all comments received prior to the Draft EA Report issuance from Aboriginal groups on these aspects. The intent is that the final document will be appended to the Final Environmental Assessment Report in October as a supporting document to the overall report. Further detail will be provided in the Final Report.
Mining							
Other	573	E-mail	04/19/2013	RRR responded to questions posed by the Canadian Environmental Assessment Agency (CEA Agency) federal	Canadian Environmental Assessment Agency, Rainy River Resources	The 2013 community newsletter mentions a new "Intrepid zone" to the East of Hwy 600 and the presence of a large deposit.	The new intrepid discovery area is under review and could likely be mined as part of the existing proposed underground

Table D-2d: Comments and Responses - Federal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
				review team regarding the proposed RRGP site plan and mine rock stockpile locations.		From the updated site layout this site appears to be under the proposed Mine Rock stockpile. Is Rainy River planning to incorporate this new area or is this the site that they were discussing accessing via the underground tunnel?	development to be described in the Draft EA. We are working on developing a resource for this new discovery area and its use would not change the configuration of the proposed mining operation as operations would be underground and included within the proposed overall footprint.
Process (Leaching, etc.)	641	E-mail	08/22/2013	AMEC, on behalf of RRR, provided the Canadian Environmental Assessment Agency (CEA Agency) RRR's response to Environment Canada's (EC) comments (received on 13-02-26) regarding the Conceptual Mine Closure Presentation and requested that they be forwarded to members of the government review team.	Canadian Environmental Assessment Agency, Environment Canada, AMEC Environment & Infrastructure, Rainy River Resources	EC recommends that the mine plans be developed to include measures to control and collect seepage from the operations area for the mine and demonstrate that all effluent subject to the monitoring requirements of the MMER will be discharged through a final discharge point(s) where its quality and flow is monitored on a weekly basis.	RRR intends to control and collect seepage which has a reasonable expectation of containing potential contamination, in accordance with MMER requirements. This information was provided in the Draft EA Report (Section 7.7.3) at a sufficient level of detail to be able to understand potential environmental impacts and to develop appropriate mitigation measures and/or contingency plans. Additional detail to support the environmental approvals for the operation can be provided to Environment Canada once developed (post Final EA Report submission).
Process (Leaching, etc.)	641	E-mail	08/22/2013	AMEC, on behalf of RRR, provided the Canadian Environmental Assessment Agency (CEA Agency) RRR's response to Environment Canada's (EC) comments (received on 13-02-26) regarding the Conceptual Mine Closure Presentation and requested that they be forwarded to members of the government review team.	Canadian Environmental Assessment Agency, Environment Canada, AMEC Environment & Infrastructure, Rainy River Resources	EC strongly recommends that a conceptual diagram and description of the plans to collect and monitor effluent within the operations area of the mine be prepared. We also recommend that the description include measures to separate contact and non contact water and to prevent erosion and sediment discharge for all project phases.	The Draft EA Report (Section 4.12.7 Figures 4-10, 13-2 and 13-3) includes conceptual diagrams demonstrating plans to collect and monitor effluent. Approaches and measures to separate contact and non-contact water are also included in the water management description.

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Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
Waste Rock Piles	573	E-mail	04/19/2013	RRR responded to questions posed by the Canadian Environmental Assessment Agency (CEA Agency) federal review team regarding the proposed RRGP site plan and mine rock stockpile locations.	Canadian Environmental Assessment Agency, Rainy River Resources	Will RRGP have 'low grade ore stock piles'? If so can you identify where they will be as they are not visible on the most recent site plan?	The ore stockpile area will be situated along the northern perimeter of the waste rock to the east of the Open Pit. This will be clearly indicated in the draft EA document.
Water Sources	641	E-mail	08/22/2013	AMEC, on behalf of RRR, provided the Canadian Environmental Assessment Agency (CEA Agency) RRR's response to Environment Canada's (EC) comments (received on 13-02-26) regarding the Conceptual Mine Closure Presentation and requested that they be forwarded to members of the government review team.	Canadian Environmental Assessment Agency, Environment Canada, AMEC Environment & Infrastructure, Rainy River Resources	Request for information describing how baseline surface and groundwater volumes and flow rates are anticipated to be altered by individual mine components (as defined in Section 6 "Scope of the Project" of the federal EIS Guidelines).	This information was provided in the Draft EA Report (Sections 7.5, 7.6 and 7.7 Appendix S) at a sufficient level of detail to be able to understand potential environmental impacts and to develop appropriate mitigation measures and/or contingency plans. It is our intent to show how surface water and groundwater could be affected holistically by the entire RRGP development, rather than to try and separate effects to surface water and groundwater from individual mine components.
Other	718	E-mail	10/07/2013	Environment Canada (EC) provided comments on RRP Draft Assessment of Alternatives for Mine Waste Disposal. RRR responded on 13-10-11.	Canadian Environmental Assessment Agency, Environment Canada, Ministry of the Environment, Rainy River Resources	The Proponent has eliminated Alternative B, located south of the open pit, from further consideration using pre-screening criterion "is this the most suitable alternative in the vicinity of the impoundment location?" A brief explanation is provided as a footnote to Table 7-1, which states that: "Alternative B cannot meet Ministry of the Environment sound quality guidelines, and therefore cannot be approved under any possible scenario." The pre-screening criterion that was applied to Alternative B and the explanation provided for its elimination from further	Alternative B is located adjacent to the neighbours located in Black Hawk. Sound modelling indicates that under any usage scenario, sound levels from regular ongoing operations will exceed Ministry of the Environment Sound Quality Guidelines. As a result, this alternative would be unable to receive provincial approval for operation, considered to be a fatal flaw, regardless of its performance in a multiple accounts analysis. For this reason, it was eliminated from any further consideration.

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Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
						consideration is not clear. The Proponent is requested to clarify the supporting rationale for the elimination of Alternative B.	
Other	718	E-mail	10/07/2013	Environment Canada (EC) provided comments on RRP Draft Assessment of Alternatives for Mine Waste Disposal. RRR responded on 13-10-11.	Canadian Environmental Assessment Agency, Environment Canada, Ministry of the Environment, Rainy River Resources	Alternative E appears to be smaller in area than alternative H (Figure 3-1, pg. 20). Yet, the alternative H has been screened out due to lack of sufficient space to contain a significant percentage of the entire volume of tailings requiring storage, whereas alternative E has not been screened out by applying the same rationale. EC asks the Proponent to clarify this ambiguity.	Alternative E is larger than Alternative H, having areas of 492 ha and 357 ha, respectively. Alternative E was screened out on the basis that there is a more suitable alternative in the immediate area (Alternative B) that has greater capacity, and does not overlap with the preferred area for the explosives facilities.
Process (Leaching, etc.)	717	E-mail	10/07/2013	On 13-10-07 Environment Canada (EC) provided additional comments raised from the RRGP Draft EIS review relating to the anticipated use of the hydrometric station data. Environment Canada suggested that NewGold and EC meet in person or by teleconference to discuss a potential agreement for the long-term operation of a hydrometric station along the Pinewood River. RRR responded on 13-10-10.	Environment Canada, Rainy River Resources	Does RRR anticipate that daily water level data and flow estimates will be used to govern effluent discharge rates for the RRGP in near-real time?	Yes. Preferably we would use flow data from the day before (or two days before) to calculate allowable loadings on any given day.
Tailing Impoundment	718	E-mail	10/07/2013	Environment Canada (EC) provided comments on RRP Draft Assessment of Alternatives for Mine Waste Disposal. RRR responded on 13-10-11.	Canadian Environmental Assessment Agency, Environment Canada, Ministry of the Environment, Rainy River Resources	The Proponent has provided two figures showing the locations of the tailings management area location alternatives (Fig. 3-1; pg. 20) and mine rock stockpile location alternatives (Fig. 7-1; pg. 44). However, a figure(s) with a greater level of detail for the preferred alternative choice(s) is/are also requested. A figure(s) is needed which shows the	The requested figures will be provided in the final document.

Table D-2d: Comments and Responses - Federal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
						locations of the Proponent's preferred alternatives for tailings and mine rock disposal. This figure(s) should also provide more detail on the features/ components of the TMA and mine rock stockpiles so that EC has a better understanding of the proposed water management for the site(s). The Proponent is requested to provide two separate (or a combined figure) showing the location and layout of the preferred choice of location of tailings management area (TMA) and the mine rock stockpiles. This figure(s) should clearly show the different features/ components of the TMA and the mine rock stockpiles (these include any dams/embankments, seepage collection and management systems, upstream and downstream watercourses and other water treatment and management features).	
Tailing Impoundment	718	E-mail	10/07/2013	Environment Canada (EC) provided comments on RRP Draft Assessment of Alternatives for Mine Waste Disposal. RRR responded on 13-10-11.	Canadian Environmental Assessment Agency, Environment Canada, Ministry of the Environment, Rainy River Resources	The Proponent has characterized about 50% of mine rock and most of the tailings as potentially acid generating (PAG). The Proponent has not indicated if co-disposal of all PAG tailings and waste rock at one location was also considered as an alternative. Co-disposal of all PAG tailings and waste rock should be considered as an alternative as it may result in a smaller environmental impact than separate disposal locations. EC requests clarification from the	A discussion of co-disposal of mine rock and tailings will be included in the final document.

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Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
						Proponent on whether co-disposal of all PAG tailings and waste rock at one location was considered as an alternative. If co-disposal was not considered as an alternative, please provide the rationale.	
Tailing Impoundment	718	E-mail	10/07/2013	Environment Canada (EC) provided comments on RRP Draft Assessment of Alternatives for Mine Waste Disposal. RRR responded on 13-10-11.	Canadian Environmental Assessment Agency, Environment Canada, Ministry of the Environment, Rainy River Resources	The Proponent has considered relevant sub-accounts and indicators in the alternatives characterization for tailings management area (Table 4-1; pg. 23) and mine rock storage area (Table 8-1; pg. 47). However, there is no description of the sub-accounts and indicators provided in the text. The rationale for the selection of the sub-accounts and indicators is an important component in demonstrating that the Proponent has assessed the proposed options by considering the environmental, socio-economic, technical and economic factors relevant to each option. Without this information it is difficult for reviewers to assess the work completed by the Proponent in developing the multiple accounts analysis (MAA). The Proponent is requested to provide in the main text a description of the sub-accounts and indicators for used for the Tailings and Mine Rock/ Overburden multiple accounts analyses.	A description of the sub-accounts and indicators used in the multiple accounts analyses will be included in the final document.
Tailing Impoundment	718	E-mail	10/07/2013	Environment Canada (EC) provided comments on RRP Draft Assessment of Alternatives for Mine Waste Disposal. RRR responded on 13-10-11.	Canadian Environmental Assessment Agency, Environment Canada, Ministry of the Environment, Rainy River Resources	The MAA undertaken by the Proponent for the mine rock storage alternatives assessment has resulted in two locations (Alternative C and E) being	The discussion of the two preferred locations for mine rock disposal will be amended in the final document to provide additional information, such as

Table D-2d: Comments and Responses - Federal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
						selected as the preferred locations for the mine rock stockpiles. There is little detail provided on the two mine rock storage piles. The two preferred locations for mine rock storage piles and their intended uses should be fully described so that the rationale for their selection may be understood by third party reviewers. EC requests that the Proponent provide more detailed description of the preferred alternatives, indicating that: 1) Alternative C is being proposed for the storage/disposal of PAG mine rock and ore; and 2) Alternative E is proposed for storage/disposal of Non-PAG mine rock and overburden.	that presented in the draft Environmental Assessment (EA) Report.
Tailing Impoundment	718	E-mail	10/07/2013	Environment Canada (EC) provided comments on RRP Draft Assessment of Alternatives for Mine Waste Disposal. RRR responded on 13-10-11.	Canadian Environmental Assessment Agency, Environment Canada, Ministry of the Environment, Rainy River Resources	EC understands that the Proponent has undertaken consultations with Aboriginal groups and that they have not identified any traditional land uses within or adjacent to the project site. There is very little discussion provided on the consultations undertaken by the Proponent. Consideration of Aboriginal concerns with respect to the proposed mine waste disposal options, including the identification of relevant Traditional Knowledge should be incorporated into the alternatives assessment. Details on the Proponent's consultations with affected stakeholders and Aboriginal groups are necessary to demonstrate that the Proponent has undertaken a	A detailed record of consultation, discussions and meetings with Aboriginal groups and the general public related to the Rainy River Project (RRP) is included as Appendix D in the Final EA Report. The Draft EA Report (Ver. 1) was issued to Aboriginal groups in May 2013 in order to allow sufficient time for comment. A subsequent independent technical review has not indicated problems with the storage locations. While a copy of the Assessment of Alternatives for Mine Waste Disposal was not available at that time, the Draft EA Report did include a comprehensive discussion of mineral waste alternatives in Section 4 of the report. RRR and our consultant will provide a copy

Table D-2d: Comments and Responses - Federal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
						thorough assessment of mine waste disposal options. EC requests that the Proponent provide more discussion on Aboriginal consultation activities, including any comments or perceptions on the project and in particular, any comments related to the alternatives for mine waste disposal.	of the extracted comments received related to mineral waste management and alternatives on behalf of the Aboriginal groups on the draft EA Report along with the Rainy River Resources (RRR) response. A summary will also be provided of all comments received prior to the Draft EA Report issuance from Aboriginal groups on these aspects. The intent is that the final document will be appended to the Final Environmental Assessment Report in October as a supporting document to the overall report. Further detail will be provided in the Final Report.
Tailing Impoundment	718	E-mail	10/07/2013	Environment Canada (EC) provided comments on RRP Draft Assessment of Alternatives for Mine Waste Disposal. RRR responded on 13-10-11.	Canadian Environmental Assessment Agency, Environment Canada, Ministry of the Environment, Rainy River Resources	The Proponent has stated that "Covers are more expensive and are less effective for controlling oxygen exposure". The rationale for this statement is unclear. The Proponent is requested to identify which type of covers (water cover or soil/dry cover) they are referring to and the rationale for the statement in Section 1.3.	The statement refers to engineered low permeability covers, and will be corrected in the final text.
Tailing Impoundment	718	E-mail	10/07/2013	Environment Canada (EC) provided comments on RRP Draft Assessment of Alternatives for Mine Waste Disposal. RRR responded on 13-10-11.	Canadian Environmental Assessment Agency, Environment Canada, Ministry of the Environment, Rainy River Resources	EC requests the Proponent to explain in more detail how the four screened out alternatives met the elimination criteria described in Section 3.1 (i.e., based on overlap of two disposal locations, with one alternative being preferable over the other).	Additional detail will be provided in the final document.
Tailing Impoundment	718	E-mail	10/07/2013	Environment Canada (EC) provided comments on RRP Draft Assessment of Alternatives for Mine Waste Disposal. RRR responded on 13-10-11.	Canadian Environmental Assessment Agency, Environment Canada, Ministry of the Environment, Rainy River Resources	Eight alternative tailings storage locations were identified for initial screening, with four options being screened out and four carried forward for MAA. While	A discussion of the four eliminated alternatives will be provided in the final document.

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						the locations of all the alternatives are provided in Figure 3-1 (pg. 20), no description has been given for the four alternatives that were screened out. It is important to fully characterize all alternatives equally so that the reader can clearly understand the assessments of all feasible options for the mine waste disposal. It is also important to include detailed rationale to support any decisions which result in the elimination of alternatives. EC requests that the Proponent provide details on the key characteristics and features of these four eliminated alternatives, similar to the level of information provided for the screened in alternatives (Alternatives A, B, C and D). EC also requests a detailed rationale supporting the decision to eliminate four alternatives from further consideration.	
Tailing Impoundment	718	E-mail	10/07/2013	Environment Canada (EC) provided comments on RRP Draft Assessment of Alternatives for Mine Waste Disposal. RRR responded on 13-10-11.	Canadian Environmental Assessment Agency, Environment Canada, Ministry of the Environment, Rainy River Resources	A greater level of detail is needed for the proposed alternatives for consideration for tailings storage. It is important to fully characterize all alternatives equally with sufficient detail so that the reader can clearly understand the assessments of all feasible options for the mine waste disposal. The Proponent is requested to provide more details for each of the proposed alternatives for consideration for tailings storage (such as the number of dams required to	Additional information on the proposed alternatives will be included in the final document.

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Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
						contain tailings in the alternatives, total length of the dams, individual dam heights, number of seepage collection and water management ponds associated with the alternatives etc.).	
Tailing Impoundment	718	E-mail	10/07/2013	Environment Canada (EC) provided comments on RRP Draft Assessment of Alternatives for Mine Waste Disposal. RRR responded on 13-10-11.	Canadian Environmental Assessment Agency, Environment Canada, Ministry of the Environment, Rainy River Resources	The Proponent is requested to clarify if they consider the combination of in-pit and underground tailings disposal with the disposal of tailings in the TMA, when they screened out alternative H based on lack of adequate storage capacity to hold the tailings	In-pit and/or underground tailings disposal were not considered as viable standalone options for tailings disposal as these alternatives are not available for storage until late in the mine life. For the same reason, they are not considered as a significant source of supplementary storage to conventional tailings deposition during the operations phase, as deposition into an active pit is not practical, and the underground storage capacity is less than 3% of the total (Section 3.4). Should there be available storage capacity at a later, as yet undefined, point in the operations phase, consideration will be given to the viability of either in-pit or underground storage of tailings.
Waste Rock Piles	718	E-mail	10/07/2013	Environment Canada (EC) provided comments on RRP Draft Assessment of Alternatives for Mine Waste Disposal. RRR responded on 13-10-11.	Canadian Environmental Assessment Agency, Environment Canada, Ministry of the Environment, Rainy River Resources	The Proponent has provided two figures showing the locations of the tailings management area location alternatives (Fig. 3-1; pg. 20) and mine rock stockpile location alternatives (Fig. 7-1; pg. 44). However, a figure(s) with a greater level of detail for the preferred alternative choice(s) is/are also requested. A figure(s) is needed which shows the locations of the Proponent's	The requested figures will be provided in the final document.

Table D-2d: Comments and Responses - Federal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
						preferred alternatives for tailings and mine rock disposal. This figure(s) should also provide more detail on the features/components of the TMA and mine rock stockpiles so that EC has a better understanding of the proposed water management for the site(s). The Proponent is requested to provide two separate (or a combined figure) showing the location and layout of the preferred choice of location of tailings management area (TMA) and the mine rock stockpiles. This figure(s) should clearly show the different features/ components of the TMA and the mine rock stockpiles (these include any dams/embankments, seepage collection and management systems, upstream and downstream watercourses and other water treatment and management features).	
Waste Rock Piles	718	E-mail	10/07/2013	Environment Canada (EC) provided comments on RRP Draft Assessment of Alternatives for Mine Waste Disposal. RRR responded on 13-10-11.	Canadian Environmental Assessment Agency, Environment Canada, Ministry of the Environment, Rainy River Resources	The Proponent has characterized about 50% of mine rock and most of the tailings as potentially acid generating (PAG). The Proponent has not indicated if co-disposal of all PAG tailings and waste rock at one location was also considered as an alternative. Co-disposal of all PAG tailings and waste rock should be considered as an alternative as it may result in a smaller environmental impact than separate disposal locations. EC requests clarification from the Proponent on whether co-	A discussion of co-disposal of mine rock and tailings will be included in the final document.

Table D-2d: Comments and Responses - Federal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
						disposal of all PAG tailings and waste rock at one location was considered as an alternative. If co-disposal was not considered as an alternative, please provide the rationale.	
Waste Rock Piles	718	E-mail	10/07/2013	Environment Canada (EC) provided comments on RRP Draft Assessment of Alternatives for Mine Waste Disposal. RRR responded on 13-10-11.	Canadian Environmental Assessment Agency, Environment Canada, Ministry of the Environment, Rainy River Resources	The Proponent has considered relevant sub-accounts and indicators in the alternatives characterization for tailings management area (Table 4-1; pg. 23) and mine rock storage area (Table 8-1; pg. 47). However, there is no description of the sub-accounts and indicators provided in the text. The rationale for the selection of the sub-accounts and indicators is an important component in demonstrating that the Proponent has assessed the proposed options by considering the environmental, socio-economic, technical and economic factors relevant to each option. Without this information it is difficult for reviewers to assess the work completed by the Proponent in developing the multiple accounts analysis (MAA). The Proponent is requested to provide in the main text a description of the sub-accounts and indicators for used for the Tailings and Mine Rock/ Overburden multiple accounts analyses.	A description of the sub-accounts and indicators used in the multiple accounts analyses will be included in the final document.
Waste Rock Piles	718	E-mail	10/07/2013	Environment Canada (EC) provided comments on RRP Draft Assessment of Alternatives for Mine Waste Disposal. RRR responded on 13-10-11.	Canadian Environmental Assessment Agency, Environment Canada, Ministry of the Environment, Rainy River Resources	The MAA undertaken by the Proponent for the mine rock storage alternatives assessment has resulted in two locations (Alternative C and E) being selected as the preferred	The discussion of the two preferred locations for mine rock disposal will be amended in the final document to provide additional information, such as that presented in the draft

Table D-2d: Comments and Responses - Federal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
						<p>locations for the mine rock stockpiles. There is little detail provided on the two mine rock storage piles. The two preferred locations for mine rock storage piles and their intended uses should be fully described so that the rationale for their selection may be understood by third party reviewers. EC requests that the Proponent provide more detailed description of the preferred alternatives, indicating that: 1) Alternative C is being proposed for the storage/disposal of PAG mine rock and ore; and 2) Alternative E is proposed for storage/disposal of Non-PAG mine rock and overburden.</p>	<p>Environmental Assessment (EA) Report.</p>

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Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
Waste Rock Piles	718	E-mail	10/07/2013	Environment Canada (EC) provided comments on RRP Draft Assessment of Alternatives for Mine Waste Disposal. RRR responded on 13-10-11.	Canadian Environmental Assessment Agency, Environment Canada, Ministry of the Environment, Rainy River Resources	EC understands that the Proponent has undertaken consultations with Aboriginal groups and that they have not identified any traditional land uses within or adjacent to the project site. There is very little discussion provided on the consultations undertaken by the Proponent. Consideration of Aboriginal concerns with respect to the proposed mine waste disposal options, including the identification of relevant Traditional Knowledge should be incorporated into the alternatives assessment. Details on the Proponent's consultations with affected stakeholders and Aboriginal groups are necessary to demonstrate that the Proponent has undertaken a thorough assessment of mine waste disposal options. EC requests that the Proponent provide more discussion on Aboriginal consultation activities, including any comments or perceptions on the project and in particular, any comments related to the alternatives for mine waste disposal.	A detailed record of consultation, discussions and meetings with Aboriginal groups and the general public related to the Rainy River Project (RRP) is included as Appendix D in the Final EA Report. The Draft EA Report (Ver. 1) was issued to Aboriginal groups in May 2013 in order to allow sufficient time for comment. A subsequent independent technical review has not indicated problems with the storage locations. While a copy of the Assessment of Alternatives for Mine Waste Disposal was not available at that time, the Draft EA Report did include a comprehensive discussion of mineral waste alternatives in Section 4 of the report. RRR and our consultant will provide a copy of the extracted comments received related to mineral waste management and alternatives on behalf of the Aboriginal groups on the draft EA Report along with the Rainy River Resources (RRR) response. A summary will also be provided of all comments received prior to the Draft EA Report issuance from Aboriginal groups on these aspects. The intent is that the final document will be appended to the Final Environmental Assessment Report in October as a supporting document to the overall report. Further detail will be provided in the Final Report.
Waste Rock Piles	718	E-mail	10/07/2013	Environment Canada (EC) provided comments on RRP	Canadian Environmental Assessment Agency,	EC requests the Proponent to explain in more detail how the	Additional detail will be provided in the final document.

Table D-2d: Comments and Responses - Federal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
				Draft Assessment of Alternatives for Mine Waste Disposal. RRR responded on 13-10-11.	Environment Canada, Ministry of the Environment, Rainy River Resources	four screened out alternatives met the elimination criteria described in Section 3.1 (i.e., based on overlap of two disposal locations, with one alternative being preferable over the other).	
Waste Rock Piles	718	E-mail	10/07/2013	Environment Canada (EC) provided comments on RRP Draft Assessment of Alternatives for Mine Waste Disposal. RRR responded on 13-10-11.	Canadian Environmental Assessment Agency, Environment Canada, Ministry of the Environment, Rainy River Resources	Eight alternative tailings storage locations were identified for initial screening, with four options being screened out and four carried forward for MAA. While the locations of all the alternatives are provided in Figure 3-1 (pg. 20), no description has been given for the four alternatives that were screened out. It is important to fully characterize all alternatives equally so that the reader can clearly understand the assessments of all feasible options for the mine waste disposal. It is also important to include detailed rationale to support any decisions which result in the elimination of alternatives. EC requests that the Proponent provide details on the key characteristics and features of these four eliminated alternatives, similar to the level of information provided for the screened in alternatives (Alternatives A, B, C and D). EC also requests a detailed rationale supporting the decision to eliminate four alternatives from further consideration.	A discussion of the four eliminated alternatives will be provided in the final document.
Waste Rock Piles	718	E-mail	10/07/2013	Environment Canada (EC) provided comments on RRP Draft Assessment of Alternatives for Mine Waste Disposal. RRR	Canadian Environmental Assessment Agency, Environment Canada, Ministry of the Environment, Rainy River	Five alternative mine rock storage locations were identified for initial screening with one option, Alternative B, eliminated	A description of Alternative B will be included in the final document. RRR appreciates the editorial correction; this oversight

Table D-2d: Comments and Responses - Federal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
				responded on 13-10-11.	Resources	from further consideration due to regulatory criteria. No detailed description of Alternative B is provided. It is important to fully characterize all alternatives equally so that the reader can clearly understand the assessments of all feasible options for the mine rock storage locations. It is also important to include detailed rationale to support any decisions which result in the elimination of alternatives. EC requests that the Proponent provide a description of Alternative B similar to the level of information provided for the screened in alternatives (Alternatives A, C, D, and E) in Section 8.0. Editorial correction: The last sentence of this section incorrectly identifies the Alternatives that were carried forward for MAA – A, B, C and D rather than A, C, D and E.	will be corrected in the final document.
Water Sources	717	E-mail	10/07/2013	On 13-10-07 Environment Canada (EC) provided additional comments raised from the RRGF Draft EIS review relating to the anticipated use of the hydrometric station data. Environment Canada suggested that NewGold and EC meet in person or by teleconference to discuss a potential agreement for the long-term operation of a hydrometric station along the Pinewood River. RRR responded on 13-10-10.	Environment Canada, Rainy River Resources	What aspects of RRGF operation and site management depend upon data from the Pinewood River hydrometric station?	Pipeline flow discharge from the water management pond to the Pinewood River would require daily flow values during the spring and fall open water periods to determine allowable discharge volumes based on daily loading calculations for critical parameters.
Project Phase							
Closure	641	E-mail	08/22/2013	AMEC, on behalf of RRR, provided the Canadian	Canadian Environmental Assessment Agency,	Request for information describing how baseline surface	This information was provided in the Draft EA Report (Sections

Table D-2d: Comments and Responses - Federal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
				Environmental Assessment Agency (CEA Agency) RRR's response to Environment Canada's (EC) comments (received on 13-02-26) regarding the Conceptual Mine Closure Presentation and requested that they be forwarded to members of the government review team.	Environment Canada, AMEC Environment & Infrastructure, Rainy River Resources	and groundwater volumes and flow rates are anticipated to be altered by individual mine components (as defined in Section 6 "Scope of the Project" of the federal EIS Guidelines).	7.5, 7.6 and 7.7 Appendix S) at a sufficient level of detail to be able to understand potential environmental impacts and to develop appropriate mitigation measures and/or contingency plans. It is our intent to show how surface water and groundwater could be affected holistically by the entire RRGP development, rather than to try and separate effects to surface water and groundwater from individual mine components.
Closure	641	E-mail	08/22/2013	AMEC, on behalf of RRR, provided the Canadian Environmental Assessment Agency (CEA Agency) RRR's response to Environment Canada's (EC) comments (received on 13-02-26) regarding the Conceptual Mine Closure Presentation and requested that they be forwarded to members of the government review team.	Canadian Environmental Assessment Agency, Environment Canada, AMEC Environment & Infrastructure, Rainy River Resources	EC recommends that the mine plans be developed to include measures to control and collect seepage from the operations area for the mine and demonstrate that all effluent subject to the monitoring requirements of the MMER will be discharged through a final discharge point(s) where its quality and flow is monitored on a weekly basis.	RRR intends to control and collect seepage which has a reasonable expectation of containing potential contamination, in accordance with MMER requirements. This information was provided in the Draft EA Report (Section 7.7.3) at a sufficient level of detail to be able to understand potential environmental impacts and to develop appropriate mitigation measures and/or contingency plans. Additional detail to support the environmental approvals for the operation can be provided to Environment Canada once developed (post Final EA Report submission).
Risks and Mitigation							
Environmental Management	658	Meeting	06/07/2013	A meeting was held to discuss Species at Risk (SAR) and the RRGP. RRR provided an update on New Gold's acquisition of RRR, the status of the Environmental Assessment (EA) Report and the anticipated timeline for the Environmental	Environment Canada, Individual , Individual - GP, Ministry of Natural Resources, Ontario Ministry of Natural Resources, Trent University, AMEC Environment & Infrastructure, Rainy River Resources	Discussions related to field surveys and methodology as well as management and protection of potentially affected SAR.	Information discussed will be considered in the preparation of the Final EA Report.

Table D-2d: Comments and Responses - Federal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
				Site Assessment (ESA). Discussions also related to field surveys and methodology as well as management and protection of potentially affected SAR. The final meeting notes were distributed to participants on 13-08-22 and are considered confidential.			
Environmental Management	641	E-mail	08/22/2013	AMEC, on behalf of RRR, provided the Canadian Environmental Assessment Agency (CEA Agency) RRR's response to Environment Canada's (EC) comments (received on 13-02-26) regarding the Conceptual Mine Closure Presentation and requested that they be forwarded to members of the government review team.	Canadian Environmental Assessment Agency, Environment Canada, AMEC Environment & Infrastructure, Rainy River Resources	A description of contingency plans if there are: significant uncertainties (e.g., high variability in the data and/or predictions) concerning impacts; considerable risks associated with effluent management (e.g., a release of effluent could permanently damage a sensitive ecosystem, species or fishery); and/or, potential for impacts of the environment on the project that could lead to adverse effects (e.g., drought conditions that could compromise plans to maintain a water cover on tailings to prevent acid rock drainage).	A description of contingency measures and plans has been provided in the Draft EA Report (Sections 4 and 9) within individual topics as appropriate, including as related to malfunctions and accidents. A copy of the RRGF Contingency Response Plan will be provided with the Final EA Report.
Monitoring	717	E-mail	10/07/2013	On 13-10-07 Environment Canada (EC) provided additional comments raised from the RRGF Draft EIS review relating to the anticipated use of the hydrometric station data. Environment Canada suggested that NewGold and EC meet in person or by teleconference to discuss a potential agreement for the long-term operation of a hydrometric station along the Pinewood River. RRR responded on 13-10-10.	Environment Canada, Rainy River Resources	What aspects of RRGF operation and site management depend upon data from the Pinewood River hydrometric station?	Pipeline flow discharge from the water management pond to the Pinewood River would require daily flow values during the spring and fall open water periods to determine allowable discharge volumes based on daily loading calculations for critical parameters.
Monitoring	717	E-mail	10/07/2013	On 13-10-07 Environment Canada (EC) provided additional	Environment Canada, Rainy River Resources	Does RRR anticipate that daily water level data and flow	Yes. Preferably we would use flow data from the day before (or

Table D-2d: Comments and Responses - Federal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
				comments raised from the RRGP Draft EIS review relating to the anticipated use of the hydrometric station data. Environment Canada suggested that NewGold and EC meet in person or by teleconference to discuss a potential agreement for the long-term operation of a hydrometric station along the Pinewood River. RRR responded on 13-10-10.		estimates will be used to govern effluent discharge rates for the RRGP in near-real time?	two days before) to calculate allowable loadings on any given day.
Monitoring	717	E-mail	10/07/2013	On 13-10-07 Environment Canada (EC) provided additional comments raised from the RRGP Draft EIS review relating to the anticipated use of the hydrometric station data. Environment Canada suggested that NewGold and EC meet in person or by teleconference to discuss a potential agreement for the long-term operation of a hydrometric station along the Pinewood River. RRR responded on 13-10-10.	Environment Canada, Rainy River Resources	EC suggested a meeting to discuss a potential agreement for the long-term operation of a hydrometric station along the Pinewood River.	This is a very good idea and we would appreciate the opportunity to discuss at your convenience, as this will be a critical item for the RRP.
Waste Management	718	E-mail	10/07/2013	Environment Canada (EC) provided comments on RRP Draft Assessment of Alternatives for Mine Waste Disposal. RRR responded on 13-10-11.	Canadian Environmental Assessment Agency, Environment Canada, Ministry of the Environment, Rainy River Resources	The Proponent has provided two figures showing the locations of the tailings management area location alternatives (Fig. 3-1; pg. 20) and mine rock stockpile location alternatives (Fig. 7-1; pg. 44). However, a figure(s) with a greater level of detail for the preferred alternative choice(s) is/are also requested. A figure(s) is needed which shows the locations of the Proponent's preferred alternatives for tailings and mine rock disposal. This figure(s) should also provide	The requested figures will be provided in the final document.

Table D-2d: Comments and Responses - Federal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
						more detail on the features/components of the TMA and mine rock stockpiles so that EC has a better understanding of the proposed water management for the site(s). The Proponent is requested to provide two separate (or a combined figure) showing the location and layout of the preferred choice of location of tailings management area (TMA) and the mine rock stockpiles. This figure(s) should clearly show the different features/ components of the TMA and the mine rock stockpiles (these include any dams/embankments, seepage collection and management systems, upstream and downstream watercourses and other water treatment and management features).	
Waste Management	718	E-mail	10/07/2013	Environment Canada (EC) provided comments on RRP Draft Assessment of Alternatives for Mine Waste Disposal. RRR responded on 13-10-11.	Canadian Environmental Assessment Agency, Environment Canada, Ministry of the Environment, Rainy River Resources	The Proponent has characterized about 50% of mine rock and most of the tailings as potentially acid generating (PAG). The Proponent has not indicated if co-disposal of all PAG tailings and waste rock at one location was also considered as an alternative. Co-disposal of all PAG tailings and waste rock should be considered as an alternative as it may result in a smaller environmental impact than separate disposal locations. EC requests clarification from the Proponent on whether co-disposal of all PAG tailings and	A discussion of co-disposal of mine rock and tailings will be included in the final document.

Table D-2d: Comments and Responses - Federal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
						waste rock at one location was considered as an alternative. If co-disposal was not considered as an alternative, please provide the rationale.	
Waste Management	718	E-mail	10/07/2013	Environment Canada (EC) provided comments on RRP Draft Assessment of Alternatives for Mine Waste Disposal. RRR responded on 13-10-11.	Canadian Environmental Assessment Agency, Environment Canada, Ministry of the Environment, Rainy River Resources	The Proponent has considered relevant sub-accounts and indicators in the alternatives characterization for tailings management area (Table 4-1; pg. 23) and mine rock storage area (Table 8-1; pg. 47). However, there is no description of the sub-accounts and indicators provided in the text. The rationale for the selection of the sub-accounts and indicators is an important component in demonstrating that the Proponent has assessed the proposed options by considering the environmental, socio-economic, technical and economic factors relevant to each option. Without this information it is difficult for reviewers to assess the work completed by the Proponent in developing the multiple accounts analysis (MAA). The Proponent is requested to provide in the main text a description of the sub-accounts and indicators for used for the Tailings and Mine Rock/ Overburden multiple accounts analyses.	A description of the sub-accounts and indicators used in the multiple accounts analyses will be included in the final document.
Waste Management	718	E-mail	10/07/2013	Environment Canada (EC) provided comments on RRP Draft Assessment of Alternatives for Mine Waste Disposal. RRR responded on 13-10-11.	Canadian Environmental Assessment Agency, Environment Canada, Ministry of the Environment, Rainy River Resources	The MAA undertaken by the Proponent for the mine rock storage alternatives assessment has resulted in two locations (Alternative C and E) being selected as the preferred locations for the mine rock	The discussion of the two preferred locations for mine rock disposal will be amended in the final document to provide additional information, such as that presented in the draft Environmental Assessment (EA)

Table D-2d: Comments and Responses - Federal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
						stockpiles. There is little detail provided on the two mine rock storage piles. The two preferred locations for mine rock storage piles and their intended uses should be fully described so that the rationale for their selection may be understood by third party reviewers. EC requests that the Proponent provide more detailed description of the preferred alternatives, indicating that: 1) Alternative C is being proposed for the storage/disposal of PAG mine rock and ore; and 2) Alternative E is proposed for storage/disposal of Non-PAG mine rock and overburden.	Report.
Waste Management	718	E-mail	10/07/2013	Environment Canada (EC) provided comments on RRP Draft Assessment of Alternatives for Mine Waste Disposal. RRR responded on 13-10-11.	Canadian Environmental Assessment Agency, Environment Canada, Ministry of the Environment, Rainy River Resources	EC requests that the environmental sub-accounts be expanded to enhance the MAA and improve the Alternatives Assessment document. Enhancing the MAA and the Alternatives Assessment document through the expansion of environmental sub-accounts will help fulfil the purpose of this assessment of alternatives, which is to objectively and rigorously assess all feasible options for mine waste disposal. EC requests that the environmental sub-accounts be expanded to enhance the MAA and improve the Alternatives Assessment document. The Proponent should consider proposing additional indicators such as impacts to water quality, impacts to terrestrial species, and number of fish bearing water	Thank you for your comment. The tables will be reviewed and expanded / amended as appropriate.

Table D-2d: Comments and Responses - Federal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
						bodies impacted.	
Waste Management	718	E-mail	10/07/2013	Environment Canada (EC) provided comments on RRP Draft Assessment of Alternatives for Mine Waste Disposal. RRR responded on 13-10-11.	Canadian Environmental Assessment Agency, Environment Canada, Ministry of the Environment, Rainy River Resources	Eight alternative tailings storage locations were identified for initial screening, with four options being screened out and four carried forward for MAA. While the locations of all the alternatives are provided in Figure 3-1 (pg. 20), no description has been given for the four alternatives that were screened out. It is important to fully characterize all alternatives equally so that the reader can clearly understand the assessments of all feasible options for the mine waste disposal. It is also important to include detailed rationale to support any decisions which result in the elimination of alternatives. EC requests that the Proponent provide details on the key characteristics and features of these four eliminated alternatives, similar to the level of information provided for the screened in alternatives (Alternatives A, B, C and D). EC also requests a detailed rationale supporting the decision to eliminate four alternatives from further consideration.	A discussion of the four eliminated alternatives will be provided in the final document.
Waste Management	718	E-mail	10/07/2013	Environment Canada (EC) provided comments on RRP Draft Assessment of Alternatives for Mine Waste Disposal. RRR responded on 13-10-11.	Canadian Environmental Assessment Agency, Environment Canada, Ministry of the Environment, Rainy River Resources	A greater level of detail is needed for the proposed alternatives for consideration for tailings storage. It is important to fully characterize all alternatives equally with sufficient detail so that the reader can clearly understand the assessments of all feasible options for the mine	Additional information on the proposed alternatives will be included in the final document.

Table D-2d: Comments and Responses - Federal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
						waste disposal. The Proponent is requested to provide more details for each of the proposed alternatives for consideration for tailings storage (such as the number of dams required to contain tailings in the alternatives, total length of the dams, individual dam heights, number of seepage collection and water management ponds associated with the alternatives etc.).	
Waste Management	718	E-mail	10/07/2013	Environment Canada (EC) provided comments on RRP Draft Assessment of Alternatives for Mine Waste Disposal. RRR responded on 13-10-11.	Canadian Environmental Assessment Agency, Environment Canada, Ministry of the Environment, Rainy River Resources	The Proponent states that Aboriginal groups have expressed “a desire to protect the local and regional environments”. Concerns raised by Aboriginal groups do not appear to be reflected in the MAA. Consultation with Aboriginal groups is an important part of the alternatives assessment process. Any concerns raised by Aboriginal groups should be reflected in the sub-accounts and indicators for the MAA. EC suggests that the Proponent add ‘Aboriginal and Public Perception/ Opinion’ as a sub-account under the ‘Socio-economic Account’, with additional indicators to rank the opinions of the Aboriginal groups and the public.	Further detail will be provided regarding consultation activities to date related to mineral waste management in the final document. No specific comments on mine waste alternatives have been received to date which would justify inclusion of a subaccount of ‘Aboriginal and Public Perception/ Opinion’; i.e., there is nothing to differentiate the various alternatives, as per section 2.5.1 of the EC Guidelines for the Assessment of Alternatives for Mine Waste Disposal, and the inclusion of this sub-account would have no impact on the final assessment.
Waste Management	718	E-mail	10/07/2013	Environment Canada (EC) provided comments on RRP Draft Assessment of Alternatives for Mine Waste Disposal. RRR responded on 13-10-11.	Canadian Environmental Assessment Agency, Environment Canada, Ministry of the Environment, Rainy River Resources	Five alternative mine rock storage locations were identified for initial screening with one option, Alternative B, eliminated from further consideration due to regulatory criteria. No detailed description of Alternative B is	A description of Alternative B will be included in the final document. RRR appreciates the editorial correction; this oversight will be corrected in the final document.

Table D-2d: Comments and Responses - Federal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
						provided. It is important to fully characterize all alternatives equally so that the reader can clearly understand the assessments of all feasible options for the mine rock storage locations. It is also important to include detailed rationale to support any decisions which result in the elimination of alternatives. EC requests that the Proponent provide a description of Alternative B similar to the level of information provided for the screened in alternatives (Alternatives A, C, D, and E) in Section 8.0. Editorial correction: The last sentence of this section incorrectly identifies the Alternatives that were carried forward for MAA – A, B, C and D rather than A, C, D and E.	
Waste Management	718	E-mail	10/07/2013	Environment Canada (EC) provided comments on RRP Draft Assessment of Alternatives for Mine Waste Disposal. RRR responded on 13-10-11.	Canadian Environmental Assessment Agency, Environment Canada, Ministry of the Environment, Rainy River Resources	The Proponent has eliminated Alternative B, located south of the open pit, from further consideration using pre-screening criterion "is this the most suitable alternative in the vicinity of the impoundment location?" A brief explanation is provided as a footnote to Table 7-1, which states that "Alternative B cannot meet Ministry of the Environment sound quality guidelines, and therefore cannot be approved under any possible scenario." The pre-screening criterion that was applied to Alternative B and the explanation provided for its elimination from further consideration is not clear. The	Alternative B is located adjacent to the neighbours located in Black Hawk. Sound modelling indicates that under any usage scenario, sound levels from regular ongoing operations will exceed Ministry of the Environment Sound Quality Guidelines. As a result, this alternative would be unable to receive provincial approval for operation, considered to be a fatal flaw, regardless of its performance in a multiple accounts analysis. For this reason, it was eliminated from any further consideration.

Table D-2d: Comments and Responses - Federal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
						Proponent is requested to clarify the supporting rationale for the elimination of Alternative B.	

Table D-2d: Comments and Responses - Provincial Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
Biophysical Environment							
Fisheries and Aquatic Resources	620	E-mail	09/10/2013	The Ministry of Natural Resources (MNR) sent the reviews for the Draft Fish Habitat Offset Strategy, the Draft Fish Habitat No Net Loss Plan (NNLP) as well as the 2013 Winter Aerial Mammal Survey to RRR. RRR responded on 13-09-10.	Ministry of Natural Resources, AMEC Environment & Infrastructure, Rainy River Resources	Consistent with RRR's response to MNR comments on the Rainy River Gold Project 2012 Aquatic Resources Baseline Report, the following statement in Section 1.0 Purpose – "The creeks and streams that are present in the local area do not support a commercial or recreational fishery" should be replaced with "while limited bait fishing does occur with certain project area streams, the area does not support a significant commercial or recreational fishery"	Text will be replaced in the Fish Habitat Offset Strategy to read: "while limited bait fishing does occur with certain project area streams, the area does not support a significant commercial or recreational fishery"
Fisheries and Aquatic Resources	620	E-mail	09/10/2013	The Ministry of Natural Resources (MNR) sent the reviews for the Draft Fish Habitat Offset Strategy, the Draft Fish Habitat No Net Loss Plan (NNLP) as well as the 2013 Winter Aerial Mammal Survey to RRR. RRR responded on 13-09-10.	Ministry of Natural Resources, AMEC Environment & Infrastructure, Rainy River Resources	Section 3.0 Environmental Effects: It is our preference that the term 'loss' be used over 'displacement' as it is a clearer and more transparent description of impacts to fish habitat.	The term loss will be used as applicable.
Fisheries and Aquatic Resources	620	E-mail	09/10/2013	The Ministry of Natural Resources (MNR) sent the reviews for the Draft Fish Habitat Offset Strategy, the Draft Fish Habitat No Net Loss Plan (NNLP) as well as the 2013 Winter Aerial Mammal Survey to RRR. RRR responded on 13-09-10.	Ministry of Natural Resources, AMEC Environment & Infrastructure, Rainy River Resources	Section 3.0 Environmental Effects – Flow Reduction (Pinewood River): First paragraph of this section discusses Pinewood River flow downstream of McCallum Creek while the second discusses flows at the junction of Loslo Creek and the Pinewood River. Two reviewers found this organization of flow predictions confusing. In the third paragraph, it is unclear whether the effluent discharge immediately downstream of McCallum Creek is accounted for the flow reduction prediction at this location.	Flow reductions have been presented to describe potential flow loss at the immediate Project site (at Loslo Creek) and at the junction of McCallum Creek, which has a considerable contribution to the Pinewood watershed area. Given the large contribution of McCallum Creek to the system, the intent is to discharge the mine effluent downstream of the McCallum Creek inflow. The flow discussion in the next revision of this document will be restructured to clearly describe the flow reductions at each location and how the effluent discharge has

Table D-2d: Comments and Responses - Provincial Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
							been included in the prediction.
Fisheries and Aquatic Resources	620	E-mail	09/10/2013	The Ministry of Natural Resources (MNR) sent the reviews for the Draft Fish Habitat Offset Strategy, the Draft Fish Habitat No Net Loss Plan (NNLP) as well as the 2013 Winter Aerial Mammal Survey to RRR. RRR responded on 13-09-10.	Ministry of Natural Resources, AMEC Environment & Infrastructure, Rainy River Resources	Given recent confirmation that mature lake sturgeon use the Pinewood River, the MNR requires predicted flow reductions in the lower reaches of the watershed (e.g., at the junction of the Kishkakoosis River and Pinewood River) be identified in this report.	Additional estimates of flow reductions at major tributary inflows such as the Kishkakoosis River will be provided in the next revision of this report.
Fisheries and Aquatic Resources	620	E-mail	09/10/2013	The Ministry of Natural Resources (MNR) sent the reviews for the Draft Fish Habitat Offset Strategy, the Draft Fish Habitat No Net Loss Plan (NNLP) as well as the 2013 Winter Aerial Mammal Survey to RRR. RRR responded on 13-09-10.	Ministry of Natural Resources, AMEC Environment & Infrastructure, Rainy River Resources	Lake Sturgeon should be added to Table 2: Fish Species Present in Affected Waterbodies	Lake Sturgeon will be added to Table 2, along with a clarifying footnote, drafted in consultation with Ministry of Natural Resources (MNR) that provides context as to the extent of Sturgeon within the Pinewood River.
Fisheries and Aquatic Resources	620	E-mail	09/10/2013	The Ministry of Natural Resources (MNR) sent the reviews for the Draft Fish Habitat Offset Strategy, the Draft Fish Habitat No Net Loss Plan (NNLP) as well as the 2013 Winter Aerial Mammal Survey to RRR. RRR responded on 13-09-10.	Ministry of Natural Resources, AMEC Environment & Infrastructure, Rainy River Resources	Figure 3: The reason for including '(Clark and West Creeks)' within the contents of the box titled 'Offset Impacts with 'Like for Like' Compensatory Offsets' should be clarified.	Although the impacts to Clark Creek and West Creek are generally associated with Section 35 of the Fisheries Act (habitat provisions), the realigned and impounded sections of these creeks will be directed as compensation for the losses associated with the Schedule 2 waterbodies. The reason for this, as discussed with Fisheries and Oceans Canada (DFO), is that the realigned and impounded habitats fit well with the Metal Mining Effluent Regulation (MMER), No Net Loss Plan (NNLP) habitat compensation requirements in terms of the amount and type of habitat created. Figure 3 will be revised in the next version to clearly differentiate between habitats that are affected and the habitats used as compensation.

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Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
Fisheries and Aquatic Resources	620	E-mail	09/10/2013	The Ministry of Natural Resources (MNR) sent the reviews for the Draft Fish Habitat Offset Strategy, the Draft Fish Habitat No Net Loss Plan (NNLP) as well as the 2013 Winter Aerial Mammal Survey to RRR. RRR responded on 13-09-10.	Ministry of Natural Resources, AMEC Environment & Infrastructure, Rainy River Resources	MNR understands and accepts the reasons for pursuing both 'like for like' habitat compensation and alternative offset strategies. We continue to support plans to rehabilitate degraded stream habitats in the Pinewood River watershed.	The Project team is continuing to have discussions with DFO to confirm that the alternative offset strategies are acceptable and consistent with developing DFO offset policy.
Fisheries and Aquatic Resources	620	E-mail	09/10/2013	The Ministry of Natural Resources (MNR) sent the reviews for the Draft Fish Habitat Offset Strategy, the Draft Fish Habitat No Net Loss Plan (NNLP) as well as the 2013 Winter Aerial Mammal Survey to RRR. RRR responded on 13-09-10.	Ministry of Natural Resources, AMEC Environment & Infrastructure, Rainy River Resources	The planned average and maximum depths of West Creek Pond and Clark Creek Pond should be identified in the report.	Further design details including mean and maximum depths will be provided in drawings in a subsequent version of this document.
Fisheries and Aquatic Resources	620	E-mail	09/10/2013	The Ministry of Natural Resources (MNR) sent the reviews for the Draft Fish Habitat Offset Strategy, the Draft Fish Habitat No Net Loss Plan (NNLP) as well as the 2013 Winter Aerial Mammal Survey to RRR. RRR responded on 13-09-10.	Ministry of Natural Resources, AMEC Environment & Infrastructure, Rainy River Resources	It would be helpful if total area of habitat types 3, 4 and 5 overprinted are identified in the report.	A summary table indicating the Weighted Usable Area of habitat types 3, 4 and 5 that are proposed to be overprinted will be included in future versions of this report.
Fisheries and Aquatic Resources	620	E-mail	09/10/2013	The Ministry of Natural Resources (MNR) sent the reviews for the Draft Fish Habitat Offset Strategy, the Draft Fish Habitat No Net Loss Plan (NNLP) as well as the 2013 Winter Aerial Mammal Survey to RRR. RRR responded on 13-09-10.	Ministry of Natural Resources, AMEC Environment & Infrastructure, Rainy River Resources	We note habitat Types 3, 4 and 5 are overprinted by mine components and the offset habitat consists of a relatively larger proportion of habitat Type 5. Further rationale for considering large impoundments greater than 11 ha in area as Type 5 habitat, described as ponds 10-50 m wide, would be of value.	The larger impoundments will provide greater surface areas with ample in-water cover opportunities and greater depths. As such it is expected that the majority of species would be provided with an increase in habitat suitability by such features, most especially with respect to overwintering opportunities. The assumption of these features providing a habitat suitability value similar to that of type 5 habitat was made in a conservative fashion so as not to overestimate the potential WUA that may be constructed.

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Fisheries and Aquatic Resources	620	E-mail	09/10/2013	The Ministry of Natural Resources (MNR) sent the reviews for the Draft Fish Habitat Offset Strategy, the Draft Fish Habitat No Net Loss Plan (NNLP) as well as the 2013 Winter Aerial Mammal Survey to RRR. RRR responded on 13-09-10.	Ministry of Natural Resources, AMEC Environment & Infrastructure, Rainy River Resources	Recognizing the expected changes in habitat types as described in the bullet above, the report could elaborate on the predicted changes to fish community composition and population sizes within the local study area.	A discussion of potential changes to fish community and/or population sizes (survival) will be included in subsequent versions of this document.
Fisheries and Aquatic Resources	620	E-mail	09/10/2013	The Ministry of Natural Resources (MNR) sent the reviews for the Draft Fish Habitat Offset Strategy, the Draft Fish Habitat No Net Loss Plan (NNLP) as well as the 2013 Winter Aerial Mammal Survey to RRR. RRR responded on 13-09-10.	Ministry of Natural Resources, AMEC Environment & Infrastructure, Rainy River Resources	Section 6.0 Measures to Mitigate Impacts to Fish Habitat during Implementation of the Plan: We expect a stronger commitment to avoid direct impacts to fish during the mine construction phase. A description of fish-out protocols and a fish relocation strategy should be included. We also suggest that minimum vegetation buffers (no clear zones) along water bodies be specified and details of when and where specific erosion control measures will be applied.	Further detail with respect to mitigation during implementation of the plan will be provided in subsequent version of the document.
Fisheries and Aquatic Resources	620	E-mail	09/10/2013	The Ministry of Natural Resources (MNR) sent the reviews for the Draft Fish Habitat Offset Strategy, the Draft Fish Habitat No Net Loss Plan (NNLP) as well as the 2013 Winter Aerial Mammal Survey to RRR. RRR responded on 13-09-10.	Ministry of Natural Resources, AMEC Environment & Infrastructure, Rainy River Resources	A description of measures to be taken, if any, to prevent blockage (beaver damming) of fish migration and dispersal routes throughout West Creek and Clark Creek diversion channels should be provided.	We see beaver as an integral component of the flow regimes in small local tributaries and do not propose any long term beaver management along the reconstructed channels. However, there may be a need to manage beaver activity in areas such as the constructed outlets from the impoundments, or in the channels to promote stabilization and maintain channel capacity during life of the mine. In the case of both West Creek and Clark Creek, we anticipate that small bodied fish colonization opportunities will exist from the upstream reaches of the watercourse, and that despite

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Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
							beaver activity, fish will be able to migrate upstream from the lower tributaries and the Pinewood River.
Fisheries and Aquatic Resources	620	E-mail	09/10/2013	The Ministry of Natural Resources (MNR) sent the reviews for the Draft Fish Habitat Offset Strategy, the Draft Fish Habitat No Net Loss Plan (NNLP) as well as the 2013 Winter Aerial Mammal Survey to RRR. RRR responded on 13-09-10.	Ministry of Natural Resources, AMEC Environment & Infrastructure, Rainy River Resources	While not specifically a requirement of the Fisheries Act, the MNR suggests that Rainy River Resources consider access to and use of offset habitats by local baitfish harvesters.	To ensure the safety of the public and its workers, RRR would take a consistent approach to all lands within the Project work area.
Wildlife	467	Meeting	11/15/2012	RRR met with the Ministry of Natural Resources (MNR) where AMEC gave a presentation on RRGP considerations for compensation package for Whip-poor-will ESA permitting. Minutes of Species at Risk working group meetings have been requested by the MNR to be kept confidential.	Ministry of Natural Resources, Trent University, AMEC Environment & Infrastructure, Rainy River Resources	MNR provided feedback on the RRGP considerations for compensation package for Whip-poor-will ESA permitting. There was general agreement that RRR was making progress on an approach to a SAR permit, but that there were still a number of aspects to sort out. MNR stated that the RRR proposal was a good start and conceptually aligns with previous discussions.	Information discussed will be considered in the preparation of the final EA Report.
Wildlife	658	Meeting	06/07/2013	A meeting was held to discuss Species at Risk (SAR) and the RRGP. RRR provided an update on New Gold's acquisition of RRR, the status of the Environmental Assessment (EA) Report and the anticipated timeline for the Environmental Site Assessment (ESA). Discussions also related to field surveys and methodology as well as management and protection of potentially affected SAR. The final meeting notes were distributed to participants on 13-08-22 and are considered confidential.	Environment Canada, Individual , Individual - GP, Ministry of Natural Resources, Ontario Ministry of Natural Resources, Trent University, AMEC Environment & Infrastructure, Rainy River Resources	Discussions related to field surveys and methodology as well as management and protection of potentially affected SAR.	Information discussed will be considered in the preparation of the final EA Report.

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Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
Wildlife	659	Meeting	06/25/2013	RRR and its consultants met with the Ministry of Natural Resources (MNR) to discuss Species at Risk (SAR) and the RRGP. The meeting focused on ongoing field surveys and survey methodology as well as management and protection of potentially affected SAR. The final meeting notes were distributed to participants on 13-08-22 and are considered confidential.	Ministry of Natural Resources, AMEC Environment & Infrastructure, Rainy River Resources	The meeting focused on ongoing field surveys and survey methodology as well as management and protection of potentially affected SAR. The final meeting notes were distributed to participants on 13-08-22 and are considered confidential.	Information discussed will be considered in the preparation of the Final EA Report.
Document Reviews							
Other	604	E-mail	05/08/2013	The CEA Agency forwarded comments on several RRGP baseline reports on behalf of the Department of Fisheries and Oceans (DFO), Environment Canada (EC), Health Canada (HC), and Ministry of Natural Resources (MNR). Responses were provided to the CEA Agency on 13-06-13.	Canadian Environmental Assessment Agency, Ontario Ministry of Environment, Ontario Ministry of Northern Development and Mines, AMEC Environment & Infrastructure, Rainy River Resources	The comments provided by DFO, EC, HC and MNR were related to the following baseline reports: B15 Climate, Air and Sound Baseline; B16 RRGP 2012 Aquatics Baseline Report; and B8 AMEC Winter Low Flow 2012.	A request was made to the CEA Agency to forward the submitted responses to the appropriate individuals within the Government agencies on behalf of RRR.
Draft EA	666	E-mail	08/29/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGP Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of MOE's Water Unit. Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-26. RRR responded to questions related to groundwater on 13-10-04.	Canadian Environmental Assessment Agency, Ministry of the Environment, Ontario Ministry of Northern Development and Mines, AMEC Environment & Infrastructure, Rainy River Resources	Comments provided by MOE can be found in Appendix D of the Final EA Report.	Formal responses to all written comments received during the consultation on the Draft EA Report (Ver. 2) can be found in Appendix D of the Final EA Report. All comments will be considered in the preparation of the Final EA Report.
Draft EA	668	E-mail	09/03/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGP Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of the	Canadian Environmental Assessment Agency, Ministry of the Environment, Ontario Ministry of Economic Development and Innovation, Ontario Ministry of	Comments provided by MEDTE can be found in Appendix D of the Final EA Report.	Formal responses to all written comments received during the consultation on the Draft EA Report (Ver. 2) can be found in Appendix D of the Final EA

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Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
				Ministry of Economic Development, Trade and Employment (MEDTE). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-18. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE.	Northern Development and Mines, AMEC Environment & Infrastructure, Rainy River Resources		Report. All comments will be considered in the preparation of the Final EA Report.
Draft EA	669	E-mail	09/03/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGD Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of the Ministry of Northern Development and Mines (MNDM). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-18. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE.	Canadian Environmental Assessment Agency, Ministry of the Environment, Ontario Ministry of Northern Development and Mines, AMEC Environment & Infrastructure, Rainy River Resources	Comments provided by MNDM can be found in Appendix D of the Final EA Report.	Formal responses to all written comments received during the consultation on the Draft EA Report (Ver. 2) can be found in Appendix D of the Final EA Report. All comments will be considered in the preparation of the Final EA Report.
Draft EA	670	E-mail	09/03/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGD Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of MOE's Air and Noise Unit. Responses to comments were provided to the Ministry of the	Canadian Environmental Assessment Agency, Ministry of the Environment, Ontario Ministry of Environment, Ontario Ministry of Northern Development and Mines, AMEC Environment & Infrastructure, Rainy River Resources	Comments provided by MOE can be found in Appendix D of the Final EA Report.	Formal responses to all written comments received during the consultation on the Draft EA Report (Ver. 2) can be found in Appendix D of the Final EA Report. All comments will be considered in the preparation of the Final EA Report.

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Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
				Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-18. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE.			
Draft EA	671	E-mail	09/03/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGD Draft Environmental Assessment (EA) Report (Ver. 2) related to surface water. Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-26.	Canadian Environmental Assessment Agency, Ministry of the Environment, Ontario Ministry of Environment, Ontario Ministry of Northern Development and Mines, AMEC Environment & Infrastructure, Rainy River Resources	Comments provided by MOE can be found in Appendix D of the Final EA Report.	Formal responses to all written comments received during the consultation on the Draft EA Report (Ver. 2) can be found in Appendix D of the Final EA Report. All comments will be considered in the preparation of the Final EA Report.
Draft EA	672	E-mail	09/03/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGD Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of the Ministry of Tourism, Culture and Sport (MTCS). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-26.	Canadian Environmental Assessment Agency, Ministry of the Environment, Ministry of Tourism and Culture, Ontario Ministry of Northern Development and Mines, AMEC Environment & Infrastructure, Rainy River Resources	Comments provided by MTCS can be found in Appendix D of the Final EA Report.	Formal responses to all written comments received during the consultation on the Draft EA Report (Ver. 2) can be found in Appendix D of the Final EA Report. All comments will be considered in the preparation of the Final EA Report.
Draft EA	673	E-mail	09/03/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGD Draft EA Report (Ver. 2) on behalf of the Ministry of Agriculture, Food and Rural Affairs (OMAFRA). Responses to comments were provided to the Ministry of the	Canadian Environmental Assessment Agency, Ministry of Agriculture, Food and Rural Affairs, Ministry of the Environment, Ontario Ministry of Northern Development and Mines, AMEC Environment & Infrastructure, Rainy River	Comments provided by OMAFRA can be found in Appendix D of the Final EA Report.	Formal responses to all written comments received during the consultation on the Draft EA Report (Ver. 2) can be found in Appendix D of the Final EA Report. All comments will be considered in the preparation of the Final EA Report.

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Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
				Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-18. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE.	Resources		
Draft EA	675	E-mail	09/03/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGD Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of the Ministry of Northern Development and Mines (MNDM). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-20. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE.	Canadian Environmental Assessment Agency, Ministry of the Environment, Ontario Ministry of Northern Development and Mines, AMEC Environment & Infrastructure, Rainy River Resources	Comments provided by MNDM can be found in Appendix D of the Final EA Report.	Formal responses to all written comments received during the consultation on the Draft EA Report (Ver. 2) can be found in Appendix D of the Final EA Report. All comments will be considered in the preparation of the Final EA Report.
Draft EA	676	E-mail	09/03/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGD Draft Environmental Assessment (EA) Report (Ver. 2) related to air quality. Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-18. RRR noted that they would be willing to arrange a meeting or conference	Canadian Environmental Assessment Agency, Ministry of the Environment, Ontario Ministry of Northern Development and Mines, AMEC Environment & Infrastructure, Rainy River Resources	Comments provided by MOE can be found in Appendix D of the Final EA Report.	Formal responses to all written comments received during the consultation on the Draft EA Report (Ver. 2) can be found in Appendix D of the Final EA Report. All comments will be considered in the preparation of the Final EA Report.

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Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
				call with technical experts to answer further questions if required as previously discussed with MOE.			
Draft EA	677	Letter	09/03/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGD Draft Environmental Assessment (EA) Report (Ver. 2). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-18. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE.	Canadian Environmental Assessment Agency, Ministry of the Environment, Ontario Ministry of Northern Development and Mines, Ontario Ministry of the Environment, AMEC Environment & Infrastructure, Rainy River Resources	Comments provided by MOE can be found in Appendix D of the Final EA Report.	Formal responses to all written comments received during the consultation on the Draft EA Report (Ver. 2) can be found in Appendix D of the Final EA Report. All comments will be considered in the preparation of the Final EA Report.
Draft EA	678	Letter	09/03/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGD Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of the Ministry of Transportation (MTO). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-18. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE.	Canadian Environmental Assessment Agency, Ministry of the Environment, Ontario Ministry of Northern Development and Mines, Ontario Ministry of Transportation, AMEC Environment & Infrastructure, Rainy River Resources	Comments provided by MTO can be found in Appendix D of the Final EA Report.	Formal responses to all written comments received during the consultation on the Draft EA Report (Ver. 2) can be found in Appendix D of the Final EA Report. All comments will be considered in the preparation of the Final EA Report.
Draft EA	706	Letter	09/03/2013	Hydro One Networks Inc. (HONI) provided comments to RRR on the RRGD Draft Environmental Assessment (EA) Report (Ver.	Canadian Environmental Assessment Agency, Hydro One Networks, Ministry of the Environment, Ontario Ministry of	Comments provided by HONI can be found in Appendix D of the Final EA Report.	Formal responses to all written comments received during the consultation on the Draft EA Report (Ver. 2) can be found in

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Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
				2). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-20. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE. RRR also provided a copy of responses directly to the Hydro One on 13-09-25.	Northern Development and Mines, Rainy River Resources		Appendix D of the Final EA Report. All comments will be considered in the preparation of the Final EA Report.
Draft EA	667	Letter	09/04/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGD Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of MOE's Air and Noise Unit. Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-26. Two attachments were inadvertently missed related to responses to MOE's noise comments and were sent to CEA Agency on 13-10-02.	Canadian Environmental Assessment Agency, Ministry of the Environment, Ontario Ministry of Environment, Ontario Ministry of Northern Development and Mines, AMEC Environment & Infrastructure, Rainy River Resources	Comments provided by MOE can be found in Appendix D of the Final EA Report.	Formal responses to all written comments received during the consultation on the Draft EA Report (Ver. 2) can be found in Appendix D of the Final EA Report. All comments will be considered in the preparation of the Final EA Report.
Draft EA	661	E-mail	09/06/2013	The Ministry of the Environment (MOE) Environmental Assessment Services provided comments on the RRGD Draft Environmental Assessment (EA) Report (Ver. 2). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency	Canadian Environmental Assessment Agency, Ministry of the Environment, Ontario Ministry of Northern Development and Mines, AMEC Environment & Infrastructure, Rainy River Resources	Comments provided by MOE can be found in Appendix D of the Final EA Report.	Formal responses to all written comments received during the consultation on the Draft EA Report (Ver. 2) can be found in Appendix D of the Final EA Report. All comments will be considered in the preparation of the Final EA Report.

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Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
				on 13-09-26.			
Draft EA	662	Letter	09/06/2013	The Ministry of the Environment (MOE) Environmental Approvals Branch provided comments on the RRGD Draft Environmental Assessment (EA) Report (Ver. 2). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-26.	Canadian Environmental Assessment Agency, Ministry of the Environment, Ontario Ministry of Northern Development and Mines, AMEC Environment & Infrastructure, Rainy River Resources	Comments provided by MOE can be found in Appendix D of the Final EA Report.	Formal responses to all written comments received during the consultation on the Draft EA Report (Ver. 2) can be found in Appendix D of the Final EA Report. All comments will be considered in the preparation of the Final EA Report.
Draft EA	663	E-mail	09/06/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGD Draft EA Report (Ver. 2) on behalf of the Ministry of Natural Resources (MNR).	Ministry of Natural Resources, Ministry of the Environment, Ontario Ministry of Natural Resources, AMEC Environment & Infrastructure, Rainy River Resources	Comments provided by MNR can be found in Appendix D of the Final EA Report.	Formal responses to all written comments received during the consultation on the Draft EA Report (Ver. 2) can be found in Appendix D of the Final EA Report. All comments will be considered in the preparation of the Final EA Report.
Draft EA	665	E-mail	09/06/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGD Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of MOE's Environmental Monitoring and Reporting Branch. Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-18. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE.	Canadian Environmental Assessment Agency, Ministry of the Environment, Ontario Ministry of Northern Development and Mines, AMEC Environment & Infrastructure, Rainy River Resources	Comments provided by MOE can be found in Appendix D of the Final EA Report.	Formal responses to all written comments received during the consultation on the Draft EA Report (Ver. 2) can be found in Appendix D of the Final EA Report. All comments will be considered in the preparation of the Final EA Report.
Draft EA	705	E-mail	09/06/2013	The Ministry of the Environment (MOE) provided comments to	Canadian Environmental Assessment Agency, Ministry of	Comments provided by the Ministry of Energy can be found	Formal responses to all written comments received during the

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Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
				RRR on the RRGD Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of the Ministry of Energy. Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-18. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE.	Energy , Ministry of the Environment, Ontario Ministry of Northern Development and Mines, Rainy River Resources	in Appendix D of the Final EA Report.	consultation on the Draft EA Report (Ver. 2) can be found in Appendix D of the Final EA Report. All comments will be considered in the preparation of the Final EA Report.
Draft EA	660	Letter	09/10/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGD Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of the Ontario Ministry of Northern Development and Mines (MNDM). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-26.	Canadian Environmental Assessment Agency, Ministry of the Environment, Ontario Ministry of Northern Development and Mines, Ontario Ministry of the Environment, Rainy River Resources	Comments provided by MNDM can be found in Appendix D of the Final EA Report.	Formal responses to all written comments received during the consultation on the Draft EA Report (Ver.2) can be found in Appendix D of the Final EA Report. All comments will be considered in the preparation of the Final EA Report.
Draft EA	687	E-mail	09/11/2013	The Ministry of Northern Development and Mines (MNDM) requested access to the draft Appendix P of the RRGD Draft EA Report (Ver. 2). RRR provided access to an FTP site on 13-09-11 noting that it had been previously provided to Environment Canada, the Canadian Environmental Assessment Agency and Ministry of the Environment on 13-09-03.	Ontario Ministry of Northern Development and Mines, AMEC Environment & Infrastructure	MNDM requested access to the draft Appendix P of the Draft EA Report (Ver. 2).	RRR provided access to an FTP site on 13-09-11 noting that it had been previously provided to Environment Canada, the Canadian Environmental Assessment Agency and Ministry of the Environment on 13-09-03.
Draft EA	704	E-mail	09/18/2013	RRR provided a copy of	Canadian Environmental	Comments received related to	RRR provided a copy of

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Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
				responses to comments received through the Independent Technical Review of the RRGP Draft Environmental Assessment (EA) Report (Ver. 1) conducted on behalf of various Aboriginal groups. Comments received related to Aboriginal consultation, Traditional Knowledge and Traditional Land Use, socio-economics, fish, wildlife, vegetation, surface water, groundwater, air quality, noise and vibration, and human and ecological health. Comments and responses are considered confidential but have been shared with the appropriate regulatory authorities.	Assessment Agency, Ministry of the Environment, Ontario Ministry of Northern Development and Mines, Rainy River Resources	Aboriginal consultation, Traditional Knowledge and Traditional Land Use, socio-economics, fish, wildlife, vegetation, surface water, groundwater, air quality, noise and vibration, and human and ecological health.	responses to comments received through the Independent Technical Review of the RRGP Draft EA Report (Ver. 1) conducted on behalf of various Aboriginal groups.
Draft EA	610	E-mail	09/26/2013	The Ministry of the Environment (MOE) noted that the attachments referenced in RRR's responses to the MOE's comments about air quality were not provided with the response document sent to the MOE on 13-09-18. RRR provided MOE and the Canadian Environmental Assessment Agency with a copy of the attachments on 13-09-26.	Canadian Environmental Assessment Agency, Ministry of the Environment, AMEC Environment & Infrastructure, Rainy River Resources	MOE noted that attachments referenced in RRR's responses to the MOE's comments about air quality were not provided with the response document sent to the MOE on 13-09-18.	RRR provided MOE and the Canadian Environmental Assessment Agency with a copy of the attachments on 13-09-26.
Terms of Reference	399	Letter	11/16/2012	The Ministry of the Environment (MOE) provided comments on the RRGP Proposed Terms of Reference (ToR). The comments received were related to noise and vibration impacts. A response was provided to the MOE on 12-12-20.	Ontario Ministry of Environment, AMEC Environment & Infrastructure	The comments received from the MOE on the Proposed ToR were related to noise and vibration impacts.	Comments and responses can be found in Appendix D of the Draft EA.
Terms of Reference	392	Letter	11/19/2012	The Ministry of the Environment (MOE) provided RRR with comments from Ministry of Northern Development and	Ontario Ministry of Environment, Ontario Ministry of Northern Development and Mines, AMEC Environment & Infrastructure	The comments received from MNDM on the Proposed ToR were related to socio-economics.	Comments and responses can be found in Appendix D of the Draft EA.

Table D-2d: Comments and Responses - Provincial Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
				Mines (MNDM) on the RRGF Proposed Terms of Reference (ToR). The comments received were related to socio-economics. Responses were provided to the MOE on 13-01-22.			
Terms of Reference	381	E-mail	11/20/2012	The Ministry of the Environment (MOE) provided RRR with comments from the Ministry of Northern Development and Mines (MNDM) on the RRGF Proposed Terms of Reference (ToR). The comments were related to land claims, the site plan and socio-economic impacts. Responses were provided to the MOE on 13-01-22.	Ontario Ministry of Environment, Ontario Ministry of Northern Development and Mines, AMEC Environment & Infrastructure	The comments received on the Proposed ToR were related to land claims, the site plan and socio-economic impacts.	Comments and responses can found in Appendix D of the Draft EA.
Terms of Reference	411	Letter	11/22/2012	The Ministry of the Environment (MOE) provided RRR with comments on the RRGF Proposed Terms of Reference (ToR) related to waste management. Responses were provided to the MOE on 13-01-25.	Ontario Ministry of Environment, AMEC Environment & Infrastructure	The comments received from MOE on the Proposed ToR were related to waste management.	Comments and responses can be found in Appendix D of the Draft EA.
Terms of Reference	409	Letter	11/23/2012	The Ministry of the Environment (MOE) provided comments on the RRGF Proposed Terms of Reference (ToR). The comments received were related to air quality and air emission alternatives. Responses were provided to the MOE on 13-01-15.	Ontario Ministry of Environment, AMEC Environment & Infrastructure	The comments received from the MOE on the Proposed ToR were related to air quality and air emission alternatives.	Comments and responses can found in Appendix D of the Draft EA.
Terms of Reference	385	Letter	11/26/2012	The Ministry of the Environment (MOE) provided RRR with comments from the Ministry of Economic Development and Innovation (MEDI) on the Proposed Terms of Reference (ToR). The comments received	Ontario Ministry of Economic Development and Innovation, Rainy River Resources	The comments received from MEDI on the Proposed ToR approved the RRGF ToR content and commitments.	Noted. RRR appreciates the comment provided by MEDI. RRR believes that the RRGF will provide a significant economic boost to the region. RRR is committed to this development and that is occur in a sustainable

Table D-2d: Comments and Responses - Provincial Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
				approved the RRGP ToR content and commitments. Responses were provided to the MOE on 12-12-06.			manner. This approach will be supported the proposed comprehensive EA.
Terms of Reference	394	Letter	11/26/2012	The Ministry of the Environment (MOE) provided comments from the Ministry of Natural Resources (MNR) on the RRGP Proposed Terms of Reference (ToR). The comments were related to proposed alternatives, performance objectives, regulatory requirements, land tenure options, and species at risk. Responses were provided to the MOE on 13-01-28.	Ministry of Natural Resources, Ontario Ministry of Environment, AMEC Environment & Infrastructure	The comments received from MNR on the Proposed ToR were related to proposed alternatives, performance objectives, regulatory requirements, land tenure options, and species at risk.	Comments and responses can be found in Appendix D of the Draft EA.
Terms of Reference	410	Letter	11/26/2012	The Ministry of the Environment (MOE) provided comments on the Proposed Terms of Reference (ToR). The comments received related to air quality, commitments and monitoring and potential environmental effects. Responses were provided to the MOE on 12-12-06.	Ontario Ministry of Environment, AMEC Environment & Infrastructure	The comments received related to air quality, commitments and monitoring and potential environmental effects.	Comments and responses can be found in Appendix D of the Draft EA.
Terms of Reference	386	Letter	11/27/2012	The Ministry of the Environment (MOE) provided RRR with comments from Ministry of Northern Development and Mines (MNDM) on the Proposed Terms of Reference (ToR). The comments received were related to anticipated power needs for the RRGP, First Nation engagement, and record of consultation practices. Responses were provided to the MOE on 13-01-22.	Ontario Ministry of Environment, Ontario Ministry of Northern Development and Mines, AMEC Environment & Infrastructure	The comments received from MNDM on the Proposed ToR were related to anticipated power needs for the RRGP, First Nation engagement, and record of consultation practices.	Comments and responses can be found in Appendix D of the Draft EA.
Terms of Reference	391	Letter	11/27/2012	The Ministry of the Environment (MOE) provided RRR with comments from Ministry of	Ontario Ministry of Energy and Infrastructure, Rainy River Resources	The comments received from the Ministry of Energy on the Proposed ToR were related to	Comments and responses can be found in Appendix D of the Draft EA.

Table D-2d: Comments and Responses - Provincial Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
				Energy on the Proposed Terms of Reference (ToR). The comments received were related to anticipated power needs of the RRGP. Responses were provided to the MOE on 13-01-07.		anticipated power needs of the RRGP.	
Terms of Reference	412	Letter	11/27/2012	The Ministry of the Environment (MOE) provided RRR with comments from Ministry of Tourism, Culture and Sport (MTCS) on the RRGP Proposed Terms of Reference (ToR). The comments received were related to archaeological resources, built heritage resources and cultural heritage landscapes. Responses were provided to the MOE on 13-01-25.	Ontario Ministry of Environment, Ontario Ministry of Tourism, Culture and Sport, AMEC Environment & Infrastructure	The comments received from MTCS on the Proposed ToR were related to archaeological resources, built heritage resources and cultural heritage landscapes.	Comments and responses can be found in Appendix D of the Draft EA.
Terms of Reference	498	Letter	12/18/2012	The Ministry of the Environment (MOE) provided RRR with comments on the RRGP Proposed Terms of Reference (ToR). The comments were related to the requirements of the Codes of Practice, record of consultation, and general comments on the RRGP. Responses were provided to the MOE on 13-01-22.	Ontario Ministry of Environment, AMEC Environment & Infrastructure	The comments received on the Proposed ToR were related to the requirements of the Codes of Practice, record of consultation, and general comments on the RRGP.	Comments and responses can be found in Appendix D of the Draft EA.
Terms of Reference	426	E-mail	01/15/2013	The Ministry of Environment (MOE) responded to the letter of support for the RRGP Draft Terms of Reference (ToR) sent by Mishkosiimiiniiziibing (Big Grassy River) First Nation on 13-01-14. The MOE indicated that the letter of support will form part of the Project file and will be considered by the Minister of the Environment when making a decision to approve the ToR.	Mishkosiimiiniiziibing (Big Grassy River) First Nation, Ontario Ministry of Environment	The MOE responded to the letter of support for the RRGP Draft ToR sent by Mishkosiimiiniiziibing (Big Grassy River) First Nation on 13-01-14. The MOE indicated that the letter of support will form part of the Project file and will be considered by the Minister of the Environment when making a decision to approve the ToR.	As the correspondence was sent to the MOE, no response was required by RRR.

Table D-2d: Comments and Responses - Provincial Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
Terms of Reference	532	E-mail	03/11/2013	RRR responded to Ministry of Environment (MOE) questions related to the Amended Proposed Terms of Reference (ToR).	Ontario Ministry of Environment, AMEC Environment & Infrastructure, Rainy River Resources	The MOE questions were related to the mine footprint, employment during construction and operations, and the timing of construction and operations phases.	RRR provided information about the construction and operations processes and anticipated timelines.
Human Environment							
Socio-Economic	543	E-mail	04/04/2013	AMEC followed up on a phone conversation with the Ministry of Transportation (MTO) related to annual average daily traffic on Highway 600 and requested level of service ratings for Highways 600, 11, and 71 within the regional study area (RSA). MTO provided additional information on levels of service on 13-04-05.	Ministry of Transportation, AMEC Environment & Infrastructure	AMEC requested information about average annual daily traffic on Highway 600 and level of service ratings for Highways 600, 11, and 71 within the RSA.	Information obtained will be used in the baseline reporting and for effects assessment and management planning.
Socio-Economic	494	E-mail	02/20/2013	The Ministry of Northern Development and Mines (MNDM) provided comments on a draft summary of major developments in the Rainy River District compiled by RRR as part of the socio-economic effects assessment for the RRGP.	Ontario Ministry of Northern Development and Mines, Rainy River Future Development Corp, Rainy River Resources	MNDM provided comments on a draft summary on major developments in the Rainy River District compiled by RRR as part of the socio-economic effects assessment for the RRGP.	The information provided was utilized as appropriate in the socio-economic and cumulative effects assessment.
Land and Resource Use	626	Open House	08/08/2013	RRR hosted an open house in Fort Frances to discuss the RRGP and share information about the Draft Environmental Assessment (EA) report. RRR representatives responded to a range of questions and comments received from participants. Approximately 27 people attended.	Confederation College, Individual - GP, Mike Carmody Contracting, Ministry of Natural Resources, Ontario Federation of Anglers and Hunters, Rainy River Valley Field Naturalists, Sunset Country Métis , Unknown , AMEC Environment & Infrastructure, Pwi-Di-Goo-Zing Ne-Yaa-Zhing Advisory Services / Rainy River Resources, Rainy River Resources	How would Project development affect Bayfield's access?	Bayfield would still have access to their larger claim block north of the East Mine Stockpile, but access to their small land-locked parcel immediately east of the open pit would require some form of access negotiation, as it would not be safe for non-Project personnel to pass through the Project site without special provisions. This is a matter to be worked out by RRR and Bayfield at a corporate level.
Methodology and Process							
Environmental Assessment	613	E-mail	07/24/2013	The Ministry of the Environment (MOE) requested the air dispersion modelling input and	Ministry of the Environment, AMEC Environment & Infrastructure	The MOE requested access to the air dispersion modelling input and output files used in the	RRR provided instructions for accessing the requested information via FTP site on

Table D-2d: Comments and Responses - Provincial Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
				output files used in the development of the RRGP Draft Environmental Assessment (EA) Report. RRR confirmed that this information would be made available and it was subsequently shared with the MOE on 13-08-12.		development of the RRGP Draft EA Report.	13-08-12.
Stakeholder Engagement	494	E-mail	02/20/2013	The Ministry of Northern Development and Mines (MNDM) provided comments on a draft summary of major developments in the Rainy River District compiled by RRR as part of the socio-economic effects assessment for the RRGP.	Ontario Ministry of Northern Development and Mines, Rainy River Future Development Corp, Rainy River Resources	MNDM provided comments on a draft summary on major developments in the Rainy River District compiled by RRR as part of the socio-economic effects assessment for the RRGP.	The information provided was utilized as appropriate in the socio-economic and cumulative effects assessment.
Mining							
Transmission Line	626	Open House	08/08/2013	RRR hosted an open house in Fort Frances to discuss the RRGP and share information about the Draft Environmental Assessment (EA) report. RRR representatives responded to a range of questions and comments received from participants. Approximately 27 people attended.	Confederation College, Individual - GP, Mike Carmody Contracting, Ministry of Natural Resources, Ontario Federation of Anglers and Hunters, Rainy River Valley Field Naturalists, Sunset Country Métis , Unknown , AMEC Environment & Infrastructure, Pwi-Di-Goo-Zing Ne-Yaa-Zhing Advisory Services / Rainy River Resources, Rainy River Resources	What was the basis for selecting the proposed transmission line route over other alternatives that would appear to be more direct or easier to construct?	Four routes were considered: the northernmost route, a route along existing roads, and two intermediate routes. The northern route was selected because it provided a reasonably direct route and more importantly was the furthest route from existing residences. Also, RRR had the best land position for this route (acquired lands and/or options and crown land). The southern route along existing roads is longer but would provide good construction access so it might be less costly to build, but people along this route had expressed a lack of support for this option as it would pass close to their homes, which was aesthetically not pleasing and otherwise restrictive to their property use. There is also the potential concern for adverse electromagnetic magnetic

Table D-2d: Comments and Responses - Provincial Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
							radiation which is of concern for high voltage transmission lines. The intermediate alternatives were further from people's homes, but still passed near some residences, and RRR also did not hold as favourable a land position on these alternatives. The northernmost and two intermediate alternatives were all similar in their expected environmental effects as they all passed through similar terrain.
Transport (Road, Barge, etc.)	626	Open House	08/08/2013	RRR hosted an open house in Fort Frances to discuss the RRGP and share information about the Draft Environmental Assessment (EA) report. RRR representatives responded to a range of questions and comments received from participants. Approximately 27 people attended.	Confederation College, Individual - GP, Mike Carmody Contracting, Ministry of Natural Resources, Ontario Federation of Anglers and Hunters, Rainy River Valley Field Naturalists, Sunset Country Métis , Unknown , AMEC Environment & Infrastructure, Pwi-Di-Goo-Zing Ne-Yaa-Zhing Advisory Services / Rainy River Resources, Rainy River Resources	How will RRR maintain local road access?	RRR provided a detailed explanation of the Highway 600 re-alignment and the alternatives considered, and well as for the East Access Road, noting that both actions were needed to ensure that local residents could carry out their business. It was also noted that the East Access Road would be used to service the mine site from Highway 71.
Project Phase							
Construction	626	Open House	08/08/2013	RRR hosted an open house in Fort Frances to discuss the RRGP and share information about the Draft Environmental Assessment (EA) report. RRR representatives responded to a range of questions and comments received from participants. Approximately 27 people attended.	Confederation College, Individual - GP, Mike Carmody Contracting, Ministry of Natural Resources, Ontario Federation of Anglers and Hunters, Rainy River Valley Field Naturalists, Sunset Country Métis , Unknown , AMEC Environment & Infrastructure, Pwi-Di-Goo-Zing Ne-Yaa-Zhing Advisory Services / Rainy River Resources, Rainy River Resources	Will there be stripping during construction?	Yes, pre-stripping will be done during the construction phase.
Risks and Mitigation							

Table D-2d: Comments and Responses - Provincial Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
Environmental Management	658	Meeting	06/07/2013	A meeting was held to discuss Species at Risk (SAR) and the RRGP. RRR provided an update on New Gold's acquisition of RRR, the status of the Environmental Assessment (EA) Report and the anticipated timeline for the Environmental Site Assessment (ESA). Discussions also related to field surveys and methodology as well as management and protection of potentially affected SAR. The final meeting notes were distributed to participants on 13-08-22 and are considered confidential.	Environment Canada, Individual , Individual - GP, Ministry of Natural Resources, Ontario Ministry of Natural Resources, Trent University, AMEC Environment & Infrastructure, Rainy River Resources	Discussions related to field surveys and methodology as well as management and protection of potentially affected SAR.	Information discussed will be considered in the preparation of the final EA Report.
Environmental Management	659	Meeting	06/25/2013	RRR and its consultants met with the Ministry of Natural Resources (MNR) to discuss Species at Risk (SAR) and the RRGP. The meeting focused on ongoing field surveys and survey methodology as well as management and protection of potentially affected SAR. The final meeting notes were distributed to participants on 13-08-22 and are considered confidential.	Ministry of Natural Resources, AMEC Environment & Infrastructure, Rainy River Resources	The meeting focused on ongoing field surveys and survey methodology as well as management and protection of potentially affected SAR. The final meeting notes were distributed to participants on 13-08-22 and are considered confidential.	Information discussed will be considered in the preparation of the final EA Report.
Environmental Management	626	Open House	08/08/2013	RRR hosted an open house in Fort Frances to discuss the RRGP and share information about the Draft Environmental Assessment (EA) report. RRR representatives responded to a range of questions and comments received from participants. Approximately 27 people attended.	Confederation College, Individual - GP, Mike Carmody Contracting, Ministry of Natural Resources, Ontario Federation of Anglers and Hunters, Rainy River Valley Field Naturalists, Sunset Country Métis , Unknown , AMEC Environment & Infrastructure, Pwi-Di-Goo-Zing Ne-Yaa-Zhing Advisory Services / Rainy River Resources, Rainy River Resources	How is water going to be managed on the site for Project needs, and to manage environmental effects?	RRR provided a detailed explanation of the water management plans for the Project, noting that these plans are designed to ensure an adequate water source for milling operations, while at the same time demonstrating concern for water quality and receiving water flow protection.

Table D-2d: Comments and Responses - Municipal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
Document Reviews							
Draft EA/Application	625	Open House	07/30/2013	RRR hosted an open house in Barwick to discuss the RRGP and share information about the Draft Environmental Assessment (EA) report. RRR representatives responded to a range of questions and comments received from participants. Approximately 51 people attended.	Bending Lake Iron, Individual , Individual - GP, Ontario Federation of Anglers and Hunters, Township of Chapple, AMEC Environment & Infrastructure, Pwi-Di-Goo-Zing Ne-Yaa-Zhing Advisory Services / Rainy River Resources	The 30 day review period allotted for the draft EA didn't allow a lot of time for review, especially if people were busy with other obligations.	RRR expressed understanding for the concern. It was noted that there is a lot of material to go through; however, the summary document should help people to focus their areas of interest, which they could then explore by reviewing selected sections of the main EA text and appendices. There will be additional opportunities for material review with the final EA document and with permit application documents.
Draft EA	645	Letter	08/19/2013	The Township of Chapple provided comments on the RRGP Draft Environmental Assessment (EA) Report. Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-20. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE. RRR also provided a copy of responses directly to the Township on 13-09-25.	Canadian Environmental Assessment Agency, Ministry of the Environment, Ontario Ministry of Northern Development and Mines, Township of Chapple, Rainy River Resources	Comments provided by the Township of Chapple can be found in Appendix D of the Final EA Report.	Comments will be considered in the preparation of the Final EA Report and a meeting will be scheduled to discuss any outstanding issues with the Township of Chapple as requested.
Terms of Reference	445	Meeting	12/05/2012	RRR gave a presentation to the Township of Chapple on the RRGP and held discussions on the Proposed Terms of Reference (ToR). Topics focused on overall municipal planning, including the timing and process for accepting and amending the new Official Plan and zoning by-law amendments, and on the	Individual - GP, Rainy River Future Development Corp, Township of Chapple, Rainy River Resources	The Township asked questions about anticipated revenue changes to the Township based on assessments, changes to road ownership and maintenance as the Project progresses, landfill impacts and official plan and zoning by-law amendments. The Township agreed that a municipal planner would be the	RRR re-iterated a previous pledge in November 2012 to pay for half of the municipal landfill study the Township was undertaking. RRR agreed that both Chapple and RRR need to ensure the Project area is appropriately zoned and that the Township and RRR understand what changes can be expected

Table D-2d: Comments and Responses - Municipal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
				proposed Highway 600 relocation and East Access Road.		best avenue for understanding anticipated changes.	for overall municipal planning purposes. RRR would hire a municipal planner to thoroughly address the Township's questions.
Human Environment							
Land and Resource Use	445	Meeting	12/05/2012	RRR gave a presentation to the Township of Chapple on the RRGF and held discussions on the Proposed Terms of Reference (ToR). Topics focused on overall municipal planning, including the timing and process for accepting and amending the new Official Plan and zoning by-law amendments, and on the proposed Highway 600 relocation and East Access Road.	Individual - GP, Rainy River Future Development Corp, Township of Chapple, Rainy River Resources	The Township expressed appreciation to RRR for its contribution towards roads and for cost sharing a landfill study.	RRR expressed thanks and appreciation.
Land and Resource Use	625	Open House	07/30/2013	RRR hosted an open house in Barwick to discuss the RRGF and share information about the Draft Environmental Assessment (EA) report. RRR representatives responded to a range of questions and comments received from participants. Approximately 51 people attended.	Bending Lake Iron, Individual , Individual - GP, Ontario Federation of Anglers and Hunters, Township of Chapple, AMEC Environment & Infrastructure, Pwi-Di-Goo-Zing Ne-Yaa-Zhing Advisory Services / Rainy River Resources, Rainy River Resources	In his role as Council for the Township, Mr. Neilson expressed concern about the ability of Bayfield Ventures Corp. to access their claims within and immediately east of the mine site.	Access through the mine site will be problematic, as the area of interest (between the open pit and the mill and the east stockpile) will be a high traffic area for heavy equipment and haul trucks, and it would not be safe for others to be passing through this area, unless specific agreements were worked out with RRR to allow any such access. However, the larger Bayfield property to the northeast of the mine site is open to the north, and would be accessible to Bayfield from the proposed East Access Road. These details are presented in Section 7.18.2 of the draft EA.

Table D-2d: Comments and Responses - Municipal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
Socio-Economic	427	E-mail	01/07/2013	A socio-economic questionnaire was sent to the Township of Sioux Narrows - Nestor Falls. RRR received the completed questionnaire on 13-01-16.	Township of Sioux Narrows - Nestor Falls, Rainy River Resources	RRR received the completed information from the Township of Sioux Narrows - Nestor Falls socio-economic questionnaire. The Township also provided a copy of their Community Improvement Plan, Official Plan and Zoning By-Law Number 279.	Information obtained will be used in the baseline reporting and for effects assessment and management planning.
Socio-Economic	447	Letter	01/24/2013	Township of Chapple sent a letter to RRR noting interest in meeting to discuss the Highway 600 re-alignment, the potential for Project-related financial impacts and the Township's interest in a negotiated agreement.	Township of Chapple, Rainy River Resources	Concern was expressed that the RRGP could result in increased municipal costs. The Council requested clarity around what RRR is willing to do, financially, to assist the community.	Information will be considered and incorporated into the EA report as appropriate. Further meetings will be scheduled with the Township of Chapple to continue discussions.
Socio-Economic	504	Meeting	02/11/2013	RRR met with the Township of Chapple to discuss options for construction of new homes for RRR employees. Information gathered included vacant or potential lots and zoning considerations.	Township of Chapple, Rainy River Resources	Discussions focused on options for construction of new homes for RRR employees, vacant or potential lots and zoning considerations.	Information will be considered and incorporated into the EA report as appropriate.
Socio-Economic	505	Meeting	02/12/2013	RRR met with the Town of Fort Frances to discuss options for construction of new homes for RRR employees. Information gathered included vacant or potential lots and zoning considerations.	Town of Fort Frances, Rainy River Resources	Discussions focused on options for construction of new homes for RRR employees, vacant or potential lots and zoning considerations.	Information will be considered and incorporated into the EA report as appropriate.
Socio-Economic	506	Meeting	02/13/2013	RRR met with the Township of Emo to discuss options for construction of new homes for RRR employees. Information gathered included vacant or potential lots and zoning considerations.	Town of Emo, Rainy River Resources	Discussions focused on options for construction of new homes for RRR employees, vacant or potential lots and zoning considerations.	Information will be considered and incorporated into the EA report as appropriate.

Table D-2d: Comments and Responses - Municipal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
Methodology and Process							
Environmental Assessment	619	Meeting	06/11/2013	RRR met with the Township of Chapple and provided an update on the RRGP Environmental Assessment (EA) and planned open houses. The Township discussed city planning, RRR's Closure Plan and expectations surrounding the proposed acquisition by New Gold. The Township of Chapple provided an update on the ongoing landfill study.	Rainy River Future Development Corp, Township of Chapple, Rainy River Resources	RRR provided an update on the EA which is scheduled to be released in mid-July 2013.	The Township of Chapple agreed to be a public hosting location for the document.
Stakeholder Engagement	492	Letter	02/04/2013	RRR sent a letter to the Township of Chapple on 13-02-04 containing comments on the Draft Official Plan and Draft Zoning By-law. The Township of Chapple responded to RRR on 13-02-22.	Township of Chapple, Rainy River Resources	Township of Chapple indicated support for the mineral exploration activities of RRR and acknowledged that the Final Draft Official Plan and Zoning By-law have been drafted to accommodate future mining activities.	RRR expressed appreciation for the opportunity to participate in the the Draft Official Plan and Draft Zoning By-law process.
Mining							
Transport (Road, Barge, etc.)	445	Meeting	12/05/2012	RRR gave a presentation to the Township of Chapple on the RRGP and held discussions on the Proposed Terms of Reference (ToR). Topics focused on overall municipal planning, including the timing and process for accepting and amending the new Official Plan and zoning by-law amendments, and on the proposed Highway 600 relocation and East Access Road.	Individual - GP, Rainy River Future Development Corp, Township of Chapple, Rainy River Resources	The Township stated that they would prefer the Highway 600 relocation to advance before mine construction in order to ease safety concerns related to traffic volumes and asked whether the Township could become the Highway re-alignment proponent in order to advance this component in an expedited manner.	RRR would support this approach.
Transport (Road, Barge, etc.)	447	Letter	01/24/2013	Township of Chapple sent a letter to RRR noting interest in meeting to discuss the Highway 600 re-alignment, the potential for Project-related financial impacts and the Township's interest in a negotiated agreement.	Township of Chapple, Rainy River Resources	It was noted that the Chapple Municipal Council is supportive of the re-routing of Highway 600 as it is Council's belief that this will increase the chance of the mine development.	Information will be considered and incorporated into the EA report as appropriate. Further meetings will be scheduled with the Township of Chapple to continue discussions.

Table D-2d: Comments and Responses - Municipal Government Agencies, November 10, 2012 to October 7, 2013

Topic	ROC	Event Type	Date	Event Summary	Participating Organizations	Comments	Official Response
Tailing Impoundment	625	Open House	07/30/2013	RRR hosted an open house in Barwick to discuss the RRGP and share information about the Draft Environmental Assessment (EA) report. RRR representatives responded to a range of questions and comments received from participants. Approximately 51 people attended.	Bending Lake Iron, Individual , Individual - GP, Ontario Federation of Anglers and Hunters, Township of Chapple, AMEC Environment & Infrastructure, Pwi-Di-Goo-Zing Ne-Yaa-Zhing Advisory Services / Rainy River Resources, Rainy River Resources	Mr. Neilson asked about perimeter runoff and seepage collect ditch placement in relation to the TMA and his property.	The ditching would be positioned beyond the toe of the tailings dams; however, the designs have not yet been developed. It is required as part of federal regulatory requirements and would likely be positioned between 20 to 50 m for the final toe position of the dam.
Negotiated Agreements							
Other	447	Letter	01/24/2013	Township of Chapple sent a letter to RRR noting interest in meeting to discuss the Highway 600 re-alignment, the potential for Project-related financial impacts and the Township's interest in a negotiated agreement.	Township of Chapple, Rainy River Resources	Council expressed interest in discussing the development of an agreement with RRR similar to agreements negotiated with First Nations. It was noted that an agreement would provide clarity to move forward.	Information will be considered and incorporated into the EA report as appropriate. Further meetings will be scheduled with the Township of Chapple to continue discussions.
Project Phase							
Closure	619	Meeting	06/11/2013	RRR met with the Township of Chapple and provided an update on the RRGP Environmental Assessment (EA) and planned open houses. The Township discussed city planning, RRR's Closure Plan and expectations surrounding the proposed acquisition by New Gold. The Township of Chapple provided an update on the ongoing landfill study.	Rainy River Future Development Corp, Township of Chapple, Rainy River Resources	The Township of Chapple noted that there was there was a good opportunity for the Research Station to be working with the mine.	RRR thanked the Township for information about the opportunity to work with the Research Station and has been in contact with the Research Station's Manager.



APPENDIX D-2e

**GOVERNMENT CONTACT RECORDS
(NOVEMBER 10, 2012 TO OCTOBER 7, 2013)**

Table D-2e: Federal Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
442	Site visit	11/15/2012	RRR hosted a site visit for four Environment Canada (EC) employees.	Rob Dobos (Environment Canada), Dan McDonell (Environment Canada), Wesley Plant (Environment Canada), Jeanette Goulet (Environment Canada)	Kyle Stanfield (Rainy River Resources), Stacey Jack (Rainy River Resources)
398	E-mail	11/27/2012	Environment Canada (EC) requested an unlocked copy of the RRGF Interim Geochemistry Report. RRR provided a copy of the unlocked report.	Dan McDonell (Environment Canada)	Kyle Stanfield (Rainy River Resources)
574	Workshop	11/29/2012	AMEC and RRR met with the Fisheries Working Group to discuss the no net loss (NNL) strategic plan and related logistical issues. The meeting minutes were distributed to participants on 13-04-23.	Tom Kleinboeck (Fisheries and Oceans Canada), David May (Rainy River District Stewardship), Chris Martin (Ontario Ministry of Natural Resources), Steve Bobrowicz (Ministry of Natural Resources)	Mark Ruthven (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources), Jason Dietrich (AMEC Environment & Infrastructure), Nathan Hellinga (AMEC Environment & Infrastructure)
528	E-mail	11/30/2012	RRR sent the Valued Ecosystem Component (VEC) and Record of Contact (ROC) monthly reports to the Canadian Environmental Assessment Agency (CEA Agency).	Stephanie Davis (Canadian Environmental Assessment Agency)	Stacey Jack (Rainy River Resources)
397	Letter	12/18/2012	RRR sent comments on the Draft Environmental Impact Statement (EIS) Guidelines issued by the Canadian Environmental Assessment Agency (CEA Agency).	Stephanie Davis (Canadian Environmental Assessment Agency)	Kyle Stanfield (Rainy River Resources)
529	E-mail	01/07/2013	RRR sent the Valued Ecosystem Component (VEC) and Record of Contact (ROC) monthly reports to the Canadian Environmental Assessment Agency (CEA Agency).	Stephanie Davis (Canadian Environmental Assessment Agency)	Stacey Jack (Rainy River Resources)
540	Meeting	01/09/2013	A meeting occurred between RRR, AMEC and various government agencies to discuss RRGF's Closure Plan. Revised meeting notes were distributed to participants on 13-03-28.	Mark O'Brien (Ontario Ministry of Northern Development and Mines), Fadi Haddad (Natural Resources Canada), Stephanie Davis (Canadian Environmental Assessment Agency), Kathleen Cavallaro (Environmental Assessment), Rachel Hill (Ministry of Natural Resources), Neal Bennett (Ontario Ministry of Northern Development and Mines), James McKeever (Ministry of Transportation), Drew Stajkowski (Ministry of Environment), Matt Myers (Ministry of Natural Resources), Anita Li (Environment Canada), Alisdair Brown (Ontario Ministry of the Environment), Chris Martin (Ontario Ministry of Natural Resources), Dan McDonell (Environment Canada), Rosanna Massimi (Environment Canada), Cindy Brown (Ministry of Transportation), Rob Purdon (Ontario Ministry of Northern Development and Mines), Mary Duda (Ministry of	David Simms (AMEC Environment & Infrastructure), Sheila Daniel (AMEC Environment & Infrastructure), Steve Sibbick (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources), Stacey Jack (Rainy River Resources), Heather Lindsay (AMEC Environment & Infrastructure)

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ROC	Event Type	Date	Event Summary	Stakeholders	Team
				the Environment), Dan Fox (Ministry of Natural Resources)	
575	Workshop	01/31/2013	The Fisheries Working Group met to discuss status updates on the RRGP, the no net loss (NNL) strategic plan, Traditional Knowledge (TK) report on Lake Sturgeon, and Pinewood River fish habitat. The meeting minutes were distributed to participants on 13-04-23.	Rich Rudolph (Fisheries and Oceans Canada), David May (Rainy River District Stewardship), Chris Martin (Ontario Ministry of Natural Resources), Neville Ward (Fisheries and Oceans Canada), Steve Bobrowicz (Ministry of Natural Resources)	Mark Ruthven (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources), Jason Dietrich (AMEC Environment & Infrastructure), Nathan Hellinga (AMEC Environment & Infrastructure)
527	E-mail	02/01/2013	RRR sent the Valued Ecosystem Component (VEC) and Record of Contact (ROC) monthly reports to the Canadian Environmental Assessment Agency (CEA Agency).	Stephanie Davis (Canadian Environmental Assessment Agency)	Stacey Jack (Rainy River Resources)
495	E-mail	02/12/2013	RRR proposed a meeting agenda for a scheduled Federal / Provincial EA coordination meeting on 13-02-22.	Stephanie Davis (Canadian Environmental Assessment Agency), Cindy Batista (Ontario Ministry of Environment)	Kyle Stanfield (Rainy River Resources)
490	Letter	02/15/2013	The Township of Chapple sent letters of support regarding the RRGP to the Canadian Environmental Assessment Agency (CEA Agency) and the Ministry of Environment (MOE).	Stephanie Davis (Canadian Environmental Assessment Agency), Peggy Johnson (Township of Chapple), Cindy Batista (Ontario Ministry of Environment), Jim Bradley (Ontario Ministry of the Environment)	
584	Letter	02/19/2013	The Township of La Vallee confirmed its support for the RRGP, noting support for timely completion of the Environmental Assessment (EA) process to allow RRGP construction to begin in the summer of 2014.	Stephanie Davis (Canadian Environmental Assessment Agency), Sylvia Smeeth (Township of La Vallee), Cindy Batista (Ontario Ministry of Environment), Jim Bradley (Ontario Ministry of the Environment)	
578	Letter	02/21/2013	The Council of the Township of Alberton sent letters confirming Council's support for the RRGP to the Ministry of the Environment (MOE) and the Canadian Environmental Assessment Agency (CEA Agency). The Council noted their support for timely completion of the Environmental Assessment (EA) process.	Stephanie Davis (Canadian Environmental Assessment Agency), Michael Hammond (Township of Alberton), Cindy Batista (Ontario Ministry of Environment), Jim Bradley (Ontario Ministry of the Environment)	
577	Letter	02/22/2013	The Town of Fort Frances expressed support for the RRGP to the Ministry of the Environment (MOE) and the Canadian Environmental Assessment Agency (CEA Agency) and emphasized the positive economic contribution the RRGP represents to the Rainy River District. The Town of Fort Frances noted their support for timely completion of the Environmental Assessment (EA) process.	Stephanie Davis (Canadian Environmental Assessment Agency), Roy Avis (Town of Fort Frances)	

Table D-2e: Federal Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
581	Meeting	02/22/2013	RRR, First Nation representatives, and Government representatives met to discuss the RRGP. Project updates were shared by RRR and First Nation representatives provided their views and shared support for the RRGP. Discussions focused on the Amended Proposed Terms of Reference (ToR), the Federal and Provincial Environmental Assessment (EA) processes, and the proposed Highway 600 realignment. Final revised meeting notes were distributed by the CEA Agency on 13-04-16.	Stephanie Davis (Canadian Environmental Assessment Agency), Regent Dickey (Major Projects Management Office), Rachel Hill (Ministry of Natural Resources), Neal Bennett (Ontario Ministry of Northern Development and Mines), Mike Grant (Ontario Ministry of Northern Development and Mines), James McKeever (Ministry of Transportation), Peggy Johnson (Township of Chapple), Peter Van Heyst (Township of Chapple), Wayne Smith (Naicatchewenin First Nation), Jim Leonard (Rainy River First Nations), Ross Lashbrook (Ontario Ministry of Environment), Alisdair Brown (Ontario Ministry of the Environment), Patrick Barnes (Ontario Ministry of Northern Development and Mines), Ken Wilson (Township of Chapple), Cindy Batista (Ontario Ministry of Environment), Dan McDonell (Environment Canada), Cindy Brown (Ministry of Transportation), Dan Fox (Ministry of Natural Resources), Iain Galloway (Ministry of Transportation), Stephen DeVos (Ontario Ministry of Northern Development and Mines), Rob Ferguson (Ontario Ministry of Northern Development and Mines), Howard Hampton (Fasken Martineau DuMoulin LLP), Anjala Puvananathan (Canadian Environmental Assessment Agency), Rosalind Cooper (Fasken Martineau DuMoulin LLP), Randy Both (Township of Chapple)	David Simms (AMEC Environment & Infrastructure), Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources), Stacey Jack (Rainy River Resources)
488	E-mail	02/25/2013	AMEC emailed the RRGP Amended Terms of Reference (ToR) Site Plan Conceptual Layout to the Canadian Environmental Assessment Agency (CEA Agency) as requested.	Stephanie Davis (Canadian Environmental Assessment Agency)	Sheila Daniel (AMEC Environment & Infrastructure)
586	Letter	02/25/2013	The Township of Morley confirmed its support for the RRGP, noting support for timely completion of the Environmental Assessment (EA) process to allow RRGP construction to begin in the summer of 2014.	Stephanie Davis (Canadian Environmental Assessment Agency), Gary Gamsby (Township of Morley)	

Table D-2e: Federal Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
483	E-mail	02/26/2013	RRR provided instructions for accessing the RRGp Climate, Air Quality and Sound Baseline Study to the Canadian Environmental Assessment Agency (CEA Agency), Ministry of the Environment (MOE) and Ministry of Northern Development and Mines (MNDM).	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Cindy Batista (Ontario Ministry of Environment)	Kyle Stanfield (Rainy River Resources)
484	E-mail	02/27/2013	RRR emailed a job posting for a Corporate Health and Safety Manager.	Allan Yerxa (Couchiching First Nation), Carrie Johnson (Naicatchewenin First Nation), Dean Wilson (Rainy River First Nations), Chris Henderson (Mitaanjigamiing First Nation), Tyrone Tenniscoe (Seine River First Nation), Michael Ottertail (Lac La Croix First Nation), Dana Bridgeman Cross (Shooniyaa Wa-Biitong), Norma Necan (Shooniyaa Wa-Biitong)	Lincoln Dunn (Pwi-Di-Goo-Zing Ne-Yaa-Zhing Advisory Services / Rainy River Resources)
585	Letter	02/27/2013	The Town of Rainy River confirmed its support for the RRGp, noting support for timely completion of the Environmental Assessment (EA) process to allow RRGp construction to begin in the summer of 2014.	Stephanie Davis (Canadian Environmental Assessment Agency), Veldron Vogan (Town of Rainy River), Cindy Batista (Ontario Ministry of Environment), Jim Bradley (Ontario Ministry of the Environment)	
530	E-mail	02/28/2013	RRR sent the Valued Ecosystem Component (VEC) and Record of Contact (ROC) monthly reports to the Canadian Environmental Assessment Agency (CEA Agency).	Stephanie Davis (Canadian Environmental Assessment Agency)	Stacey Jack (Rainy River Resources)
542	E-mail	03/28/2013	RRR sent the Record of Contact (ROC) and Valued Ecosystem Components (VEC) tables for the RRGp to the Canadian Environment Assessment Agency (CEA Agency).	Stephanie Davis (Canadian Environmental Assessment Agency)	Stacey Jack (Rainy River Resources)
573	E-mail	04/19/2013	RRR responded to questions posed by the Canadian Environmental Assessment Agency (CEA Agency) federal review team regarding the proposed RRGp site plan and mine rock stockpile locations.	Stephanie Davis (Canadian Environmental Assessment Agency)	Kyle Stanfield (Rainy River Resources)
571	E-mail	04/29/2013	RRR sent the monthly Record of Contact (ROC) and Valued Ecosystem Components (VEC) reports, current to 13-04-01, to the Canadian Environmental Assessment Agency (CEA Agency).	Stephanie Davis (Canadian Environmental Assessment Agency)	Stacey Jack (Rainy River Resources)
603	Meeting	05/08/2013	AMEC and RRR met with the Fisheries Working Group to discuss the no net loss plan (NNLP) and the Offset Strategy document. RRR also provided an update on the RRGp. The meeting minutes were distributed to participants on 13-06-18.	Chris Martin (Ontario Ministry of Natural Resources), Neville Ward (Fisheries and Oceans Canada), Steve Bobrowicz (Ministry of Natural Resources)	Mark Ruthven (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources), Jason Dietrich (AMEC Environment & Infrastructure), Nathan Hellinga (AMEC Environment & Infrastructure)

Table D-2e: Federal Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
604	E-mail	05/08/2013	The CEA Agency forwarded comments on several RRGp baseline reports on behalf of the Department of Fisheries and Oceans (DFO), Environment Canada (EC), Health Canada (HC), and Ministry of Natural Resources (MNR). Responses were provided to the CEA Agency on 13-06-13.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Ross Lashbrook (Ontario Ministry of Environment)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
605	E-mail	05/23/2013	The CEA Agency forwarded comments on several RRGp baseline reports on behalf of the Ministry of Natural Resources (MNR) and Environment Canada (EC). Responses were provided to the CEA Agency on 13-06-13.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Ross Lashbrook (Ontario Ministry of Environment)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
587	E-mail	05/27/2013	RRR provided additional baseline reports for the RRGp to the Canadian Environmental Assessment Agency (CEA Agency), Ministry of the Environment (MOE) and Ministry of Northern Development and Mines (MNDM).	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Ross Lashbrook (Ontario Ministry of Environment)	Kyle Stanfield (Rainy River Resources)
588	E-mail	05/28/2013	RRR sent the Draft Environmental Assessment (EA) Table of Contents to the Canadian Environmental Assessment Agency (CEA Agency), Ministry of the Environment (MOE), and Ministry of Northern Development and Mines (MNDM) in order to assist the agencies with review planning.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Ross Lashbrook (Ontario Ministry of Environment)	Kyle Stanfield (Rainy River Resources)
589	E-mail	05/29/2013	AMEC provided the Ministry of Natural Resources (MNR) a draft version of the RRGp Schedule 2 No Net Loss Plan for review and comment by the Fisheries Working Group.	Chris Martin (Ontario Ministry of Natural Resources), Neville Ward (Fisheries and Oceans Canada), Steve Bobrowicz (Ministry of Natural Resources)	Jason Dietrich (AMEC Environment & Infrastructure)
591	E-mail	05/31/2013	RRR sent the Valued Ecosystem Component (VEC) and Record of Contact (ROC) reports for the RRGp to the Canadian Environmental Assessment Agency (CEA Agency) current to 13-05-01.	Stephanie Davis (Canadian Environmental Assessment Agency)	Stacey Jack (Rainy River Resources)
658	Meeting	06/07/2013	A meeting was held to discuss Species at Risk (SAR) and the RRGp. RRR provided an update on New Gold's acquisition of RRR, the status of the Environmental Assessment (EA) Report and the anticipated timeline for the Environmental Site Assessment (ESA). Discussions also related to field surveys and methodology as well as management and protection of potentially affected SAR. The final meeting notes were distributed to participants on 13-08-22 and are considered	Greg Chapman (Ministry of Natural Resources), Rachel Hill (Ministry of Natural Resources), Matt Myers (Ministry of Natural Resources), John Van den Broeck (Ministry of Natural Resources), Greg Rand (Trent University), Melissa Mosley (Ontario Ministry of Natural Resources), Dan McDonell (Environment Canada), Darryl McLeod (Ministry of Natural Resources), Andrea Ellis-Nsiah (Ministry of Natural Resources)	David Simms (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources), Alyson Bisson (Rainy River Resources), Matt Evans (AMEC Environment & Infrastructure), Mark Vancook (Rainy River Resources), Julia Robertson Cowan (Rainy River Resources), Michael Willick (Individual - GP)

Table D-2e: Federal Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
			confidential.		
607	E-mail	06/20/2013	RRR sent the Valued Ecosystem Component (VEC) and Record of Contact (ROC) reports for the RRGp to the Canadian Environmental Assessment Agency (CEA Agency) current to 13-06-01.	Stephanie Davis (Canadian Environmental Assessment Agency)	Stacey Jack (Rainy River Resources)
689	Mass Mailout	07/12/2013	A Notice of Consultation Opportunity for the RRGp was provided along with a copy of the Draft Environmental Assessment (EA) Report (Ver. 2) to various Federal Government agencies. It was noted that written comments are invited by 2013-08-19.	Stephanie Davis (Canadian Environmental Assessment Agency), David Zeit (Transport Canada - Ontario Region), Sara Eddy (Fisheries and Oceans Canada)	Kyle Stanfield (Rainy River Resources)
688	Mass Mailout	07/15/2013	A Notice of Consultation Opportunity for the RRGp was provided along with a copy of the Draft Environmental Assessment (EA) Report (Ver. 2) to various Federal Government agencies. It was noted that written comments are invited by 2013-08-19.	Dan McDonnell (Environment Canada), Bernard Beckhoff (International Joint Commission), Kathleen Cavallaro (Environmental Assessment), Regent Dickey (Major Projects Management Office), John Rafferty (Thunder Bay - Rainy River), Gail Faveri (Environment Canada), Melanie Lalani (Health Canada)	Kyle Stanfield (Rainy River Resources)
624	E-mail	07/25/2013	RRR provided information to the Ministry of the Natural Resource (MNR) and the Canadian Environmental Assessment Agency (CEA Agency) on the alternatives assessment methodology for tailings and mine rock storage that will be used in the Environmental Assessment (EA).	Stephanie Davis (Canadian Environmental Assessment Agency), Rachel Hill (Ministry of Natural Resources)	Kyle Stanfield (Rainy River Resources)
612	E-mail	07/31/2013	RRR sent the Valued Ecosystem Component (VEC) and Record of Contact (ROC) reports for the RRGp to the Canadian Environmental Assessment Agency (CEA Agency) current to 13-07-01.	Stephanie Davis (Canadian Environmental Assessment Agency)	Stacey Jack (Rainy River Resources)
657	Letter	07/31/2013	Fisheries and Oceans Canada (DFO) provided comments on the RRGp Draft Fish Habitat Offset Strategy - Revision A (May 2013) and the Fish Habitat No Net Loss Plan (NNLP) MMR Schedule 2 Amendment Waterbodies - Draft (May 2013). RRR provided responses to the comments on 13-09-10.	Rachel Hill (Ministry of Natural Resources), Chris Martin (Ontario Ministry of Natural Resources), Julie Dahl (Fisheries and Oceans Canada), Sara Eddy (Fisheries and Oceans Canada)	Mark Ruthven (AMEC Environment & Infrastructure)
627	E-mail	08/12/2013	RRR provided instructions to the Canadian Environmental Assessment Agency (CEA Agency) for accessing the Climate Change report from an FTP site.	Dan McDonnell (Environment Canada)	David Simms (AMEC Environment & Infrastructure), Dan Russell (AMEC Environment & Infrastructure)

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ROC	Event Type	Date	Event Summary	Stakeholders	Team
707	Meeting	08/12/2013	RRR met with the Canadian Environmental Assessment Agency (CEA Agency) to discuss the coordinated Federal / Provincial Environmental Assessment (EA) process, review of Draft EA Report and project timeline. A copy of the final meeting notes were provided by the CEA Agency on 13-09-23.	Stephanie Davis (Canadian Environmental Assessment Agency), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Jill Aitken (Canadian Environmental Assessment Agency)	Kyle Stanfield (Rainy River Resources)
709	E-mail	08/14/2013	The Chief of the Rainy River First Nations provided a copy of the technical review of the RRGP draft Environmental Assessment (EA) Report (Ver. 1) on behalf of the First Nation communities who participated in the review (Couchiching First Nation, Lac La Croix First Nation, Mitaanigamiing First Nation, Rainy River First Nations, Seine River First Nation). It was noted that Big Grassy First Nation participated in the draft EA Report (Ver. 1) review but would be conducting a final community review prior to submitting its comments separately.	Stephanie Davis (Canadian Environmental Assessment Agency), Jim Leonard (Rainy River First Nations), Sasha McLeod (Ministry of the Environment)	Kyle Stanfield (Rainy River Resources)
644	Letter	08/19/2013	The Ontario Federation of Anglers and Hunters (OFAH) Zone A branch provided comments on the RRGP Draft Environmental Assessment (EA) Report. Additional comments were received on 13-08-21 but requested to be considered as part of the 13-08-19 submission. Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-20. RRR also provided a copy of the responses via fax to the OFAH Zone A on 13-09-26.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Bruce Hamilton (Ontario Federation of Anglers and Hunters), Amy Liu (Canadian Environmental Assessment Agency), Jill Aitken (Canadian Environmental Assessment Agency)	Kyle Stanfield (Rainy River Resources), Stacey Jack (Rainy River Resources)
645	Letter	08/19/2013	The Township of Chapple provided comments on the RRGP Draft Environmental Assessment (EA) Report. Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-20. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE. RRR also provided a copy of responses directly to the Township on 13-09-25.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Peggy Johnson (Township of Chapple), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Jill Aitken (Canadian Environmental Assessment Agency)	Kyle Stanfield (Rainy River Resources), Stacey Jack (Rainy River Resources)

Table D-2e: Federal Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
646	Letter	08/19/2013	The Rainy River Future Development Corporation (RRFDC) provided comments on the sections of the RRGD Draft Environmental Assessment (EA) Report pertaining to economic growth. The comments noted that the RRFDC reviewed the Draft EA along with the Town of Fort Frances Economic Development Advisory Committee. It was recommended that RRR work with the economic development officer to help maximize the economic benefits to the community. Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-20. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE. RRR also provided a copy of responses directly to the RRFDC on 13-09-25.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Sandra Whalen (Rainy River Future Development Corp), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Jill Aitken (Canadian Environmental Assessment Agency)	Kyle Stanfield (Rainy River Resources), Stacey Jack (Rainy River Resources)
648	Letter	08/19/2013	The Ontario Federation of Anglers and Hunters (OFAH) provided comments on RRGD Draft Environmental Assessment (EA) Report regarding potential impacts to local fish and fish habitat. OFAH recommends that a Ministry of Environment (MOE) Environmental Effects Monitoring Program be implemented to monitor heavy metal accumulation. Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-26. RRR also provided a copy of the responses to the OFAH on 13-09-26.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Shari Sokay (Ontario Federation of Anglers and Hunters), Jill Aitken (Canadian Environmental Assessment Agency)	Kyle Stanfield (Rainy River Resources), Stacey Jack (Rainy River Resources)
641	E-mail	08/22/2013	AMEC, on behalf of RRR, provided the Canadian Environmental Assessment Agency (CEA Agency) RRR's response to Environment Canada's (EC) comments (received on 13-02-26) regarding the Conceptual Mine Closure Presentation and requested that they be forwarded to members of the government review team.	Stephanie Davis (Canadian Environmental Assessment Agency), Dan McDonnell (Environment Canada)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)

Table D-2e: Federal Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
666	E-mail	08/29/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGF Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of MOE's Water Unit. Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-26. RRR responded to questions related to groundwater on 13-10-04.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Simon Haslam (Ministry of the Environment), Jill Aitken (Canadian Environmental Assessment Agency)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
651	E-mail	08/30/2013	RRR sent the Valued Ecosystem Component (VEC) and Record of Contact (ROC) reports for the RRGF to the Canadian Environmental Assessment Agency (CEA Agency) current to 13-08-01.	Stephanie Davis (Canadian Environmental Assessment Agency)	Stacey Jack (Rainy River Resources)
668	E-mail	09/03/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGF Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of the Ministry of Economic Development, Trade and Employment (MEDTE). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-18. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Michael Helfinger (Ontario Ministry of Economic Development and Innovation), Sasha McLeod (Ministry of the Environment)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
669	E-mail	09/03/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGF Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of the Ministry of Northern Development and Mines (MNDM). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-18. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Rob Purdon (Ontario Ministry of Northern Development and Mines), Sasha McLeod (Ministry of the Environment)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)

Table D-2e: Federal Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
670	E-mail	09/03/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGF Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of MOE's Air and Noise Unit. Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-18. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Sushant Agarwal (Ontario Ministry of Environment), Sasha McLeod (Ministry of the Environment)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
671	E-mail	09/03/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGF Draft Environmental Assessment (EA) Report (Ver. 2) related to surface water. Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-26.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Paula Spencer (Ontario Ministry of Environment), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Jill Aitken (Canadian Environmental Assessment Agency)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
672	E-mail	09/03/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGF Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of the Ministry of Tourism, Culture and Sport (MTCS). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-26.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Ami Didrikson (Ministry of Tourism and Culture), Jill Aitken (Canadian Environmental Assessment Agency)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
673	E-mail	09/03/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGF Draft EA Report (Ver. 2) on behalf of the Ministry of Agriculture, Food and Rural Affairs (OMAFRA). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-18. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Sasha McLeod (Ministry of the Environment), Gary Sliworsky (Ministry of Agriculture, Food and Rural Affairs)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)

Table D-2e: Federal Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
674	E-mail	09/03/2013	The Ministry of the Environment (MOE) provided comments from 13-09-03 and 13-09-06 to RRR on the RRGD Draft EA Report (Ver. 2) on behalf of the Ministry of Northern Development and Mines (MNDM). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-18 and 13-09-20. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Jill Aitken (Canadian Environmental Assessment Agency)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
675	E-mail	09/03/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGD Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of the Ministry of Northern Development and Mines (MNDM). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-20. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Jeannette Cawston (Ontario Ministry of Northern Development and Mines), Jill Aitken (Canadian Environmental Assessment Agency)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
676	E-mail	09/03/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGD Draft Environmental Assessment (EA) Report (Ver. 2) related to air quality. Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-18. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Sasha McLeod (Ministry of the Environment), Jodie Horihan (Ministry of the Environment)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
677	Letter	09/03/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGD Draft Environmental Assessment (EA) Report (Ver. 2). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Sasha McLeod (Ministry of the Environment), Stefanos Habtom (Ontario Ministry of the Environment)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)

Table D-2e: Federal Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
			the CEA Agency on 13-09-18. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE.		
678	Letter	09/03/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGP Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of the Ministry of Transportation (MTO). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-18. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Jim McKeever (Ontario Ministry of Transportation), Sasha McLeod (Ministry of the Environment)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
686	E-mail	09/03/2013	RRR provided instructions to Environment Canada (EC) for access to the FTP site hosting the draft Mine Waste Alternatives Assessment Report for review.	Dan McDonell (Environment Canada)	Sheila Daniel (AMEC Environment & Infrastructure)
706	Letter	09/03/2013	Hydro One Networks Inc. (HONI) provided comments to RRR on the RRGP Draft Environmental Assessment (EA) Report (Ver. 2). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-20. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE. RRR also provided a copy of responses directly to Hydro One on 13-09-25.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Cyrus Elmpak-Mackie (Hydro One Networks), Jill Aitken (Canadian Environmental Assessment Agency)	Kyle Stanfield (Rainy River Resources), Stacey Jack (Rainy River Resources)
667	Letter	09/04/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGP Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of MOE's Air and Noise Unit. Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-26. Two attachments were	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Amy Liu (Canadian Environmental Assessment Agency), Pierre Godbout (Ontario Ministry of Environment), Sasha McLeod (Ministry of the Environment), Jill Aitken (Canadian Environmental Assessment Agency)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)

Table D-2e: Federal Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
			inadvertently missed related to responses to MOE's noise comments and were sent to CEA Agency on 13-10-02.		
680	E-mail	09/04/2013	The Canadian Environmental Assessment Agency (CEA Agency) provided comments on the RRG Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of the Department of Fisheries and Oceans (DFO). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-26.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Sara Eddy (Fisheries and Oceans Canada), Jill Aitken (Canadian Environmental Assessment Agency)	Kyle Stanfield (Rainy River Resources)
681	E-mail	09/04/2013	The Canadian Environmental Assessment Agency (CEA Agency) provided comments on the RRG Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of Natural Resources Canada (NRCan). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-20. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE. RRR responded to questions related to groundwater on 13-10-04.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Jill Aitken (Canadian Environmental Assessment Agency)	Kyle Stanfield (Rainy River Resources)
682	E-mail	09/04/2013	The Canadian Environmental Assessment Agency (CEA Agency) provided comments on the RRG Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of Transport Canada (TC). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-20. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Ana Hamid (Transport Canada), Jill Aitken (Canadian Environmental Assessment Agency)	Kyle Stanfield (Rainy River Resources)
679	E-mail	09/05/2013	The Canadian Environmental Assessment Agency (CEA Agency) provided comments on the RRG Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of Health Canada (HC). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Allison Denning (Health Canada), Jill Aitken	Sheila Daniel (AMEC Environment & Infrastructure)

Table D-2e: Federal Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
			Development and Mining (MNDM), and the CEA Agency on 13-09-26.	(Canadian Environmental Assessment Agency)	
683	E-mail	09/05/2013	The Canadian Environmental Assessment Agency (CEA Agency) provided comments on the RRG Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of Environment Canada (EC). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-26.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Jill Aitken (Canadian Environmental Assessment Agency)	Kyle Stanfield (Rainy River Resources)
684	E-mail	09/05/2013	The Canadian Environmental Assessment Agency (CEA Agency) provided comments on the RRG Draft Environmental Assessment (EA) Report (Ver. 2). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-26.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Jill Aitken (Canadian Environmental Assessment Agency)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
685	E-mail	09/05/2013	The Canadian Environmental Assessment Agency (CEA Agency) provided examples to RRR of how another proponent addressed the requirements set out in Section 9.2 of the Environmental Impact Statement (EIS) Guidelines.	Stephanie Davis (Canadian Environmental Assessment Agency), Corey Dekker (Canadian Environmental Assessment Agency)	Kyle Stanfield (Rainy River Resources)
661	E-mail	09/06/2013	The Ministry of the Environment (MOE) Environmental Assessment Services provided comments on the RRG Draft Environmental Assessment (EA) Report (Ver. 2). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-26.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Jill Aitken (Canadian Environmental Assessment Agency)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
662	Letter	09/06/2013	The Ministry of the Environment (MOE) Environmental Approvals Branch provided comments on the RRG Draft Environmental Assessment (EA) Report (Ver. 2). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-26.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Dale Gable (Ministry of the Environment), Jill Aitken (Canadian Environmental Assessment Agency)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)

Table D-2e: Federal Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
664	E-mail	09/06/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGF Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of the Ministry of Tourism, Culture and Sport (MTCS). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-26.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), James Antler (Ministry of Tourism and Culture), Jill Aitken (Canadian Environmental Assessment Agency)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
665	E-mail	09/06/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGF Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of MOE's Environmental Monitoring and Reporting Branch. Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-18. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Sasha McLeod (Ministry of the Environment), Robert Bloxam (Ministry of the Environment), Jinliang (John) Liu (Ministry of the Environment)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
705	E-mail	09/06/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGF Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of the Ministry of Energy. Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-18. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Sasha McLeod (Ministry of the Environment), Cheryl O'Donnell (Ministry of Energy)	Kyle Stanfield (Rainy River Resources)
660	Letter	09/10/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGF Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of the Ontario Ministry of Northern Development and Mines (MNDM). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-26.	Joseph Tyance (Ontario Ministry of the Environment), Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Jill Aitken (Canadian Environmental Assessment Agency)	Kyle Stanfield (Rainy River Resources)

Table D-2e: Federal Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
704	E-mail	09/18/2013	RRR provided a copy of responses to comments received through the Independent Technical Review of the RRGD Draft Environmental Assessment (EA) Report (Ver. 1) conducted on behalf of various Aboriginal groups. Comments received related to Aboriginal consultation, Traditional Knowledge and Traditional Land Use, socio-economics, fish, wildlife, vegetation, surface water, groundwater, air quality, noise and vibration, and human and ecological health. Comments and responses are considered confidential but have been shared with the appropriate regulatory authorities.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Sasha McLeod (Ministry of the Environment)	Kyle Stanfield (Rainy River Resources)
610	E-mail	09/26/2013	The Ministry of the Environment (MOE) noted that the attachments referenced in RRR's responses to the MOE's comments about air quality were not provided with the response document sent to the MOE on 13-09-18. RRR provided MOE and the Canadian Environmental Assessment Agency with a copy of the attachments on 13-09-26.	Stephanie Davis (Canadian Environmental Assessment Agency), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Jill Aitken (Canadian Environmental Assessment Agency)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
611	E-mail	09/26/2013	RRR provided a copy of Appendix D of the Approved Amended Terms of Reference for the RRGD in response to the Department of Fisheries and Oceans (DFO) comments on the RRGD Draft Environmental Assessment (EA) Report.	Sara Eddy (Fisheries and Oceans Canada)	Sheila Daniel (AMEC Environment & Infrastructure)
714	E-mail	10/01/2013	RRR sent the Valued Ecosystem Component (VEC) and Record of Contact (ROC) reports for the RRP to the Canadian Environmental Assessment Agency (CEA Agency) current to 13-09-01.	Stephanie Davis (Canadian Environmental Assessment Agency)	Stacey Jack (Rainy River Resources)
717	E-mail	10/07/2013	On 13-10-07 Environment Canada (EC) provided additional comments raised from the RRGD Draft EIS review relating to the anticipated use of the hydrometric station data. Environment Canada suggested that NewGold and EC meet in person or by teleconference to discuss a potential agreement for the long-term operation of a hydrometric station along the Pinewood River. RRR responded on 13-10-10.	Dan McDonell (Environment Canada)	Kyle Stanfield (Rainy River Resources)
718	E-mail	10/07/2013	Environment Canada (EC) provided comments on RRP Draft Assessment of Alternatives for Mine Waste Disposal. RRR responded on 13-10-11.	Amy Liu (Canadian Environmental Assessment Agency), Dan McDonell (Environment Canada), Sasha McLeod (Ministry of the Environment), Jill	Kyle Stanfield (Rainy River Resources)

Table D-2e: Federal Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
				Aitken (Canadian Environmental Assessment Agency)	

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ROC	Event Type	Date	Event Summary	Stakeholders	Team
389	Letter	11/12/2012	The Ministry of the Environment (MOE) provided RRR with comments from an individual on the RRGP Proposed Terms of Reference (ToR). The comments received were related to general chemical, biophysical, and human environment impacts in relation to RRGP operations, negative impacts on hunting activities and visual aesthetics. A response was provided to the MOE on 13-01-22.	Cindy Batista (Ontario Ministry of Environment), George Gallinger (Individual - GP)	Sheila Daniel (AMEC Environment & Infrastructure)
360	E-mail	11/13/2012	The Ministry of Environment (MOE) asked for copies of the poster boards and handouts used at the 12-11-07 and 12-11-08 open houses. A weblink was provided by RRR on 12-11-16.	Charlene Cressman (Ontario Ministry of the Environment)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
393	E-mail	11/14/2012	The Ministry of the Environment (MOE) provided RRR with comments from an individual on the RRGP Proposed Terms of Reference (ToR). The comments were in favour of the RRGP and included concerns related to water quality. Responses were provided to the MOE on 13-01-22.	Cindy Batista (Ontario Ministry of Environment), Glenda Weir (Individual - GP)	Sheila Daniel (AMEC Environment & Infrastructure)
467	Meeting	11/15/2012	RRR met with the Ministry of Natural Resources (MNR) where AMEC gave a presentation on RRGP considerations for compensation package for Whip-poor-will ESA permitting. Minutes of Species at Risk working group meetings have been requested by the MNR to be kept confidential.	Rachel Hill (Ministry of Natural Resources), Matt Myers (Ministry of Natural Resources), John Van den Broeck (Ministry of Natural Resources), Greg Rand (Trent University), Hilary Gignac (Ministry of Natural Resources)	David Simms (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources), Stacey Jack (Rainy River Resources), Matt Evans (AMEC Environment & Infrastructure)
399	Letter	11/16/2012	The Ministry of the Environment (MOE) provided comments on the RRGP Proposed Terms of Reference (ToR). The comments received were related to noise and vibration impacts. A response was provided to the MOE on 12-12-20.	Cindy Batista (Ontario Ministry of Environment), Pierre Godbout (Ontario Ministry of Environment)	Sheila Daniel (AMEC Environment & Infrastructure)
382	Letter	11/19/2012	The Ministry of the Environment (MOE) provided RRR with comments from an individual on the RRGP Proposed Terms of Reference (ToR). The comments were related to public consultation, cyanide use and effects, water use, operational electrical needs, road access, water quality, biophysical and human impacts, Species at Risk, and zoning bylaws. Responses were provided to the MOE on 13-01-22.	Donelda DeLaRonde (Individual - GP), Cindy Batista (Ontario Ministry of Environment)	Sheila Daniel (AMEC Environment & Infrastructure)

Table D-2e: Provincial Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
384	Letter	11/19/2012	The Ministry of the Environment (MOE) provided RRR with comments from two individuals on the RRGP Proposed Terms of Reference (ToR). The comments received were related to air quality and noise pollution. Responses were provided to the MOE on 13-01-22.	Phillip & Cindy Haggberg (Individual - GP), Cindy Batista (Ontario Ministry of Environment)	Sheila Daniel (AMEC Environment & Infrastructure)
392	Letter	11/19/2012	The Ministry of the Environment (MOE) provided RRR with comments from Ministry of Northern Development and Mines (MNDM) on the RRGP Proposed Terms of Reference (ToR). The comments received were related to socio-economics. Responses were provided to the MOE on 13-01-22.	Jane Gillon (Ontario Ministry of Northern Development and Mines), Cindy Batista (Ontario Ministry of Environment)	Sheila Daniel (AMEC Environment & Infrastructure)
381	E-mail	11/20/2012	The Ministry of the Environment (MOE) provided RRR with comments from the Ministry of Northern Development and Mines (MNDM) on the RRGP Proposed Terms of Reference (ToR). The comments were related to land claims, the site plan and socio-economic impacts. Responses were provided to the MOE on 13-01-22.	Julia McFarling (Ontario Ministry of Northern Development and Mines), Cindy Batista (Ontario Ministry of Environment)	Sheila Daniel (AMEC Environment & Infrastructure)
411	Letter	11/22/2012	The Ministry of the Environment (MOE) provided RRR with comments on the RRGP Proposed Terms of Reference (ToR) related to waste management. Responses were provided to the MOE on 13-01-25.	Cindy Batista (Ontario Ministry of Environment), Lynda Mulchay (Ontario Ministry of Environment)	Sheila Daniel (AMEC Environment & Infrastructure)
390	E-mail	11/23/2012	The Ministry of the Environment (MOE) provided RRR with comments from an individual on the RRGP Proposed Terms of Reference (ToR). The comments were related to cyanide use, tailings waste management and alternatives, and environmental closure. Responses were provided to the MOE on 13-01-22.	Alessandra Massaro (Individual - GP), Cindy Batista (Ontario Ministry of Environment)	Sheila Daniel (AMEC Environment & Infrastructure)
409	Letter	11/23/2012	The Ministry of the Environment (MOE) provided comments on the RRGP Proposed Terms of Reference (ToR). The comments received were related to air quality and air emission alternatives. Responses were provided to the MOE on 13-01-15.	Cindy Batista (Ontario Ministry of Environment), Sushant Agarwal (Ontario Ministry of Environment)	Sheila Daniel (AMEC Environment & Infrastructure)

Table D-2e: Provincial Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
385	Letter	11/26/2012	The Ministry of the Environment (MOE) provided RRR with comments from the Ministry of Economic Development and Innovation (MEDI) on the Proposed Terms of Reference (ToR). The comments received approved the RRGP ToR content and commitments. Responses were provided to the MOE on 12-12-06.	Michael Helfinger (Ontario Ministry of Economic Development and Innovation)	Kyle Stanfield (Rainy River Resources)
394	Letter	11/26/2012	The Ministry of the Environment (MOE) provided comments from the Ministry of Natural Resources (MNR) on the RRGP Proposed Terms of Reference (ToR). The comments were related to proposed alternatives, performance objectives, regulatory requirements, land tenure options, and species at risk. Responses were provided to the MOE on 13-01-28.	Greg Chapman (Ministry of Natural Resources), Cindy Batista (Ontario Ministry of Environment)	Sheila Daniel (AMEC Environment & Infrastructure)
410	Letter	11/26/2012	The Ministry of the Environment (MOE) provided comments on the Proposed Terms of Reference (ToR). The comments received related to air quality, commitments and monitoring and potential environmental effects. Responses were provided to the MOE on 12-12-06.	Cindy Batista (Ontario Ministry of Environment), Sandra Ausma (Ontario Ministry of Environment)	Sheila Daniel (AMEC Environment & Infrastructure)
413	Letter	11/26/2012	The Ministry of the Environment (MOE) provided RRR with comments from an individual on the RRGP Proposed Terms of Reference (ToR). The comments received were related to the proximity of Tailings Management Area (TMA) to home property, alternatives related to the TMA and environmental contamination. Responses were provided to the MOE on 13-01-22.	Rick Neilson (Township of Chapple), Cindy Batista (Ontario Ministry of Environment)	Sheila Daniel (AMEC Environment & Infrastructure)
386	Letter	11/27/2012	The Ministry of the Environment (MOE) provided RRR with comments from Ministry of Northern Development and Mines (MNDM) on the Proposed Terms of Reference (ToR). The comments received were related to anticipated power needs for the RRGP, First Nation engagement, and record of consultation practices. Responses were provided to the MOE on 13-01-22.	Neal Bennett (Ontario Ministry of Northern Development and Mines), Cindy Batista (Ontario Ministry of Environment)	Sheila Daniel (AMEC Environment & Infrastructure)
391	Letter	11/27/2012	The Ministry of the Environment (MOE) provided RRR with comments from Ministry of Energy on the Proposed Terms of Reference (ToR). The comments received were related to anticipated power needs of the RRGP. Responses were	Andrea Stoiko (Ontario Ministry of Energy and Infrastructure)	Kyle Stanfield (Rainy River Resources)

Table D-2e: Provincial Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
			provided to the MOE on 13-01-07.		
412	Letter	11/27/2012	The Ministry of the Environment (MOE) provided RRR with comments from Ministry of Tourism, Culture and Sport (MTCS) on the RRGP Proposed Terms of Reference (ToR). The comments received were related to archaeological resources, built heritage resources and cultural heritage landscapes. Responses were provided to the MOE on 13-01-25.	Cindy Batista (Ontario Ministry of Environment), Paula Kulpa (Ontario Ministry of Tourism, Culture and Sport)	Sheila Daniel (AMEC Environment & Infrastructure)
574	Workshop	11/29/2012	AMEC and RRR met with the Fisheries Working Group to discuss the no net loss (NNL) strategic plan and related logistical issues. The meeting minutes were distributed to participants on 13-04-23.	Tom Kleinboeck (Fisheries and Oceans Canada), David May (Rainy River District Stewardship), Chris Martin (Ontario Ministry of Natural Resources), Steve Bobrowicz (Ministry of Natural Resources)	Mark Ruthven (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources), Jason Dietrich (AMEC Environment & Infrastructure), Nathan Hellinga (AMEC Environment & Infrastructure)
435	E-mail	12/06/2012	An individual from Hamilton, Ontario sent an email to the Ministry of the Environment (MOE) containing comments on the RRR Proposed Terms of Reference (ToR). Comments received related to protecting the local water quality and mitigation tactics to prevent a decline in species at risk (SAR) and threatened wildlife. The individual expressed support for the RRGP. Responses were provided to the MOE on 13-01-22.	Charlene Cressman (Ontario Ministry of the Environment), Cindy Batista (Ontario Ministry of Environment), Jeffrey Leon (Hamilton)	Sheila Daniel (AMEC Environment & Infrastructure)
498	Letter	12/18/2012	The Ministry of the Environment (MOE) provided RRR with comments on the RRGP Proposed Terms of Reference (ToR). The comments were related to the requirements of the Codes of Practice, record of consultation, and general comments on the RRGP. Responses were provided to the MOE on 13-01-22.	Cindy Batista (Ontario Ministry of Environment)	Sheila Daniel (AMEC Environment & Infrastructure)
475	Letter	12/21/2012	RRR advised the Ministry of Environment (MOE) of their intent to amend the RRGP Terms of Reference (ToR) and noted that AMEC would be submitting the Amended ToR for review.	Agatha Garcia-Wright (Ontario Ministry of the Environment)	Kyle Stanfield (Rainy River Resources)
437	Letter	01/08/2013	The Métis Nation of Ontario (MNO) sent a letter to the Ministry of the Environment (MOE) on the Draft RRGP Proposed Terms of Reference (ToR). Comments were related to consultation efforts with the Métis. Responses were provided to the MOE on 13-02-05.	Brian Tucker (Sunset Country Métis), Charlene Cressman (Ontario Ministry of the Environment)	Sheila Daniel (AMEC Environment & Infrastructure)

Table D-2e: Provincial Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
540	Meeting	01/09/2013	A meeting occurred between RRR, AMEC and various government agencies to discuss RRGPs Closure Plan. Revised meeting notes were distributed to participants on 13-03-28.	Mark O'Brien (Ontario Ministry of Northern Development and Mines), Fadi Haddad (Natural Resources Canada), Stephanie Davis (Canadian Environmental Assessment Agency), Kathleen Cavallaro (Environmental Assessment), Rachel Hill (Ministry of Natural Resources), Neal Bennett (Ontario Ministry of Northern Development and Mines), James McKeever (Ministry of Transportation), Drew Stajkowski (Ministry of Environment), Matt Myers (Ministry of Natural Resources), Anita Li (Environment Canada), Alisdair Brown (Ontario Ministry of the Environment), Chris Martin (Ontario Ministry of Natural Resources), Dan McDonell (Environment Canada), Rosanna Massimi (Environment Canada), Cindy Brown (Ministry of Transportation), Rob Purdon (Ontario Ministry of Northern Development and Mines), Mary Duda (Ministry of the Environment), Dan Fox (Ministry of Natural Resources)	David Simms (AMEC Environment & Infrastructure), Sheila Daniel (AMEC Environment & Infrastructure), Steve Sibbick (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources), Stacey Jack (Rainy River Resources), Heather Lindsay (AMEC Environment & Infrastructure)
425	E-mail	01/14/2013	Mishkosiimiiniiziibing (Big Grassy River) First Nation emailed the Ministry of Environment (MOE) indicating that the Draft Terms of Reference (ToR) have been reviewed by the First Nation members and NRF Consultation Advisor. The email demonstrated the current satisfaction with the Draft ToR and support for working with the MOE to expedite the approvals required toward the implementation of the Environmental Assessment (EA).	Romeo Duguay (Mishkosiimiiniiziibing (Big Grassy River) First Nation), Cindy Batista (Ontario Ministry of Environment)	
426	E-mail	01/15/2013	The Ministry of Environment (MOE) responded to the letter of support for the RRGPs Draft Terms of Reference (ToR) sent by Mishkosiimiiniiziibing (Big Grassy River) First Nation on 13-01-14. The MOE indicated that the letter of support will form part of the Project file and will be considered by the Minister of the Environment when making a decision to approve the ToR.	Romeo Duguay (Mishkosiimiiniiziibing (Big Grassy River) First Nation), Cindy Batista (Ontario Ministry of Environment)	

Table D-2e: Provincial Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
428	Phone Call	01/16/2013	A conference call to discuss comments on proposed Terms of Reference (ToR) took place on 2012-12-13. Discussions continued by email between RRR and MOE and on 13-01-30, AMEC provided the MOE with a copy of the Amended Proposed Terms of Reference.	Ross Lashbrook (Ontario Ministry of Environment), Cindy Batista (Ontario Ministry of Environment)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
541	Letter	01/22/2013	The Chiefs of Naicatchewenin First Nation and Rainy River First Nations sent a joint letter of support for the RRGP to the Ministry of Environment (MOE) and requested that the MOE approve the RRGP Terms of Reference (ToR). The letter was incorrectly dated 12-01-22.	Wayne Smith (Naicatchewenin First Nation), James Leonard II (Rainy River First Nations), Cindy Batista (Ontario Ministry of Environment)	
575	Workshop	01/31/2013	The Fisheries Working Group met to discuss status updates on the RRGP, the no net loss (NNL) strategic plan, Traditional Knowledge (TK) report on Lake Sturgeon, and Pinewood River fish habitat. The meeting minutes were distributed to participants on 13-04-23.	Rich Rudolph (Fisheries and Oceans Canada), David May (Rainy River District Stewardship), Chris Martin (Ontario Ministry of Natural Resources), Neville Ward (Fisheries and Oceans Canada), Steve Bobrowicz (Ministry of Natural Resources)	Mark Ruthven (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources), Jason Dietrich (AMEC Environment & Infrastructure), Nathan Hellinga (AMEC Environment & Infrastructure)
495	E-mail	02/12/2013	RRR proposed a meeting agenda for a scheduled Federal / Provincial EA coordination meeting on 13-02-22.	Stephanie Davis (Canadian Environmental Assessment Agency), Cindy Batista (Ontario Ministry of Environment)	Kyle Stanfield (Rainy River Resources)
702	Meeting	02/13/2013	A meeting was held to discuss Species at Risk (SAR) permitting and the RRGP. The final meeting notes are considered confidential.	Matt Myers (Ministry of Natural Resources), John Van den Broeck (Ministry of Natural Resources), Greg Rand (Trent University), Gary Burness (Trent University)	David Simms (AMEC Environment & Infrastructure), Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources), Matt Evans (AMEC Environment & Infrastructure), Izabela Kalkowski (AMEC Environment & Infrastructure), Michael Willick (Individual - GP)
490	Letter	02/15/2013	The Township of Chapple sent letters of support regarding the RRGP to the Canadian Environmental Assessment Agency (CEA Agency) and the Ministry of Environment (MOE).	Stephanie Davis (Canadian Environmental Assessment Agency), Peggy Johnson (Township of Chapple), Cindy Batista (Ontario Ministry of Environment), Jim Bradley (Ontario Ministry of the Environment)	
584	Letter	02/19/2013	The Township of La Vallee confirmed its support for the RRGP, noting support for timely completion of the Environmental Assessment (EA) process to allow RRGP construction to begin in the summer of 2014.	Stephanie Davis (Canadian Environmental Assessment Agency), Sylvia Smeeth (Township of La Vallee), Cindy Batista (Ontario Ministry of Environment), Jim Bradley (Ontario Ministry of the Environment)	
494	E-mail	02/20/2013	The Ministry of Northern Development and Mines (MNDM) provided comments on a draft summary of major developments in the Rainy River District compiled by RRR as part of the socio-economic effects assessment for the RRGP.	Geoff Gillon (Rainy River Future Development Corp), Jane Gillon (Ontario Ministry of Northern Development and Mines)	Stacey Jack (Rainy River Resources)

Table D-2e: Provincial Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
497	Letter	02/21/2013	RRR sent a letter to the Ministry of the Environment (MOE) containing an erratum table for the RRGP Amended Proposed Terms of Reference (ToR).	Ian Parrott (Ontario Ministry of Environment)	Kyle Stanfield (Rainy River Resources)
578	Letter	02/21/2013	The Council of the Township of Alberton sent letters confirming Council's support for the RRGP to the Ministry of the Environment (MOE) and the Canadian Environmental Assessment Agency (CEA Agency). The Council noted their support for timely completion of the Environmental Assessment (EA) process.	Stephanie Davis (Canadian Environmental Assessment Agency), Michael Hammond (Township of Alberton), Cindy Batista (Ontario Ministry of Environment), Jim Bradley (Ontario Ministry of the Environment)	
581	Meeting	02/22/2013	RRR, First Nation representatives, and Government representatives met to discuss the RRGP. Project updates were shared by RRR and First Nation representatives provided their views and shared support for the RRGP. Discussions focused on the Amended Proposed Terms of Reference (ToR), the Federal and Provincial Environmental Assessment (EA) processes, and the proposed Highway 600 realignment. Final revised meeting notes were distributed by the CEA Agency on 13-04-16.	Stephanie Davis (Canadian Environmental Assessment Agency), Regent Dickey (Major Projects Management Office), Rachel Hill (Ministry of Natural Resources), Neal Bennett (Ontario Ministry of Northern Development and Mines), Mike Grant (Ontario Ministry of Northern Development and Mines), James McKeever (Ministry of Transportation), Peggy Johnson (Township of Chapple), Peter Van Heyst (Township of Chapple), Wayne Smith (Naicatchewenin First Nation), Jim Leonard (Rainy River First Nations), Ross Lashbrook (Ontario Ministry of Environment), Alisdair Brown (Ontario Ministry of the Environment), Patrick Barnes (Ontario Ministry of Northern Development and Mines), Ken Wilson (Township of Chapple), Cindy Batista (Ontario Ministry of Environment), Dan McDonell (Environment Canada), Cindy Brown (Ministry of Transportation), Dan Fox (Ministry of Natural Resources), Iain Galloway (Ministry of Transportation), Stephen DeVos (Ontario Ministry of Northern Development and Mines), Rob Ferguson (Ontario Ministry of Northern Development and Mines), Howard Hampton (Fasken Martineau DuMoulin LLP), Anjala Puvananathan (Canadian Environmental Assessment Agency), Rosalind Cooper (Fasken Martineau DuMoulin LLP), Randy Both (Township of Chapple)	David Simms (AMEC Environment & Infrastructure), Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources), Stacey Jack (Rainy River Resources)

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ROC	Event Type	Date	Event Summary	Stakeholders	Team
582	Letter	02/22/2013	The Council of the Township of Dawson confirmed Council's support for the RRGp to the Ministry of the Environment (MOE). The Council noted their support for timely completion of the Environmental Assessment (EA) process.	Patrick Giles (Township of Dawson), Cindy Batista (Ontario Ministry of Environment)	
583	Letter	02/22/2013	The Township of Lake of the Woods confirmed support for the RRGp, noting support for timely completion of the Environmental Assessment (EA) process to allow for RRGp construction to begin in the summer of 2014.	Cindy Batista (Ontario Ministry of Environment), Patrick Giles (Township of Lake of the Woods)	
483	E-mail	02/26/2013	RRR provided instructions for accessing the RRGp Climate, Air Quality and Sound Baseline Study to the Canadian Environmental Assessment Agency (CEA Agency), Ministry of the Environment (MOE) and Ministry of Northern Development and Mines (MNDM).	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Cindy Batista (Ontario Ministry of Environment)	Kyle Stanfield (Rainy River Resources)
585	Letter	02/27/2013	The Town of Rainy River confirmed its support for the RRGp, noting support for timely completion of the Environmental Assessment (EA) process to allow RRGp construction to begin in the summer of 2014.	Stephanie Davis (Canadian Environmental Assessment Agency), Veldron Vogan (Town of Rainy River), Cindy Batista (Ontario Ministry of Environment), Jim Bradley (Ontario Ministry of the Environment)	
532	E-mail	03/11/2013	RRR responded to Ministry of Environment (MOE) questions related to the Amended Proposed Terms of Reference (ToR).	Cindy Batista (Ontario Ministry of Environment)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
539	E-mail	03/25/2013	AMEC requested information from the Fort Frances Ontario Provincial Police (OPP) on any potential traffic or safety issues for Highways 11 and 71 in the Rainy River District.	Darren Hyatt (Ontario Provincial Police)	Caroline Burgess (AMEC Environment & Infrastructure)
543	E-mail	04/04/2013	AMEC followed up on a phone conversation with the Ministry of Transportation (MTO) related to annual average daily traffic on Highway 600 and requested level of service ratings for Highways 600, 11, and 71 within the regional study area (RSA). MTO provided additional information on levels of service on 13-04-05.	James McKeever (Ministry of Transportation)	Caroline Burgess (AMEC Environment & Infrastructure)
572	Letter	04/29/2013	Naicatchewenin First Nation sent a letter of support for the RRGp to the Ontario Ministry of Northern Development and Mines (MNDM) and voiced concerns regarding a delay in the Terms of Reference (ToR) as having an impact on First Nation communities' ability to adequately review the Environmental Assessment (EA).	Michael Gravelle (Ontario Ministry of Northern Development and Mines), Wayne Smith (Naicatchewenin First Nation)	

Table D-2e: Provincial Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
			Naicatchewenin First Nation recommended that the MDNM work closely with RRR to facilitate the approval of the ToR.		
603	Meeting	05/08/2013	AMEC and RRR met with the Fisheries Working Group to discuss the no net loss plan (NNLP) and the Offset Strategy document. RRR also provided an update on the RRGP. The meeting minutes were distributed to participants on 13-06-18.	Chris Martin (Ontario Ministry of Natural Resources), Neville Ward (Fisheries and Oceans Canada), Steve Bobrowicz (Ministry of Natural Resources)	Mark Ruthven (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources), Jason Dietrich (AMEC Environment & Infrastructure), Nathan Hellinga (AMEC Environment & Infrastructure)
604	E-mail	05/08/2013	The CEA Agency forwarded comments on several RRGP baseline reports on behalf of the Department of Fisheries and Oceans (DFO), Environment Canada (EC), Health Canada (HC), and Ministry of Natural Resources (MNR). Responses were provided to the CEA Agency on 13-06-13.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Ross Lashbrook (Ontario Ministry of Environment)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
576	Letter	05/15/2013	The Mitaanjigamiing First Nation expressed support for the RRGP to the Minister of Northern Development and Mines (MNDM). The letter noted concerns regarding the delay in approving the RRGP Terms of Reference (ToR) and indicated that this has an impact on First Nation communities' ability to adequately review the Environmental Assessment (EA). The Mitaanjigamiing First Nation recommended that the MDNM work closely with RRR to facilitate the approval of the ToR.	Michael Gravelle (Ontario Ministry of Northern Development and Mines), Janice Henderson (Mitaanjigamiing First Nation)	
605	E-mail	05/23/2013	The CEA Agency forwarded comments on several RRGP baseline reports on behalf of the Ministry of Natural Resources (MNR) and Environment Canada (EC). Responses were provided to the CEA Agency on 13-06-13.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Ross Lashbrook (Ontario Ministry of Environment)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
587	E-mail	05/27/2013	RRR provided additional baseline reports for the RRGP to the Canadian Environmental Assessment Agency (CEA Agency), Ministry of the Environment (MOE) and Ministry of Northern Development and Mines (MNDM).	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Ross Lashbrook (Ontario Ministry of Environment)	Kyle Stanfield (Rainy River Resources)
588	E-mail	05/28/2013	RRR sent the Draft Environmental Assessment (EA) Table of Contents to the Canadian Environmental Assessment Agency (CEA Agency), Ministry of the Environment (MOE), and Ministry of Northern Development and Mines (MNDM) in order to assist the agencies with review planning.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Ross Lashbrook (Ontario Ministry of Environment)	Kyle Stanfield (Rainy River Resources)

Table D-2e: Provincial Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
589	E-mail	05/29/2013	AMEC provided the Ministry of Natural Resources (MNR) a draft version of the RRGP Schedule 2 No Net Loss Plan for review and comment by the Fisheries Working Group.	Chris Martin (Ontario Ministry of Natural Resources), Neville Ward (Fisheries and Oceans Canada), Steve Bobrowicz (Ministry of Natural Resources)	Jason Dietrich (AMEC Environment & Infrastructure)
597	Community Event	06/04/2013	RRR hosted a Spring Ceremony at the RRGP site. The ceremony was conducted by an Elder from Naicatchewenin First Nation and approximately 50 people were in attendance.	John Pollock (Woodland Heritage Services Ltd), Ryan Primrose (Woodland Heritage Services Ltd), Jim Leonard (Rainy River First Nations), Tammy Ryll (Fort Frances Chiefs Secretariat), Romeo Duguay (Mishkosiimiiniiziibing (Big Grassy River) First Nation), Albert Handorgan (Anishinaabeg of Naongashiing (Big Island) First Nation), Tony Marinaro (Naicatchewenin First Nation), Alex Tom (Naotkamegwanning (Whitefish Bay) First Nation), Carl Tuesday (Mishkosiimiiniiziibing (Big Grassy River) First Nation), Bessie Tom (Mishkosiimiiniiziibing (Big Grassy River) First Nation), Robert Archie (Mishkosiimiiniiziibing (Big Grassy River) First Nation), Allan Yerxa (Couchiching First Nation), Susan Archie (Mishkosiimiiniiziibing (Big Grassy River) First Nation), Bill Morrison (Mishkosiimiiniiziibing (Big Grassy River) First Nation), Dean McMahon (Sunset Country Métis), Delia Smith (Naicatchewenin First Nation), Gilbert Smith (Naicatchewenin First Nation), Chris Henderson (Mitaanjigamiing First Nation), Annie Wayash (Mitaanjigamiing First Nation), Bob Armit (Sunset Country Métis), Dorothy Huittika (Sunset Country Métis), John George (Sunset Country Métis), Val Pelepetz (Sunset Country Métis), Bill Wayash (Mitaanjigamiing First Nation), Paul Henderson (Mitaanjigamiing First Nation), Unknown Unknown (Sunset Country Métis), Andrew Hinshelwood (Ontario Ministry of Tourism, Culture and Sport), Bella Andy (Mishkosiimiiniiziibing (Big Grassy River) First Nation), Alex Epp (Woodland Heritage Services Ltd), Forrest Hinich (Woodland Heritage Services Ltd), Charlie Binguis (Woodland Heritage Services Ltd), Mike O'Connor (Woodland Heritage Services Ltd), Shannon King (Naicatchewenin Development Corporation), Tracy Yerxa (Couchiching First Nation), Frank Tom Sr. (Naotkamegwanning (Whitefish Bay) First Nation),	Kyle Stanfield (Rainy River Resources), Lincoln Dunn (Pwi-Di-Goo-Zing Ne-Yaa-Zhing Advisory Services / Rainy River Resources), Stacey Jack (Rainy River Resources), Alyson Bisson (Rainy River Resources), Andrew Tims (Rainy River Resources), Cameron Shaw (Rainy River Resources), Sarah Miller (Rainy River Resources), Mark Vancook (Rainy River Resources), Darrell Hyde (Rainy River Resources), Rosina Hiebert (Individual - GP)

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ROC	Event Type	Date	Event Summary	Stakeholders	Team
				Jane Tom (Naotkamegwanning (Whitefish Bay) First Nation), George Kirkruide (Anishinaabeg of Naongashiing (Big Island) First Nation), Alex Bruyere (Fort Frances Chiefs Secretariat)	
658	Meeting	06/07/2013	A meeting was held to discuss Species at Risk (SAR) and the RRG. RRR provided an update on New Gold's acquisition of RRR, the status of the Environmental Assessment (EA) Report and the anticipated timeline for the Environmental Site Assessment (ESA). Discussions also related to field surveys and methodology as well as management and protection of potentially affected SAR. The final meeting notes were distributed to participants on 13-08-22 and are considered confidential.	Greg Chapman (Ministry of Natural Resources), Rachel Hill (Ministry of Natural Resources), Matt Myers (Ministry of Natural Resources), John Van den Broeck (Ministry of Natural Resources), Greg Rand (Trent University), Melissa Mosley (Ontario Ministry of Natural Resources), Dan McDonell (Environment Canada), Darryl McLeod (Ministry of Natural Resources), Andrea Ellis-Nsiah (Ministry of Natural Resources)	David Simms (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources), Alyson Bisson (Rainy River Resources), Matt Evans (AMEC Environment & Infrastructure), Mark Vancook (Rainy River Resources), Julia Robertson Cowan (Rainy River Resources), Michael Willick (Individual - GP)
659	Meeting	06/25/2013	RRR and its consultants met with the Ministry of Natural Resources (MNR) to discuss Species at Risk (SAR) and the RRG. The meeting focused on ongoing field surveys and survey methodology as well as management and protection of potentially affected SAR. The final meeting notes were distributed to participants on 13-08-22 and are considered confidential.	Rachel Hill (Ministry of Natural Resources), Matt Myers (Ministry of Natural Resources), John Van den Broeck (Ministry of Natural Resources)	David Simms (AMEC Environment & Infrastructure), Alyson Bisson (Rainy River Resources), Matt Evans (AMEC Environment & Infrastructure), Mark Vancook (Rainy River Resources), Jon Pleizier (AMEC Environment & Infrastructure)
691	Mass Mailout	07/12/2013	A Notice of Consultation Opportunity for the RRG was provided along with a copy of the Draft Environmental Assessment (EA) Report (Ver. 2) to various Provincial Government agencies. It was noted that written comments are invited by 2013-08-19.	Rachel Hill (Ministry of Natural Resources), Neal Bennett (Ontario Ministry of Northern Development and Mines), Sasha McLeod (Ministry of the Environment)	Kyle Stanfield (Rainy River Resources)
690	Mass Mailout	07/15/2013	A Notice of Consultation Opportunity for the RRG was provided along with a copy of the Draft Environmental Assessment (EA) Report (Ver. 2) to various Provincial Government agencies. It was noted that written comments are invited by 2013-08-19.	Leslie Koch (Hydro One Networks Inc.), Reed Barrett (Ministry of Economic Development and Trade), Peter Craig (Ministry of Economic Development and Trade), Allan Jenkins (Ministry of Energy), Paula Allen (Ontario Ministry of the Environment), Don Hamilton (Ministry of Environment), Trina Rawn (Ministry of Environment), Sylvia Shedden (Ministry of Health and Long-Term Care), Jamie Austin (Ministry of Infrastructure), Audrey E. Anderson (Ministry of Municipal Affairs & Housing), Greg Chapman (Ministry of Natural Resources), Evan Simpson (Ministry of Natural Resources), Allan Willcocks (Ministry of Natural Resources), Mike Grant	Kyle Stanfield (Rainy River Resources)

Table D-2e: Provincial Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
				(Ontario Ministry of Northern Development and Mines), Grace Lo (Ontario Ministry of Northern Development and Mines), Joan van Kralingen (Ontario Ministry of Northern Development and Mines), James McKeever (Ministry of Transportation), Paula Brown (Ontario Provincial Police), Sarah Campbell (Rainy River District), Bill Mauro (Thunder Bay - Atikokan), Gary Sliworsky (Ontario Ministry of Agriculture, Food and Rural Affairs), Laura Hatcher (Ministry of Tourism and Culture), Hartley Springman (Ministry of Energy)	
613	E-mail	07/24/2013	The Ministry of the Environment (MOE) requested the air dispersion modelling input and output files used in the development of the RRGD Draft Environmental Assessment (EA) Report. RRR confirmed that this information would be made available and it was subsequently shared with the MOE on 13-08-12.	Sasha McLeod (Ministry of the Environment)	Sheila Daniel (AMEC Environment & Infrastructure)
624	E-mail	07/25/2013	RRR provided information to the Ministry of the Natural Resource (MNR) and the Canadian Environmental Assessment Agency (CEA Agency) on the alternatives assessment methodology for tailings and mine rock storage that will be used in the Environmental Assessment (EA).	Stephanie Davis (Canadian Environmental Assessment Agency), Rachel Hill (Ministry of Natural Resources)	Kyle Stanfield (Rainy River Resources)
657	Letter	07/31/2013	Fisheries and Oceans Canada (DFO) provided comments on the RRGD Draft Fish Habitat Offset Strategy - Revision A (May 2013) and the Fish Habitat No Net Loss Plan (NNLP) MMER Schedule 2 Amendment Waterbodies - Draft (May 2013). RRR provided responses to the comments on 13-09-10.	Rachel Hill (Ministry of Natural Resources), Chris Martin (Ontario Ministry of Natural Resources), Julie Dahl (Fisheries and Oceans Canada), Sara Eddy (Fisheries and Oceans Canada)	Mark Ruthven (AMEC Environment & Infrastructure)
626	Open House	08/08/2013	RRR hosted an open house in Fort Frances to discuss the RRGD and share information about the Draft Environmental Assessment (EA) report. RRR representatives responded to a range of questions and comments received from participants. Approximately 27 people attended.	Bruce Hamilton (Ontario Federation of Anglers and Hunters), Trish & Colin Neilson (Individual - GP), Donald Huitikka (Individual - GP), Colin + Dorothy Neilson (Individual - GP), Colleen MacEachern (Individual - GP), Larry Stahn (Individual - GP), Anne Renaud (Confederation College), Matt Myers (Ministry of Natural Resources), John Van den Broeck (Ministry of Natural Resources), Bob Armit (Sunset Country Métis), Larry Lamb (Individual - GP), Mike Hammond (Rainy River Valley Field Naturalists), Mike Carmody (Mike Carmody)	David Simms (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources), Andrea Curtis (Rainy River Resources), Lincoln Dunn (Pwi-Di-Goo-Zing Ne-Yaa-Zhing Advisory Services / Rainy River Resources), Stacey Jack (Rainy River Resources), Alyson Bisson (Rainy River Resources), Andrew Tims (Rainy River Resources), Jason Pattison (Rainy River Resources), Mark Vancook (Rainy River Resources)

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ROC	Event Type	Date	Event Summary	Stakeholders	Team
				Contracting), Jennifer Horton (Individual - GP), Michael Willick (Individual - GP), Shawn MacEachern (Individual - GP), Shawn Neilson (Individual - GP), Andrea Ellis-Nsiah (Individual - GP), Thomas D. Drew (Individual - GP), Lonnie Beaulne (Individual - GP), Robert Wepruk (Individual - GP), Unknown Unknown (Unknown), Don Huitikka Jr. (Individual - GP), Heather Latter (Individual - GP), Linda Lamb (Individual - GP), Louis Cousineau (Individual - GP), Shelley Jondbro (Individual - GP), Kaela Hahkala (Individual - GP)	
701	Meeting	08/08/2013	A meeting was held to discuss Species at Risk (SAR) permitting and the RRG. The final meeting notes were distributed to participants on 13-09-13 and are considered confidential.	Matt Myers (Ministry of Natural Resources), John Van den Broeck (Ministry of Natural Resources)	David Simms (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources), Michael Willick (Individual - GP)
707	Meeting	08/12/2013	RRR met with the Canadian Environmental Assessment Agency (CEA Agency) to discuss the coordinated Federal / Provincial Environmental Assessment (EA) process, review of Draft EA Report and project timeline. A copy of the final meeting notes were provided by the CEA Agency on 13-09-23.	Stephanie Davis (Canadian Environmental Assessment Agency), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Jill Aitken (Canadian Environmental Assessment Agency)	Kyle Stanfield (Rainy River Resources)
709	E-mail	08/14/2013	The Chief of the Rainy River First Nations provided a copy of the technical review of the RRG draft Environmental Assessment (EA) Report (Ver. 1) on behalf of the First Nation communities who participated in the review (Couchiching First Nation, Lac La Croix First Nation, Mitaanjigamiing First Nation, Rainy River First Nations, Seine River First Nation). It was noted that Big Grassy First Nation participated in the draft EA Report (Ver. 1) review but would be conducting a final community review prior to submitting its comments separately.	Stephanie Davis (Canadian Environmental Assessment Agency), Jim Leonard (Rainy River First Nations), Sasha McLeod (Ministry of the Environment)	Kyle Stanfield (Rainy River Resources)
644	Letter	08/19/2013	The Ontario Federation of Anglers and Hunters (OFAH) Zone A branch provided comments on the RRG Draft Environmental Assessment (EA) Report. Additional comments were received on 13-08-21 but requested to be considered as part of the 13-08-19 submission. Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-20. RRR also provided a copy of the responses via	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Bruce Hamilton (Ontario Federation of Anglers and Hunters), Amy Liu (Canadian Environmental Assessment Agency), Jill Aitken (Canadian Environmental Assessment Agency)	Kyle Stanfield (Rainy River Resources), Stacey Jack (Rainy River Resources)

Table D-2e: Provincial Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
645	Letter	08/19/2013	<p>fax to the OFAH Zone A on 13-09-26.</p> <p>The Township of Chapple provided comments on the RRGP Draft Environmental Assessment (EA) Report. Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-20. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE. RRR also provided a copy of responses directly to the Township on 13-09-25.</p>	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Peggy Johnson (Township of Chapple), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Jill Aitken (Canadian Environmental Assessment Agency)	Kyle Stanfield (Rainy River Resources), Stacey Jack (Rainy River Resources)
646	Letter	08/19/2013	<p>The Rainy River Future Development Corporation (RRFDC) provided comments on the sections of the RRGP Draft Environmental Assessment (EA) Report pertaining to economic growth. The comments noted that the RRFDC reviewed the Draft EA along with the Town of Fort Frances Economic Development Advisory Committee. It was recommended that RRR work with the economic development officer to help maximize the economic benefits to the community. Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-20. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE. RRR also provided a copy of responses directly to the RRFDC on 13-09-25.</p>	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Sandra Whalen (Rainy River Future Development Corp), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Jill Aitken (Canadian Environmental Assessment Agency)	Kyle Stanfield (Rainy River Resources), Stacey Jack (Rainy River Resources)
648	Letter	08/19/2013	<p>The Ontario Federation of Anglers and Hunters (OFAH) provided comments on RRGP Draft Environmental Assessment (EA) Report regarding potential impacts to local fish and fish habitat. OFAH recommends that a Ministry of Environment (MOE) Environmental Effects Monitoring Program be implemented to monitor heavy metal accumulation. Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-26. RRR also provided a copy of the responses to the OFAH</p>	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Shari Sokay (Ontario Federation of Anglers and Hunters), Jill Aitken (Canadian Environmental Assessment Agency)	Kyle Stanfield (Rainy River Resources), Stacey Jack (Rainy River Resources)

Table D-2e: Provincial Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
			on 13-09-26.		
666	E-mail	08/29/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGP Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of MOE's Water Unit. Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-26. RRR responded to questions related to groundwater on 13-10-04.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Simon Haslam (Ministry of the Environment), Jill Aitken (Canadian Environmental Assessment Agency)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
668	E-mail	09/03/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGP Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of the Ministry of Economic Development, Trade and Employment (MEDTE). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-18. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Michael Helfinger (Ontario Ministry of Economic Development and Innovation), Sasha McLeod (Ministry of the Environment)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
669	E-mail	09/03/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGP Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of the Ministry of Northern Development and Mines (MNDM). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-18. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Rob Purdon (Ontario Ministry of Northern Development and Mines), Sasha McLeod (Ministry of the Environment)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
670	E-mail	09/03/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGP Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of MOE's Air and Noise Unit. Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-18. RRR noted that they would be willing to arrange a meeting or conference call	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Sushant Agarwal (Ontario Ministry of Environment), Sasha McLeod (Ministry of the Environment)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)

Table D-2e: Provincial Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
			with technical experts to answer further questions if required as previously discussed with MOE.		
671	E-mail	09/03/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGF Draft Environmental Assessment (EA) Report (Ver. 2) related to surface water. Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-26.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Paula Spencer (Ontario Ministry of Environment), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Jill Aitken (Canadian Environmental Assessment Agency)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
672	E-mail	09/03/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGF Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of the Ministry of Tourism, Culture and Sport (MTCS). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-26.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Ami Didrikson (Ministry of Tourism and Culture), Jill Aitken (Canadian Environmental Assessment Agency)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
673	E-mail	09/03/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGF Draft EA Report (Ver. 2) on behalf of the Ministry of Agriculture, Food and Rural Affairs (OMAFRA). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-18. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Sasha McLeod (Ministry of the Environment), Gary Sliworsky (Ministry of Agriculture, Food and Rural Affairs)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
674	E-mail	09/03/2013	The Ministry of the Environment (MOE) provided comments from 13-09-03 and 13-09-06 to RRR on the RRGF Draft EA Report (Ver. 2) on behalf of the Ministry of Northern Development and Mines (MNDM). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-18 and 13-09-20. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Jill Aitken (Canadian Environmental Assessment Agency)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)

Table D-2e: Provincial Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
675	E-mail	09/03/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGP Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of the Ministry of Northern Development and Mines (MNDM). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-20. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Jeannette Cawston (Ontario Ministry of Northern Development and Mines), Jill Aitken (Canadian Environmental Assessment Agency)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
676	E-mail	09/03/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGP Draft Environmental Assessment (EA) Report (Ver. 2) related to air quality. Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-18. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Sasha McLeod (Ministry of the Environment), Jodie Horihan (Ministry of the Environment)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
677	Letter	09/03/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGP Draft Environmental Assessment (EA) Report (Ver. 2). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-18. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Sasha McLeod (Ministry of the Environment), Stefanos Habtom (Ontario Ministry of the Environment)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
678	Letter	09/03/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGP Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of the Ministry of Transportation (MTO). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-18. RRR noted that they would be willing to arrange a meeting or	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Jim McKeever (Ontario Ministry of Transportation), Sasha McLeod (Ministry of the Environment)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)

Table D-2e: Provincial Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
			conference call with technical experts to answer further questions if required as previously discussed with MOE.		
706	Letter	09/03/2013	Hydro One Networks Inc. (HONI) provided comments to RRR on the RRGD Draft Environmental Assessment (EA) Report (Ver. 2). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-20. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE. RRR also provided a copy of responses directly to Hydro One on 13-09-25.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Cyrus Elmpak-Mackie (Hydro One Networks), Jill Aitken (Canadian Environmental Assessment Agency)	Kyle Stanfield (Rainy River Resources), Stacey Jack (Rainy River Resources)
667	Letter	09/04/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGD Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of MOE's Air and Noise Unit. Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-26. Two attachments were inadvertently missed related to responses to MOE's noise comments and were sent to CEA Agency on 13-10-02.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Amy Liu (Canadian Environmental Assessment Agency), Pierre Godbout (Ontario Ministry of Environment), Sasha McLeod (Ministry of the Environment), Jill Aitken (Canadian Environmental Assessment Agency)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
680	E-mail	09/04/2013	The Canadian Environmental Assessment Agency (CEA Agency) provided comments on the RRGD Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of the Department of Fisheries and Oceans (DFO). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-26.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Sara Eddy (Fisheries and Oceans Canada), Jill Aitken (Canadian Environmental Assessment Agency)	Kyle Stanfield (Rainy River Resources)
681	E-mail	09/04/2013	The Canadian Environmental Assessment Agency (CEA Agency) provided comments on the RRGD Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of Natural Resources Canada (NRCAN). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-20. RRR noted that they	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Jill Aitken (Canadian Environmental Assessment Agency)	Kyle Stanfield (Rainy River Resources)

Table D-2e: Provincial Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
			would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE. RRR responded to questions related to groundwater on 13-10-04.		
682	E-mail	09/04/2013	The Canadian Environmental Assessment Agency (CEA Agency) provided comments on the RRGF Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of Transport Canada (TC). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-20. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Ana Hamid (Transport Canada), Jill Aitken (Canadian Environmental Assessment Agency)	Kyle Stanfield (Rainy River Resources)
679	E-mail	09/05/2013	The Canadian Environmental Assessment Agency (CEA Agency) provided comments on the RRGF Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of Health Canada (HC). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-26.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Allison Denning (Health Canada), Jill Aitken (Canadian Environmental Assessment Agency)	Sheila Daniel (AMEC Environment & Infrastructure)
683	E-mail	09/05/2013	The Canadian Environmental Assessment Agency (CEA Agency) provided comments on the RRGF Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of Environment Canada (EC). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-26.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Jill Aitken (Canadian Environmental Assessment Agency)	Kyle Stanfield (Rainy River Resources)
684	E-mail	09/05/2013	The Canadian Environmental Assessment Agency (CEA Agency) provided comments on the RRGF Draft Environmental Assessment (EA) Report (Ver. 2). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-26.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Jill Aitken (Canadian Environmental Assessment Agency)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
713	Meeting	09/05/2013	RRR participated in a Local Government Networking Group meeting held to discuss the	Geoff Gillon (Rainy River Future Development Corp), Gord Armstrong (Town of Rainy River), Anne	Kyle Stanfield (Rainy River Resources), Stacey Jack (Rainy River Resources)

Table D-2e: Provincial Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
			need for trades training. RRR provided an overview of potential employment opportunities during construction and operations and noted interest in working collaboratively with regional training partners. Meeting participants shared their perspectives on the availability of workers and the need for apprenticeship training. The participants identified additional potential partners or attendees for future meetings.	Renaud (Confederation College), Allan Katz (Riverside Health Care Facilities), Wayne Zimmer (Seven Generations Education Institute), Ken Wilson (Township of Chapple), Delbert Horton (Seven Generations Education Institute), Steve Latimer (United Native Friendship Centre (UNFC)), Casey Slack (Rainy River District School Board), Kimberly Williamson (Ontario Ministry of Training, Colleges and Universities)	
661	E-mail	09/06/2013	The Ministry of the Environment (MOE) Environmental Assessment Services provided comments on the RRGP Draft Environmental Assessment (EA) Report (Ver. 2). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-26.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Jill Aitken (Canadian Environmental Assessment Agency)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
662	Letter	09/06/2013	The Ministry of the Environment (MOE) Environmental Approvals Branch provided comments on the RRGP Draft Environmental Assessment (EA) Report (Ver. 2). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-26.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Dale Gable (Ministry of the Environment), Jill Aitken (Canadian Environmental Assessment Agency)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
663	E-mail	09/06/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGP Draft EA Report (Ver. 2) on behalf of the Ministry of Natural Resources (MNR).	Rachel Hill (Ministry of Natural Resources), John Van den Broeck (Ministry of Natural Resources), Chris Martin (Ontario Ministry of Natural Resources), Melissa Mosley (Ontario Ministry of Natural Resources), Sasha McLeod (Ministry of the Environment), Marney Brown (Ministry of Natural Resources), Kevin Brown (Ministry of Natural Resources), Phil Cooze (Ministry of Natural Resources)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
664	E-mail	09/06/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGP Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of the Ministry of Tourism, Culture and Sport (MTCS). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-26.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), James Antler (Ministry of Tourism and Culture), Jill Aitken (Canadian Environmental Assessment Agency)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)

Table D-2e: Provincial Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
665	E-mail	09/06/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGP Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of MOE's Environmental Monitoring and Reporting Branch. Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-18. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Sasha McLeod (Ministry of the Environment), Robert Bloxam (Ministry of the Environment), Jinliang (John) Liu (Ministry of the Environment)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
705	E-mail	09/06/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGP Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of the Ministry of Energy. Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-18. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Sasha McLeod (Ministry of the Environment), Cheryl O'Donnell (Ministry of Energy)	Kyle Stanfield (Rainy River Resources)
620	E-mail	09/10/2013	The Ministry of Natural Resources (MNR) sent the reviews for the Draft Fish Habitat Offset Strategy, the Draft Fish Habitat No Net Loss Plan (NNLP) as well as the 2013 Winter Aerial Mammal Survey to RRR. RRR responded on 13-09-10.	Rachel Hill (Ministry of Natural Resources), Matt Myers (Ministry of Natural Resources)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
660	Letter	09/10/2013	The Ministry of the Environment (MOE) provided comments to RRR on the RRGP Draft Environmental Assessment (EA) Report (Ver. 2) on behalf of the Ontario Ministry of Northern Development and Mines (MNDM). Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-26.	Joseph Tyance (Ontario Ministry of the Environment), Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Jill Aitken (Canadian Environmental Assessment Agency)	Kyle Stanfield (Rainy River Resources)
687	E-mail	09/11/2013	The Ministry of Northern Development and Mines (MNDM) requested access to the draft Appendix P of the RRGP Draft EA Report (Ver. 2). RRR provided access to an FTP site on 13-09-11 noting that it had been previously provided to Environment Canada, the Canadian Environmental	Neal Bennett (Ontario Ministry of Northern Development and Mines), Rob Purdon (Ontario Ministry of Northern Development and Mines)	Sheila Daniel (AMEC Environment & Infrastructure)

Table D-2e: Provincial Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
			Assessment Agency and Ministry of the Environment on 13-09-03.		
704	E-mail	09/18/2013	RRR provided a copy of responses to comments received through the Independent Technical Review of the RRGD Draft Environmental Assessment (EA) Report (Ver. 1) conducted on behalf of various Aboriginal groups. Comments received related to Aboriginal consultation, Traditional Knowledge and Traditional Land Use, socio-economics, fish, wildlife, vegetation, surface water, groundwater, air quality, noise and vibration, and human and ecological health. Comments and responses are considered confidential but have been shared with the appropriate regulatory authorities.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Sasha McLeod (Ministry of the Environment)	Kyle Stanfield (Rainy River Resources)
708	E-mail	09/25/2013	RRR sent the Cultural Heritage Assessment Report and mitigation recommendations prepared by Unterman McPhail Associates to the Ministry of Tourism, Culture and Sport (MTCS) as requested.	Ami Didrikson (Ministry of Tourism and Culture)	Stacey Jack (Rainy River Resources)
610	E-mail	09/26/2013	The Ministry of the Environment (MOE) noted that the attachments referenced in RRR's responses to the MOE's comments about air quality were not provided with the response document sent to the MOE on 13-09-18. RRR provided MOE and the Canadian Environmental Assessment Agency with a copy of the attachments on 13-09-26.	Stephanie Davis (Canadian Environmental Assessment Agency), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Jill Aitken (Canadian Environmental Assessment Agency)	Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources)
715	E-mail	10/05/2013	SLR Consulting sent the updated RRGD Traffic Impact Study for Highway 600 to the Ministry of Transportation (MTO). The study addresses comments previously provided as well as comments were received by RRR through the Draft Environmental Assessment (EA) review period. It was noted that a design report for the associated relocations and improvements related to MTO facilities will be provided in the next few weeks.	James McKeever (Ministry of Transportation), Darcy Cowan (SLR Consulting (Canada) Ltd.)	
718	E-mail	10/07/2013	Environment Canada (EC) provided comments on RRP Draft Assessment of Alternatives for Mine Waste Disposal. RRR responded on 13-10-11.	Amy Liu (Canadian Environmental Assessment Agency), Dan McDonell (Environment Canada), Sasha McLeod (Ministry of the Environment), Jill Aitken (Canadian Environmental Assessment Agency)	Kyle Stanfield (Rainy River Resources)

Table D-2e: Municipal Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
358	Phone Call	11/15/2012	Individual interested in employment for locals and expressed concern that the EA process and open house focused too much on Whip-poor-will birds than the human aspect.	Unknown Unknown (Town of Emo)	Indi Gopinathan (Rainy River Resources)
413	Letter	11/26/2012	The Ministry of the Environment (MOE) provided RRR with comments from an individual on the RRGF Proposed Terms of Reference (ToR). The comments received were related to the proximity of Tailings Management Area (TMA) to home property, alternatives related to the TMA and environmental contamination. Responses were provided to the MOE on 13-01-22.	Rick Neilson (Township of Chapple), Cindy Batista (Ontario Ministry of Environment)	Sheila Daniel (AMEC Environment & Infrastructure)
445	Meeting	12/05/2012	RRR gave a presentation to the Township of Chapple on the RRGF and held discussions on the Proposed Terms of Reference (ToR). Topics focused on overall municipal planning, including the timing and process for accepting and amending the new Official Plan and zoning by-law amendments, and on the proposed Highway 600 relocation and East Access Road.	Peggy Johnson (Township of Chapple), Peter Van Heyst (Township of Chapple), Geoff Gillon (Rainy River Future Development Corp), Rilla Race (Township of Chapple), James Gibson (Township of Chapple), R. Both (Individual - GP), Rick Neilson (Township of Chapple)	Kyle Stanfield (Rainy River Resources), Stacey Jack (Rainy River Resources)
462	Survey	12/12/2012	RRR and AMEC conducted a socio-economic interview with the Township of Emo. Discussions focused on economic development, employment opportunities, and community building.	Brenda Cooke (Town of Emo), Vincent Sheppard (Town of Emo)	Caroline Burgess (AMEC Environment & Infrastructure), Stacey Jack (Rainy River Resources)
427	E-mail	01/07/2013	A socio-economic questionnaire was sent to the Township of Sioux Narrows - Nestor Falls. RRR received the completed questionnaire on 13-01-16.	Jeffrey Port (Township of Sioux Narrows - Nestor Falls)	Stacey Jack (Rainy River Resources)
447	Letter	01/24/2013	Township of Chapple sent a letter to RRR noting interest in meeting to discuss the Highway 600 re-alignment, the potential for Project-related financial impacts and the Township's interest in a negotiated agreement.	Peggy Johnson (Township of Chapple)	Kyle Stanfield (Rainy River Resources)
492	Letter	02/04/2013	RRR sent a letter to the Township of Chapple on 13-02-04 containing comments on the Draft Official Plan and Draft Zoning By-law. The Township of Chapple responded to RRR on 13-02-22.	Peggy Johnson (Township of Chapple)	Kyle Stanfield (Rainy River Resources), Stacey Jack (Rainy River Resources)
493	Meeting	02/06/2013	RRR and a municipal planner consultant met with the Township of Chapple. The purpose of the meeting was to discuss the municipal planner's scope of work with RRR.	Peggy Johnson (Township of Chapple), Geoff Gillon (Rainy River Future Development Corp), Ken Wilson (Township of Chapple), Peter VanHeyst (Township of Chapple), Andrea Bourrie (Andrea Bourrie Consulting (ABC))	Kyle Stanfield (Rainy River Resources), Stacey Jack (Rainy River Resources)

Table D-2e: Municipal Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
504	Meeting	02/11/2013	RRR met with the Township of Chapple to discuss options for construction of new homes for RRR employees. Information gathered included vacant or potential lots and zoning considerations.	Peggy Johnson (Township of Chapple)	Stacey Jack (Rainy River Resources)
505	Meeting	02/12/2013	RRR met with the Town of Fort Frances to discuss options for construction of new homes for RRR employees. Information gathered included vacant or potential lots and zoning considerations.	Faye Flatt (Town of Fort Frances)	Stacey Jack (Rainy River Resources)
506	Meeting	02/13/2013	RRR met with the Township of Emo to discuss options for construction of new homes for RRR employees. Information gathered included vacant or potential lots and zoning considerations.	Brenda Cooke (Town of Emo)	Stacey Jack (Rainy River Resources)
469	Letter	02/14/2013	RRR informed the Township of Chapple about the proposed use of watershed restoration techniques as a method of offsetting the effects of the RRGP development on fish habitat. RRR requested written confirmation of support from the Township of Chapple confirming that this approach is acceptable.	Peggy Johnson (Township of Chapple)	Kyle Stanfield (Rainy River Resources)
490	Letter	02/15/2013	The Township of Chapple sent letters of support regarding the RRGP to the Canadian Environmental Assessment Agency (CEA Agency) and the Ministry of Environment (MOE).	Stephanie Davis (Canadian Environmental Assessment Agency), Peggy Johnson (Township of Chapple), Cindy Batista (Ontario Ministry of Environment), Jim Bradley (Ontario Ministry of the Environment)	
584	Letter	02/19/2013	The Township of La Vallee confirmed its support for the RRGP, noting support for timely completion of the Environmental Assessment (EA) process to allow RRGP construction to begin in the summer of 2014.	Stephanie Davis (Canadian Environmental Assessment Agency), Sylvia Smeeth (Township of La Vallee), Cindy Batista (Ontario Ministry of Environment), Jim Bradley (Ontario Ministry of the Environment)	
578	Letter	02/21/2013	The Council of the Township of Alberton sent letters confirming Council's support for the RRGP to the Ministry of the Environment (MOE) and the Canadian Environmental Assessment Agency (CEA Agency). The Council noted their support for timely completion of the Environmental Assessment (EA) process.	Stephanie Davis (Canadian Environmental Assessment Agency), Michael Hammond (Township of Alberton), Cindy Batista (Ontario Ministry of Environment), Jim Bradley (Ontario Ministry of the Environment)	
577	Letter	02/22/2013	The Town of Fort Frances expressed support for the RRGP to the Ministry of the Environment (MOE) and the Canadian Environmental Assessment Agency (CEA Agency) and emphasized the positive economic contribution the	Stephanie Davis (Canadian Environmental Assessment Agency), Roy Avis (Town of Fort Frances)	

Table D-2e: Municipal Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
			RRGP represents to the Rainy River District. The Town of Fort Frances noted their support for timely completion of the Environmental Assessment (EA) process.		
581	Meeting	02/22/2013	RRR, First Nation representatives, and Government representatives met to discuss the RRG. Project updates were shared by RRR and First Nation representatives provided their views and shared support for the RRG. Discussions focused on the Amended Proposed Terms of Reference (ToR), the Federal and Provincial Environmental Assessment (EA) processes, and the proposed Highway 600 realignment. Final revised meeting notes were distributed by the CEA Agency on 13-04-16.	Stephanie Davis (Canadian Environmental Assessment Agency), Regent Dickey (Major Projects Management Office), Rachel Hill (Ministry of Natural Resources), Neal Bennett (Ontario Ministry of Northern Development and Mines), Mike Grant (Ontario Ministry of Northern Development and Mines), James McKeever (Ministry of Transportation), Peggy Johnson (Township of Chapple), Peter Van Heyst (Township of Chapple), Wayne Smith (Naicatchewenin First Nation), Jim Leonard (Rainy River First Nations), Ross Lashbrook (Ontario Ministry of Environment), Alisdair Brown (Ontario Ministry of the Environment), Patrick Barnes (Ontario Ministry of Northern Development and Mines), Ken Wilson (Township of Chapple), Cindy Batista (Ontario Ministry of Environment), Dan McDonell (Environment Canada), Cindy Brown (Ministry of Transportation), Dan Fox (Ministry of Natural Resources), Iain Galloway (Ministry of Transportation), Stephen DeVos (Ontario Ministry of Northern Development and Mines), Rob Ferguson (Ontario Ministry of Northern Development and Mines), Howard Hampton (Fasken Martineau DuMoulin LLP), Anjala Puvananathan (Canadian Environmental Assessment Agency), Rosalind Cooper (Fasken Martineau DuMoulin LLP), Randy Both (Township of Chapple)	David Simms (AMEC Environment & Infrastructure), Sheila Daniel (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources), Stacey Jack (Rainy River Resources)
582	Letter	02/22/2013	The Council of the Township of Dawson confirmed Council's support for the RRG to the Ministry of the Environment (MOE). The Council noted their support for timely completion of the Environmental Assessment (EA) process.	Patrick Giles (Township of Dawson), Cindy Batista (Ontario Ministry of Environment)	
583	Letter	02/22/2013	The Township of Lake of the Woods confirmed support for the RRG, noting support for timely	Cindy Batista (Ontario Ministry of Environment), Patrick Giles (Township of Lake of the Woods)	

Table D-2e: Municipal Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
			completion of the Environmental Assessment (EA) process to allow for RRGP construction to begin in the summer of 2014.		
586	Letter	02/25/2013	The Township of Morley confirmed its support for the RRGP, noting support for timely completion of the Environmental Assessment (EA) process to allow RRGP construction to begin in the summer of 2014.	Stephanie Davis (Canadian Environmental Assessment Agency), Gary Gamsby (Township of Morley)	
585	Letter	02/27/2013	The Town of Rainy River confirmed its support for the RRGP, noting support for timely completion of the Environmental Assessment (EA) process to allow RRGP construction to begin in the summer of 2014.	Stephanie Davis (Canadian Environmental Assessment Agency), Veldron Vogan (Town of Rainy River), Cindy Batista (Ontario Ministry of Environment), Jim Bradley (Ontario Ministry of the Environment)	
534	Meeting	03/13/2013	RRR met with the Township of Emo's Chief Administrative Officer (CAO) to discuss RRR housing options.	Brenda Cooke (Town of Emo)	Stacey Jack (Rainy River Resources)
570	E-mail	03/25/2013	The Township of La Vallee inquired where RRR is in the Environmental Assessment (EA) process and whether a decision has been made to proceed with the mine.	Ross Donaldson (Township of La Vallee)	Kyle Stanfield (Rainy River Resources)
619	Meeting	06/11/2013	RRR met with the Township of Chapple and provided an update on the RRGP Environmental Assessment (EA) and planned open houses. The Township discussed city planning, RRR's Closure Plan and expectations surrounding the proposed acquisition by New Gold. The Township of Chapple provided an update on the ongoing landfill study.	Peggy Johnson (Township of Chapple), Peter Van Heyst (Township of Chapple), Geoff Gillon (Rainy River Future Development Corp), Rilla Race (Township of Chapple), James Gibson (Township of Chapple), Ken Wilson (Township of Chapple), Randy Both (Township of Chapple)	Kyle Stanfield (Rainy River Resources), Stacey Jack (Rainy River Resources)
693	Mass Mailout	07/12/2013	A Notice of Consultation Opportunity for the RRGP was provided along with a copy of the Draft Environmental Assessment (EA) Report (Ver. 2) to various Municipal Government agencies. It was noted that written comments are invited by 2013-08-19.	Deborah Ewald (Town of Rainy River), Gary Gamsby (Township of Morley), Ross Donaldson (Township of La Vallee), Michael Hammond (Township of Alberton), Eltjo Wiersema (Township of Dawson)	Kyle Stanfield (Rainy River Resources)
694	Hand Delivery	07/12/2013	A Notice of Consultation Opportunity for the RRGP was hand delivered along with a copy of the Draft Environmental Assessment (EA) Report (Ver. 2) to public hosting locations for public access. It was noted that written comments are invited by 2013-08-19.	Peggy Johnson (Township of Chapple), Michael Dawber (Rainy River Library), Alicia Subnaik Kilgour (Fort Frances Public Library), Jessie Roberts (Brodie Resource Library)	Kyle Stanfield (Rainy River Resources), Andrea Curtis (Rainy River Resources), Indi Gopinathan (Rainy River Resources)
692	Mass Mailout	07/15/2013	A Notice of Consultation Opportunity for the RRGP was provided along with a copy of the Draft Environmental Assessment (EA) Report (Ver. 2) to	John Mason (City of Thunder Bay), Roy Avis (Town of Fort Frances), Veldron Vogan (Town of Rainy River), Peggy Johnson (Township of Chapple),	Kyle Stanfield (Rainy River Resources)

Table D-2e: Municipal Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
			various Municipal Government agencies. It was noted that written comments are invited by 2013-08-19.	Peter Van Heyst (Township of Chapple), Brenda Cooke (Town of Emo), Vincent Sheppard (Town of Emo), Patrick Giles (Township of Dawson), Teresa Desserre (Township of Morley), Dawn Hayes (Township of Alberton), Sylvia Smeeth (Township of La Vallee), Wanda Kabel (Township of Sioux Narrows - Nestor Falls), Bill Thompson (Township of Sioux Narrows - Nestor Falls), Glenn Trefitin (Town of Fort Frances)	
617	Mail	07/19/2013	At the request of the Township of Chapple, RRR provided three additional copies of the RRGD Draft Environmental Assessment (EA) Report and a DVD containing the appendices.	Peter Van Heyst (Township of Chapple)	Stacey Jack (Rainy River Resources)
625	Open House	07/30/2013	RRR hosted an open house in Barwick to discuss the RRGD and share information about the Draft Environmental Assessment (EA) report. RRR representatives responded to a range of questions and comments received from participants. Approximately 51 people attended.	Peter Van Heyst (Township of Chapple), Bruce Hamilton (Ontario Federation of Anglers and Hunters), Geoff Pearce (Individual - GP), Donald Huitikka (Individual - GP), Brian Gerula (Individual - GP), Murray Gerula (Individual - GP), Alvin and Carol McLain (Individual - GP), Frank Curtis (Individual - GP), Ken Angus (Individual - GP), Colleen MacEachern (Individual - GP), Rick and Linda Neilson (Individual - GP), Allen Raoul (Bending Lake Iron), Bill Bone (Individual - GP), Carol Burnell (Individual - GP), Ted Kaemingh (Individual - GP), Stephan Szeder (Individual - GP), Rosina Hiebert (Individual - GP), Keith Haw (Individual - GP), Bill Baranowski (Individual - GP), Bob Durnin (Individual - GP), Alwine Teeple (Individual - GP), Tara MacEachern (Individual - GP), Bill and Emily Clink (Individual), Welly Gibson (Individual - GP), Ken Desserre (Individual - GP), Mireille Pelletier (Individual - GP), Ben Grant (Individual - GP), Brian Trump (Individual - GP), Terry Wilcott (Individual - GP), Sam Fuhrer (Individual - GP), Jackie Champagne (Individual - GP), Wendy Judson (Individual - GP), Jennifer Horton (Individual - GP), Peirce and Kim Gushulak (Individual - GP), David Marr (Individual - GP), Eric Fuhrer (Individual - GP), George Cawston (Individual - GP), Sandie Stark (Individual - GP), Cathy Wilcott (Individual - GP), Lyle and June Wheatley (Individual - GP), LaVerne and Bill Caul	David Simms (AMEC Environment & Infrastructure), Kyle Stanfield (Rainy River Resources), Lincoln Dunn (Pwi-Di-Goo-Zing Ne-Yaa-Zhing Advisory Services / Rainy River Resources), Stacey Jack (Rainy River Resources), Alyson Bisson (Rainy River Resources), Amy Shute (Rainy River Resources), Mark Vancook (Rainy River Resources)

Table D-2e: Municipal Government Contact Records from November 10, 2012 to October 7, 2013

ROC	Event Type	Date	Event Summary	Stakeholders	Team
				(Individual - GP), Robert Wepruk (Individual - GP), Charlie Morken (Individual - GP), David Kaemingh (Individual - GP)	
628	Hand Delivery	07/31/2013	RRR hand delivered 14 copies of the RRGP Draft Environmental Assessment (EA) Summary booklet to the Township of Chapple.	Peggy Johnson (Township of Chapple)	Kyle Stanfield (Rainy River Resources)
631	Hand Delivery	08/01/2013	RRR hand delivered two copies of the RRGP Draft Environmental Assessment (EA) Summary booklet to the Township of Emo Municipal Office.		Kyle Stanfield (Rainy River Resources)
645	Letter	08/19/2013	The Township of Chapple provided comments on the RRGP Draft Environmental Assessment (EA) Report. Responses to comments were provided to the Ministry of the Environment (MOE), Ministry of Northern Development and Mining (MNDM), and the CEA Agency on 13-09-20. RRR noted that they would be willing to arrange a meeting or conference call with technical experts to answer further questions if required as previously discussed with MOE. RRR also provided a copy of responses directly to the Township on 13-09-25.	Stephanie Davis (Canadian Environmental Assessment Agency), Neal Bennett (Ontario Ministry of Northern Development and Mines), Peggy Johnson (Township of Chapple), Amy Liu (Canadian Environmental Assessment Agency), Sasha McLeod (Ministry of the Environment), Jill Aitken (Canadian Environmental Assessment Agency)	Kyle Stanfield (Rainy River Resources), Stacey Jack (Rainy River Resources)
713	Meeting	09/05/2013	RRR participated in a Local Government Networking Group meeting held to discuss the need for trades training. RRR provided an overview of potential employment opportunities during construction and operations and noted interest in working collaboratively with regional training partners. Meeting participants shared their perspectives on the availability of workers and the need for apprenticeship training. The participants identified additional potential partners or attendees for future meetings.	Geoff Gillon (Rainy River Future Development Corp), Gord Armstrong (Town of Rainy River), Anne Renaud (Confederation College), Allan Katz (Riverside Health Care Facilities), Wayne Zimmer (Seven Generations Education Institute), Ken Wilson (Township of Chapple), Delbert Horton (Seven Generations Education Institute), Steve Latimer (United Native Friendship Centre (UNFC)), Casey Slack (Rainy River District School Board), Kimberly Williamson (Ontario Ministry of Training, Colleges and Universities)	Kyle Stanfield (Rainy River Resources), Stacey Jack (Rainy River Resources)



APPENDIX D-2f

**GOVERNMENT CORRESPONDENCE DOCUMENTS
(NOVEMBER 10, 2012 TO OCTOBER 7, 2013)**



Rainy River Resources Ltd.
1111 Victoria Avenue East
Thunder Bay, Ontario P7C 1B7

T 807-623-1540
F 807-623-0974

November 13, 2012

Canadian Environmental Assessment Agency
c/o Stephanie Davis, Project Manager
55 St. Clair Avenue East, Suite 907
Toronto, Ontario
M4T 1M2

Re: Rainy River Gold Project, Draft EIS Guidelines comments from Rainy River Resources

Dear Stephanie:

Rainy River Resources Ltd. (RRR) has taken the opportunity to review the Draft Environmental Impact Statement (EIS) Guidelines issued for the Rainy River Gold Project on October 19, 2012.

We would respectfully provide the following comments for consideration by the Canadian Environmental Assessment Agency (CEA Agency) in finalization of the Guidelines:

- Section 2.2 "*The Act requires that the Agency provides the public,... opportunity to comment on the draft EA report.*"

Please clarify whether a draft EA is required by the Act to be issued for public comment. RRR has committed to providing a draft EA for government and Aboriginal group review.

- Section 3.5 "*should contain the following information,... title of the document, including the term environmental impact statement*"

As the CEA Agency is aware, there may be a potential conflict between the regulatory requirement of the Ontario Ministry of the Environment and the draft EIS Guidelines with respect to the title of the document. Based on the discussions that RRR has held with Federal and Provincial government representatives to date, we suggest that the document be titled Environmental Assessment Report.

- Section 3.5 "*The exception to this preference is cumulative effects assessment, which should be provided in a stand-alone section as described in section 12.1.12.*"

Without prejudging the content of the EIS, it is likely that all natural environment effects of the Project could be confined to lands defined by the Pinewood River watershed, and the transmission line corridor boundary; and that there will be no other identified new or planned projects for this area, or that would affect ecosystem components in this area. In such an instance, the Project environmental effects and the cumulative environmental effects for the natural environment could be one and the same, as existing land uses and stresses would be considered within the discussion of Project effects. If this were to be the case, then for the cumulative effects discussion we would want

to refer to the Project environmental effects section of the EIS, and not duplicated those considerable materials in the cumulative effects section.

- Section 3.5 *"Detailed studies,... shall be provided in separate appendices and shall be referenced by appendix, section and page in the text of the main document of the EIS."*

Respectfully, the requirement to list page number is a very onerous request and we would request the following alternative wording: *...,... and shall be referenced by appendix (and section or page number where appropriate).*

- Section 5.1 *"The EIS shall include expanded descriptions,... included detailed descriptions of the activities to be carried out during each phase,... detailed schedule,..."*

While the Proponent agrees this information should be provided in the EIS, we believe it is better suited in the appropriate detailed sections later in the EIS and not in the summary section. We respectfully suggest that a slight re-wording be considered to remove the reference to "detailed" and "expanded".

- Section 5.2 *"More specifically identify;,... policies and guidelines of Aboriginal groups being consulted that are pertinent to the project and/or EA and discuss their implications; any treaty or self government agreements with Aboriginal groups that are pertinent to the project and/or EA;"*

The Proponent requests that a qualifying statement be made after "More specifically identify", such as "where known and reasonably available".

- Section 7.1.2 *"the worst case scenarios and the effects of these scenarios"*.

RRR suggest that the CEA Agency consider a slight re-wording as follows, "the worst case scenarios plausible, and the effects of these scenarios". This wording suggestion is to allow that the worst case scenario may not have the potential to realistically occur.

- Section 9.1.1 *"The Proponent shall summarize all pertinent historical information on the size and geographic extent of relevant animal populations as well as density, based on best available information. Where little or no information is available, specific studies shall be designed to gather further information on species populations and densities."*

We respectfully suggest a re-wording of these sentences from their current text, to reflect that specific studies should be completed if pertinent to the project design or EIS conclusions where little or no information is available, and that the studies should focus on the aspects relevant, which may or may not include population and density information. Note: The details of populations and densities are usually not required to assess Project effects, except in very specific circumstances, and the acquisition of such data is very onerous, especially when used without further qualifiers.

- Section 9.2 *"...,... making key EA summary documents (baseline studies, draft/Final EIS and key findings) accessible and making plain language summaries of these documents available in English, French, and Ojibwe."*

RRR has made considerable efforts to ensure Aboriginal groups previously identified by the Agency are aware of the Rainy River Gold Project and engaged in the public review process. To date there

have been no requests for accommodation from local Aboriginal groups by the provision of documents in languages other than English, including Ojibwe or French. We propose to translate the Executive Summary of the EIS into French as requested by the CEA Agency. Translation of other documents into French or Ojibwe is extremely costly and time-consuming, and we believe, unwarranted for a Project in this locale.

- Section 9.2 "*As a minimum,.... a map of the group's traditional territory,...*"

The Proponent respectfully requests, that a qualifying statement "where publicly available" be added to the first bullet regarding the requirement for a map of each group's traditional territory.

- 10.1.1 "*predicting/evaluating the likely effects on identified valued components*"

Please clarify that the terminology environmental components (EC) has been used in CEAA, 2012, and if yes, this reference to valued components appears to be a typographic mistake.

- 10.1.1 "*develop contingency plans that explicitly address accidents and malfunctions*"

RRR intends to prepare contingency plans a part of the site Emergency Response Plan and will provide this framework within the EA.

- 12.1.1 "*The residual effects, even if very small or deemed insignificant should be described.*"

We would appreciate if this statement could be clarified, as the current wording could be viewed as extremely onerous and requiring an extensive documentation.

We respectfully request that the CEA Agency consider the comment herein prior to finalization of the EIS Guidelines for the Rainy River Gold Project.

Sincerely,



Kyle L. Stanfield P.Eng.
Vice President, Environment & Sustainability

From: Cressman, Charlene (ENE)
Sent: November 27, 2012 8:44 AM
To: Batista, Cindy (ENE)
Subject: FW: Consideration for Environmental Assessment

Thanks,

Charlene

416-314-7222

From: Weir, Glenda [mailto:Glenda.Weir@ainsworth.ca]
Sent: November-27-12 7:49 AM
To: Cressman, Charlene (ENE)
Subject: FW: Consideration for Environmental Assessment

Hi Charlene,
Could you please read my comments below? Thanks, Glenda

From: RainyRiver [CEAA] [mailto:RainyRiver@ceaa-acee.gc.ca]
Sent: Friday, November 23, 2012 3:59 PM
To: RainyRiver [CEAA]; Weir, Glenda
Subject: RE: Consideration for Environmental Assessment

Dear Ms. Weir,

Further to my last email, I also recommend you forward your comments on to Charlene Cressman at the Ontario Ministry of the Environment.

There is both a federal and an provincial environmental assessment for this project. At the moment, there is a public consultation underway on the provincial Terms of Reference document.

If you forward your comments on to the province they will be summarized and provided to the proponent for a response. Note: The proponent won't respond directly to you. They will respond to the province and it will be on the public record.

Charlene's details are below.

Kind Regards,
Stephanie

Ministry of the Environment
Environmental Approvals Branch
Attn: Charlene Cressman
Special Project Officer
2 St. Clair Avenue West, Floor 12A
Toronto, Ontario
M4V 1L5

TEL.: 416-314-7222
FAX: 416-314-8452

Charlene.cressman@ontario.ca

From: RainyRiver [CEAA]
Sent: November 22, 2012 9:43 AM
To: 'Weir, Glenda'
Subject: RE: Consideration for Environmental Assessment

Thank you for contacting the Canadian Environmental Assessment Agency. Your comments on the proposed Rainy River Gold Project have been received and added to the project file for consideration.

Sincerely,

Stephanie Davis
Project Manager

From: Weir, Glenda [<mailto:Glenda.Weir@ainsworth.ca>]
Sent: November 14, 2012 5:13 PM
To: RainyRiver [CEAA]
Subject: Consideration for Environmental Assessment

Hello,

I am for this project going through as this area needs diversification in its industry. However, as a resident who read the initial environmental assessment, I was concerned that the spring water aquifers we use for residential and farm use were not mentioned. We are lucky enough to have spring fed water that is a consistent 4 degree Celsius in summer or winter, is delicious tasting and of consistent flow rates. Water not used in our home, fills our pond and eventually flows into the Rainy River through tap ditches. Prior to getting a mortgage on the property, the water was tested.

I would like to be ensured that the water flow or quality will not be impacted by this project. I would like to know if we should start testing water samples to ensure we are not exposed to any contaminants and what testing should be done. I would like to know that there will be no leaching into the ground water from tailings piles for years to come.

Please consider this aspect in the planned environmental assessment. (I think I just needed to respond by email. If there was a form or another process, please let me know). Thanks very much, Glenda

From: Bennett, Neal (MNDM)
Sent: November 19, 2012 8:53 AM
To: Davis, Stephanie [CEAA]; Cressman, Charlene (ENE)
Cc: anglersproshop@hotmail.com
Subject: FW: statement of greavences towards RRR
 Phillip/Cindy

Thank you very much for submitting your comments/concerns on the RRR project. I have Cc'd both the Federal and Provincial contacts for the Environmental Assessment to ensure that your comments are added to the list of comments received during the review periods. These concerns will have to be addressed by Rainy River Resources as part of the Environmental Assessment process.

Best Regards,

Neal Bennett
 Mineral Exploration and Development Consultant
 Ministry of Northern Development and Mines
 Mineral Development and Lands Branch
 Suite B002, 435 James Street South
 Thunder Bay, ON P7E 6S7
 Tel: 807-475-1362
 Fax: 807-475-1112
 Email: neal.bennett@ontario.ca

From: Angler's Pro Shop [mailto:anglersproshop@hotmail.com]
Sent: November 19, 2012 7:37 AM
To: Bennett, Neal (MNDM)
Subject: statement of greavences towards RRR

goodmorning, i would like to put on record my greavences towards the mining project of RRR. Our family have lived on the Gallinger road in Finland for 12yrs. We have enjoyed it emencely. The quite lifestyle, the hunting and farming. Our life is about to change for the worse. As we are in the path of destruction with overburden being dumped in our backyard. As close as in the next 1/4 section west of our house. RRR says they have a buffer zone. That is not much of a buffer! It would not stop the dust and debreie from being blown around in our clean air. And the thought of having such strong chemicals in our air is very scary. Our worry is the quality of our life is being treated with no concern on their part. We talked at meetings and they are more concerned with the animals then the humans. But really they are hurting all of us!!

And we are also concerned about our drinking water. the drilling and eplosives etc... can effect our water and the supply of it. Proven fact!! Please help us in this fight to have a our great lifestyle back. To leave us here would here would not be good. Mentally or physically.

We would like a responce back. As we do not know what to do. We where told you could help us with this problem. Either way please let us know something.

Thank you,

Phillip and Cindy haggberg

WWW.ANGLERSPROSHOP.CA

807-484-2525

From: Bennett, Neal (MNDM)
Sent: November 23, 2012 11:00 AM
To: Cressman, Charlene (ENE); Batista, Cindy (ENE)
Subject: FW: Rainy River Gold Project - Proposed Terms of Reference - Comments for inclusion referencing section 6.7 Human Environment
 Cindy/Charlene

Please include the ToR comments below from our northern development branch which looks at the socio economic impacts. I will be putting together some comments on consultation. However, due to the announcement about the idling of the Resolute Forest Products kraft mill and paper machine number 5 in Fort Frances please do not include the item related to skills shortages in the comment on the proposed ToR.

Cheers,

Neal Bennett
 Mineral Exploration and Development Consultant
 Ministry of Northern Development and Mines
 Mineral Development and Lands Branch
 Suite B002, 435 James Street South
 Thunder Bay, ON P7E 6S7
 Tel: 807-475-1362
 Fax: 807-475-1112
 Email: neal.bennett@ontario.ca

From: Gillon, Jane (MNDM)
Sent: November 19, 2012 5:36 PM
To: Bennett, Neal (MNDM)
Cc: Hansen, Christine (MNDM); Kilpatrick, Carol (MNDM)
Subject: RE: Rainy River Gold Project - Proposed Terms of Reference - Comments for inclusion referencing section 6.7 Human Environment

Hi Neal

I have reviewed the socio economic areas of the "Proposed Terms of Reference" and offer the following:

- o The economy of the Rainy River District is in decline.
- o The largest employer in the region Resolute Forest Products has had some market issues and has been shut down for market related reasons a few times over the past few years however is still in full operation and employs approximately 550 workers. The financial crisis of a few years ago saw US housing starts falter and Canadian exports to the US have slowed and this has impacted the economy of the area.
- o Any diversification of the economy of the Rainy River District is positive and complements the Growth Plan for Northern Ontario and the mandated responsibilities of the Northern Development Division of MNDM.

The jobs that will come as a result of the Rainy River Resources gold mine and the mine construction will on the whole be welcomed by the Rainy River District residents; however the

following information is suggested for inclusion in the EA.

- The socio economic impact of the project on the Municipality of Chapple where the gold project resides should be detailed specifically. Chapple is a stand alone municipality under the Municipal Act and will be the first to feel any impacts and/or potential benefits. The socio economic impact of the project on the municipalities and First Nation communities of Rainy River District also should also be detailed collectively, these items should be discussed:
 - The number and distribution of people who could be affected
 - The social and economic impacts of the gold mine on the area, including
 - Local employment and training
 - Local procurement
 - Population changes
 - Demands on local services and infrastructure
 - Regional and provincial benefits
 - Trapping, hunting, fishing, agriculture, tourism, forestry and manufacturing
- Impacts of the potential project on local/area utilities, transportation and communication networks.
- The economic impacts of the project on the Rainy River District and on Northwestern Ontario, having regard for capital, labour and other costs. In addition, discuss Rainy River Resource's policies and programs respecting the use of local, Ontario and Canadian goods and services. Provide an estimated breakdown of Ontario, other Canadian and non-Canadian industrial benefits from Project management/engineering, equipment and materials, construction labour and operations. Also provide a breakdown of the type of materials and services that will need to be acquired in the construction and operation of the mine and the opportunity that may exist for the local/regional procurement of these items.
- The employment and business development opportunities the Project that may be created for First Nations, Metis, local communities and the region. Provide a breakdown of the type of employment and number of employees with respect to construction and operational workforces. Identify the source of labour for the project. Impacts of the project on potential shortages of skilled labour in the region. Identify and discuss plans to address these impacts.
- Impacts of the project on potential shortages of affordable housing and the social ramifications. Identify and discuss the mitigation plans to address these impacts. Provide a summary of any discussions that have taken place with local municipalities.
- A process is needed that provides a coordinated and effective channel through which regional and cumulative socio economic impacts can be addressed in a meaningful and demonstrable way. A system to adequately monitor and verify predictions with regard to socio economic and health issues.

- Reliable source information that strategic decisions can be made is especially important in the socio economic area, given the expected growth the District could experience.

Note:

The last paragraph on Page 48 of the proposed ToR indicates that the Township of Emo has a water treatment plant with capacity. Emo has approached Ontario seeking funding for a new or expanded water treatment plant because they are at capacity.

The second paragraph on Page 49 of the proposed ToR indicates that three dams and a generating station are owned and operated by Resolute Forest Products. The dams and generating stations were set up as a separate company some time ago.

- H2O power LP is the successor company to AbitibiBowater's ACH LP Operations. H2O Power LP was established in May 2011 on completion of the sale by AbitibiBowater LP of the ACH LP assets. The assets, among others, included the Fort Frances Generating Station on the Rainy River, the Squirrel Falls/Kettle Falls Control Dam at the outlet of Namakan Lake and the Calm Lake and Surgeon Falls Generating Station on the Seine River.

Call me if you have any questions.

Jane

Jane Gillon

Northern Development Officer

Regional Economic Development Branch

Northern Development Division

Ministry of Northern Development and Mines

☎ Office: 807-274-5320 | Mobile: 807-276-4290 | Fax:807-274-4438

✉ 922 Scott Street | Fort Frances, Ontario | P9A 1J4

Email: jane.gillon@ontario.ca | www.mndm.gov.on.ca

I am not always at my desk as I am often meeting with clients. I check my email often and will get back to you as soon as I can.

If your matter requires my immediate attention, please try me on my cell phone at (807) 276-4290. Thanks and have a great day.

From: Bennett, Neal (MNDM)
Sent: Friday November 2, 2012 10:41 AM
To: Gillon, Jane (MNDM)
Cc: Hill, Rachel (MNR)
Subject: Rainy River - Terms of Reference

Jane,

I don't believe we have met yet but I am currently the MNDM lead on the Rainy River Gold Project. They have recently distributed a draft Terms of Reference. I was wondering if you would be able to review this document to provide comments based on the socio economic impacts of the project. Rachel Hill who I believe is in the same office as you would have a copy of this document. I have been given 2 hard copies and am reviewing one copy while Melanie Mathieson is currently reviewing the second copy. Rachel, would you be able to allow Jane to review your copy at some point?

Cheers,

Neal Bennett

Mineral Exploration and Development Consultant
Ministry of Northern Development and Mines
Mineral Development and Lands Branch
Suite B002, 435 James Street South
Thunder Bay, ON P7E 6S7
Tel: 807-475-1362
Fax: 807-475-1112
Email: neal.bennett@ontario.ca

Environmental Assessment and Approvals Branch

November 19, 2012

TO: Charlene Cressman
Special Project Officer
Environmental Approvals Branch

FROM: Pierre Godbout
Senior Noise Engineer
Environmental Approvals Branch

RE: Noise and Vibration Impacts Review Comments
Review of Proposed Terms of Reference
Rainy River Gold Project
EA FILE No.: 05-09-02
Noise EA File No.: E-0012-12

This office was requested to review the noise and vibration aspects of the document entitled "Rainy River Gold Project Proposed Terms of Reference" prepared by AMEC and dated October 2012.

The following noise and vibration study items should be considered when preparing Environmental Assessment studies for mining activities undertaken by Rainy River Resources Ltd.

Noise Impacts

- (1) Noise Limits: shall comply with the MOE noise limits in:
 - a) Publication NPC-205, "Sound Level Limits for Stationary Sources in Class 1 & 2 Areas (Urban)", October, 1995 as amended; or
 - b) Publication NPC-232, "Sound Level Limits for Stationary Sources in Class 3 Areas (Rural)", October, 1995 as amended; as applicable

- (2) Noise Screening: shall be prepared in accordance with:
 - a) Primary Noise Screening Process For S.9 Applications Supplement To Application For Approval
 - b) Secondary Noise Screening Process For S.9 Applications Supplement To Application For Approval

- (3) Noise Reports: shall be prepared in accordance with:
 - a) Publication NPC-233, "Information to be Submitted for Approval of Stationary Sources of Sound", October, 1995 as amended
 - b) Supporting Information for the Preparation of an Acoustic Assessment Report

Vibration Impacts

- (1) Vibration Limits: shall comply with the MOE vibration limits in:
 - a) Publication NPC-207, "Impulse Vibration in Residential Buildings", November, 1983 as amended
 - b) Publication NPC-119, "Blasting", Model Municipal Noise Control By-Law, Final Report, August 1978
- (2) Vibration Reports: shall be prepared in accordance with:
 - a) Publication NPC-233, "Information to be Submitted for Approval of Stationary Sources of Sound", October, 1995 as amended

We trust the above would be of assistance to you.

If you have any questions, please contact Pierre Godbout, P.Eng. at 416-212-4205.



P. Godbout, P.Eng.
Senior Noise Engineer



I. Greason, P.Eng.
Director
appointed for the purposes of Part II.1 of the
Environmental Protection Act

From: Bennett, Neal (MNDM)
Sent: November 23, 2012 11:02 AM
To: Cressman, Charlene (ENE); Batista, Cindy (ENE)
Subject: FW: Please repond by Nov 22: Rainy River Resources Ltd ToR
 Cindy\Charlene,

More comments below from other branches of MNDM on the proposed ToR.

Regards,

Neal Bennett

Mineral Exploration and Development Consultant
 Ministry of Northern Development and Mines
 Mineral Development and Lands Branch
 Suite B002, 435 James Street South
 Thunder Bay, ON P7E 6S7
 Tel: 807-475-1362
 Fax: 807-475-1112
 Email: neal.bennett@ontario.ca

From: McFarling, Julie (MNDM)
Sent: November 20, 2012 2:45 PM
To: Bennett, Neal (MNDM)
Cc: Lillie-Paetz, Jennifer (MNDM); Cousineau, Scott (MNDM)
Subject: RE: Please repond by Nov 22: Rainy River Resources Ltd ToR

Hi Neal,

Comments for the Rainy River Resources Ltd ToR:

- Area of interest appears to be within several claims. These claims are held by Rainy River Resources.
- Area of interest **may** extend into claims that are not held by Rainy River Resources. It's difficult to tell from Figure 2 -Preliminary Site Plan Conceptual Layout. If they do, a surface rights compensation agreement with the claimholder would be needed. To make the determination of an exact location, a shapefile or list of coordinates would be required. It's not possible for me to be exactly sure where the areas of interest are from the coordinates provided with Figure 2.
- Most of the area of interest falls within Mining and Surface Rights Patents and/or Mining Rights Leases, Surface Rights Patents ("private land"). Ownership information could be obtained from the Land Registry Office.

Please call or email me if you have any further questions,

Julie

Julie McFarling

Lands Technician
 Technical Services Unit
 Ministry of Northern Development and Mines
 933 Ramsey Lake Road, Sudbury ON P3E 6B5
 (705) 670-5738

From: Lillie-Paetz, Jennifer (MNDM)
Sent: November 15, 2012 5:00 PM
To: Cousineau, Scott (MNDM); Debicki, Ruth (MNDM); McFarling, Julie (MNDM)
Cc: Lo, Grace (MNDM); Bennett, Neal (MNDM); Lillie-Paetz, Jennifer (MNDM)
Subject: R: Please repond by Nov 22: Rainy River Resources Ltd ToR

Hi Scott, Julie, Ruth,

Attached is the Notice of Proposed Terms of Reference for the Rainy River Gold Project. Neal Bennett is our "One Window" contact for this project. Please send Neal any comments or concerns by Thursday November 22. (sorry about the shorter turnaround than usual).

I have a hard copy of the Proposed ToR and the Record of Consultation at my desk.

Thanks!

Jenn Lillie-Paetz

Environmental Assessment Coordinator
Ministry of Northern Development and Mines
933 Ramsey Lake Rd, 6th Floor
Sudbury ON P3E 6B5
Tel: (705) 670-5918
Toll Free: (888) 415-9845 Ext. 5918
Fax: (705) 670-5803
Email: Jennifer.Lillie-Paetz@Ontario.ca

From: Lo, Grace (MNDM)
Sent: November 7, 2012 4:27 PM
To: Lillie-Paetz, Jennifer (MNDM)
Subject: Rainy River Resources Ltd ToR

Hi Jenn

Can you distribute for comment.
The deadline's Nov. 26.

I'm also sending you a hard copy of the proposed Terms of Reference and the Record of Consultation, Meetings and discussion in case anyone wants to review.

Also – will keep you posted on the MOE application for Review.
It is still under consideration at MOE. Their deadline for sending a response back to the applicant is Dec. 22, 2012-11-07

Hope all is well!!!

Grace Lo

*Policy Advisor
Corporate Policy Secretariat*

Ministry of Northern Development and Mines
Rm 5630, Whitney Block
99 Wellesley St. W
Toronto ON M7A 1W3
Tel: (416) 325 3447

**Ministry of
the Environment**

Environmental Approvals
Branch

2 St. Clair Avenue West
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Tel.: 416 212-4622
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**Ministère de
l'Environnement**

Direction des autorisations
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Télééc. : 416 314-8452



November 22, 2012

MEMORANDUM

TO: Cindy Batista, Project Officer

FROM: Lynda Mulcahy, P.Eng.
Senior Review Engineer (waste)
Environmental Approvals Branch

RE: Rainy River Gold Project, Proposed Terms of Reference
EA FILE NO. EA-05-09-02

The draft Terms of Reference (TOR) for the above- noted project was reviewed for waste-related issues only. The following comments are provided:

The proposed Rainy River gold project involves an open pit and underground gold mine.

Although waste rock/rock tailings are exempted from part V approval in O.Reg. 347, other wastes are expected to be produced from this project.

Waste management is discussed in Section 5.4.10. The draft TOR appropriately evaluates solid waste management alternatives. Liquid wastes are not mentioned – these should be included, if required. Liquid hazardous wastes are subject wastes- requiring registration/manifesting for transport.

If the Township of Chapple landfill cannot accommodate wastes from the project, and other off-site, approved disposal sites are not available, then it is strongly recommended that the establishment of an onsite licenced landfill be considered. Part V approval under the Environmental Protection Act will be required for any new onsite landfill. Depending on the proposed volume, separate environmental assessment requirements may be triggered. Rainy River is currently evaluating this option and alternative locations. Financial Assurance (FA) for the landfill should be included with the overall site FA that is provided to Ministry of Northern Development and Mines.

The draft TOR discusses hazardous wastes – what types of hazardous wastes are expected? It is understood that off-site transport and disposal is considered the best option for these – have potential disposal or treatment sites been identified- that are within reasonable distance to the

site? Interim storage will likely be required for these wastes – The storage area(s) should be identified and shown on site plans. Chemical storage facilities should meet the requirements of the Ministry’s “Guidelines for Environmental Protection Measures at Chemical and Waste Storage Facilities” 2007. It is noted that petroleum- hydrocarbon contaminated soils would not likely be considered hazardous (under the definition in O.Reg. 347), unless they are leach-toxic under O.Reg. 347 Schedule 4. These could likely be included under non-hazardous wastes. Please note that any on-site treatment process for these soils (wastes) would require Ministry approval.

The proposed mine decommissioning and Closure Activities are discussed in section 5.4.13. The Closure plan should include waste management activities, closure and any post-closure activities for the onsite landfill, if it is established.

If there are any questions regarding the above comments, please contact the undersigned.

Regards,



Lynda Mulcahy, P.Eng.
Senior Review Engineer,
EAB

LJM/

From: Alessandra Massaro, Maria [mari.ale.massaro@gmail.com]
Sent: November 23, 2012 5:18 PM
To: Cressman, Charlene (ENE)
Subject: Rainy River Gold Project: EIS Guidelines
Hello Ms. Charlene Cressman,

I was advised to forward my comments to you on the Rainy River Gold Project to ensure both federal and provincial EIS/EA committees could respond. Please see message below.

Thank you,
Alessandra Massaro

From: Alessandra Maria Massaro <mari.ale.massaro@gmail.com>
Date: Mon, 19 Nov 2012 22:15:19 -0500
To: <RainyRiver@ceaa-acee.gc.ca>
Subject: Rainy River Gold Project: EIS Guidelines

Canadian Environmental Assessment Agency
55 St. Clair Avenue East, Suite 907
Toronto, ON M4T 1M2
416-952-1576
RainyRiver@ceaa-acee.gc.ca

November 19, 2012

To Whom It May Concern,

I am writing today to comment on the Environmental Impact Statement (EIS) guidelines prepared by the Canadian Environmental Assessment Agency (CEAA) for the Rainy River Gold Project. In this letter I have amendments to these guidelines which I feel are necessary additions in order to ensure that the EIS produced by the proponents includes all necessary elements. I understand that Federal EIS's generally cover mineral waste management [1] which is my main concern in this project. There must be stringent guidelines for the monitoring, mitigation and post-EIS monitoring and mitigation of the tailings waste management procedures. Proper action plans must be outlined within the EIS guidelines to ensure these are included in the Environmental Assessment (EA) along with penalties and fines put in place in the case these practices are not followed.

Tailings from ore refinement processes have long been known for their adverse environmental and health effects. The people of Nova Scotia are still suffering the impact of the gold mine tailings waste sites, contaminated with arsenic and mercury [2]. Specific to the proposed Rainy River Gold Mine, I am worried about the cyanide that will be used in the ore-refining process as well as the two tailing waste management facilities: the potentially acid generating (PAG) and the non-acid generating (NAG) containment dams.

In theory only the PAG dam would be completely cut off from the environment to prevent acid rain and other forms of pollution, while the NAG dam would be open to the atmosphere with a protective lining to prevent leaching. The guidelines must specify that monitoring pH levels on the NAG dam is necessary, with a temporary closure available if pH levels get too low. This would help to ensure the safety of our water and air quality. Leaching is another problem seen in other mine tailing containment areas and a monitoring program should be required by guidelines to ensure that the containment dam lining is adequate and will prevent possible leaks.

In a technical report compiled by SRK Consulting, it was mentioned that some of tailings waste water would not be treated (other than cyanide removal) before being released back into the environment [3]. As the nearby streams and rivers are not classified as fishing waters, this action is deemed acceptable. I believe that the duty of the EIS guidelines is to ensure the environmental safety of all our habitats and precious freshwater and so these effluent waters should be monitor for toxic substances. These rivers and streams may not be used today, but they most certainly may serve another purpose tomorrow. It is vital that we do not harm this freshwater ecosystem. The EIS guidelines entail proponents to include a viable alternative to creating these "Tailings Impoundment Areas" in natural bodies of water [1], I believe that this is extremely important and would only add that the guidelines include that the proponents must propose alternatives that are also economically feasible.

Kyle Stanfield P. Eng, Vice President of Environment & Sustainability at Rainy River Resources, assures that the Rainy River Gold Project is designed to have full environmental closure, which ensures that site restoration funds are provided to the government of Canada upfront before any project construction begins. I hope that any added costs that were not initially forecasted would still be required to be covered by Rainy River Resources, and that a penalty or fine would be administered if this cost isn't covered and the site isn't restored to its full potential.

One extremely important guideline that I had not seen included in this EIS guideline summary is a detailed requirement of "follow-up". There needs to be plans outlined in the EIS guidelines for follow-up reports entailing that estimations of environmental effects were accurate, or if they were not, how they should be mitigated due to new measurements. If results of these measurements confirm new environmental effects that were not initially predicted, there should be procedures that must be followed which should also be outlined in the EIS guidelines. Guidelines should ensure that non-compliance is not an option. The government should be prepared to administer penalties or fines in the case that procedures and follow-up outlined in the EIS guidelines.

Thank you for taking the time to consider public opinion. If you include these amendments to the EIS guidelines, it will ensure that the proponents can comply to proper EA procedure to create an inclusive EIS that will ensure a successful project with a minimal environmental footprint.

Sincerely,

Alessandra Maria Massaro
96 Borrows Street
Thornhill, ON L4J 2W7
289-880-1905
mari.ale.massaro@gmail.com

- [1] Canadian Environmental Assessment Agency, "Draft EIS Guidelines," Government of Canada, Ottawa, 2012.
- [2] Nova Scotia, Canada: Environment, "Historic Gold Mine Tailings," 08 09 2009. [Online]. Available: <http://www.gov.ns.ca/nse/contaminatedsites/goldmines.asp>. [Accessed 06 11 2012].
- [3] SRK Consulting (Canada) Inc., "Technical Report for the Rainy River Gold Project, Northwestern Ontario, Canada," SRK Consulting (Canada) Inc., Toronto, 2012.

Ministry
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Environmental Approvals Branch

November 23, 2012

TO: Charlene Cressman
Special Project Officer
Environmental Approvals Branch

FROM: Sushant Agarwal, P. Eng.
Senior Air Engineer, Approval Services Unit – Team 4
Environmental Approvals Branch

RE: Air Review
Proposed TOR for the Rainy River Gold Project
EA File No. 05-09-02

The Approval Services Unit of the Environmental Approvals Branch was requested by Charlene Cressman to review the air aspects of the above-referenced project. The reports reviewed include the following:

- Rainy River Gold Project, Proposed Terms of Reference, October 2012, (TOR Document).
- Rainy River Gold Project, Record of Consultation, Meetings and Discussions, October 2012.

The above documents were reviewed with respect to expected methods/procedures for the evaluation of air emissions and effects, and the guidelines provided in the Ministry document "Code of Practice - Preparing and Reviewing Terms of Reference for Environmental Assessments in Ontario, October 2009" (TOR Code of Practice).

Review Findings:

Section 7.2.2- Effects Analysis of the TOR Document provides a general description of how the environmental effects analysis will be conducted by the proponent. Table 14 and 15 of the TOR document indicates that air emissions such as dust and products of combustion could potentially affect human health and that compliance will be assessed with O.Reg 419 limits.

The description provided in the TOR Document is very high level and is not media specific, with no details on the potential sources of air emissions and the intended methodology for estimation of air emissions and prediction of effects. Section 4.2.7 of the TOR Code of Practice requires

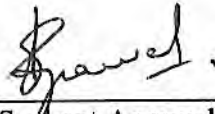
that criteria, indicators and methods must be developed to evaluate the project alternatives as much as possible in the TOR and the methods chosen must be able to produce an assessment that is clear, logical and traceable.

Recommendations:

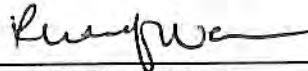
The TOR Document should provide a description of the following:

1. Identification of potential sources of air emissions and /or proposed criteria to identify these sources.
2. Proposed methodology to estimate air emissions from the identified sources.
3. Proposed methodology for predicting atmospheric effects of the air emissions.
4. Criteria to be used for evaluating effects for the identified project alternatives.
5. Intended references for obtaining data needed for the above assessment emissions/effects assessment.

We trust the above air review comments would be of assistance to you. If you have any questions, please call Sushant Agarwal at (416)314-7281.



Sushant Agarwal, P.Eng.
Senior Air Engineer



Rudolf Wan, P.Eng.
Supervisor, Team 3
Environmental Approvals Branch

Hearst Block, 8th Floor
900 Bay St.
Toronto, Ontario
M7A 2E1

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900, rue Bay
Toronto (Ontario)
M7A 2E1

November 26, 2012

Memorandum

To: Charlene Cressman
Special Project Officer
Environmental Approvals Branch
Ministry of the Environment

From: Michael Helfinger
Senior Policy Advisor, Cabinet Liaison and Policy Support Unit
Strategic Policy Branch

Subject: **Comments on Proposed Terms of Reference for Rainy River Gold
Project Environmental Assessment**

Thank you for providing the Ministry of Economic Development and Innovation with the opportunity to comment on the proposed Terms of Reference (ToR), prepared by AMEC Environment and Infrastructure, and submitted by Rainy River Resources, for the Environmental Assessment (EA) of the Rainy River Gold Project. The proposed ToR encompasses the proposed open pit and underground mine as well as the ore processing plant, site infrastructure and related supply and service facilities.

MEDI is encouraged by the coverage of the mine site, processing facility, infrastructure and supply and service facilities site by a single EA, which should facilitate the timely launch of the Assessment and, ultimately, project approval. Overall, the Terms of Reference appear to commit to a comprehensive assessment of the environmental, social, cultural and economic impacts of the proposed developments. MEDI looks forward to reviewing the completed EA, containing a detailed discussion of the impact of the proposed project on local, regional and provincial economic development.

If you have any questions, please do not hesitate to contact me at 416.325.6519.

Thank you,

Michael Helfinger, Senior Policy Advisor

c.c. John Bullen, Manager, Cabinet Office Liaison and Policy Support Unit

November 26, 2012

Ministry of Environment
Environmental Assessment Approvals Branch
Cindy Batista
Project Officer
2 St. Clair Avenue West
12A Floor
Toronto, ON
M4V 1L5

Subject: Proposed Terms of Reference – Rainy River Resources Limited

Dear Cindy,

Thank you for the opportunity to review and comment on the proposed Terms of Reference (ToR) for the Rainy River Resources (RRR) gold mine project.

The Ministry of Natural Resources (MNR) has the following comments and required alterations:

Description and Rationale for Alternatives

There needs to be additional explanation to this section of the report. It is not understood if the alternatives selected for this ToR have been screened as per the framework identified in section 5.1 of the ToR. A summary of information that was collected during the screening for these alternatives should be presented in the ToR and further details provided in the supporting documentation. It is expected that the supporting documentation will include details such as:

- The method to determine the relative desirability of alternatives from an environmental perspective should be detailed and based, at least in part, on an evaluation of indicators. This evaluation should reflect the degree to which alternatives are expected to conflict with the intention of relevant laws, regulations and policies while considering proposed mitigation measures. For environmental components or processes that may not be specifically protected by laws, regulations or policies (e.g. many invertebrates, reduction in bird abundance due to habitat loss or conversion), expert judgement will be required to 1) predict the relative impacts of different alternatives and 2) determine whether any individual alternative is “likely to cause significant adverse effects to the natural environment that cannot reasonably be mitigated (unacceptable)” (ToR, pg. 17) and therefore inconsistent with the purpose of the Environmental Assessment Act.

- Section 5.2.3 states “it may be that one or two performance objectives are more important and override all other objectives ...”. Effects (adverse) to the natural and human environments and amenability to reclamation are relatively more important performance objectives. This valuation should be stated explicitly in the ToR and future environmental assessment.

It is expected the EA will provide details of the alternatives to be examined but the ToR should set out a reasonable range of those alternatives that will be examined and how they will be selected for further study. The alternatives identified in 5.4.1 would appear to have the methods identified for each undertaking/element and this would be logical. However, this is not carried through consistently through the rest of the document and lends to some confusion. That is, in Table 1, it should be clearly identified what is the project undertaking, the project elements and the alternative methods of those project elements. Each project element should clearly identify the method (i.e. the element of Highway 600 alignment should identify the 4 alignment options).

The ToR should better describe the screening process used to assess how the alternatives met the criteria identified in the framework. Section 5.2.1 states that alternatives will be evaluated at the EA stage based on the performance objectives and described indicators. However in Appendices B and C the proponent reached their conclusions on the alternative methods for the road alignment and transmission corridor without defining indicators.

The proposed approach described in section 5.2.3 is quite confusing. It is not understood what is meant by “*relying on verbal distinctions inherent in the terminology of the criteria*”. The reference to other projects has limited relevance given the changes in regulatory requirements and differences in the scale and the processes of the projects.

Some of the terms used are inconsistent and the meaning is not clear. That is the term ‘natural environment’ is used to describe performance objectives in section 5.2.2, but in AppB-4 when describing performance objectives, the term ‘biophysical environment’ is used. It is not understood if these are to mean the same, or if they are different and if so why. Given the importance of these objectives, the ToR needs to provide definitions.

Regarding sections 5.4.4, 5.4.6 and 5.4.8, while it is recognized that adjusting general locations of these various components will be limited and alternatives to the general locations is not feasible, it is suggested the ToR allow for some flexibility in configuration of these areas and placement of buildings. For example, slight re-configuration of the east mine rock stock pile boundary from that shown in Fig 1, may help avoid negative impacts to Golden-winged Warbler habitat.

It should be clarified that MNR will not engage in discussions around land tenure options (as identified on Pg AppB-1) until a preferred route is confirmed at the environmental assessment approval stage.

MNR has several questions and comments on Table AppB-1 Pg. AppB-9:

- Effects on the Human Environment – a description of why Alternative A is expected to ‘provide positive effects’ is warranted.
- Could Alternative D be considered ‘preferred’ under amenability to reclamation?

- Does RRR plan to remove the transmission line following use?
- The broad, 3-level evaluation criteria may mask some finer differences among the alternatives – e.g. effects on the biophysical environment are all ranked as ‘acceptable’ but some alternatives are likely ‘preferable’ within this ranking.
- This preliminary assessment of transmission line routing alternatives is of some value, but a much more detailed analysis is expected in the environmental assessment. Currently, the assessment does not suggest that there is very strong economic, social and/or technical rationale to reject alternatives B, C and D. These conditions were needed to justify lack of detailed baseline studies in the area of these alternatives.

The ToR does not identify any potential or candidate alternatives (sites) for hazardous solid waste. It will be expected there will need to be sites identified in the EA.

It is unclear as to what the purpose of Table 15 is. The proponent needs to better describe how the EA will consider, evaluate and assess each criterion. The grouping of environmental components in this table again differs from the framework and from Table 14.

Species At Risk

The summary of Provincial and Federal listings of species at risk (Pg 45) is incomplete. Golden-winged warbler is listed as a threatened species Federally and should therefore be included in the summary. It is suggested the legal status and designations of each species be included in the summary for clarity.

It should be identified that RRR is one of three partners funding the study on Whip-poor-will. These partners are Trent University, MNR and RRR.

In order to properly address the potential issues regarding impacts of the project to Whip-poor-will, MNR feels it is important to provide the public with a shared understanding of the species and its habitat. The ministry and RRG have been meeting to discuss ESA consideration for the file and have not reached consensus on the information presented in the ToR. RRG has proposed that there is abundant habitat surrounding the RRG project site which appears suitable based on an aerial flight around the project area. MNR, however, believes that there are additional factors and site fidelity considerations that are critical to the assessment of habitat suitability. It is apparent from information collected since 2010 that Whip-poor-will occurrences in the west end of Fort Frances District are best described as a ‘pocket’ distribution, and show a landscape pattern that cannot be fully explained by coarse scale habitat associations, as suggested by RRR. Despite what may appear as suitable habitat at a coarse scale (such as fly by), these areas are in many cases not occupied. Importantly, known sites, such as the RRR site have demonstrated long term occupancy. Land owners have reported Whip-poor-will use of these areas dating back 35 to 70 years. This important context information has been excluded from the Terms of Reference. The ToR instead focuses on coarse scale similarity of the surrounding area even though research discussions have revolved around the uncertainty of factors that are likely responsible for site selection of Whip-poor-will.

Criteria, Indicators and Methods

In order to evaluate the alternatives to the project and alternative methods, the criteria, indicators and methods must be developed and/or it must be explained how indicators will be developed. The proponent's current approach makes it difficult to identify how the proponent plans to address the criteria and indicators as laid out in section 4.2.7 of the Code of Practice. The framework presented and what it is being compared in the ToR to is confusing. In section 7.2.1 the components are evaluated under another set of standards and ratings (different than 5.2.2) which will need to be divided further when evaluation potential environmental effects.

Environmental components (e.g. aquatic invertebrate richness, snapping turtle abundance) predicted to be impacted by each alternative may be used as indicators. Indicators must be measurable in a rigorous qualitative (few, many) or quantitative (numerical) manner and be comparable to a pre-determined baseline, standard or target value.

As indicated for air quality, noise and water quality in Table 6, more specifics can and should be provided at this point concerning relevant legislation, regulation and policy that set limits to impacts on fisheries and aquatic resources, aquatic habitat, terrestrial habitat, wildlife, migratory birds and species at risk. As an example, the Fish and Wildlife Conservation Act, 1997, conserves terrestrial habitat, wildlife and some migratory birds by prohibiting destruction of beaver dams, furbearer dens, black bear dens and bird nests and eggs.

The proponent should also state the potential data sources for the criteria and indicators. It is understood that some of these data sources are listed in Table 3. However, this necessary statement should be made explicitly in the ToR.

The approach to restrict analysis of cumulative projects/activities is not supported. Awareness of past projects/activities may be an important consideration in cumulative effects assessment. As one example, recognizing that historical clearing of land and road construction in the study area has fragmented and reduced forest cover, alternatives that will fragment forests further (e.g. transmission corridor alternative A) will contribute to cumulative impacts on forest environments.

In Table 14, the potential of effect described for large predators and furbearers is described as "*limited if any due to lack of presence*". Since large predators and furbearers are notoriously difficult to observe/survey i.e. inactive during day light hours, Table 11 identifies observations of 10 beaver dams, this is not an accurate statement. Effects on mammals may be limited for other reasons, which will need to be provided in the EA.

The ToR needs to have a commitment that the effects analysis evaluation approach chosen will need to be further detailed in the EA and be accepted and approved by all applicable agencies.

Commitments and Monitoring

The Terms of Reference needs to provide more detail on the commitment of environmental effects and monitoring. This is an important section and it is expected the Environmental Assessment will have an Environmental Effects Monitoring Plan that will include:

1. a description of the potential negative environmental effect for each criterion.
2. mitigation and protection measures planned for each criterion and performance measures.
3. how the project will be monitored to ensure that mitigation strategies are meeting performance objectives.
4. a contingency plan to be implemented should monitoring reveal that mitigation measures have failed.
5. a description of frequency and duration of monitoring for each negative impact, for each phase of the project.
6. a non-compliance strategy that will identify a plan of action for out of compliance situations.

The Terms of Reference should identify that an Environmental Effects Monitoring Plan will be prepared in the EA and approved by all applicable agencies.

Consultation

MNR has concerns on how the comments, as identified in the ToR and AppF-1 were addressed.

Section 9.5.3 of the report identifies that the key comments raised by First Nations were focused in relation to employment and business opportunities. But the summary of comments in Appendix F suggests other concerns regarding environmental impacts were important. The ToR should clearly identify that there were many concerns raised by First Nations around contaminants, fish, water quality and protection, wildlife, harvest food, medicines and future appearance of the site.

Some of the questions appeared to be answered very inadequately. Here are some examples of responses to First Nations that are of particular concern:

ROC 73 question 1: how will fuel spills in water will be cleaned up? The response: *the procedure for clean up is the same as at gas stations.*

ROC 73 question 4&5: will there be chemicals that could harm the animals? The response: *RRR indicated there will be no chemicals used on the site.*

MNR has many concerns over Table AppF-1 (Comments and Responses).

- It is confusing as to why RRR identified only selected portions of MNR's comments without adequate summary of the comments we provided. This results in the comment being read out of context and not fully understood (ie ROC 67 comment 1&2), as well as comments being described incorrectly. For example ROC 67, comment 8 was stated incorrectly. The correct comment MNR made

was that the ToR should state an effectiveness monitoring plan will be required in the EA.

- The responses in the table infer that RRR previously provided MNR responses in regard to comments of the review of the draft ToR (see ROC 67 response to comment 5 which suggests they are waiting for a response from MNR). MNR does not have a record of any response from RRR and there is nothing identified in Appendix E that a response was provided.
- The response to ROC 67 (comment 7) regarding MNR wanting a map of the footprint was incorrectly stated. Figure 2 in the draft ToR did not satisfy our concerns. The addition of Figure 4 in the proposed ToR has addressed the comment.
- The table does not consistently present what are comments are and what are responses. I.e ROC 58, (it is not evident the trapper has any issues). And ROC 177&180 are not comments.
- There were an unacceptable number of comments and questions where the proponent did not answer the question: (ROC#58 (comment 18), 71(comment 5&7), 67 (comments 1,2,4,7&8), 60 (comments 3&4), 107 (comment 10), 259 (comment 14), 169 (comment 28&29). Responses provided must be directed to the question as best as possible.
- There are a few questions to the responses around the alternatives versus what is being presented in the body of the report. For example, ROC 91, comment 5, the response does not identify there are any alternatives to the road alignment of Hwy 600 but they are described in the ToR. Contrarily there is no reference to any alternatives to realign a section of the Pinewood River in the ToR but the response to ROC 92, comment 1 suggests there may be.
- ROC 58, comment 18, made a request for a copy of MNR report on Whip-poor-will. The individual should have been directed to MNR.
- ROC 169, comment 36: the proponent responds with incorrect information. There had not been any discussions with MNR regarding baseline studies before the agency meeting held on July 18, 2012. Previous work with the proponent was specific to the collaborative research project on Whip-poor-will. This was clearly described in MNR's letter of response to the draft ToR.
- Regarding ROC 67 comment 5&6, there are no formal names for Loslow, Jones and Clarke creeks. Geographic naming of creeks, rivers and lakes requires a formal process. It is suggested the proponent refer to them in generic reference is Creek A, Creek B, Creek C etc.

Editorials

Pg vii – The rainy river gold project is not a 'gold exploration project'

Pg viii – Reference to MOE (2007) should be MOE (2009).

Figure 1 – Lount Lake should be 'Lac Seul'

Figure 2 – Where will pondwater in the area of the 'Plant Site' needs explanation.

Pg. 11 – Reference to MOE (2009)

Section 5.4.1, pg. 16 – First statement somewhat repetitive with Section 5.1 and may be more appropriate under Section 5.1 (alternatives criteria).

Sec 6.6.2, p. 43 – Suggest mention of AMEC's own effort in surveying rare plants.

Pg. 51 - explain AMEC (2012) Rainy River Gold Project, vs 2011 Terrestrial Resources Baseline Study equivalent to the 2011 Wildlife Baseline Study.

If you have any questions regarding this letter, or require further clarification on any of the comments we have provided, please contact Rachel Hill, District Planner at (807) 274-8605 or Rachel.hill@Ontario.ca

Yours truly,


Greg Chapman
District Manager
Fort Frances District
Phone (807) 274-8633
Fax (807) 274-4438

Ministry of the Environment

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Ministère de l'Environnement

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26 November 2012

MEMORANDUM

TO: Charlene Cressman
Special Project Officer – Rainy River Gold Project
Environmental Approvals Branch

Cc: Paula Allen
APEP Supervisor – Northern Region

Trina Rawn
District Supervisor – Kenora District Office

FROM: Sandra Ausma
Air Quality Analyst
Northern Region Technical Support

RE: Air Review of Rainy River Gold Project Terms of Reference EA File No. 05-09-02

Rainy River Resources (RRR) is proposing to construct and develop an open pit and underground gold mine on the Rainy River Gold Project (RRGP) property. The Proposed Terms of Reference (ToR) for the facility were prepared by AMEC and are dated October 2012.

The purpose of the review is to determine whether the Ministry of the Environment's (ministry) mandated responsibilities would be addressed if the EA were to be completed as proposed in the ToR.

This reviewer has examined the air quality aspects of the Proposed ToR and offers the following comments and recommended modifications.

Comments

- 1) Section 6.2.2 Air Quality discusses background air quality data that were collected by RRR to estimate background concentrations of particulate in proximity to the RRGP site. If the expectation is that RRR use the collected data as part of their air quality baseline within their Environmental Assessment (EA), the proponent should be engaging the ministry to ensure that any air quality monitoring meets the minimum requirements laid out in the *Operations*

Manual for Air Quality Monitoring in Ontario (PIBS 6687e) (Manual) including approval of the air quality monitoring plan, review of sites, and audits of the equipment and monitoring stations. The purpose of this is to ensure that any collected data is scientifically sound and will meet the requirements of the ministry with respect to EA baseline estimation and discussions and other regulatory uses for which RRR may wish to use the data.

Recommended modification: That Section 6.2.2 include discussion on how on-going air quality monitoring activities will meet the requirements of the Manual and ensure that the data is scientifically sound.

- 2) Section 8.0 Commitments and Monitoring briefly mentions that a monitoring framework will be developed for the post-EA phase to address all stages of the proposed undertaking including compliance and effects monitoring if appropriate. The section does not indicate which environmental matrices will be monitored for effects.

Recommended modification: That Section 8.0 be revised to include reference to ministry guidance documents for monitoring such as the Manual to ensure that any monitoring conducted will meet minimum requirements for data quality and ministry requirements.

- 3) Table 14 which is the preliminary summary of potential environmental effects only lists dust and products of petroleum hydrocarbon combustion as compounds that could be released and which impact human, plant and animal health. Since this is a metal mine site with a processing plant as well as explosive manufacturing and storage facilities, other compounds will be released that could have an impact. This includes metals, ore processing chemicals and by-products of explosives manufacturing.

Recommended modification: That Table 14 be expanded to include other compounds that will be emitted from the RRGP site including metals, airborne emissions from any processing chemicals and by-products of explosives manufacturing.

If you have any questions or comments, please contact me.

Sandra Ausma, PhD, PEng

bc: File AQ 05 01 2012 Rainy River Gold Project

(N:\AIR\air group shared files\Air Analyst\Environmental Assessments\Rainy River Gold\2012 11 26 RRG ToR review - Air.doc)

Nov 26, 2012

Rick Neilson

Comments – Rainy River Resources proposed Terms of Reference

Thank you for the opportunity to comment on the proposed Terms of Reference for the Rainy River Resources Proposed Gold Project. My comments here are further to my comments submitted on the draft Terms of Reference on June 16, 2012, the Fort Frances District Office of the MNR concerning a Minor Amendment Review of timber harvest on Sept 9, 2012, and to the Canadian Environmental Assessment Agency on Sept 23, 2012.

I understand that many of the issues facing RRR at this point are “big picture” and as a local landholder, I am focused on details, especially as they impact me, my family and my home in Richardson Township.

I appreciate that RRR has shown a willingness to listen and respond to suggestions.

I will start by saying that, from conversation with Kyle Stanfield at the open house in Emo, Ontario, I understand that the Preliminary Site Plan Conceptual Layout on page 10 of the document needs work with regard to the Tailings Management Area. I was disheartened to see that the TMA had moved from touching the corner of our property in the draft ToR to actually bordering our property along ~ 700 metres. Upon reading the document, I took false comfort in my understanding that there was to be a 1km buffer around the whole of the project. I am sorry that I cannot find the reference to the buffer now but from my conversation with David Simms from AMEC, at the Emo open-house, I understand that there is no buffer in this particular area.

My house, which is mistakenly marked as “Building – Unknown Use” is less than 1 km from the TMA. Furthermore, my wilderness cabin, not marked on the plan, is no more than 100 metres from the TMA. Both of these buildings should be marked “Residence – House” on the plan. The guest cabin is occasionally used as lodging for longer and shorter term guests and was built for that purpose.

Sec 5.4.6 of the Proposed ToR suggests “Selection of a site immediately Northwest of the open pit.” and puts that forth as the preferred site. Further, Table 1: Summary of alternatives to be considered in the EA, top of Page 28, in Tailings Management alternatives says “Surface TMA located proximal to the open pit (northwest of the open pit preferred)

It should be noted that the Preliminary Site Plan locates the TMA 2 km northwest of the open pit – neither immediately Northwest or proximal to the open pit. Immediately to

the Northwest of the pit is proposed as overburden and mine rock.

Sec 5.4.6 (top of pg 21) also speaks of “the need to capture a sufficient area of upstream watershed to be able to maintain a water cover on the deposited tailings...” but as proposed, the TMA is at the top of the Loslo creek watershed and in fact takes in some of the McCallum Creek* watershed. Drainage across Hwy 600 near Jones Rd (Southwest of large pond) is not shown on the Preliminary Site Plan but is visible on Google Earth. The northern limit of the TMA is no more than 1 km from the north end of McCallum Creek with the ground sloping to the north from the TMA.

*local name for Jones Creek.

Table 1: Summary of alternatives to be considered in the EA, top of Page 28, in Tailings Management Alternatives: “Alternative tailings management methods, such as thickened tailings or tailings co-deposited with mine rock”

I would like to see that alternative seriously considered, *immediately* Northwest of the open pit for the following reason:

This project is from beginning to end is being driven by high gold prices which have very little to do with gold as a commodity. The demand is being driven by uncertainty about the global economy and, as such, is subject to unpredictability. Throughout the life of the mine, there is the distinct possibility that gold prices could fall or costs rise and the project become uneconomic to continue. It seems most likely that if operations are suspended, the first reaction would be to wait for more favourable economics and hope to resume operations.

The problem with that is that while everyone is waiting for more favourable conditions, the waste rock will be exposed to the elements and generating contaminants.

Assuming that the clay is quite impervious, as seems to be generally agreed, it should be possible to suspend operations at low cost with a relatively easy restart, by encasing the mine rock/tailings in clay. If, on the other hand, all goes as planned and the mine continues for its expected life, or beyond, that is all well and good and Richardson Township will have a lake and a mountain or two.

Final Point: I feel very strongly that it is important to preserve some of the area adjacent to the project so that:

Nature can creep back into the site post-closure.

McCallum Creek is relatively unspoiled and protecting this watershed will in some ways mitigate loss of the other waterways.

RRR can be seen as caring for the land and can use that fact to promote goodwill within the area and their industry.

As stated previously, I want to welcome RRR as a neighbour and to have good relations going forward. I am available to discuss my concerns at any time.

Respectfully submitted
Rick Neilson

From: Stoiko, Andrea (ENERGY)
Sent: November 27, 2012 5:21 PM
To: Batista, Cindy (ENE)
Cc: Sermat-Harding, Kaili (ENERGY); Schultz, Daniel (ENERGY)
Subject: ENERGY comment - Rainy River Gold Project ToR

Hi Cindy:

Please see the Ministry of Energy's comment below regarding the power requirements for the Rainy River Gold Project Terms of Reference:

The proponent should describe the anticipated power needs of the project in ToR or say they will describe the anticipated power needs of the project in the EA. The power requirements for the project are usually described for each phase of the project (i.e. construction, operation). The information would support the need for the 230 kV transmission line connection.

We may have one additional comment that would be sent your way tomorrow. My apologies for the delay.

Thank you,

Andrea

Ministry of Tourism, Culture and Sport

Culture Services Unit
Programs and Services Branch
401 Bay Street, Suite 1700
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et du Sport**

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November 27, 2012 (BY EMAIL ONLY)

Cindy Batista, Special Project Officer
Environmental Approvals Branch
Ministry of the Environment
2 St. Clair Avenue West, 14th Floor
Toronto, ON M4V 1L5

Subject: Proposed Terms of Reference, Individual Environmental Assessment
Project: Rainy River Gold Project
Location: Township of Chapple, District of Rainy River
Proponent: Rainy River Resources Limited
MTCS File: 60EA039

Dear Ms. Cressman:

The Ministry of Tourism, Culture and Sport (MTCS) has received the final Terms of Reference (October 2012) prepared for the Rainy River Gold Project Individual Environmental Assessment. The package also included the final Record of Consultation main report and associated appendices. The ministry's interest in this project relates to our mandate of conserving, protecting and preserving Ontario's heritage including archaeological resources, built heritage resources, and cultural heritage landscapes.

Purpose of the Undertaking and Environmental Assessment

The purpose of the undertaking is to produce gold for sale and provide a return on investment to shareholders of Rainy River Resources Ltd., by constructing and operating an open pit and underground mine (the RRGP). Rather than meeting a series of streamlined provincial Class Environmental Assessments and Environmental Screening processes, the proponent, Rainy River Resources Limited, entered into a Voluntary Agreement with the Ontario Ministry of the Environment to conduct an Individual Environmental Assessment for the RRGP that will meet the requirements of the Ontario *Environmental Assessment Act*. The issuance of the proposed Terms of Reference is to provide the framework for completing a Provincial Individual EA in order to allow approvals to be issued for the RRGP and is also intended to facilitate on-going consultation on the RRGP.

MTCS Comments

Please note that the ministry's full-name and short form are incorrect in the Glossary included on Page v.

The ToR mentions that while most of the project will be located on privately owned land, it also indicates that the project could involve property that is or will be controlled by the Crown. This would include:

- the realignment of provincial Highway 600, which will be fully funded by the proponent, but will adhere to the Ministry of Transportation's (MTO) design standards and processes and will be assumed by MTO following an inspection and approval of the works undertaken by Rainy River.
- The disposition of Crown lands for the purposing of constructing or operating the project, which is usually under the jurisdiction of the Ministry of Natural Resources (MNR).

Please note that the *Standards and Guidelines for Conservation of Provincial Heritage Properties (Standards & Guidelines)*, prepared pursuant to Section 25.2 of the *Ontario Heritage Act*, came into effect on July 1, 2010.

The *Standards & Guidelines* apply should a property of cultural heritage value or interest be located on land owned or controlled by the Province.

6.0 Description of the environment

Table 2 within this chapter provides a summary of environmental components to be profiled. "Heritage and cultural resources" are included as a component under Socio-cultural Aspects, but are otherwise not discussed within subsection 6.7 Human Environment. Furthermore, the further detail provided in Table 2 only mentions archaeology and Traditional Knowledge studies and does not make reference to built heritage resources or cultural heritage landscapes.

Table 3, which provides a summary of potential environmental data sources, lists the *Stage 1 Archaeological and Cultural Heritage Resource Assessment of the Rainy River Resources Advanced Exploration Project, northwest of Fort Frances, Rainy River District, Ontario (in progress)*. Archaeological assessments do not address known or potential built heritage resources or cultural heritage landscapes. It is recommended that additional data be collected and technical studies undertaken to identify these types of cultural heritage resources. For example, the ministry notes that in Figure 2 which shows the preliminary site plan conceptual layout, that there are a number of buildings (both residential as well as those where the use is unknown) within the area. Are any of these building over 40 years old, or is there are information available indicating that they may be of potential cultural heritage value or interest?

7.2 Effects Analysis Methodology

On page 67 of the ToR it lists expected criteria for selecting Valued Socio-Economic Components. The second item listed is "Heritage or cultural resources (archaeology)". Cultural heritage resources include archaeological resources, built heritage resources and cultural heritage landscapes. Each of these categories of the cultural environment need to be considered when identifying environmental components and considering effects. Additionally, it is not clear what analysis supports the conclusion in Table 14 Preliminary Summary of Potential Environmental Effects that there is expected to be to effects to physical and cultural heritage or identified structures of sites, the latter of which is meant to refer to "Structures or sites of historical, archaeological, paleontological or architectural significance." Furthermore, it would appear that there is overlap between these two categories of components. It is suggested that they be combined into a single category that looks at cultural heritage resources, meaning specifically archaeological resources, built heritage resources and cultural heritage landscapes.

9.5.4 Current Aboriginal Traditional Land Use

On page 91 of the ToR it indicates that the proponent is: "seeking information that Aboriginal people may have with respect to current populations of fish, wildlife and plants in the area to

incorporate traditional knowledge into biological and physical studies for the area.” It is suggested that traditional knowledge should also be sought regarding cultural heritage resources and incorporated into related technical studies.

*Appendix B: Preliminary Assessment of Transmission Line Routing Alternatives; and
Appendix C: Preliminary Assessment of Highway 600 Re-alignment Routing Alternatives*

Neither appendix includes a discussion of cultural heritage resources when considering effects on the human environment, which includes the cultural environment.

These form the Ministry of Tourism, Culture and Sport’s comments on the Terms of Reference for the Rainy River Gold Project EA. We would be pleased to discuss any of our comments and/or provide additional information. We would also appreciate being kept informed regarding the manner in which MTCS’ input has been considered, and wish to remain on the circulation list for this project.

Regards,

Paula Kulpa

Team Lead – Heritage Land Use Planning
Culture Services Unit | Ministry of Tourism, Culture & Sport



Meeting Notes – Township of Chapple

Date: December 5, 2012

Purpose of Meeting: Project update /proposed ToR discussion

Location: Chapple Municipal Office

Time: 10:00am – 12:00 pm

RRR Participants: Kyle Stanfield, Stacey Jack

Municipal Participants:

Geoff Gillon (Rainy River Future Development Corporation)	Peggy Johnson, Clerk
Peter Van Heyst (Reeve)	Rick Neilson (Council)
James Gibson (Council)	Rilla Race (Council)
Randy Both (Public Works Superintendent)	

The Township expressed appreciation to RRR for its contribution towards roads and for cost sharing a landfill study.

The Township asked questions related to the proposed ToR including anticipated revenue changes to the Township based on assessments, changes to road ownership and maintenance as the project progresses, landfill impacts and official plan and zoning by-law amendments. KS re-iterated a previous pledge in November 2012 to pay for half of the Municipal landfill study the Township was undertaking. KS agreed that both Chapple and RRR needs to ensure the project area is appropriately zoned and that the Township and RRR understand what changes can be expected for overall municipal planning purposes. KS stated that RRR would hire a municipal planner to thoroughly address the Township's questions. The Township agreed that a municipal planner would be the best avenue for understanding anticipated changes.

The Township provided an update on the timing and process for accepting and amending the new Official Plan and zoning by-law amendments.

KS provided an update on the proposed Highway 600 relocation and the proposed East Access Road. The Township stated that they would prefer the Highway 600 relocation to advance

before mine construction in order to ease safety concerns related to traffic volumes and asked whether the Township could become the Highway re-alignment proponent in order to advance this component in an expedited manner. KS stated that RR would certainly support that approach.

The Township provided an update on the Sturgeon Creek School Accommodation Review. KS stated that RRR would forward a letter to the School Board suggesting that they hold off on making a decision until the RRR Environmental Assessment is complete.

From: [Daniel, Sheila E](#)
To: [RRRsiims](#)
Cc: [TC111504](#); [Charette, Donald](#); [Maydew, Krista](#)
Subject: FW: Comments on the Rainy River Gold Project, Proposed ToR - E-mail 1 of 2
Date: Wednesday, February 20, 2013 12:27:16 PM
Attachments: [RRGP ToR_MinEnergy_Stoiko_Nov27_Response_Table.docx](#)
[RRGP ToR_Brown_Nov_8_Response_Table.docx](#)
[RRGP ToR_DeLaRonde_Nov19_Response_Table.docx](#)
[RRGP ToR_EC_Undated_Response_Table.docx](#)
[RRGP ToR_Emes_Nov2_Response_Table.docx](#)
[RRGP ToR_Gallinger_Nov12_Response_Table.docx](#)
[RRGP ToR_Haggberg_Nov19_Response_Table.docx](#)
[RRGP ToR_Massarò_Nov19_Response_Table.docx](#)
[RRGP ToR_MEDI_Helfinger_Nov_26_Response_Table.docx](#)

Sheila Daniel

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sheila.daniel@amec.com

From: Daniel, Sheila E
Sent: Thursday, December 06, 2012 3:03 PM
To: 'Cindy.Batista@ontario.ca'; 'Lashbrook, Ross (ENE)'
Cc: TC111504; 'Kyle Stanfield'; 'Stacey Jack'; Russell, Dan; Simms, David
Subject: Comments on the Rainy River Gold Project, Proposed ToR - E-mail 1 of 2

Please find attached on behalf of Rainy River Resources (RRR), comprehensive tables summarizing the comments regarding the Rainy River Gold Project Proposed ToR and RRR responses in two e-mails. The tables have been provided only in Word, but can be provided as PDF files if preferred.

Tables relating to the MNR, MNDR and recent MOE EA Branch comments are not attached. The tables relating to MNR and MNDR comments are currently under final internal review.

Per our discussion with Ross Lashbrook, we wish to bring to your attention that a considerable number of the comments, RRR fully intends to address in the EA Report, as they believe that the appropriate venue, rather than amending the Proposed ToR. That includes technical comments related to the environmental baseline investigations and comments related to potential environmental impacts.

We would welcome the opportunity to have further discussion with the MOE EA Branch regarding these submissions, or EA Branch comments.

Best regards,

Sheila Daniel, M.Sc., P.Geo.
Senior Associate Geoscientist;
Head Environmental Management
AMEC

Environment & Infrastructure
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Business sustainability starts here... AMEC supports SOS Children

Jeffrey Leon
43 Emerson St.
Hamilton, ON
L8S 2X2

Ministry of the Environment
Environmental Approvals Branch
2 St. Clair Avenue West, Floor 12A
Toronto, Ontario
M4V 1L5

December 6, 2012

Dear Ms. Cressman,

As an Ontarian conscious of the wide-ranging benefits and pitfalls of large-scale mining, I am strongly in favour of the Rainy River Gold Project (RRGP) for its optimistic direction and bounty of economic benefits. Nonetheless, Rainy River Resources (RRR) must not lose focus on the potential environmental impacts that could burden the surrounding communities and natural habitat.

The chosen mining site, northwest of Fort Frances, is a well-recognized district for mineral exploration. The Rainy River region historically boasts a large quantity of gold ore in its geologic composition, and RRR has determined the presence of abundant reserves through their exploration efforts. As a result, this study area would be an ideal location for mining gold in Ontario compared to other feasible places. In the past seven years of subsurface examination, the continuous growth of the Intrepid Gold-Silver Zone with its high precious metal recovery rates has outlined an impressive template for the future mining process, and appears to be promising for shareholders.

Adverse environmental impacts are typically expected when situating a large-scale mine. In consideration of minimizing ecological harm, the distant 10km radius to lakes and sporadic frequency of creeks in the area label it as an attractive zone for mining gold.

I was initially concerned about the possibility of tailings chemicals migrating through the regional watershed into the pristine wetlands of Lake Superior. A detailed look at the layout of neighbouring basins identifies more localized, westward flow of surface and groundwater, which should eliminate any detriment to the high quality water of this Great Lake.

Multiple stakeholders questioned the escape of cyanide and other toxic byproducts of mine/mill throughput at the public meeting held on September 1, 2012, since it could compromise the integrity of regional water sources. Representatives of RRR answered to these individuals with consistently vague replies, simply stating they have consultants assessing the potential risk.

I am concerned about proper regulation of local water resources due to these nondeterministic remarks combined with a lack of specific tailings management strategies in the

project documentation. Will the *entire* tailings impoundment be lined with an impermeable material to prohibit the escape of toxins? I firmly believe that by conceding to this worthwhile investment, RRR can drastically reduce the concentration of local water-borne contaminants in the operation and decommissioning phases of monitoring the mine.

Additional public concern has been raised regarding water quality relating to the impacts on groundwater wells. I would like to expand on my previous statement by calling into question if RRR has created a directive to manage the effect of their tailings pond on the local watershed in response to flooding or heavy rainfall events. How is the proponent ensuring these potential risks will not degrade the surrounding aqueous environments that nearby communities are dependent on for a freshwater supply?

An additive impact of the RRGP's massive physical presence on the natural environment is that the open pit mine, waste stockpile, processing plants, tailings management areas, transmission lines, and new road network all directly encroach on the habitat of thirteen Species at Risk (SAR). The smaller tributaries in closer contact with the project area link up to the Pinewood River, a home to large-bodied fish with integral ecosystem importance. The forest and wetlands nearby are home to a variety of avian, mammal, amphibian and reptile species as well. Knowing that three of these species are classified as *threatened*, I would highly recommend obtaining the Provincial Species at Risk Permit to exercise environmental responsibility in anticipation that this project will likely harm these animals.

The project motives are impressive for their negligible effect on human recreational activity and protected land infringement. The heritage centers, museums, campground and Rainy River boating ventures characteristic to the township of Chapple and the surrounding district appear to be unaffected by the mining operations. The pursuit RRR undertook in gaining insightful opinions from regional First Nations communities identifies the company as a dignified party serious about accounting for public views in their EA process.

While I stand in strong accord with the RRGP, the proponent must remain vigilant in protecting the local water quality and engage in more rigorous mitigation tactics to prevent a decline in SAR and threatened wildlife.

Sincerely,

Jeffrey Leon

RRGP Socio-economic Interviews December 10 – 13, 2012

Interview Notes – Final

Interviewee: Township of Emo
Representatives: Vince Sheppard – Mayor; Brenda Cooke, CAO/Clerk/Treasurer
RRR/AMEC representatives: Stacey Jack (RRR), Caroline Burgess (AMEC)
Date/Time: December 12, 2012 at 1:30 p.m. Central
Location: Emo Municipal Office

Q1: Is there a long-term economic development strategy for the community?

Yes, an overall economic development strategy for the region exists – provided in interview with Rainy River Futures Development Corporation.

Emo wants to grow with or without the Rainy River Gold Project (RRGP). The following is an overview of the residential and commercial lot developments that are either planned or underway:

- 70 Lot subdivision that has been approved called Echo Lake Estates. Two lots are sold. Zoned R1 and R2 for duplexes or single homes. There are 3 developers interested.
- Meadowlands of Emo (East side of Emo): 24 lots plus a church and a new school. The school is a Protestant faith-based private school (JK – grade 12). It was located at Stratton but it is moving to Emo so the teachers will also be moving. Two lots are left for sale. It includes five commercial lots but is not an approved subdivision.
- There is some apartment developments in Emo (R3 in new Official Plan). There is also an older house that was converted to three apartments. The town needs apartments.
- There is a third subdivision one mile north of Emo. Privately serviced (septic and well) five acre, treed lots (estate lots). Three lots are sold. There are twenty-eight in total; twenty-five left. The subdivision approvals are from MMAH through Thunder Bay.
- There is a fourth vacant lot condo subdivision five miles east. There is a common area with a driveway into the subdivision. There are 14 lots and the lots are privately serviced with septic and wells. It is a “green” development and will use solar power.

Emo conducted a school study. In three years we will be building a school. Currently we have the highest enrollment in the regional schools with students from: Sturgeon Creek, Emo and Crossroads.

Q2: In your opinion what would be the effects of the project on your community?

The effects are positive. We are not going crazy. We are developing housing because there are families coming back partly because of their religious background. We will need assisted living facilities and apartments. There are speculators on the apartment development.

Q3: Are there any barriers or challenges that could impact the ability to achieve community development objectives?

Water and sewer upgrades are costly. It will cost \$5.9 million to upgrade the water and sewer. The upgrades would be enough to handle the new subdivision demands. Emo will upgrade whether we get the grants or not because we want a desirable community with basic amenities. We are continuing to apply for grants and have retained an engineer to evaluate the needs. We have completed an EA for the water and sewer upgrades. We have a lagoon expansion scheduled for spring 2013 because it is at maximum capacity. It will fix the distribution lines and there will be better pressure and flows. We have to upgrade or we can't grow.

New homes must have water meters so we are being proactive. The water distribution system is 40 years old – we have lots of water availability (from the Rainy River) but the distribution system was not operating efficiently. We went to the Association of Municipalities of Ontario conference this year to ask for funding. We were turned down on provincial /federal infrastructure grant for water, sewer, and roads.

The municipal staff is busy. There are only four public works employees. The building inspector and building manager are experienced. Administration is busy. Brenda has been working here for 32 years. She is training new people and we are succession planning. One employee is taking CGA training. We are running tight with financing. We have some money saved but may have been penalized on government grants because we have the money.

Q4: Have you identified ways that the project could help reduce these barriers or challenges (if any)?

We are working with RRR currently and need to know where to fit in with the plans.

Q5: In your opinion, how can the community, RRR and/or other partners best maximize potential positive benefits and minimize potential negative impacts of the RRGP?

They can partner on projects with us. If there is financial assistance, then families can move to Emo.

There shouldn't be any negative impacts from the RRGP. We have good business people and they have prepared by handing down businesses in the family. We have strong work ethics. Young families stay here.

The Province doesn't see the need to upgrade. They will be more likely to give funds if there was a partnership. We need to show that the infrastructure could be maintained and we need maintenance dollars. For example, the arena costs \$150,000+ per year to maintain. LaVallee helps pay for 30% of the shortfall and Emo pays the remainder.

Q6: What is your vision for the local economy after the mine has closed?

It is a great place to live for young families and older people. There should be a good workforce because EMO is centrally located in the region.

Q7: How can the project be used to realize that vision?

Surplus houses could attract people. Young people coming back to start businesses, commercial development of new business types.

Q8: Do you have any comments regarding the RRGP?

We are very excited and very privileged to have their office in Emo. Hope to be ready to accommodate some of the workers.

Other comments:

- Few people work out west (Fort McMurray, AB) but still have homes here. Others work in Kenora, and Dryden but live here.
- The housing vacancy rate is very low. If houses are not selling it's because the price is too high. There are only five houses for sale. There is one serviced industrial lot for sale right now.
- The Rainy River District is designated by the World Health Organization as a "Safe Community". As a result of this designation, there is a reduction in WSIB (Workplace Safety and Insurance Board) rates. We don't need to keep reapplying for the designation. We are part of the RR. Freda Carmody is the municipal councilor (LaVallee) who prepares the quarterly report for the RR Valley Safety Coalition. The annual meeting is in January.



Rainy River Resources Ltd.
1111 Victoria Avenue East
Thunder Bay, Ontario P7C 1B7

T 807-623-1540
F 807-623-0974

Dec 21, 2012

Ministry of the Environment
Environmental Approvals Branch
2 St. Clair Avenue West
Floor 12A
Toronto ON M4V 1L5

**RE: Notice of Intent to Amend the Rainy River Gold Project Terms of Reference
EA File No. 05 09 02**

Dear Ms Agatha Garcia-Wright:

Pursuant to recent discussions, we would like to advise that we intend to Amend the Rainy River Gold Project Terms of Reference (ToR). Our consultant AMEC Earth and Infrastructure, will be submitting an Amended ToR to your offices in the coming days for review.

Please do not hesitate to contact me if you have any questions or concerns.

Sincerely,

Kyle L. Stanfield
Vice-President, Environment & Sustainability
Rainy River Resources Ltd.

cc. Cindy Batista, Ross Lashbrook - MOE
Sheila Daniel – AMEC
Howard Hampton - Fasken Martineau

From: Daniel, Sheila E
Sent: Monday, January 07, 2013 1:48 PM
To: Batista, Cindy (ENE)
Cc: TC111504; Kyle Stanfield (kstanfield@rainyriverresources.com); Burgess, Caroline M; Russell, Dan; Simms, David; Stacey Jack
Subject: RE: Rainy River Gold Project - Revised Responses to Comments on the Proposed ToR

Please find attached, tables including the responses to the ToR comments provided this morning by the MOE, on behalf of Rainy River Resources, for completeness.

Sheila Daniel

Tel: 905-568-2929 x 4123
Direct: 905-568-1917 x 4123, Mobile: 416-524-5928
sheila.daniel@amec.com

From: Daniel, Sheila E
Sent: Monday, January 07, 2013 12:43 PM
To: 'Batista, Cindy (ENE)'
Cc: TC111504; 'Kyle Stanfield (kstanfield@rainyriverresources.com)'; Burgess, Caroline M; Russell, Dan; Simms, David; Stacey Jack
Subject: RE: Rainy River Gold Project - Revised Responses to Comments on the Proposed ToR

Also, in regards to the MTCS comment regarding built heritage resources, the Stage 2 Archaeological and Cultural Heritage Resource Assessment report currently in preparation, has now been added to Table 3 of the Amended ToR as a source of information. The scope of the Stage 2 assessment / study has been defined in association with MTCS, and does include the built heritage aspects referenced by Ms Kulpa.

Sheila Daniel

Tel: 905-568-2929 x 4123
Direct: 905-568-1917 x 4123, Mobile: 416-524-5928
sheila.daniel@amec.com

From: Daniel, Sheila E
Sent: Monday, January 07, 2013 12:29 PM
To: 'Batista, Cindy (ENE)'
Cc: TC111504; Kyle Stanfield (kstanfield@rainyriverresources.com); Burgess, Caroline M; Russell, Dan; Simms, David
Subject: RE: Rainy River Gold Project - Revised Responses to Comments on the Proposed ToR

We have received the follow-up comments appended to your e-mail.

In regards to the MTCS comments, we will include the additional information they have requested in the Amended ToR.

In regards to the MOE – Groundwater comments, these comments relate to the groundwater model and its assumptions and will all be fully considered in the technical report.

In regards to ME – “MOE to AMEC: Please specify where in the ToR it states that a 230kV transmission line is required? Please be specific.” It is stated on Page 24, Section 5.4.11, Power Supply Alternatives. Additional information will also be provided in the Amended ToR.

Could you please let us know when you expect responses from EC, MNDM, MOE (waste / air) and MNR.

Best regards,

Sheila Daniel

Tel: 905-568-2929 x 4123

Direct: 905-568-1917 x 4123, Mobile: 416-524-5928

sheila.daniel@amec.com

From: Batista, Cindy (ENE) [<mailto:Cindy.Batista@ontario.ca>]

Sent: Monday, January 07, 2013 11:58 AM

To: Daniel, Sheila E

Cc: Batista, Cindy (ENE); Kyle Stanfield (kstanfield@rainyriverresources.com); Burgess, Caroline M; Russell, Dan; Simms, David

Subject: FW: Rainy River Gold Project - Revised Responses to Comments on the Proposed ToR

Importance: High

Hello Sheila:

I have reviewed your revised responses to the agency and shared, where necessary, with the appropriate agency. The attached tables include additional comments with respect to AMEC's December 20th revised responses to the following agencies:

- MTCS
- ME
- MOE – Alisdair Brown – additional comments attached regarding the groundwater modelling assumption (technical report – not ToR)

As for AMEC's responses to the following, MOE have no additional comments and is generally satisfied with AMEC's response:

- MEDI
- MOE – Noise (Pierre Godbout) and Air quality analyst (Sandra Ausma)

As for EC, MNDM, MOE (Brown – groundwater, Mulcahy – waste, Sushant – air), and MNR – I am waiting to hear back from these agencies on whether or not they are satisfied on AMEC's revised responses to their initial comments on the proposed ToR.

As for the amended ToR document that was sent to me in December, I would prefer to review it once all of the amendments, including the revised Record of Consultation was complete. As you will see my e-mail sent to you on December 28th, including additional comments attached and remaining comments from the agencies, more revisions may be required to the ToR.

Please do not hesitate to contact me should you have any questions regarding the above. As for my review on AMEC's response to the public comments, I will send that to you sometime this afternoon.

Thanks,

Cindy

From: Daniel, Sheila E [<mailto:sheila.daniel@amec.com>]

Sent: December 20, 2012 3:59 PM

To: Batista, Cindy (ENE)

Cc: TC111504; Kyle Stanfield; Burgess, Caroline M; Russell, Dan; Simms, David

Subject: Rainy River Gold Project - Revised Responses to Comments on the Proposed ToR

Please find attached revised responses regarding the comments on the Proposed ToR. The inserted / revised text is shown in red Font for your ease of identification.

Best regards,

Sheila Daniel, M.Sc., P.Geo.
Senior Associate Geoscientist;
Head Environmental Management
AMEC

Environment & Infrastructure

160 Traders Blvd. East, Suite 110, Mississauga ON Canada L4Z 3K7

Tel: 905-568-2929 x 4123

Direct: 905-568-1917 x 4123, Mobile: 416-524-5928

sheila.daniel@amec.com

amec.com

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From: [Stacey Jack](#)
To: jport@snnf.ca
Cc: [TC111504; Burgess, Caroline M](#)
Subject: Socio-Ec. Questionnaire
Date: Monday, January 07, 2013 3:36:44 PM
Attachments: [image001.jpg](#)
[Township of Sioux Narrows-Nestor Falls socio-economic questionnaire - v1.doc](#)

Hi Jeff – Thanks for the phone call today. I appreciate you taking the time to fill out the attached questionnaire on behalf of Sioux Narrows-Nestor Falls.

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

Sincerely,

Stacey



Stacey Jack

Community Coordinator

T 807 482 2501 | F 807 482 2834 | sjack@rainyriverresources.com

Rainy River Resources Ltd., 5967 Highway 11/71, PO Box 5, Emo, ON P0W 1E0

**Rainy River Resources Gold Project
January 16, 2013**

SOCIO-ECONOMIC DATA COLLECTION QUESTIONNAIRE

Thank you for participating in this survey. Your responses to the following questions will help us get a better understanding of your community, land uses and/or organization so that we can assess any potential effects of the Rainy River Gold Project for the Provincial and Federal environmental assessments. Rainy River Resources is committed to working with regional communities to identify and determine appropriate ways to manage any potential negative project effects or enhance any positive effects from the Project.

Organization	Township of Sioux Narrows – Nestor Falls
Sent to	Jeff Port jport@snnf.ca
Questionnaire Completed by: Please add names, titles and contact information of all persons who assisted in completing this survey	Jeffrey C. Port, M.Sc. MCIP RPP Director of Planning and Development Township of Sioux Narrows-Nestor Falls Sioux Narrows, ON P0X 1N0 Tel: 807-226-5241

Official Community Plan

1. Has the new Official Community Plan/Community improvement plan been approved?

Official Plan approval: January 2011

Community Improvement Plan approval: June 2013

New Comprehensive Zoning By-Law approval: December 2012

2. Are there other relevant plans available that we should take into consideration?

- Yes
- No (skip to question 3)
- Not sure (skip to question 3)

- a. If yes, where can we get a copy/can you supply us with a copy?

**Rainy River Resources Gold Project
January 16, 2013**

Housing and Accommodations

3. Can you comment on the general availability of housing in the community?

In general, most of the housing that comes available on the market is waterfront residential. Housing prices have stabilized recently, so waterfront living is as affordable as it has been in a long time. There are a few backshore houses and lots available as well. Generally, our community appeals to those people who want to live in a lakefront setting.

4. Are there new residential developments planned to be built within the next five years?

Most of the residential development over the next 5 years in Sioux Narrows-Nestor Falls will likely be resort conversions to condominium units. This is a much more affordable way to buy a waterfront property. The Township has approved one new 10 unit condominium last June, and I have two more application in the system – one for 23 units and another for 7 units.

I expect we will be dealing with 2 to three new applications per year over the next 5 years.

5. How many lots are available for residential development?

There are about 15 – 20 vacant lots available in Sioux Narrows and Nestor Falls, most of them on Lake of the Woods. All lots are serviced by private water and sewage systems.

6. How many lots are there for commercial/industrial use?

We have about 6 to 8 commercial/retail properties available in Sioux Narrows-Nestor Falls. Typically they have frontage on Highway 71.

7. Please indicate approximately how many units of each housing type are in your community:

Apartments: 50

Townhouses/Duplexes/Multi-family home: 25

Single Family Homes: 1125

8. Please indicate how many rooms are available in temporary accommodations:

Hotel/Motel: 100

B&B: 25

Short-term apartment/suite rentals: 150 (winterized resort units)

Other _____

**Rainy River Resources Gold Project
January 16, 2013**

9. What is the vacancy rate for Temporary/short-term accommodation?

The occupancy rate averages around 60% - lower of course in the winter.

Emergency services

10. How many people (volunteer and paid) work at the fire department?

We have a complement of about 40 volunteer fire fighters. This includes first response service on Highway 71 for motor vehicle accidents.

11. How many fire incidents are attended to each year?

Approximately 10.

Recreation and Tourism

12. Are there any plans to change recreation and park facilities in Sioux Narrows – Nestor Falls over the next few years?

Yes

No

Not sure

- a. If so, why are these changes being made?

It is expected that the Township will be taking over the operation of Caliper Lake Provincial Park.

13. Where do tourists to Sioux Narrows – Nestor Falls mainly come from?

Predominantly Manitoba and the mid-western United States.

**Rainy River Resources Gold Project
January 16, 2013**

What is the primary attraction to this area?

The primary attraction is the famous Lake of the Woods, and associated lake based activities. Fishing is first and foremost.

14. When is the visitorship the highest?

June 15 to August 15

Transportation

15. Are there any changes being planned to roads in Sioux Narrows – Nestor Falls?

- Yes
- No (Skip to question 20)
- Not sure (Skip to question 20)

a. If so, why are these changes being made?

Utilities

16. What is the remaining lifespan for Sioux Narrows – Nestor Falls landfill facilities?

We are working on that right now. It looks like we have a 20 year lifespan, however we are also in the planning stages for a new landfill.

17. Are all residential lots on private well water systems?

Yes.

**Rainy River Resources Gold Project
January 16, 2013**

Project Mailing List

18. Rainy River Resources has established a project mailing list. Would you like to stay informed of about the project by being placed on this list?

No, do not place me on the mailing list

Yes, put me on the mailing list

Name:	Jeffrey Port
Mailing Address:	P.O. Box 417
City/Town:	Sioux Narrows, ON
Postal Code:	P0X 1H0
E-mail:	jport@snnf.ca

19. Is there anything else you would like us to know that would be relevant to the environmental assessment for this project?

20. Do you have other comments or suggestions about how you would want to be involved?

Thank you!

Please return your questionnaire by January 18, 2012 to:

Stacey Jack
Community Coordinator
Rainy River Resources Ltd.
5967 Highway 11/71
PO Box 5,
Emo, ON P0W 1E0
Tel: 807 482 2501
Fax: 807 482 2834
sjack@rainyriverresources.com

Daniel, Sheila E

From: Batista, Cindy (ENE) [Cindy.Batista@ontario.ca]
Sent: Thursday, January 10, 2013 3:26 PM
To: Daniel, Sheila E; Burgess, Caroline M
Cc: Kyle Stanfield (kstanfield@rainyriverresources.com); Batista, Cindy (ENE)
Subject: FW: Comments from the Métis Nation of Ontario on the Adequacy of the Rainy River Gold
Attachments: Rainy_River_Resources_TOR_Draft-MNO_comment - FINAL.pdf

Good afternoon Sheila and Caroline:

The ministry received a letter from the Métis Nation of Ontario who expresses concerns with the ToR. Although the letter was received outside the comment period, it is the ministry's expectation that Rainy River/AMEC will provide a response to the concerns being raised and as part of each response indicate whether revisions to the ToR document are required to address the comment being made by the Métis. Responding in a table format is preferred.

In addition, I have some further comments regarding the Aboriginal consultation record, as a result of speaking to our legal services that should be incorporated into the revised consultation record. The comments are as follows:

- Although you summarize the interests and comments raised by all communities in the body of the consultation record, I am recommending that you describe each community's concerns, when was the concern raised and what did RRR do to address this issue. It is difficult from the running table in appendix G to get a better picture of the consultation. It may be beneficial to summarize the consultation by each group, list the concerns and identify how the concerns were addressed.
- Did RRR hear from Buffalo Point or Onigaming First Nation?

We can discuss this further tomorrow during our call if there are any questions on the above.

Regards,

Cindy

From: Brian Tucker [<mailto:BrianT@metisnation.org>]
Sent: January-09-13 6:36 PM
To: Cressman, Charlene (ENE)
Cc: TheresaStenlund
Subject: RE: Comments from the Métis Nation of Ontario on the Adequacy of the Rainy River Gold

Hi Charlene,

I have corrected the date at the top of the letter (2012 -> 2013). The rest of the document has remained unchanged.

Kind regards,
Brian

--

Brian C. Tucker

Manager, Métis Traditional Knowledge and Land Use

Métis Nation of Ontario

426 Victoria Avenue, Fort Frances, ON P9A 2C3

Office: 807-274-1386 x5 | Cell: 905-301-5203 | Fax: 807-274-1801 | Web: www.metisnation.org

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From: Brian Tucker
Sent: January 9, 2013 3:44 PM
To: 'Charlene.Cressman@ontario.ca'
Cc: TheresaStenlund; Mark Bowler
Subject: Comments from the Métis Nation of Ontario on the Adequacy of the Rainy River Gold

Hi Charlene,

Please find attached the Métis Nation of Ontario comments on the Rainy River Gold Project Proposed Terms of Reference.

If you have any questions, please don't hesitate to send me an email or give me a call.

Kind regards,
Brian

--

Brian C. Tucker
Manager, Métis Traditional Knowledge and Land Use
Métis Nation of Ontario
426 Victoria Avenue, Fort Frances, ON P9A 2C3
Office: 807-274-1386 x5 | Cell: 905-301-5203 | Fax: 807-274-1801 | Web: www.metisnation.org

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From: Batista, Cindy (ENE) [<mailto:Cindy.Batista@ontario.ca>]
Sent: Tuesday, January 15, 2013 09:06 AM
To: Romeo Duguay <abuscan@sympatico.ca>
Cc: Carl Tuesday <zigtuesday@hotmail.com>; Stacey Jack; Kyle Stanfield; Batista, Cindy (ENE) <Cindy.Batista@ontario.ca>
Subject: RE: Review of the Proposed Terms of Reference EA File 05-09-02

Good morning Romeo:

Thank you for your e-mail below and informing the ministry that Big Grassy First Nation supports the Rainy River Gold Project Terms of Reference. Your letter of support will form part of the ministry's project file and considered by the Minister of the Environment when making a decision to approve or not approve the Terms of Reference.

Sincerely,

Cindy

From: Romeo Duguay [<mailto:abuscan@sympatico.ca>]
Sent: January 14, 2013 1:09 PM
To: Batista, Cindy (ENE)
Cc: Carl Tuesday; Stacey Jack; Kyle Stanfield
Subject: Review of the Proposed Terms of Reference EA File 05-09-02

Good Morning Cindy,

On behalf of Chief Carl Tuesday of the Big Grassy First Nation, I am writing with regard to the current status of the Rainy River Resources EA Terms of Reference approvals. We received copies of the the "Terms" in mid October along with the "Record of the Consultation Meetings and discussions". We have made these documents available for review by our First Nation members. The documents were also reviewed by myself personally. I found them to be substantive and informative in all material respects and quite accurately represented the concerns of our First Nation members with respect to our environmental concerns. I might add that, the Big Grassy First Nation leadership and the Big Grassy Elders Advisory Council have worked very closely with the representatives from the Rainy River Resources office over the past 2 years . We are signatories to an MOU between both parties and recently signed off on a "Data-Sharing Agreement" on (Traditional Ecological Knowledge/Tradition Land Use) with the Company.

The primary purpose of this correspondence is to demonstrate our current satisfaction with the "Terms of Reference" as presented, and how the Big Grassy First Nation can work with the Ministry to expedite the approvals required toward the implementation of the EA.

The Big Grassy First Nation is in close proximity to the proposed mine site and we have a moral and economic stake in its success. Looking forward to your response and direction in this matter.

Joseph R. Duguay
NRF Consultation Advisor/Special Projects Officer
Big Grassy First Nation

From: [Daniel, Sheila E](#)
To: [RRRsiims](#)
Cc: [TC111504](#); [Charette, Donald](#); [Maydew, Krista](#)
Subject: FW: Rainy River Gold Project - revised responses to comments on proposed ToR
Date: Wednesday, February 20, 2013 12:24:18 PM
Attachments: [RRGP Response to EAB comments on proposed amendts to ToR to MOE Jan22.docx](#)
[RRGP ToR MNDM RRR revised response to MOE Jan22.docx](#)
[RRGP ToR MOE Brown Nov 8 Revised response to MOE Jan22.docx](#)
[RRGP ToR Public Response Table to MOE Jan22.docx](#)
[RRGP ToR IJC Fay Oct 29 Response Table to MOE Jan22.docx](#)
[RRGP ToR Leon Dec 6 Revised Response Table to MOE Jan22.docx](#)
[Status of Comments Responses Jan 22.xlsx](#)

Sheila Daniel

Tel: 905-568-2929 x 4123
Direct: 905-568-1917 x 4123, Mobile: 416-524-5928
sheila.daniel@amec.com

From: Daniel, Sheila E
Sent: Tuesday, January 22, 2013 9:08 AM
To: 'Batista, Cindy (ENE)'
Cc: TC111504; 'Kyle Stanfield'; Russell, Dan; Simms, David
Subject: Rainy River Gold Project - revised responses to comments on proposed ToR

Please find attached revised responses to the comments provided by the MOE recently on the Rainy River Gold Project, Proposed Terms of Reference. We have included an additional column / coloured font as appropriate with follow-up responses for your ease of review. We have also included a copy of the tracking table we are using for discussion purposes.

We will try and get in touch with you this morning to discuss any outstanding comments / concerns in order that we can finalize the Amended Proposed ToR.

Best regards,

Sheila Daniel, M.Sc., P.Geo.
Senior Associate Geoscientist;
Head Environmental Management
AMEC

Environment & Infrastructure
160 Traders Blvd. East, Suite 110, Mississauga ON Canada L4Z 3K7
Tel: 905-568-2929 x 4123
Direct: 905-568-1917 x 4123, Mobile: 416-524-5928
sheila.daniel@amec.com
amec.com

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From: [Burgess, Caroline M](#)
To: [RRRsiims](#)
Subject: FW: Development Agreement
Date: Thursday, January 24, 2013 2:51:00 PM
Attachments: [image001.jpg](#)
[MX-2300N_20130124_114829.pdf](#)

The attachment

From: Kyle Stanfield [mailto:kstanfield@rainyriverresources.com]
Sent: January-24-13 12:00 PM
To: Peggy Johnson
Cc: andreabourrie@rogers.com; Julia Robertson Cowan; Burgess, Caroline M; Stacey Jack
Subject: FW: Development Agreement

Hello Peggy – Thanks for the letter and the continued support we receive from the Township in general. As discussed, I will be in touch regarding a potential meeting with the Minister of Transportation to advance the Township as the highway by-pass proponent with RRR funding the development.

I wanted to respond back on the other items raised with an e-mail before writing a formal letter back. As discussed previously, we certainly agree that we need to properly assess the items raised a number of times last year as well as at the Township office meeting last month during our update meeting. As you know, the project Feasibility Study and Environmental Assessment process is underway with results expected in the coming months for public review. Many details of the project are still to come but in advance of the release of the Environmental Assessment, we need to coordinate further with the Municipality on issues such as taxes, zoning, roads, waste management, housing considerations etc.. I did commit to funding half of the landfill study as requested earlier last year and trust this aspect is underway in support of the concerns raised by the Township Council pertaining to capacity.

Andrea Bourrie is a registered Municipal Planner working with Rainy River Resources and I have asked Andrea to start have a closer look at the Municipal planning aspect we have discussed together with the Township to assist with the Environmental Assessment and the detailed permitting to come over the next 2 years. A specific task that I have asked Andrea to assess is what is the municipal cost burden of the proposed footprint currently (before mine development), road maintenance etc, what is the tax base coming into the municipality and what is the expected tax base once the mine is up and running. This should be the starting point in my mind as discussed last month to properly understand how the mine will support the Township of Chapple financially. I believe Andrea has already been in touch with you to start discussing these aspects further and how this may relate to the Municipal Plan being finalized by your consultant.

I expect to have further information in hand from Andrea in the coming weeks so we can start looking at areas we may need to further coordinate etc. I see this as just the beginning of a very coordinated effort to ensure the Township is properly supported.

In the meantime, please do not hesitate to contact me.

Cheers, Kyle



Kyle L. Stanfield P.Eng.

Vice President, Environment & Sustainability

T 807 623 1540 | C 807 621 6152 | F 807 623 0974 | kstanfield@rainyriverresources.com

Rainy River Resources Ltd., 1111 Victoria Avenue East, Thunder Bay, Ontario, Canada P7C 1B7

From: Peggy Johnson [mailto:chapple@tbaytel.net]

Sent: Thursday, January 24, 2013 11:25 AM

To: Kyle Stanfield

Subject: Development Agreement

FYI...original mailed today. Peggy

MX-2300N_20130124_114829.pdf;

CORPORATION OF THE TOWNSHIP OF CHAPPLE

P.O. Box 4

BARWICK, ONTARIO POW 1A0

Phone 807-487-2354 Fax 807-487-2406

OFFICE OF THE CLERK-TREASURER

e-mail: chapple@tbaytel.net

January 24, 2013

Rainy River Resources
1111 Victoria Avenue East
Thunder Bay, Ontario
P7C 1B7

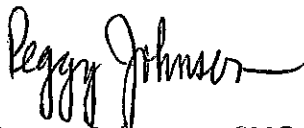
Attention: Kyle Stanfield, P.Eng.
Vice President, Environment & Sustainability

Dear Kyle:

I am writing to you on behalf of Chapple Municipal Council in regards to our recent request for a meeting pertaining to the re-routing of Highway 600. As you know, Council is very supportive of this initiative as it will further increase the chance of the mine development. Council welcomes the opportunity to discuss this with you.

Council continues to be concerned about the financial challenges Chapple may be facing should the mine become a reality. As you know from our previous meeting, there are numerous issues which Chapple has identified that have the potential to increase municipal costs. While we are sure that these issues will be identified in the EA process, Council requires more clarity around what Rainy River Resources (RRR) is willing to do, financially, to assist the community. In addition to discussing the road, Council would like to discuss the process of developing an agreement with RRR similar to those we see with First Nations. Such an agreement would give both Rainy River Resources and the Chapple the clarity needed to move forward.

Sincerely,



Peggy Johnson, CMO
CAO/Clerk Treasurer



From: [Daniel, Sheila E](#)
To: [RRRsiims](#)
Cc: [TC111504](#); [Charette, Donald](#); [Maydew, Krista](#)
Subject: FW: RRGp ToR_MTCS_AMEC revised response Jan 25 to MOE.docx
Date: Wednesday, February 20, 2013 12:23:54 PM
Attachments: [RRGP ToR_MTCS_AMEC revised response Jan 25 to MOE.docx](#)

Sheila Daniel

Tel: 905-568-2929 x 4123
Direct: 905-568-1917 x 4123, Mobile: 416-524-5928
sheila.daniel@amec.com

From: Daniel, Sheila E
Sent: Friday, January 25, 2013 4:02 PM
To: 'Batista, Cindy (ENE)'
Cc: TC111504; 'Kyle Stanfield'; 'Stacey Jack'; Russell, Dan; Simms, David
Subject: RRGp ToR_MTCS_AMEC revised response Jan 25 to MOE.docx

Please find attached a revised response from RRR to the MTCS comments received from the MOE.

Best regards and have a nice weekend.

Sheila Daniel, M.Sc., P.Geo.
Senior Associate Geoscientist;
Head Environmental Management
AMEC

Environment & Infrastructure
160 Traders Blvd. East, Suite 110, Mississauga ON Canada L4Z 3K7
Tel: 905-568-2929 x 4123
Direct: 905-568-1917 x 4123, Mobile: 416-524-5928
sheila.daniel@amec.com
amec.com

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From: [Daniel, Sheila E](#)
To: [RRRsiims](#)
Cc: [TC111504](#); [Charette, Donald](#); [Maydew, Krista](#)
Subject: FW: Rainy River Gold Project - responses to outstanding comments - revision as requested
Date: Wednesday, February 20, 2013 12:22:20 PM
Attachments: [RRGP ToR MNR AMEC Revised Jan 29 to MOE_REV2.docx](#)

Sheila Daniel

Tel: 905-568-2929 x 4123
Direct: 905-568-1917 x 4123, Mobile: 416-524-5928
sheila.daniel@amec.com

From: Daniel, Sheila E
Sent: Monday, January 28, 2013 4:23 PM
To: 'Batista, Cindy (ENE)'
Cc: TC111504; 'Kyle Stanfield'; Russell, Dan; Simms, David
Subject: RE: Rainy River Gold Project - responses to outstanding comments - revision as requested

Please see the attached revised response.

We have included a note both in the response table, as well as near the title of Attachment 2 indicating that to RRR's knowledge meeting attendees were not given an opportunity to review the minutes. We trust that is satisfactory.

Sheila Daniel

Tel: 905-568-2929 x 4123
Direct: 905-568-1917 x 4123, Mobile: 416-524-5928
sheila.daniel@amec.com

From: Batista, Cindy (ENE) [<mailto:Cindy.Batista@ontario.ca>]
Sent: Monday, January 28, 2013 4:09 PM
To: Daniel, Sheila E
Cc: Batista, Cindy (ENE)
Subject: FW: Rainy River Gold Project - responses to outstanding comments

Hello Sheila:

Further to my e-mail below, MNR is satisfied with the revised comments. However, they are asking that as far as the MNDM minutes that were attached (Attachment 2), if these are to be provided as part of the public record, MNR would like to see a statement that the minutes have not been reviewed by any of the agencies other than MNDM.

Please let me know if you have any concerns with the above statement.

Thanks,

Cindy

From: Batista, Cindy (ENE)
Sent: January 28, 2013 12:35 PM

To: 'Daniel, Sheila E'
Cc: Batista, Cindy (ENE)
Subject: RE: Rainy River Gold Project - responses to outstanding comments

Thanks Sheila!

Myself with legal will review AMEC/RRR responses to MNO and let you know if we have any concerns. As for MNR comments, I anticipate that the remaining outstanding concerns have now been addressed.

Thanks,

Cindy

From: Daniel, Sheila E [mailto:sheila.daniel@amec.com]
Sent: January 28, 2013 10:46 AM
To: Batista, Cindy (ENE)
Cc: TC111504; Kyle Stanfield; Simms, David; Russell, Dan; Burgess, Caroline M
Subject: Rainy River Gold Project - responses to outstanding comments

Please find attached revised response from Rainy River Resources to all of the outstanding comments on the Proposed ToR received to date (MNR and MNO; MCTS sent previously), along with an updated tracking table.

The Amended ToR and Revised Record of Consultation, Discussion and Meetings include all of the responses made to date.

We propose to issue the Amended ToR and Revised Record of Consultation, Discussion and Meetings to the Ministry of the Environment tomorrow.

Best regards,

Sheila Daniel, M.Sc., P.Geo.
Senior Associate Geoscientist;
Head Environmental Management
AMEC

Environment & Infrastructure
160 Traders Blvd. East, Suite 110, Mississauga ON Canada L4Z 3K7
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Direct: 905-568-1917 x 4123, Mobile: 416-524-5928
sheila.daniel@amec.com
amec.com

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Rainy River Resources Ltd.
1111 Victoria Avenue East
Thunder Bay, Ontario P7C 1B7

T 807-623-1540
F 807-623-0974

February 4, 2013

Peggy Johnson CAO/Clerk Treasurer
Township of Chapple
PO Box 5
Barwick, ON, POW 1A0

Dear Ms. Johnson,

Subject: Comments on the Final Draft Official Plan and Zoning By-law (Dec 2012)

Thank you for the opportunity to review and comment on the Township of Chapple's (the "Township") final draft Official Plan and Zoning By-law. We appreciate that the Township has included us in prior planning-related discussions and that these planning documents will guide municipal land use and planning decisions for many years to come.

Throughout the Background Report, the Official Plan and Zoning By-law, the Township has recognized the role that effective natural resource management plays in ensuring healthy and sustainable communities. We are proud of the involvement of Rainy River Resources Ltd. ("Rainy River Resources") in the Township and surrounding area to date. We look forward to continuing a positive influence as the Rainy River Gold Project (the "Project" or the "RRGP") evolves through the Environmental Assessment process and ultimately, should the Project receive the required approvals, throughout the development, operational and reclamation phases.

Generally, the Official Plan and the Zoning By-law are well-written and easy to understand. A few minor revisions may help to ensure clarity with respect to our interests and our support of the Township.

We have broken our comments into two sections:

1. General comments with respect to the documents and matters that we want to ensure are properly documented so that all parties have a common understanding of issues that may play out over a period of time; and
2. Specific requests for text/schedule modifications, additions and/or deletions.

As always, we appreciate on-going dialogue with the Township and we would be happy to discuss the content of this letter in more detail, as required.

Part 1 - General Comments

1. The RRGP has been in the exploration stage for well over five years with a Mine Feasibility Study nearing completion and the Environmental Assessment process now underway. A Project Description was accepted by the Canadian Environmental Assessment Agency ("CEAA") in August of 2012 and a Draft Proposed Terms of Reference was submitted to the Ontario Ministry of Environment. Rainy River Resources voluntarily agreed to undertake a provincial

environmental assessment in April of 2012 with the expectation that a Federal Environmental Assessment would be required also. It is our expectation that the detailed technical work that has gone into the Feasibility Report will result in a positive outcome for the Environmental Assessment. We will be working closely with the Township over the coming months prior to release of the Environmental Assessment report to the regulatory agencies and the general public.

In our view, the "Introduction" Section of the Official Plan does not adequately reflect that the RRGP's Environmental Assessment process is still underway and as such, may mislead readers unfamiliar with the status of the RRGP. Clarification should be made and we have provided suggestions in Part 2 of this letter.

2. Our understanding from on-going discussions is that the Township will remain a key stakeholder as approvals related to the RRGP evolve. Based on the wording in the Official Plan and Zoning By-law we also understand that the Township will respect the outcome of the Environmental Assessment process specifically related to land use, natural environment and community impact. We support this proactive approach as it reflects the very detailed and technical nature of the Environmental Assessment process as well as ensuring efficient and timely public process.

We want to ensure that it is understood that various land uses, environmental impact/mitigation scenarios, servicing options and community impact issues will be addressed through the Environmental Assessment process. This will include, but may not be limited to: waste management, transportation, location of various operational facilities, type and location of various associated facilities, and land use compatibility standards. The Environmental Assessment report will also assist private home developers to understand the varied development opportunities that exist both within the Township of Chapple as well as the surrounding communities that may address the needs of the RRGP.

If approved, it our expectation that results of the Environmental Assessment will be fully implemented in the Township's Official Plan and Zoning By-law without the need for further studies or process. We have identified a few policy sections that may benefit from clarification in this regard. Our confirmation requests and/or suggested changes are described in Part 2 of this letter.

3. Schedule A includes a "Mine Site symbol" that we understand is intended to represent the RRGP. It is important to note that the mine site will ultimately be the majority of the area shown previously in both the Project Description and the Proposed Terms of Reference.
4. Schedule A includes a "conceptual realignment of Highway 600" that has been the subject of our on-going discussions. It may be appropriate to indicate that this alignment is the preferred realignment option reviewed by the Township and makes the most use of existing roadway easements and allowances.
5. Implementation of the RRGP is intended to be in accordance with the Zoning By-law, specifically the Mining Mineral Zone (MM) Regulations, although other Zones and Regulations may apply. As presented above, we wish to clarify that it is the Township's intention to implement the details coming from the on-going Environmental Assessment process. As such, a combination regulation may in fact be the most appropriate way to implement the final mine/mine site in order to accommodate operations, land uses and associated facilities. These details will be addressed when the Environmental Assessment is complete.

Part 2 - Specific Requests

A. Section 1.2 Basis of the Official Plan

Economy

4th Sentence to be modified to read, "Rainy River Resources has conducted a preliminary economic assessment and is anticipating opening a gold mine in the Township, *subject to completion and approval of an Environmental Assessment and other required permits and approvals.*"

5th Sentence to be modified to read, "The underground pre-production is anticipated to start as early as 2015 *subject to completion and approval of the Environmental Assessment.*"

6th Sentence to be modified to read, "*Depending on the findings of the final feasibility report, the project would provide 400 to 675 jobs during construction of the open pit operations.*"

7th Sentence to be modified to read, "*Depending on the findings of the final feasibility report, once the mine is open, it is anticipated that between 400 and 600 long-term jobs will be associated with the mine.*"

B. Section 1.2.1 Housing Requirements

3rd Sentence to be modified to read, "As discussed earlier, Rainy River Resources anticipates that *if approved, the mine will provide 400 to 600 long-term jobs.*"

C. Section 2.14 Portable Asphalt Plants

Portable asphalt plants and concrete plants are permitted to be used throughout the Township by public road authorities or their agents. The RRGP will require portable plants at least during construction and perhaps at other times over the life of the operation. The Environmental Assessment process will address impacts arising from construction activities. Please confirm that the Township's Official Plan and Zoning By-law requirements will be met should the Environmental Assessment approve these activities.

D. Section 3.2 Rural Area

Please confirm our understanding that the Mine Site symbol (Section 3.11) is an overlay (in the Rural Designation) that generally represents the location of the mine development. The underlying Rural Policies apply until such time as the mine receives approval to operate. At that time, the Environmental Assessment details will prevail, as implemented through the Zoning By-law.

E. Section 3.8 Conservation – Environmental Protection Area and Section 4 Natural Heritage Features

These designations set aside lands that contain natural environment hazards and or environmental features worthy of conservation and lay out the policy for development in and in close proximity to features.

Please confirm our understanding that the Environmental Assessment process and approval will dictate what can happen in these areas and what mitigation and monitoring is required.

F. Section 3.9 Waste Disposal Site

Rainy River Resources intends to use the existing and/or expanded municipal landfill site. That said, the Environmental Assessment process will address waste management in the context of "associated facilities." If the Environmental Assessment process addresses waste disposal, please confirm that the Township's Official Plan and Zoning By-law requirements will be met.

G. Section 3.11 Mine Sites

Please confirm that the Environmental Assessment process will determine the details associated with the Mine Site including boundary, operation, land use compatibility and associated facility details.

In addition, Sub-Section 6 speaks to rehabilitation of the mine site to the satisfaction of the Ministry and the Township. During the process of preparing the Mine Site Plan and Rehabilitation Plan, and prior to approval of such plans, please confirm the Township's criteria for suitable rehabilitation.

H. Section 5 Servicing

The Environmental Assessment process will address servicing as part of the overall project description and impact assessment.

Please confirm that the Township's Official Plan and Zoning By-law servicing requirements will be met, subject to successful completion of the Environmental Assessment.

I. Section 6.2 Provincial Highways

Subsection 6.2.12 acknowledges the conceptual realignment of Highway 600 (the "Highway") and references its depiction on Schedule A. As stated in the Official Plan, an amendment is not required to implement the realignment shown. Please confirm our opinion that if the alignment currently shown is modified, there is still no requirement for an Official Plan Amendment to implement the new Highway, subject to other applicable approvals such as the Environmental Assessment.

J. Zoning By-law Definitions

Mineral Mining Operation is stated to include "*...operational, land and associated facilities*". Please confirm what the Township considers to be included under the heading of "associated facilities"?

Thank you again for the opportunity to be part of the Township's planning process. We will be in attendance at the Statutory Public Meeting on Tuesday February 5, 2013. As always, please feel free to contact me with any questions or concerns.

Most sincerely,

RAINY RIVER RESOURCES LTD.



Kyle Stanfield, P. Eng
Vice-President – Environment & Sustainability

cc: Andrea Bourrie, MCIP, RPP

From: Daniel, Sheila E
Sent: Tuesday, February 05, 2013 10:49 AM
To: 'Batista, Cindy (ENE)'; Lashbrook, Ross (ENE)
Cc: TC111504; Kyle Stanfield; Stacey Jack; Russell, Dan; Simms, David; Burgess, Caroline M
Subject: MNO Comments on RRGF Proposed ToR / RoCDM - RRR Revised Response

Please find attached a tabular response to MNO comments provided by the MOE last week. Both word and pdf versions have been provided, as the pdf version includes Attachment 1 (the e-mail sent by Mr. Kyle Stanfield, Rainy River Resources to the MOE on January 30, 2013).

Best regards,

Sheila Daniel

Tel: 905-568-2929 x 4123

Direct: 905-568-1917 x 4123, Mobile: 416-524-5928

sheila.daniel@amec.com

From: Batista, Cindy (ENE) [<mailto:Cindy.Batista@ontario.ca>]
Sent: Wednesday, January 30, 2013 1:57 PM
To: Daniel, Sheila E; Lashbrook, Ross (ENE)
Cc: TC111504; Kyle Stanfield; Stacey Jack; Russell, Dan; Simms, David; Burgess, Caroline M; Batista, Cindy (ENE)
Subject: RE: RRGF Amended Proposed ToR and Revised Record of Consultation, Discussions and Meetings

Good afternoon Sheila:

I will let you know when I receive the documents. Please find attached an update response tracking table, as well as a screening checklist for potential impacts on built and cultural landscapes, provided by MTCS. MTCS is satisfied with your revised responses to their comments.

As for comments/concerns raised by MNO, please see the attached table for further clarification/questions.

Thanks,

Cindy

From: Daniel, Sheila E [<mailto:sheila.daniel@amec.com>]
Sent: January 30, 2013 12:46 PM
To: Batista, Cindy (ENE); Lashbrook, Ross (ENE)
Cc: TC111504; Kyle Stanfield; Stacey Jack; Russell, Dan; Simms, David; Burgess, Caroline M
Subject: RRGF Amended Proposed ToR and Revised Record of Consultation, Discussions and Meetings

Cindy:

A hard copy of each of the RRGF Proposed Terms of Reference - Amended and Revised Record of Consultation, Discussions and Meetings has been direct-couriered to your attention, for review by the Ministry of the Environment. Note per our earlier discussion / your agreement, only a digital copy has been provided of the appendices associated with the Revised Record of Consultation, Discussions and Meetings. Please let us know if you do not receive this package before the end of the day, and if any other documentation (forms etc.) is required for the Amendment review process to start.

Attached to this e-mail for your ease of review is a “compared” version of the Proposed Terms of Reference – Amended against the Proposed Terms of Reference. To the best of our knowledge every edit Rainy River Resources committed to making through the comments / response process has been incorporated into the Terms of Reference - Amended and/or Revised Record of Consultation, Discussion and Meetings as appropriate.

We greatly appreciate your assistance in working through the comments and responses on the Proposed Terms of Reference and Record of Consultation, Discussion and Meetings with the Rainy River Resources team.

Best regards,

Sheila Daniel, M.Sc., P.Geol.
Senior Associate Geoscientist;
Head Environmental Management
AMEC

Environment & Infrastructure
160 Traders Blvd. East, Suite 110, Mississauga ON Canada L4Z 3K7
Tel: 905-568-2929 x 4123
Direct: 905-568-1917 x 4123, Mobile: 416-524-5928
sheila.daniel@amec.com
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Meeting Notes – Township of Chapple

Date: February 6, 2013

Purpose of Meeting: Follow-up to December 2012 Meeting /Project update/Municipal Planning

Location: Chapple Municipal Office

Time: 10:00am – 11:00 am

RRR Participants: Kyle Stanfield (KS)
Stacey Jack (SJ)

Other Participants: Andrea Bourrie – Consultant Planner for RRR (AB)

Municipal Participants: Peter Van Heyst (Reeve) (PV)
Peggy Johnson, Clerk (PJ)
Ken Wilson (Council) (KW)
Geoff Gillon (Rainy River Future Development Corporation) (GG)

After introductions, greetings were extended by the Municipality and Rainy River Resources.

KS provided an update to a December 2012 meeting discussion regarding the Community Pasture Association land selection.

KS provided a project update, including an update on the EA. The Township expressed their support for the RRGP and stated they would be sending a letter to the MOE in support of the ToR.

KS introduced AB and explained the scope of work she would be providing, and how her work would address the issues that Chapple had previously expressed in regards to planning, zoning and municipal tax rates. KS also explained how and why agreements with First Nations differed from Municipalities.

AB provided information on her credentials and provided an overview of her approach to establishing a baseline in order to address the questions raised by the Township regarding planning, zoning and tax rates. AB addressed specific questions raised by Municipal participants.

Discussion amongst participants regarding Chapple land fill study and the municipal drains located within the Project area.

From: McDonell,Dan [Burlington] [<mailto:Dan.McDonell@ec.gc.ca>]
Sent: Tuesday, February 26, 2013 10:56 AM
To: Kyle Stanfield
Cc: Bennett, Neal (MNDM) ; Davis,Stephanie [CEAA]; Dobos,Rob [Burlington]
Subject: EC comments on the Rainy River Gold Mine Conceptual Mine Closure Plan

Hello Kyle,

Please find attached EC's comments on the Rainy River Gold Mine Conceptual Mine Closure Plan (presented on January 9th, 2013).

Thank you for inviting us to provide these comments and clarifications. If you have any questions regarding these comments, do not hesitate to contact me at (905) 336-4957 or by email.

Dan

Dan McDonell

Environmental Assessment Officer
*Environmental Assessment Section
Environment Canada
Telephone: 905-336-4957
Fax: 905-336-8901
Environment Canada
867 Lakeshore Rd
Burlington, ON, L7R 4A6
dan.mcdonell@ec.gc.ca*

For reasons of computer security, this office has prohibited the use of automated response tools to indicate when we are away from the office.

If I do not respond to your message, I may be away from the office.

 Please consider the environment before printing this email note



Environmental Assessment Section
Environmental Protection Operations Directorate - Ontario
Environment Canada
P.O. Box 5050, 867 Lakeshore Rd.
Burlington, Ontario L7R 4A6

Our File No.: 2011-080

February 11, 2013

Kyle Stanfield
Vice President, Environment & Sustainability
Rainy River Resources Ltd
1111 Victoria Avenue East
Thunder Bay, ON P7C 1B7

Dear Mr. Stanfield,

Re: EC response on the Rainy River Gold Mine Conceptual Mine Closure Plan

Thank you for providing Environment Canada (EC), along with other agencies, a presentation on the conceptual closure plan for the Rainy River Gold Mine proposal as part of the conference call on January 9th, 2013. As you requested during that meeting, the following are some preliminary comments resulting from our review of the Conceptual Mine Closure Plan information that was presented. The information identified here will assist in our understanding and review of this project in relation to the requirements of the federal *Metal Mining Effluent Regulations* (MMER).

The following information would further assist us in providing advice to the Canadian Environmental Assessment Agency on potential impacts to water quality associated with the project. We believe, for the sake of efficiency, the most practical time to include these items would be during the submission of the federal Environmental Impact Statement (EIS).

- 1) Information describing how baseline surface and groundwater volumes and flow rates are anticipated to be altered by individual mine components (as defined in Section 6 "Scope of the Project" of the federal EIS Guidelines).
- 2) All effluent from the proposed Rainy River Gold Mine, including seepage and surface drainage from tailings, waste rock or any other parts of the operations area, that contains any concentration of the substances listed in Schedule 4 of the MMER would be considered effluent and subject to the monitoring and reporting requirements of the Regulations. EC recommends that the mine plans be developed to:
 - include measures to control and collect seepage from the operations area¹ for the mine; and,
 - demonstrate that all effluent subject to the monitoring requirements of the MMER will be discharged through a final discharge point(s) where its quality and flow is monitored on a weekly basis.

EC strongly recommends that a conceptual diagram and description of the plans to collect and monitor effluent within the operations area of the mine be prepared.

¹ "operations area" means all the land and works that are used or have been used in conjunction with a hydrometallurgical, milling or mining activity, including
(a) open pits, underground mines, heap leaching areas, solution mines, buildings, ore storage areas and waste rock dumps;
(b) tailings impoundment areas, lagoons and treatment ponds; and
(c) cleared or disturbed areas that are adjacent to the land and works that are not included in paragraph (a) or (b) (MMER, 2012, pg. 3).

We also recommend that the description include measures to separate contact and non-contact water and to prevent erosion and sediment discharge for all project phases.

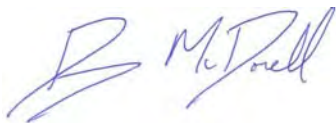
EC is also interested in information on other potential contaminants of concern not identified in Schedule 4 of the MMER when evaluating the impacts of the project on water quality. Information on the predicted concentrations of all contaminants of concern will be useful in this regard for EC to advise on the potential water quality impacts associated with the project. EC recommends that this information be integrated into a water management plan for the project.

- 3) An assessment and prediction of water quality for seepage and runoff produced from major mine components (as defined in Section 6 "Scope of the Project" of the EIS Guidelines) and all site water discharges (including groundwater discharge points in lakes and streams, for all phases of the Project). EC recommends that this assessment include:
 - An estimate of the seepage and runoff volumes from the mine component and/or discharge;
 - water quality characterization of the seepage and runoff from the mine component and/or discharge with comparison to toxicity data;
 - discharge structures and locations;
 - potential effects on the receiving environment from all cumulative site water discharges; and,
 - the description of any mitigation strategies and/or treatment processes implemented to manage effluent before it is released into the receiving environment.

- 4) A description of contingency plans if there are:
 - significant uncertainties (e.g. high variability in the data and/or predictions) concerning impacts;
 - considerable risks associated with effluent management (e.g. a release of effluent could permanently damage a sensitive ecosystem, species or fishery); and/or,
 - potential for impacts of the environment on the project that could lead to adverse effects (e.g. drought conditions that could compromise plans to maintain a water cover on tailings to prevent acid rock drainage).

Thanks again for inviting us to provide these clarifications. If you have any questions regarding these comments, do not hesitate to contact me at (905) 336-4957 or by email: dan.mcdonell@ec.gc.ca

Sincerely,



Dan McDonnell,
Environmental Assessment Officer

c.c. Rob Dobos – Environment Canada
Neal Bennett – Ministry of Northern Development and Mines
Stephanie Davis – Canadian Environmental Assessment Agency



Rainy River Resources Ltd.
1111 Victoria Avenue East
Thunder Bay, Ontario P7C 1B7

T 807-623-1540
F 807-623-0974

February 14, 2013

Township of Chapple
c/o Peggy Johnson, CAO/Clerk Treasurer
P.O. Box 4
Barwick, Ontario P0W 1A0

Re: *Stakeholder Support for Proposed Methods of Fish Habitat Compensation Associated with the Rainy River Gold Project*

Dear Ms. Johnson;

As you are aware, the Environmental Assessment (EA) of the Rainy River Gold Project (RRGP) is underway with an EA Report to be made available for Public review by mid-2013. An important part of the EA process is understanding how best to support and manage sustainable aquatic ecosystems in the vicinity of the project. While the proposed mine footprint itself does not support a recreational or commercial fishery, there will be some unavoidable losses of certain tributary fish habitat areas within the project footprint that must be properly assessed and compensated for as part of the Mine EA and associated permitting process.

Through consultations with the Rainy River First Nations, Ministry of Natural Resources (MNR) and the Department of Fisheries and Oceans regarding fish habitat compensation options for the RRGP, it is Rainy River Resources' understanding that local stakeholders are interested in focusing Project related fish habitat compensation efforts on overall water quality and general habitat improvements to the Pinewood River system as a whole.

As a result of our consultations, Rainy River Resources is proposing the use of watershed restoration techniques directed at water quality and habitat improvement within existing watercourses as a method of offsetting the effects of the RRGP development on fish habitat. The proposed compensation strategy would make every effort to compliment and work with existing local programs and initiatives, such as the Rainy River First Nations Watershed Program and the MNR District Partnership Program. Our intention is to utilize these successful programs to initiate measures such as cattle fencing, off-channel cattle watering sources, and channel and riparian zone restoration. A significant proportion of the Project related fish habitat impacts would be compensated for by improving the existing Pinewood River and its tributaries, with little to no new habitat area developed.

Rainy River Resources believes that this compensation strategy is consistent with the priorities of local stakeholders. As such, I would appreciate written confirmation of support from you that this approach is acceptable with your expectations of the Project.

If you have any questions regarding the information I have provided, or would like to speak with me about this or any other aspect of the Project, please do not hesitate to contact me directly at (807) 623-1540.

Sincerely,

A handwritten signature in blue ink, appearing to read 'K. Stanfield', written in a cursive style.

Kyle Stanfield, P.Eng.
Vice President, Environment and Sustainability
kstanfield@rainyriverresources.com
807-623-1540

CORPORATION OF THE TOWNSHIP OF CHAPPLE

P.O. Box 4
BARWICK, ONTARIO POW 1A0
Phone 807-487-2354 Fax 807-487-2406

OFFICE OF THE CLERK-TREASURER
e-mail: chapple@tbaytel.net

February 15, 2013

Canadian Environmental Assessment Agency
Ontario Region
55 St. Clair Avenue East, Suite 907
Toronto, Ontario
M4T 1M2

Attention: Stephanie Davis, BEng, LEED AP
Project Manager

Dear Stephanie Davis:

Re: Rainy River Gold Project – Environmental Assessment

As our collective local economy has entered a critical phase in recent years, with many families and Municipalities facing tough choices that have resulted in a reduced quality of life, it is imperative that government agencies demonstrate their commitment to our economy by ensuring the Rainy River Gold Project Environmental Assessment process is efficiently and effectively managed.

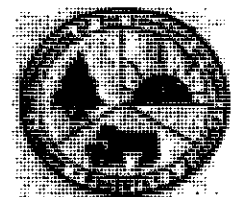
We look forward to receiving the Environmental Assessment report in July of 2013 with the expectation that construction will start in the summer of 2014.

Thank you very much for your assistance with this crucial matter.

Sincerely,



Peggy Johnson, CMO
CAO/Clerk Treasurer



CORPORATION OF THE TOWNSHIP OF CHAPPLE

P.O. Box 4
BARWICK, ONTARIO POW 1A0
Phone 807-487-2354 Fax 807-487-2406

OFFICE OF THE CLERK-TREASURER
e-mail: chapple@tbaytel.net

February 15, 2013

The Honourable Jim Bradley
Minister of Environment
77 Wellesley Street West
11th Floor, FergusonBlock
Toronto, Ontario
M7A 2T5

Re: Rainy River Gold Project – Environmental Assessment

Dear Honourable Jim Bradley:

As our collective local economy has entered a critical phase in recent years, with many families and Municipalities facing tough choices that have resulted in a reduced quality of life, it is imperative that government agencies demonstrate their commitment to our economy by ensuring the Rainy River Gold Project Environmental Assessment process is efficiently and effectively managed.

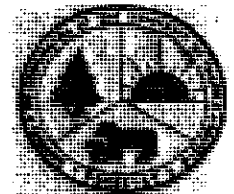
We look forward to receiving the Environmental Assessment report in July of 2013 with the expectation that construction will start in the summer of 2014.

Thank you very much for your assistance with this crucial matter.

Sincerely,



Peggy Johnson, CMO
CAO/Clerk Treasurer



CORPORATION OF THE TOWNSHIP OF CHAPPLE

P.O. Box 4
BARWICK, ONTARIO POW 1A0
Phone 807-487-2354 Fax 807-487-2406

OFFICE OF THE CLERK-TREASURER
e-mail: chapple@tbaytel.net

February 15, 2013

Ministry of Environment
2 St. Clair Avenue West, 14th Floor
Toronto, Ontario

Attention: Cindy Batista
Rainy River Gold Project Officer

Dear Cindy Batista:

As our collective local economy has entered a critical phase in recent years, with many families and Municipalities facing tough choices that have resulted in a reduced quality of life, it is imperative that government agencies demonstrate their commitment to our economy by ensuring the Rainy River Gold Project Environmental Assessment process is efficiently and effectively managed.

We look forward to receiving the Environmental Assessment report in July of 2013 with the expectation that construction will start in the summer of 2014.

Thank you very much for your assistance with this crucial matter.

Sincerely,



Peggy Johnson, CMO
CAO/Clerk Treasurer





Township of La Vallee

OFFICE OF
CLERK AND TREASURER

P.O. BOX 99, DEVLIN, ONTARIO POW 1C0
TELEPHONE 807-486-3452 FAX 807-486-3863

email: lavalley@nwonet.net

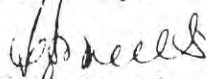
February 19, 2013

Cindy Batista
Ministry of Environment
Rainy River Gold Project Officer
2 St. Clair Avenue West, 14th Floor
Toronto, Ontario

Dear Cindy:

As our collective local economy has entered a critical phase in recent years, with many families and Municipalities facing tough choices that have resulted in a reduced quality of life, it is imperative that government agencies demonstrate their commitment to our economy by ensuring the Rainy River Gold Project Environmental Assessment process is efficiently and effectively managed. We look forward to receiving the Environmental Assessment report in July of 2013 with the expectation that construction will start in the summer of 2014.

Yours truly,


Sylvia Smeeth
Clerk-Treasurer

SS/pm



Township of La Vallee

OFFICE OF
CLERK AND TREASURER
P.O. BOX 99, DEVLIN, ONTARIO P0W 1C0
TELEPHONE 807-486-3452 FAX 807-486-3863
email: lavalley@nwonet.net

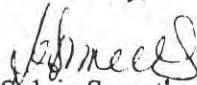
February 19, 2013

Hon. Jim Bradley
Minister of the Environment
77 Wellesley Street West
11th Floor, Ferguson Block
Toronto, Ontario
M7A 2T5

Dear Hon. Bradley:

As our collective local economy has entered a critical phase in recent years, with many families and Municipalities facing tough choices that have resulted in a reduced quality of life, it is imperative that government agencies demonstrate their commitment to our economy by ensuring the Rainy River Gold Project Environmental Assessment process is efficiently and effectively managed. We look forward to receiving the Environmental Assessment report in July of 2013 with the expectation that construction will start in the summer of 2014.

Yours truly,


Sylvia Smeeth
Clerk-Treasurer

SS/pm



Township of La Vallee

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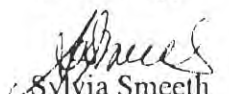
February 19, 2013

Stephanic Davis, BEng, LEED AP
Project Manager
Canadian Environmental Assessment Agency
Ontario Region
55 St. Clair Avenue East
Suite 907
Toronto, Ontario
M4T 1M2

Dear Stephanie:

As our collective local economy has entered a critical phase in recent years, with many families and Municipalities facing tough choices that have resulted in a reduced quality of life, it is imperative that government agencies demonstrate their commitment to our economy by ensuring the Rainy River Gold Project Environmental Assessment process is efficiently and effectively managed. We look forward to receiving the Environmental Assessment report in July of 2013 with the expectation that construction will start in the summer of 2014.

Yours truly,


Sylvia Smeeth
Clerk-Treasurer

SS/pm

From: Stacey Jack [mailto:sjack@rainyriverresources.com]
Sent: February-20-13 10:40 AM
To: Gillon, Jane (MNDM)
Cc: geoff@rrfdc.on.ca; Burgess, Caroline M; TC111504; RRRsiims
Subject: Re: Project List to verify with RRFDC / response

Thanks Jane. I appreciate your assistance on this.

Stacey Jack
Community Coordinator
Rainy River Resources Ltd.

On 2013-02-20, at 9:08 AM, "Gillon, Jane (MNDM)" <jane.gillon@ontario.ca> wrote:

Hi Stacey,

It looks like you have included just the rehabilitation highway projects in the list in Appendix A – that may have been deliberate as the expansion projects are primarily east of Thunder Bay but they are generally significantly more costly. I have included the most up to date links to both for informational purposes.

Highway Project Links

Expansion Projects

<http://www.mto.gov.on.ca/english/pubs/highway-construction/northern-highway-2012/expansion-projects-2012-2016.shtml>

Rehabilitation Projects

<http://www.mto.gov.on.ca/english/pubs/highway-construction/northern-highway-2012/rehabilitation-projects.shtml#s8>

Appendix B – you are correct the projects listed are complete, most were completed by 2011. The Provincial -Territorial Base Fund was established to provide each province and territory with funding of \$25 million per year, over seven years (from 2007 to 2014), for a total of \$175 million per jurisdiction. The list in Appendix B is a list of approved projects and the amount they were approved from by the Federal government it does not reflect the total costs of the projects.

Another significant investment in the area is the reconstruction and repair of the Noden Causeway.

The Noden Causeway, just east of Fort Frances, is midway through a major rebuilt. Work started in 2008 on the renovation program and has been ongoing since.

These parts of these projects include:

- a. Trial Pile Repairs – Value of \$ 0.2 M
- b. Trial Pile Repairs – Value of \$ 0.6 M

- c. East Low Level Structure Deck Rehabilitation – Value \$6.5 M
- d. West Low Level Structure, Repair of 200 piles – Value \$8.0 M
- e. West Low Level Structure, Concrete Deck Panel Purchase – Value \$4.9 M

Three projects at a value of \$37.0 M. These projects include:

- f. West Low Level Structure, Deck Rehabilitation – Value \$9.6 M
- g. High Level Structure, Pile Repairs – Value \$22.2 M
- h. High Level Structure, Concrete Deck Purchase – Value \$5.2 M

The exact packaging of future work has not been determined. Three to five projects are anticipated.

- i. High Level Structure, Deck Rehabilitation
- j. East Low Level Structure Pile Repairs. Work may include encapsulation of the bottom of all piles for the three structures
- k. West low Level and High Level Structures, substructure

The funding is coming from the Northern Highways Program. The Noden Causeway is a critical link in the Northwestern highway system connecting the Rainy River District to Thunder Bay and Dryden.

I am unaware of any other major developments that would influence the region.

Jane

Jane Gillon

Northern Development Officer

Regional Economic Development Branch

Northern Development Division

Ministry of Northern Development and Mines

☎ Office: 807-274-5320 | Mobile: 807-276-4290 | Fax:807-274-4438

✉ 922 Scott Street | Fort Frances, Ontario | P9A 1J4

Email: jane.gillon@ontario.ca | www.mndm.gov.on.ca

I am not always at my desk as I am often meeting with clients. I check my email often and will get back to you as soon as I can.

If your matter requires my immediate attention, please try me on my cell phone at (807) 276-4290. Thanks and have a great day.

From: Stacey Jack [<mailto:sjack@rainyriverresources.com>]

Sent: Wednesday February 13, 2013 4:19 PM

To: geoff@rrfdc.on.ca; Gillon, Jane (MNDM)

Subject: FW: Project List to verify with RRFDC

Good Afternoon Geoff and Jane;

To complete Rainy River Resources socio-economic effects assessment, Rainy River Resources take into account other economic activities (future proposed/planned) for the region to determine effects that

could be added as a result of the RRG. We would appreciate if you would review the attached summary of the major projects we compiled from HRSDC's Labour Market Monitor of projects which either are in the Rainy River District, may have effects on the Rainy River District, or indicate regional trends which relate to leading Rainy River District industries.

The attached summary also includes information of various road maintenance works on Northern Ontario highways to be constructed from 2013 to 2016 in Northwestern Ontario from MNM, which altogether are employing several hundreds of construction workers. Finally included is a list of local infrastructure development for the coming fiscal year for which the regional municipalities have applied for support from the Federal government through the Provincial-Territorial Base Fund to support.

As you will notice, some of the information from the Infrastructure Canada website (Appendix B) does not appear accurate; many of these projects, I believe, are complete. Can you please verify?

If we are missing any major developments that you may be aware of, then please let us know – or conversely if some of these projects won't, in your opinion influence the region, then to also let us know.

Your thoughts on this would be very much appreciated by Wednesday next week.

Thanks,
Stacey

<image001.jpg>

Stacey Jack
Community Coordinator

T 807 482 2501 | F 807 482 2834 | sjack@rainyriverresources.com

Rainy River Resources Ltd., 5967 Highway 11/71, PO Box 5, Emo, ON P0W 1E0



The Corporation of the Township of Alberton

Corner of Hwy 11/71 & Hwy 611 South - Mailing Address: RR #1 – B2, Fort Frances, Ontario, P9A 3M2

Telephone: 807-274-6053
Fax: 807-274-8449
e-mail: alberton@jam21.net
website: www.alberton.ca

February 21, 2013

Stephanie Davis, Beng, LEED AP
Project Manager / Gestionnaire de Projets
Canadian Environmental Assessment Agency
Ontario Region / Region de l'Ontario
55 St. Clair Avenue East / 55, avenue St-Clair Est
Suite 907 / piece 907
Toronto, Ontario
M4T 1M2
email: stephanie.davis@ceaa-acee.gc.ca

Dear Ms. Davis:

Re: Letter of Support for Rainy River Gold Project Environmental Assessment

On behalf of Council for the Township of Alberton, I confirm Council's full support for the Rainy River Gold Project and for the expeditious completion of the Environmental Assessment process.


The collective local economy of the Rainy River District has entered a critical phase in recent years due to adverse impacts to the forestry and tourism sectors, as well as in the past few months due to the downsizing of operations at the Resolute mill in Fort Frances.

With many families and municipalities facing tough choices that have resulted in a reduced quality of life, it is imperative that government agencies unequivocally demonstrate their commitment to our economy by ensuring that the Rainy River Gold Project Environmental Assessment process is efficiently and effectively managed.

We trust that this project will move forward and that construction will commence in the summer of 2014.

Thank you for your quick and timely action on this matter.

Yours truly,



Michael Hammond
Reeve



The Corporation of the Township of Alberton

Corner of Hwy 11/71 & Hwy 611 South - Mailing Address: RR #1 – B2, Fort Frances, Ontario, P9A 3M2

Telephone: 807-274-6053
Fax: 807-274-8449
e-mail: alberton@jam21.net
website: www.alberton.ca

February 21, 2013

Ms. Cindy Batista
Ministry of Environment
Rainy River Gold Project Officer
2 St. Clair Avenue West – 14th Floor
Toronto, Ontario
email: cindy.batista@ontario.ca

Dear Ms. Batista:

Re: Letter of Support for Rainy River Gold Project Environmental Assessment

On behalf of Council for the Township of Alberton, I confirm Council's full support for the Rainy River Gold Project and for the expeditious completion of the Environmental Assessment process.

The collective local economy of the Rainy River District has entered a critical phase in recent years due to adverse impacts to the forestry and tourism sectors, as well as in the past few months due to the downsizing of operations at the Resolute mill in Fort Frances.

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Yours truly,

Michael Hammond
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Telephone: 807-274-6053

Fax: 807-274-8449

e-mail: alberton@jam21.net

website: www.alberton.ca

February 21, 2013

The Honourable Jim Bradley
Minister of the Environment
77 Wellsley Street West
11th Floor – Ferguson Block
Toronto, Ontario
email: minister.moe@ontario.ca

Dear Minister Bradley:

Re: Letter of Support for Rainy River Gold Project Environmental Assessment

On behalf of Council for the Township of Alberton, I confirm Council's full support for the Rainy River Gold Project and for the expeditious completion of the Environmental Assessment process.

The collective local economy of the Rainy River District has entered a critical phase in recent years due to adverse impacts to the forestry and tourism sectors, as well as in the past few months due to the downsizing of operations at the Resolute mill in Fort Frances.

With many families and municipalities facing tough choices that have resulted in a reduced quality of life, it is imperative that government agencies unequivocally demonstrate their commitment to our economy by ensuring that the Rainy River Gold Project Environmental Assessment process is efficiently and effectively managed.

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Thank you for your quick and timely action on this matter.

Yours truly,

Michael Hammond
Reeve



Rainy River Resources Ltd.
1111 Victoria Avenue East
Thunder Bay, Ontario P7C 1B7

T 807-623-1540
F 807-623-0974

February 21, 2013

Ministry of the Environment
Environmental Approvals Branch
2 St. Clair Avenue West
Floor 12A
Toronto ON M4V 1L5
Attention: Ian Parrott, Acting Director

**RE: Submission of Erratum; Rainy River Gold Project Amended Terms of Reference
EA File No. 05 09 02**

Dear Mr. Parrott:

Pursuant to a recent e-mail from Ms Cindy Batista, Project Officer, we would like to submit this letter with attached erratum table for the Rainy River Gold Project Amended Terms of Reference (ToR), for your consideration.

The Amended Proposed ToR will be posted on the Rainy River Gold Project website.

Please do not hesitate to contact me if you have any questions or concerns.

Sincerely,

Kyle L. Stanfield
Vice-President, Environment & Sustainability
Rainy River Resources Ltd.

cc. Cindy Batista, Ross Lashbrook - MOE
Sheila Daniel – AMEC
Howard Hampton - Fasken Martineau

**RAINY RIVER GOLD POWER PROJECT
AMENDED PROPOSED TERMS OF REFERENCE
- ERRATUM**

Page	Existing Text	Page	Correction Required / Additional Text
27	As both of these mining methods are being consider,.... they will be both be assessed in the EA.	27	As both of these mining methods are being consider,.... they will be assessed individually and in combination in the EA.
10	<ul style="list-style-type: none"> Active reclamation: 1 to 2 years 	10	<ul style="list-style-type: none"> Decommissioning / Closure Phase (including active reclamation: 1 to 2 years followed by passive reclamation and monitoring)
26	-	26	<p>Alternatives to the Undertaking</p> <p>The purpose of the Project as defined in Section 3 is to develop and operate a new gold mine to produce gold from RRGP property. There are no other suitable alternatives to the RRGP which meet this purpose, and as such, the only alternative to the RRGP is the "do nothing" alternative.</p> <p>It is a standard best practice within the context of an EA to bring forward the "do nothing" alternative, primarily as a benchmark against which the anticipated overall project impacts can be measured, and can be used to highlight the benefits of proceeding with the undertaking. As such, while the "do nothing" alternative would mean that the RRGP would not go forward, it will be carried forward to the EA process to allow comparison against the impacts of the whole undertaking. The alternative of proceeding with the undertaking, but on a delayed schedule will also be considered.</p> <p>RRR recognizes that the MNR has a unique screening approach to selecting and assessing Project alternatives within the Class EA process for MNR Resource Stewardship and Facility Development Projects. RRR proposes to utilize the MNR Environmental Screening Criteria to assess Project alternatives in the EA Report.</p>
44	Environmental baseline studies for certain aspects, including,..... TK/TLU and socio-economics are on-going as of the issuance of the Amended Proposed ToR.	44	Environmental baseline studies for certain aspects, including,..... built heritage / cultural heritage resources , TK/TLU and socio-economics are on-going. These specialized studies will be used to inform the EA.
55	-	55	<ul style="list-style-type: none"> identify the need for additional monitoring and assessment to address potential facility development impacts that had not been defined at the time of the baseline study.
82 (7.2.1)	<ul style="list-style-type: none"> Groundwater systems 	82 (7.2.1)	<ul style="list-style-type: none"> Groundwater systems (flow and quality)



Meeting Minutes

MEETING TOPIC:

Meeting Date:	February 22, 2013	Location:	Toronto
Meeting Time:	10:00 – 12:00	Teleconference Dial-in Number:	Teleconference Line: 1-877-413-4788 Passcode: 4096110
Organizer Contact Information	Name: Stephanie Davis, CEAA Email: stephanie.davis@ceaa-acee.gc.ca		
Participants:	Stephanie Davis CEAA Rachel Hill MNR Cindy Brown MTO James McKeever MTO Neal Bennett MNDM Alisdair Brown MOE Cindy Batista MOE Ross Lashbrook MOE Regent Dickey MPMO Sheila Daniel AMEC Dave Simms AMEC Kyle Stanfield Rainy River Resources Anjala Puvananathan CEAA Howard Hampton Fasken Martineau Rosalind Cooper Fasken Martineau Mike Grant MNDM Stephen DeVos MNDM Chief Jim Leonard Rainy River FN Chief Wayne Smith – Naicatchewenin FN Stacey Jack – Rainy River Resources Rob Ferguson MNDM Peggy Johnson – Township of Chapple Peter Van Heyst – Township of Chapple Randy Both – Township of Chapple Ken Wilson – Township of Chapple Dan Fox MNR Pat Barnes MNDM Dan McDonell EC	Regrets:	

Purpose: To discuss EA progress, the project timeline and the proposal for the Township of Chapple's to become the proponent for the Highway 600 re-alignment

Project Name: Rainy River Gold Project

CEAA File: 005346



Outcome:

- A revised EA schedule
- Communicate potential EA and regulatory implications associated with Town of Chapple's proposal

AGENDA

Item	Topic	Speaker	Time
1	Update from RRR	KS (RRR) JL (RRFN) WS (NFN)	10:00am
2	MOE-EAB update on Amended Proposed Terms of Reference review/Minister sign-off	CB, RL (MOE)	10:15am
3	CEAA update on Federal EA	SD (CEAA)	10:25am
4	RRGP EA Federal/Provincial Schedule Coordination Discussion	SD (CEAA), CB, RL (MOE) KS (RRR) SD,DS (AMEC)	10:35am
5	Proposal for Township of Chapple to become Highway 600 realignment proponent (Representatives from the Township of Chapple to dial-in to the CEAA Boardroom)	All	11:20am
6	Closing remarks	SD (CEAA), KS (RRR)	11:50am

ACTION ITEMS & NOTES

Item	Action By
Item 1 - Update from RRR	
<ul style="list-style-type: none"> • RRR provided an update on their key activities (resubmission of the ToR, recent discussions with Aboriginal communities, discussions with the Town of Chapple regarding Highway 600 realignment) 	None
<ul style="list-style-type: none"> • Chief Leonard provided his views on the project and insight on how their environmental professionals were looking at the project. In the 1990's community Elders had told the leadership to watch out for the earth. With that direction, the First Nation started their Watershed Program and has been active ever since. The First Nation works with its neighbors, which includes Rainy River Resources. Rainy River First Nations and has good relations with its neighbors, while continuing to be active managers of the environment. 	None
<ul style="list-style-type: none"> • Chief Smith noted that he supported both the project and the environment. Chief Smith stated First Nations people have been here a long time, and that his community will continue to work towards the interests of future generations. 	None
Item 2 - MOE-EAB update on Amended Proposed ToR	
<ul style="list-style-type: none"> • Amended ToR is presently under review. The anticipated decision date is March 21; however, the decision is still valid if rendered after this date. 	None
<ul style="list-style-type: none"> • MOE to inform federal and provincial departments when a decision is made on the Amended ToR. 	MOE
Item 3 - CEAA update on Federal EA	
<ul style="list-style-type: none"> • Federal funding application period ends on February 25, 2013. Funding announcements will be released approximately one month later. 	None
<ul style="list-style-type: none"> • Major Projects Management Office will be issuing the project agreement to RRR shortly. This document provides important info on the timeframes for the federal EA as well as the federal regulatory phase. 	None

Project Name: Rainy River Gold Project

CEAA File: 005346



<ul style="list-style-type: none"> CEAA to send a response on EIS Guidelines comments submitted by RRR. 	CEAA
<ul style="list-style-type: none"> CEAA noted the EIS Guidelines format is new and encouraged RRR to engage CEAA and authorities if they had questions regarding federal requirements for assessment. 	None
<ul style="list-style-type: none"> CEAA requested responses to comments on the geochemistry reports previously submitted by federal departments. 	RRR
<ul style="list-style-type: none"> CEAA to send a question recently submitted by EC regarding low-grade ore stockpiles to RRR for a response. 	CEAA
Item 4 - RRGP EA Federal/Provincial Schedule Coordination	
<ul style="list-style-type: none"> CEAA discussed federal process steps in the schedule. The federal schedule incorporates a six week draft review of the EAR (EIS/EA). It assumes the document passes the conformity review on the first submission. It also does not budget time for the proponents preparation of responses/additional information during the technical review. This will depend on RRR/AMEC and the number and the nature of the comments put forward by the technical experts. 	None
<ul style="list-style-type: none"> CEAA recommended a presentation by AMEC to federal departments on key results in the first week of the six week review. This would enable reviews to quickly get up to speed with the document. Depending on how the review was going, another meeting prior to the submission of comments may be held so technical reviewers can ask questions. 	None
<ul style="list-style-type: none"> Both MoE and CEAA requested to review the proponent's responses to comments prior to official submission of the EAR. A common understanding on how issues will be dealt with will assist with the formal review process. 	None
<ul style="list-style-type: none"> RRR informed team the EAR will be a combined document, satisfying the requirements of both processes. 	None
<ul style="list-style-type: none"> RRR confirmed the majority of the technical reports would be available with the draft EAR. (Built Heritage Report may be late, MMRER might be ready, all other reports will be on time). 	None
<ul style="list-style-type: none"> RRR informed team that a draft EAR would be provided to Aboriginal groups for review in mid-May 2013. The draft would be updated and made available to federal and provincial reviewers in July 2013. 	None
<ul style="list-style-type: none"> Provincial EA Process: Assuming a decision is made to approve the ToR the steps are as follows: Step 1: RRR consults during EA preparation with agencies, public and Aboriginal communities. Step 2: RRR submits EA to MOE. Step 3: Government, public and Aboriginal community review of the EA (7 wks). Step 4: MOE posts a Notice of Completion of Ministry Review – another comment period (5 wks). Step 5: Public Inspection of the MOE review - Final (5 wks). Step 6: Minister's decision (13 weeks). 	
<ul style="list-style-type: none"> CEAA and MoE to update EA schedule and distribute to RRR 	CEAA/MOE
<ul style="list-style-type: none"> AMEC requested clarification as to whether the RRGP EA Report will meet the MTO Class EA needs or whether there is other documentation needed. MTO replied that it will. 	None
<ul style="list-style-type: none"> RRR requested that MTO clarify the requirement for a traffic study. MTO indicated that they will review and let RRR know what is needed. 	MTO
Topic 5 - Proposal for Township of Chapple to become Highway 600 realignment proponent	
<ul style="list-style-type: none"> CEAA indicated more information would be needed (answers to questions previously provided to RRR) before a decision could be made on whether or not the road realignment would still be included in the scope of the federal EA. 	None
<ul style="list-style-type: none"> MOE outlined the provincial EA implications associated with the proposal. Consultation: Proceeding through the Class EA may create confusion for the public and Aboriginal communities in terms of what is being consulted on given that there may be concurrent consultation taking place for the 	None

Project Name: Rainy River Gold Project

CEAA File: 005346



<p>federal EA, provincial EA and Class EA process.</p> <ul style="list-style-type: none">• Undertaking the road re-alignment through a Class EA process is not ideal in terms of cumulative impact assessment.• The Minister may receive Part II Order request(s) which are requests to bump up the Class EA project to an individual EA.• Risk to the Town if the project does not go ahead. Township would be responsible for upkeep and maintenance of the road (Township does not have the resources). MTO only interested in taking over the road if project goes ahead.	
<ul style="list-style-type: none">• MTO and MNR discussed the various permits the Township would be responsible for if they were the proponent for the road realignment. Detail of the various permits was not discussed. MNR asked if 1) the Town would be responsible for any of the permits required and if 2) the Town was aware of all the permits and approvals required. The Town advised they were not, and then KS advised there would be an agreement with the town and RRG for whatever approvals would be necessary for the road.	None
<p>EIS – Environmental Impact Statement (federal) EA – Environmental Assessment (provincial) EAR – Environmental Assessment Report, the combined EIS/EA report that incorporates federal and provincial assessment requirements.</p>	

From: Peggy Johnson [<mailto:chapple@tbaytel.net>]
Sent: Friday, February 22, 2013 3:21 PM
To: Kyle Stanfield
Cc: abourrie@croworld.com; Andrew Sacret; Melodie Simard
Subject: Official Plan and Zoning By-law Review

Good afternoon Kyle....

Please find attached response from Township of Chapple with regards to Rainy River Resources comments on the Final Draft Official Plan and Final Draft Zoning By-law.

In our conversation yesterday you had mentioned that Rainy River Resources may be able to assist with the overage costs associated with accommodating the mineremoval of CEP designation, develop new policy section with regards to rivers, wetlands, etc , new mapping. I contacted Fotenn for a breakdown of additional costs. They have indicated that, in going through their log records, the overage of \$7,000 plus HST can be attributed as follows: \$ 5,500.00 plus Hst to mining issues and \$1,500.00 plus Hst to PSW and agricultural issues. Thank you very much for your consideration of this matter.

Peggy Johnson, CMO
CAO/Clerk Treasurer
MX-2300N_20130222_152157.pdf;

CORPORATION OF THE TOWNSHIP OF CHAPPLE

P.O. Box 4

BARWICK, ONTARIO POW 1A0
Phone 807-487-2354 Fax 807-487-2406

February 22, 2013

Kyle Stanfield, P. Eng
Rainy River Resources Ltd.
1111 Victoria Avenue East
Thunder Bay, Ontario P7C 1B7

OFFICE OF THE CLERK-TREASURER
e-mail: chapple@tbaytel.net

RE: Township of Chapple Response to Rainy River Resources (RRR) February 4th Comments on Final Draft Official Plan and Final Draft Zoning By-law (December 2012)

via email : kstanfield@rainyriverresources.com

Dear Mr. Stanfield,

The Township of Chapple has reviewed the comment letter submitted by Rainy River Resources in relation to the Township's Final Draft Official Plan and Final Draft Zoning By-law (December 2012). The Township supports the mineral exploration activities of Rainy River Resources in Chapple, and looks forward to working with the company to facilitate the eventual opening of a mine. Accordingly, the Final Draft Official Plan and Zoning By-law have been drafted in a way to accommodate future mining activity as much as possible. The policies have been written in a way that seeks to avoid the need for further Official Plan amendments, and that will complement the results of the Environmental Assessment process currently underway. The following section of this letter explains the Township's response to the specific concerns raised in the comments submitted on February 4, 2013.

Comment A - Section 1.2: Basis of the Official Plan - Economy

- *4th Sentence to be modified to read, "Rainy River Resources has conducted a preliminary economic assessment and is anticipating opening a gold mine in the Township, subject to completion and approval of an Environmental Assessment and other required permits and approvals."*
- *5th Sentence to be modified to read, "The underground pre-production is anticipated to start as early as 2015 subject to completion and approval of the Environmental Assessment."*
- *6th Sentence to be modified to read, "Depending on the findings of the final feasibility report, the project would provide 400 to 675 jobs during construction of the open pit operations."*
- *7th Sentence to be modified to read, "Depending on the findings of the final feasibility report, once the mine is open, it is anticipated that between 400 and 600 long-term jobs will be associated with the mine."*

Township Response:
Updated as requested.



Comment B - Section 1.2.1: Housing Requirements

- *3rd Sentence to be modified to read, "As discussed earlier, Rainy River Resources anticipates that if approved, the mine will provide 400 to 600 long-term jobs."*

Township Response:
Updated as requested.

Comment C - Section 2.14: Portable Asphalt Plants

- *Portable asphalt plants and concrete plants are permitted to be used throughout the Township by public road authorities or their agents. The RRGP will require portable plants at least during construction and perhaps at other times over the life of the operation. The Environmental Assessment process will address impacts arising from construction activities. Please confirm that the Township's Official Plan and Zoning By-law requirements will be met should the Environmental Assessment approve these activities.*

Township Response:
A policy has been added to clarify that portable asphalt plants and portable concrete plants shall be permitted on Mine Sites. These uses shall be considered as an associated use to the mineral mining operation.

Comment D - Section 3.2: Rural Area

- *Please confirm our understanding that the Mine Site symbol (Section 3.11) is an overlay (in the Rural Designation) that generally represents the location of the mine development. The underlying Rural Policies apply until such time as the mine receives approval to operate. At that time, the Environmental Assessment details will prevail, as implemented through the Zoning By-law.*

Township Response:
The above understanding is correct.

Comment E - Section 3.8: Conservation – Environmental Protection Area and Section 4 Natural Heritage Features

- *These designations set aside lands that contain natural environment hazards and or environmental features worthy of conservation and lay out the policy for development in and in close proximity to features.*
- *Please confirm our understanding that the Environmental Assessment process and approval will dictate what can happen in these areas and what mitigation and monitoring is required.*

Township Response:

The Township's existing Official Plan has set aside lands along the Pinewood River for conservation and environmental protection. This approach has been carried forward in the draft Official Plan with some updates to the policies. It has however been brought to our attention that there are some concerns with the way that these lands are mapped in the draft Official Plan. We are reviewing the accuracy of the mapping and considering some refinements to the policy approach for lands adjacent to watercourses.

In a broader sense, the Environmental Assessment for the mine should be guided by the policies of the Township of Chapple Official Plan and applicable provincial policies. The Environmental Assessment process should discuss alternatives to any works that would have a negative impact on sensitive environmental features. The Environmental Assessment should address the extent of alterations and disruptions to the area, and propose mitigation measures to limit negative impacts.

Comment F - Section 3.9: Waste Disposal Site

- *Rainy River Resources intends to use the existing and/or expanded municipal landfill site. That said, the Environmental Assessment process will address waste management in the context of "associated facilities." If the Environmental Assessment process addresses waste disposal, please confirm that the Township's Official Plan and Zoning By-law requirements will be met.*

Township Response:

The Township of Chapple will require an Official Plan amendment for any new waste disposal site as per Section 3.9(2) of the Final Draft Official Plan. Expansion to an existing waste disposal site that is already identified on Schedule A will require a Zoning By-law amendment as per Section 3.9(4) of the Plan. An Environmental Assessment is required for any new or expanded waste disposal site in accordance with provincial legislation.

Comment G - Section 3.11 Mine Sites

- *Please confirm that the Environmental Assessment process will determine the details associated with the Mine Site including boundary, operation, land use compatibility and associated facility details.*
- *In addition, Sub-Section 6 speaks to rehabilitation of the mine site to the satisfaction of the Ministry and the Township. During the process of preparing the Mine Site Plan and Rehabilitation Plan, and prior to approval of such plans, please confirm the Township's criteria for suitable rehabilitation.*

Township Response:

The Environmental Assessment process should include the above noted information. The boundary of the mineral mining operation will be established through the EA process. This boundary should take into consideration the adjacent land uses. The proponent should refer to the Ministry of Environment D-

series guidelines and to the land use compatibility policies in the Township of Chapple Final Draft Official Plan. The proponent should also clarify with the township the uses that are proposed as 'associated' to the mineral mining operation. Associated uses are intended to be associated industrial uses such as aggregate extraction.

Section 3.11(6) has been changed to delete the requirement that the mine site shall be rehabilitated to the satisfaction of the Township. The updated policy will require that the mine site be rehabilitated according to the Ministry of Northern Development and Mines criteria (e.g. closure plan).

Comment H - Section 5: Servicing

- *The Environmental Assessment process will address servicing as part of the overall project description and impact assessment.*
- *Please confirm that the Township's Official Plan and Zoning By-law servicing requirements will be met, subject to successful completion of the Environmental Assessment.*

Township Response:

The mine site will be subject to Site Plan Control as per Section 7.10 of the Final Draft Official Plan and the Servicing Section of the Plan, in particular section 5.2.2 and 5.3.2. The Site Plan Control policies have been updated to ensure that adequate water and sewage disposal services is provided.

Comment I - Section 6.2: Provincial Highways

- *Subsection 6.2.12 acknowledges the conceptual realignment of Highway 600 (the "Highway") and references its depiction on Schedule A. As stated in the Official Plan, an amendment is not required to implement the realignment shown. Please confirm our opinion that if the alignment currently shown is modified, there is still no requirement for an Official Plan Amendment to implement the new Highway, subject to other applicable approvals such as the Environmental Assessment.*

Township Response:

The realignment of the highway will not require an Official Plan amendment. The policy has been updated to clarify the intent as follows:

Section 6.2(12): A conceptual realignment of the preferred realignment of Highway 600 is shown on Schedule A. The Plan shall be amended at the time of the next statutory review or through a housekeeping Official Plan amendment at Council's discretion to reflect the actual realignment, consistent with any Environmental Assessment process that may apply.

Comment J - Zoning By-law Definitions

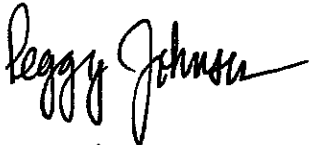
- *Mineral Mining Operation is stated to include "...operational, land and associated facilities". Please confirm what the Township considers to be included under the heading of "associated facilities"?*

Township Response:

Associated uses are generally intended to be industrial uses which support the mineral mining operation.

Thank you for taking the time to thoroughly review the Township of Chapple Final Draft Official Plan and Final Draft Zoning By-law and to submit detailed comments. We trust that the responses in this letter adequately address the concerns raised by Rainy River Resources. It is Council's intent to adopt the revised Official Plan at their meeting on March 12, 2013. I may be reached at 807-487-2354 for any further questions.

Best regards,



Peggy Johnson , CMO
CAO/Clerk Treasurer
Township of Chapple

Cc: Andrea Bourrie, MCIP, RPP
Andrew Sacret, MCIP, RPP, FOTENN Consultants
Mélodie Simard, M. ATDR, FOTENN Consultants



OFFICE OF THE MAYOR

320 PORTAGE AVENUE, FORT FRANCES, ONTARIO P9A 3P9

email: town@fort-frances.com

www.fort-frances.com

February 22, 2013

Canadian Environmental Assessment Agency
Ontario Region
Attn: Stephanie Davis, BEng, LEED AP
Project Manager
55 St. Clair Avenue East, Suite 907
Toronto, Ontario
M4T 1M2

Dear Ms. Davis:

The Town of Fort Frances has within the past few weeks negotiated a settlement for reduced tax assessment with its largest municipal taxpayer that will leave Fort Frances having to make a refund to the taxpayer of past taxes in the amount of \$1.7 million. Without this settlement the repayment would have been in the approximate amount of \$4 million. It is the expectation that unless some other industry is established in Town that the industrial assessment in Fort Frances will continue to decline placing more pressure on the Town to maintain services on a go forward basis. The impact of the loss of assessment in Fort Frances will have detrimental effects that will reach across the entire Rainy River District.

Fort Frances Council has been monitoring with interest the development over the past few years by mineral exploration companies, currently Rainy River Resources Ltd., of the mining claims (now collectively referred to as the Rainy River Gold Project) approximately 65 kms northwest of Fort Frances. The abundance of information made available in the media and shared through public presentations and mail outs has made it very easy to maintain this vigilance. Council is supportive of all phases of the Rainy River Gold Project as the project will prove to be economically beneficial to the entire Rainy River District and indeed all of Northwestern Ontario.

Fort Frances Council is cognizant of the current environmental assessment phase that the Rainy River Gold Project is now going through.

OFFICE OF THE MAYOR

-2-

As our collective local economy has entered a critical phase in recent years and continues to struggle, with many families and Municipalities having to face tough choices that will result in a further reduction in quality of life, it is imperative that government agencies demonstrate their commitment to our economy by ensuring the Rainy River Gold Project Environmental Assessment process is efficiently and effectively managed. Fort Frances Council looks forward to the completion of the Environmental Assessment phase in 2013 with the expectation that construction will start in the summer of 2014.

Respectfully submitted,



Mayor Roy Avis



OFFICE OF THE MAYOR

320 PORTAGE AVENUE, FORT FRANCES, ONTARIO P9A 3P9

email: town@fort-frances.com

www.fort-frances.com

February 22, 2013

The Honourable Jim Bradley
Minister of the Environment
77 Wellesley Street West
11th Floor, Ferguson Block
Toronto, Ontario
M7A 2T5

Dear Honourable Minister Bradley:

The Town of Fort Frances has within the past few weeks negotiated a settlement for reduced tax assessment with its largest municipal taxpayer that will leave Fort Frances having to make a refund to the taxpayer of past taxes in the amount of \$1.7 million. Without this settlement the repayment would have been in the approximate amount of \$4 million. It is the expectation that unless some other industry is established in Town that the industrial assessment in Fort Frances will continue to decline placing more pressure on the Town to maintain services on a go forward basis. The impact of the loss of assessment in Fort Frances will have detrimental effects that will reach across the entire Rainy River District.

Fort Frances Council has been monitoring with interest the development over the past few years by mineral exploration companies, currently Rainy River Resources Ltd., of the mining claims (now collectively referred to as the Rainy River Gold Project) approximately 65 kms northwest of Fort Frances. The abundance of information made available in the media and shared through public presentations and mail outs has made it very easy to maintain this vigilance. Council is supportive of all phases of the Rainy River Gold Project as the project will prove to be economically beneficial to the entire Rainy River District and indeed all of Northwestern Ontario.

Fort Frances Council is cognizant of the current environmental assessment phase that the Rainy River Gold Project is now going through.

OFFICE OF THE MAYOR

-2-

As our collective local economy has entered a critical phase in recent years and continues to struggle, with many families and Municipalities having to face tough choices that will result in a further reduction in quality of life, it is imperative that government agencies demonstrate their commitment to our economy by ensuring the Rainy River Gold Project Environmental Assessment process is efficiently and effectively managed. Fort Frances Council looks forward to the completion of the Environmental Assessment phase in 2013 with the expectation that construction will start in the summer of 2014.

Respectfully submitted,



Mayor Roy Avis



Website: www.lakeofthewoods.ca

PHONE/FAX 807 852-3529 email lakeofthewoodstwp@tbaytel.net

PO BOX 427 211 FOURTH STREET

RAINY RIVER, ON POW1L0

US ADDRESS: PO Box 1057 Baudette MN 56623

February 22, 2013

Cindy Batista
Ministry of the Environment
Rainy River Gold Project Officer
2 St. Clair Ave West, 14th Floor
Toronto, ON
M4V1L5

Cindy.bastista@ontario.ca

Dear Cindy Batista:

Re: Rainy River Gold Project

As you are aware our local economy has been in a depressed state for some time. The Township of Lake of the Woods and its residents look to the positive economic impact the Rainy River Gold Project offers. We understand that in order for this project to proceed the approval of the Environmental Assessment process is necessary. We therefore ask that the approval of the terms of reference for the Environmental Assessment be completed in a timely manner. It is imperative that the Environmental Assessment report completed by mid-2013 in order that construction will start in the summer of 2014.

Yours truly,

A handwritten signature in blue ink that reads "Patrick W. Giles".

Patrick W Giles
Clerk-Treasurer

TOWNSHIP OF DAWSON

PO BOX 427 211 FOURTH STREET
RAINY RIVER, ON POW 1L0
PHONE/FAX 807 852-3529
US ADDRESS: PO Box 1057
Baudette MN 56623

February 22, 2013

Cindy Batista
Ministry of the Environment
Rainy River Gold Project Officer
2 St. Clair Ave West, 14th Floor
Toronto, ON
M4V1L5

Cindy.bastista@ontario.ca

Dear Cindy Batista:

Re: Rainy River Gold Project

As you are aware our local economy has been in a depressed state for some time. The Township of Dawson and its residents look to the positive economic impact the Rainy River Gold Project offers. In order for this project to proceed the approval of the Environmental Assessment process is necessary. Therefore we ask that the approval of the terms of reference for the Environmental Assessment process move forward in a timely manner. We look forward to seeing the Environmental Assessment report completed by mid-2013 with the expectation that construction will start in the summer of 2014.

Yours truly,



Patrick W Giles
Clerk-Treasurer

Sandra Whalen - RE: Ltr to RRR, Terms of Reference

From: "Town of Rainy River" <rainyriver@tbaytel.net>
To: "Sandra Whalen" <sandra@rrfdc.on.ca>
Date: May 15, 2013 11:28 AM
Subject: RE: Ltr to RRR, Terms of Reference

Is this the correspondence that you are looking for? This was in response to an email received from Glenn Treftlin on behalf of the RRDMA.

From: Town of Rainy River [mailto:rainyriver@tbaytel.net]
Sent: February-27-13 9:41 AM
To: 'Cindy.batista@ontario.ca'; 'minister.moe@ontario.ca'; 'stephanie.davis@ceaa-acee.gc.ca'
Cc: 'gtreftlin@fort-frances.com'
Subject: Support for Rainy River Gold Project EA

Dear Sir or Madam:

RE: Support for Rainy River Gold Project EA

As our collective local economy has entered a critical phase in recent years, with many families and Municipalities facing tough choices that have resulted in a reduced quality of life, it is imperative that government agencies demonstrate their commitment to our economy by ensuring the Rainy River Gold Project Environmental Assessment process is efficiently and effectively managed. We would like to see this project move towards construction in 2014.

Sincerely,

Veldron Vogan, AMCT
 Chief Administrative Officer
 Town of Rainy River

VV/er

From: Sandra Whalen [mailto:sandra@rrfdc.on.ca]
Sent: May-15-13 9:08 AM
To: Township Chapple; Township Emo; Town Frances; Township Morley; Township Alberton; Township LaVallee; Township Dawson; Township Woods; Town of Rainy River
Cc: Geoff Gillon
Subject: Ltr to RRR, Terms of Reference

Hello All,
 RRFDC is requesting from you a copy of the letter that your municipality sent previously to Rainy River Resources re: Terms of Reference.
 Could you kindly forward this to me before noon today, or as soon as possible. Thank you.

Sandra Whalen, Secretary/Clerk
Rainy River Future Development Corp.
608 Scott Street
Fort Frances, Ontario, Canada P9A 1H6
807-274-3276 * 807-274-6989 Fax
info@rrfdc.on.ca * www.rrfdc.on.ca* http://rrfdc.blogspot.com/

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<http://rrfdc.blogspot.com/>

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February 25th, 2013

Canadian Environmental Assessment Agency
Ontario Region
55 St. Clair Avenue East, Suite 907
Toronto, Ontario
M7A 2T5

stephanie.davis@ceaa-acee.gc.ca Original to be mailed

Attention: Stephanie Davis
Project Manager

Re: Rainy River Gold Project Environmental Assessment

As our collective local economy has entered a critical phase in recent years, with many families and Municipalities facing tough choices that have resulted in a reduced quality of life, it is imperative that government agencies demonstrate their commitment to our economy by ensuring the Rainy River Gold Project Environmental Assessment process is efficiently and effectively managed. We would like to see the environmental Assessment process completed in time to begin construction in the summer of 2014.

Please contact us if you require any further clarification in regards to this matter.

Thank you,

Sincerely,

(Mr.) Gary Gamsby
Reeve

From: Daniel, Sheila E
Sent: February-25-13 8:10 AM
To: 'Stephanie.Davis@ceaa-acee.gc.ca'
Cc: TC111504; Kyle Stanfield; Simms, David; RRRsiims
Subject: Rainy River Gold Project - Amended ToR Site Plan Conceptual Layout

As requested,

Best regards,

Sheila Daniel, M.Sc., P.Geo.
Senior Associate Geoscientist;
Head Environmental Management
AMEC

Environment & Infrastructure
160 Traders Blvd. East, Suite 110, Mississauga ON Canada L4Z 3K7
Tel: 905-568-2929 x 4123
Direct: 905-568-1917 x 4123, Mobile: 416-524-5928
sheila.daniel@amec.com
amec.com

Business sustainability starts here... AMEC supports SOS Children

From: Stacey Jack
Sent: February-28-13 10:43 AM
To: Davis,Stephanie [CEAA] (Stephanie.Davis@ceaa-acee.gc.ca)
Cc: Kyle Stanfield
Subject: ROC/VEC Report to February 1, 2013

Good Morning Stephanie;
Please find attached the ROC and VEC reports for the Rainy River Gold Project. These reports are current to February 1, 2013.
If you have any questions, please do not hesitate to contact me.
Sincerely,
Stacey



Stacey Jack
Community Coordinator

T 807 482 2501 | F 807 482 2834 | sjack@rainyriverresources.com

Rainy River Resources Ltd., 5967 Highway 11/71, PO Box 5, Emo, ON P0W 1E0

From: [Daniel, Sheila E](#)
To: [Batista, Cindy \(ENE\)](#)
Cc: [Kyle Stanfield](#); [Stacey Jack](#); [TC111504](#); [RRRsims](#); [Russell, Dan](#)
Subject: RE: Rainy River ToR
Date: Monday, March 11, 2013 4:19:33 PM

As requested:

Commissioning is the process of fine tuning the processing plant and is generally considered the last stage of construction. It includes an initial processing of ore at considerably less than the full production rate. For the layperson, it could be considered getting the plant ready to run and getting the bugs out of the system once built in order that full production is achieved smoothly. Per Section 4.2.1, construction is proposed to commence on receipt of environmental approvals in 2014. Actual gold production at close to the planned production rate would commence approximately 1.5 years after (per Section 4.2 of the Amended ToR) and depending on any environmental constraints that could temporarily delay construction activities (such as those related to migratory birds etc.).

The Rainy River Gold Project is currently at the Feasibility Study stage and has not completed the detailed design necessary to finalize job requirements. Based on information available currently, an expected approximately 600 people will be required during site construction of the RRGP and there is expected to be approximately 600 full time permanent positions during operations (Section 4.3 of the Amended ToR).

Best regards,

Sheila Daniel

Tel: 905-568-2929 x 4123
Direct: 905-568-1917 x 4123, Mobile: 416-524-5928
sheila.daniel@amec.com

From: Batista, Cindy (ENE) [<mailto:Cindy.Batista@ontario.ca>]
Sent: Monday, March 11, 2013 3:53 PM
To: Stacey Jack; Daniel, Sheila E
Cc: Kyle Stanfield
Subject: RE: Rainy River ToR
Importance: High

Good afternoon Stacey and Sheila:

Can you kindly confirm the following:

1. The ToR states that mine and processing plant commissioning will begin in late 2015. Does this mean that construction will commence in 2016 or 2016? How long, approximately, will it take to complete construction and begin operations (gold production) at the site? 2016? I believe that's what the amended ToR states on page 10. Please confirm.
2. Please confirm whether the mine development (gold production) will create 500 or 600 fulltime jobs?

Please provide me with this information as quickly as possible.

Regards,

Cindy Batista | Project Officer
Environmental Approvals Branch | Ministry of the Environment
2 St. Clair Avenue West, 14th Floor, Toronto ON M4V 1L5

P: 416-314-8214 | F: 416-314-8452 | Cindy.Batista@ontario.ca

From: Kyle Stanfield [<mailto:kstanfield@rainyriverresources.com>]
Sent: March 4, 2013 5:47 PM
To: Batista, Cindy (ENE)
Cc: Stacey Jack
Subject: RE: Rainy River ToR

You are very welcome Cindy and hope you are doing well. Call me anytime if you have questions. I will be on vacation starting this Wednesday but please do contact Stacey in my absence if I cannot be reached etc. Stacey will be pleased to assist.

Cheers, Kyle



Kyle L. Stanfield P.Eng.

Vice President, Environment & Sustainability

T 807 623 1540 | C 807 621 6152 | F 807 623 0974 | kstanfield@rainyriverresources.com
Rainy River Resources Ltd., 1111 Victoria Avenue East, Thunder Bay, Ontario, Canada P7C 1B7

From: Batista, Cindy (ENE) [<mailto:Cindy.Batista@ontario.ca>]
Sent: Monday, March 04, 2013 4:13 PM
To: Kyle Stanfield
Subject: RE: Rainy River ToR

Thanks Kyle!

Cindy Batista | Project Officer
Environmental Approvals Branch | Ministry of the Environment
2 St. Clair Avenue West, 14th Floor, Toronto ON M4V 1L5

P: 416-314-8214 | F: 416-314-8452 | Cindy.Batista@ontario.ca

From: Kyle Stanfield [<mailto:kstanfield@rainyriverresources.com>]

Sent: March 1, 2013 4:27 PM
To: Batista, Cindy (ENE)
Cc: Hampton_Howard; Daniel, Sheila E
Subject: RE: Rainy River ToR

Hello Cindy – The Amended Proposed ToR is now listed on our website as requested by the EAB.

See responses to your most recent questions below and please let me know if you have any further questions to support the Minister's decision on the Amended Proposed ToR.

Regards, Kyle



Kyle L. Stanfield P.Eng.
Vice President, Environment & Sustainability

T 807 623 1540 | C 807 621 6152 | F 807 623 0974 | kstanfield@rainyriverresources.com

Rainy River Resources Ltd., 1111 Victoria Avenue East, Thunder Bay, Ontario, Canada P7C 1B7

From: Batista, Cindy (ENE) [<mailto:Cindy.Batista@ontario.ca>]
Sent: Thursday, February 28, 2013 9:22 AM
To: Kyle Stanfield
Cc: 'sheila.daniel@amec.com' (sheila.daniel@amec.com); Batista, Cindy (ENE)
Subject: RE: Rainy River ToR

Thanks Kyle.

I do have a few questions for you and/or AMEC for the proposed undertaking. The questions are as follows:

1. What is the proposed footprint of the mine pit? **1.68 km²**
2. How deep is the proposed mine pit? **400 metres**
3. How many residents are live in the area? Any residents living on the project site? **There are a few residents living within the footprint who will be moving off the property we now own over the next few months. There will be 6 residents remaining within 1 kilometer of the mine site ultimate perimeter thereafter, 3 of which we are in negotiations with to purchase and 1 who has requested we support his vision for an 'Environmental Buffer' (Rick Neilson) that will leave 2 within a 1 kilometer buffer from the perimeter of the ultimate mine footprint.**
4. Are there any groundwater wells on the site? If so, how many? **The groundwater wells (19 in total) on the site are former agricultural/residential wells that are now owned by Rainy River Resources and will be decommissioned as part of the mine development process according to the Act.**
5. Is the project within a source water protection area? **No.**

Thanks,

Cindy Batista | Project Officer
Environmental Approvals Branch | Ministry of the Environment
2 St. Clair Avenue West, 14th Floor, Toronto ON M4V 1L5

P: 416-314-8214 | F: 416-314-8452 | Cindy.Batista@ontario.ca

From: Kyle Stanfield [<mailto:kstanfield@rainyriverresources.com>]
Sent: February 28, 2013 8:27 AM
To: Batista, Cindy (ENE)
Cc: 'sheila.daniel@amec.com' (sheila.daniel@amec.com)
Subject: RE: Rainy River ToR

Thanks Cindy.

We should be able to get it uploaded by day's end tomorrow if that works for you.

Cheers, Kyle



Kyle L. Stanfield P.Eng.

Vice President, Environment & Sustainability

T 807 623 1540 | C 807 621 6152 | F 807 623 0974 | kstanfield@rainyriverresources.com

Rainy River Resources Ltd., 1111 Victoria Avenue East, Thunder Bay, Ontario, Canada P7C 1B7

From: Batista, Cindy (ENE) [<mailto:Cindy.Batista@ontario.ca>]
Sent: Thursday, February 28, 2013 8:00 AM
To: Kyle Stanfield
Cc: 'sheila.daniel@amec.com' (sheila.daniel@amec.com); Batista, Cindy (ENE)
Subject: RE: Rainy River ToR

Good morning Kyle:

Sorry for not getting back to you yesterday. I've been busy working on Rainy River. Agencies are asking for a copy of the Amended ToR and to ensure transparency throughout the process the Amended ToR should be posted on your website for anyone who may have an interest in the project.

Just let me know when it is posted so that I may inform the review team.

Thanks,

Cindy Batista | Project Officer

Environmental Approvals Branch | Ministry of the Environment

2 St. Clair Avenue West, 14th Floor, Toronto ON M4V 1L5

P: 416-314-8214 | F: 416-314-8452 | Cindy.Batista@ontario.ca

From: Kyle Stanfield [<mailto:kstanfield@rainyriverresources.com>]
Sent: February 28, 2013 7:49 AM
To: Batista, Cindy (ENE)
Cc: 'sheila.daniel@amec.com'
Subject: Re: Rainy River ToR

Hi Cindy - I left you a voicemail on Tuesday.

We can upload fairly quickly. I was unsure what the timing is for this - can you explain and I can direct staff?

Thanks, Kyle

Regards,

Kyle Stanfield,
Vice President, Environment & Sustainability

Rainy River Resources Ltd.

o: +1 807 623 1540
m: +1 807 621 6152
f: . +1 807 623 0974

From: Batista, Cindy (ENE) [<mailto:Cindy.Batista@ontario.ca>]
Sent: Tuesday, February 26, 2013 03:54 PM
To: Kyle Stanfield
Cc: 'sheila.daniel@amec.com' (sheila.daniel@amec.com) <sheila.daniel@amec.com>
Subject: Rainy River ToR

Hello Kyle:

I visited Rainy River's website this morning and I only came across the October 2012 ToR. When can I expect to see the amended ToR posted on your website?

Please and thanks,

Cindy Batista | Project Officer
Environmental Approvals Branch | Ministry of the Environment
2 St. Clair Avenue West, 14th Floor, Toronto ON M4V 1L5

P: 416-314-8214 | F: 416-314-8452 | Cindy.Batista@ontario.ca

From: Stacey Jack [mailto:sjack@rainyriverresources.com]
Sent: March-28-13 10:54 AM
To: Davis, Stephanie [CEAA] (Stephanie.Davis@ceaa-acee.gc.ca)
Cc: Kyle Stanfield; RRRsiims
Subject: RRR ROC and VEC tables to March 1, 2013

Good Morning Stephanie;
Please find attached the ROC and VEC tables for the Rainy River Gold Project, current to March 1, 2013.
Please let me know if you have any questions or comments about the tables.

I hope you have a pleasant long weekend.

Sincerely,
Stacey



Stacey Jack
Community Coordinator

T 807 482 2501 | F 807 482 2834 | sjack@rainyriverresources.com

Rainy River Resources Ltd., 5967 Highway 11/71, PO Box 5, Emo, ON P0W 1E0

From: Kyle Stanfield [<mailto:kstanfield@rainyriverresources.com>]
Sent: Friday, April 19, 2013 1:41 PM
To: Davis,Stephanie [CEAA]
Cc: Daniel, Sheila E; Simms, David; McDonell,Dan [Burlington]
Subject: RE: Project questions from federal reviewers.

Stephanie – The new intrepid discovery area is under review and could likely be mined as part of the existing proposed underground development to be described in the Draft EA. We are working on developing a resources for this new discovery area and its use would not change the configuration of the proposed mining operation as operations would be underground and included within the proposed overall footprint.

The ore stockpile area will be situated along the northern perimeter of the waste rock to the east of the Open Pit. This will be clearly indicated in the draft EA document.

Let me know if there are further questions at this time.

Regards,
Kyle



Kyle L. Stanfield P.Eng.
Vice President, Environment & Sustainability

T 807 623 1540 | C 807 621 6152 | F 807 623 0974 | kstanfield@rainyriverresources.com
Rainy River Resources Ltd., 1111 Victoria Avenue East, Thunder Bay, Ontario, Canada P7C 1B7

From: Davis,Stephanie [CEAA] [<mailto:Stephanie.Davis@ceaa-acee.gc.ca>]
Sent: Thursday, April 18, 2013 10:29 AM
To: Kyle Stanfield
Cc: Daniel, Sheila E; Simms, David; McDonell,Dan [Burlington]
Subject: Project questions from federal reviewers.

Kyle,

Two questions that have recently come up from the federal team:

- 1) The 2013 community newsletter mentions a new "Intrepid zone" to the East of Hwy 600 and the presence of a large deposit. From the updated site layout this site appears to be under the proposed Mine Rock stockpile. Is Rainy River planning to incorporate this new area or is this the site that they were discussing accessing via the underground tunnel?
- 2) Will RRGF have 'low grade ore stock piles'? If so can you identify where they will be as they are not visible on the most recent site plan.

Can you or Sheila or Dave, please shed some light?

Regards,
Stephanie

Stephanie Davis, BEng, LEED AP

Project Manager | Gestionnaire de projets

Canadian Environmental Assessment Agency | Agence canadienne d'évaluation environnementale

Ontario Region | Région de l'Ontario

55 St. Clair Avenue East, Suite 907, Toronto, ON M4T 1M2 | 55, avenue St-Clair Est, pièce 907, Toronto, ON M4T 1M2

stephanie.davis@ceaa-acee.gc.ca

<http://www.ceaa-acee.gc.ca>

Telephone | Téléphone 416-954-7334

Facsimile | Télécopieur 416-952-1573

Government of Canada | Gouvernement du Canada

From: Stacey Jack
Sent: April-29-13 12:32 PM
To: Davis, Stephanie [CEAA] (Stephanie.Davis@ceaa-acee.gc.ca)
Cc: Kyle Stanfield
Subject: ROC and VEC tables current to April 1, 2013

Good Afternoon Stephanie;
Please find attached the ROC and VEC tables for the Rainy River Gold Project, current to April 1, 2013.
If you have any questions or comments, please contact me.
Sincerely,
Stacey



Stacey Jack
Community Coordinator

T 807 482 2501 | F 807 482 2834 | sjack@rainyriverresources.com

Rainy River Resources Ltd., 5967 Highway 11/71, PO Box 5, Emo, ON P0W 1E0

From: Davis,Stephanie [CEAA] [<mailto:Stephanie.Davis@ceaa-acee.gc.ca>]
Sent: Wednesday, May 08, 2013 2:40 PM
To: Kyle Stanfield
Cc: Daniel, Sheila E; Simms, David
Subject: Federal comments on baseline reports B15, B16 and B8.

Kyle,

Further to our discussion this morning, I am sending federal comments on some of the baseline reports.

The federal departments have commented on:

B15 Climate_Air_Sound Baseline
B16 RRGF 2012 Aquatics Baseline Report
B8 AMEC Winter Low Flow 2012

Comments on the B12 - RRGF 2012 Terrestrial Baseline, B14 - RRGF 2012 Aerial Survey Report and B13 - RRGF 2012 Species at Risk report will be sent next week.

We can discuss the schedule for responding in tomorrow's meeting.

Kind Regards,
Stephanie

Stephanie Davis, BEng

Project Manager | Gestionnaire de projets
Canadian Environmental Assessment Agency | Agence canadienne d'évaluation environnementale
Ontario Region | Région de l'Ontario
55 St. Clair Avenue East, Suite 907, Toronto, ON M4T 1M2 | 55, avenue St-Clair Est, pièce 907, Toronto,
ON M4T 1M2
stephanie.davis@ceaa-acee.gc.ca
<http://www.ceaa-acee.gc.ca>
Telephone | Téléphone 416-954-7334
Facsimile | Télécopieur 416-952-1573
Government of Canada | Gouvernement du Canada

For reasons of computer security, this office has prohibited the use of automated response tools to indicate when we are away from the office. If I do not respond to your message, I may be away from the office. Kindly contact our office reception at 416 952 1576 for immediate attention.

Pour des raisons de sécurité informatique, ce bureau interdit l'utilisation des outils de réponse automatisés pour indiquer quand nous sommes absents du bureau.

Si je ne réponds pas à votre message, il se pourrait que je sois absent du bureau. Veuillez communiquer avec notre service d'accueil en composant le 416 952 1576 pour obtenir une réponse rapidement.

DFO Comments on Rainy River Resources Ltd Rainy River Gold Project

2012 Aquatic Resources Baseline Report (March 2013)

Page 2, 1.3 Spatial Boundaries, 1st paragraph – the creeks and streams may not support a commercial (no bait harvesting?) or recreational fishery, but do the fish in the creeks and streams support a downstream fishery by providing a food source?

Page 10, 2.6 Fisheries Resources, 1st line – fish samples were collected in July, August and September, but none were collected in May to June. Is it possible that some streams reported as fishless, could in fact have supported fish in the spring?

Page 37, 3.4.5 Fisheries Resources for Unnamed Tributary 1 system – would the channel have been dry if sampled in the spring?

Page 41, 3.6.5, Fisheries Resources for Unnamed Tributary 2 system – would fish have been present if the sampling was conducted in the spring?

Page 42, 4th paragraph – any thoughts on why the August pH at Loslo Creek was so acidic (5.45)? Isn't that at a level where some fish species disappear?

Page 49, 3.9.3 Fisheries Resources for West Creek Tributary 1 – could the low captures of baitfish be attributed to the low oxygen levels of 1.57-3.56 mg/L recorded for West Creek tributary 1 (page 47)?

Page 50, 3.10.3 Habitat Type Availability, 2nd paragraph – is the lower reaches of Clark Creek referred to as the Teeple Drain and thus the reason why the lower reaches are more channelized?

Page 57, 1st paragraph – how do these mercury levels in walleye relate to the 'Guide to Eating Ontario Sport Fish'?

Page 92, 2nd paragraph, 2nd last sentence – isn't an increase in phosphorus levels also due to animal manure as well as the long term agricultural use of mineral fertilizers? Cattle excrement is mentioned on page 98 in the phosphorus discussion.

Table 3-14, Species Distribution across the study area between 1997 and 2012 – this table should either reference the discussion on page 93, 4th paragraph or provide more details in the table on what it means. Do we have the fish sampling results from the MNR/Rainy River FN and KCB sampling efforts – areas and date sampled?

Page 93, 2nd paragraph – not only could low levels of benthic invertebrate density be attributed to the drought conditions in the summer and fall of 2012, but it could also explain why fish were not present in some of the tributaries. Fish sampling in the spring is needed to confirm whether those fishless streams are in fact devoid of fish.

Neville Ward
Senior Habitat Biologist
Thunder Bay
April 10, 2013.

RAINY RIVER GOLD MINE: 2012 Baseline Reports Activity Log and Disposition Table

Submitted: May 3, 2013

B15 - Climate, Air Quality and Sound Baseline Report (January 2013)

Reference #	Section of Baseline report	Page of Baseline	GENERAL COMMENT	RATIONALE	AREA OF EXPERTISE
EC#1_B15	Wind climate baseline	4	It is not appropriate to use Environment Canada's Wind Energy Atlas (CWEA) as a wind climate baseline for the project since the CWEA provides the results of the wind numerical model simulations. The CWEA modeled baseline could potentially affect on the accuracy/reliability of environment assessment on air pollution dispersion modeling. Furthermore, the modeled wind data are not suitable for the references to compare with on-site wind data monitored by Klohn Crippen Berger (KCB). Suitable wind climate baseline information should be derived by a long-term observed wind data record nearby the project site. Suitable stations include Kenora A (Climate ID: 6034075), Atikokan (Climate ID: 6020379) and Atikokan (AUT) (Climate ID: 6020LPQ), which possess hourly wind observations for the periods 1953-present, 1966-1988 and 1994-present, respectively.		MSC
EC#2_B15	Table 7	12	NO2 concentrations under AAQC are wrong, the correct standards are: NO2 concn for 24 hr avg 200 and for 1hr avg 400 ppb. Also PM2.5 mean concen is 30 ug/m3 based on 24 hrs, and its not indicated in the table.		Air Quality
EC#3_B15	Table 8	13	provides rural AQ data based on MOE stations in 3 locations and the data from these stations are used to develop background condition for the project, but the report does not indicate how they would use these numbers as the concentrations of different pollutants are different at each station (for example would they use avg form 3 station?). Also since KCB has conducted PM monitoring in the site area, it would be reasonable to use these data for PM10 and PM2.5 instead of PM data from monitoring stations but the report does not explain. What is the distance of each of these 3 stations to the project site?		Air Quality
EC#4_B15	Table 9	14	Provides background PM in the site based on KCB monitoring, but the results are not directly comparable because reported numbers was averaged over 3 hours rather than 24 hrs (page 10). what is the rationale of not monitoring or averaging for 24 hrs period in order to be able to make direct comparison with the stds?. It would be useful to provide a map/figure of project site and the 3 locations of KCB PM monitoring stations.		Air Quality
EC#5_B15	N/A	N/A	It is assumed that information related to climate change scenarios and the models being used will be presented as part of the impacts assessment. Climate change could adversely affect the project and this in turn could result in impacts to the environment.		MSC

B16 - 2012 Aquatic Resources Baseline Report (N

Reference #	Section of Baseline report	Page of Baseline	GENERAL COMMENT	RATIONALE	AREA OF EXPERTISE
EC#1_B16	3.2 Pinewood River System	27	<p>It appears that Station Pin-7 (located on the Pinewood River) was dropped from routine monitoring. Pin-7 had previously shown in the 2011 monitoring report unusually high concentrations of: aluminum, iron, cobalt, copper, vanadium and zirconium and is located downstream of the project as discussed in the RRGP comment table August 2012. It is in the proponents' best interests to better understand the unusually high concentrations of metals and low dissolved oxygen at this location, rather than characterizing it less. Fully characterizing existing degraded conditions will help the proponent to demonstrate in the future that the area was previously impacted.</p>		Water Quality

Environmental Assessment Program
Health Canada
180 Queen Street West, 10th Floor
Toronto, ON M5V 3L7

April 9, 2013

Sent by e-mail to: stephanie.davis@ceaa-acee.gc.ca

Subject: Health Canada's review of the Climate, Air Quality and Sound Baseline Study for the Rainy River Gold Project, dated January 2013

Dear Ms. Davis,

Thank you for your email dated March 1, 2013, requesting Health Canada's review of the Climate Air and Sound Baseline report, dated January 2013, for the Rainy River Gold Project. Health Canada (HC) is participating in this review as a Federal Authority (FA) in accordance with Section 20 of the *Canadian Environmental Assessment Act, 2012* (the Act), providing expertise in its possession when requested to do so by a Responsible Authority.

The objective of HC's review is to enable a more complete analysis and understanding of potential human health effects of the project. In some cases, failing to provide the suggested information may impact HC's understanding of the potential human health risks, and/or potentially lead to an under- and/or over-estimation of human health risks.

HC has completed a preliminary review of the Climate Air and Sound Baseline report, dated January 2013 (the report), for the Rainy River Gold Project (the project). This review was limited to HC's expertise in the areas of air quality and noise. HC offers the following comments for your consideration.

Air Quality

HC has no comments on the baseline air quality data provided in the report.

Noise

- 1) The report does not identify existing human receptors in the area that may be influenced by project-related noise.

The characterization of potential receptors would typically include the distance to the project's local study area (LSA) and regional study area (RSA) for each receptor, and a map illustrating modelled noise levels from the project at receptors in the study area.

- 2) The baseline survey report (Draft Sound Monitoring Report 2012) highlights elevated night-time noise levels during exploration activities at three receptors: Unit 2A, Unit 2B, and Unit 4A. Unit 4A is described as being adjacent to a house, with "residences nearby".

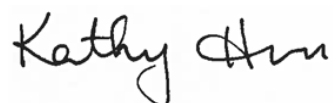
HC suggests that measured or valid estimates of baseline noise levels for both daytime (Ld) and night-time (Ln) at all representative receptor locations be assessed and reported in the EA. When baseline measurement is conducted, HC advises that the measurement be completed in accordance with ISO 1996-2:2007 at each representative receptor and that reports include the hours used to characterize these measurements.

- 3) Table 3 of the report (page 14), titled "Human Perception of Sound" links increases in decibel level to human perception. However, people may respond to sound characteristics that do not necessarily increase the sound level appreciably. Therefore, in the context of EA, HC advises that statements relating to perceptibility or whether changes in noise are noticeable based solely on decibel levels be avoided, as these statements may be misleading.

To enable HC's review of potential human health effects of the Project, HC advises the inclusion of the information listed in relevant sections of the recent publication entitled "Useful Information for Environmental Assessments".¹ This guidance document describes HC's areas of expertise and guidance with respect to human health information to be included in environmental assessments.

Should you have any questions regarding HC's response, please feel free to contact the undersigned.

Sincerely,



Katherine Hess
A/Environmental Assessment Coordinator
Environmental Assessment Division
Health Canada, National Capital Region
Tel: (613) 948-9408
Fax: (613) 946-9673

cc: Debby Leblanc, Manager, Environmental Health Program - Ontario, Health Canada
Kitty Ma, Regional Environmental Assessment Coordinator - Ontario, Health Canada
Kelly Senkiw, A/Sr. Environmental Health Assessment Specialist, Health Canada

¹ Health Canada (2010). *Useful Information for Environmental Assessments*. Available at: http://www.hc-sc.gc.ca/ewh-semt/pubs/eval/environ_assess-eval/index-eng.php

Stakeholder: Environment Canada
Point of Contact: c/o Stephanie Davis, Project Manager, Canadian Environmental Assessment Agency
Comments received: November 2, 2012

#	COMMENT (abbreviated)	RRR RESPONSE	EC Additional Comments
Surface Water Low Survey Reports			
1	<ul style="list-style-type: none"> The methodology adopted by the proponent in both the 2011 and 2012 field observations appears to be adequate,... The aforementioned reports do not provide the level of detail with regards to sampling and data treatment to directly verify this point, but we assume that industry standards for hydrological measurement were followed during the field observations. 	<p>Appropriate industry standards were followed during the 2011 and 2012 flow surveys as identified within <i>Manual of British Columbia Hydrometric Standards</i> (March, 2009). RRR is not however, proposing to rely on short term site hydrological monitoring stations for determining water balance and flow conditions, because: (1) two long-term Water Survey of Canada (WSC) stations exist on the Pinewood River, including one near the site, which provide better data; (2) the local creeks are of small size, are low gradient, exhibit intermittent flow, and are interrupted by numerous beaver dams, making it nearly impossible to get reliable flow data; (3) no statistically reliable data can be derived from the local site stations because of the above limitations.</p>	<p>It should be noted that since the data (from the currently discontinued WSC gauge) was seasonal, it will not be representative of the full range of flow data. In particular the low flow data which primarily happens through the winter (or non-operational) time period. The nearer and active Hydrometric site has only been in operation for 7 years, but only has 5 years of verification of the stage-discharge relationship, and may not be appropriate to compute statistical hydrological parameters at this time (due to the very small sample set). In addition several problems have been experienced at this station including: considerable aggradation and erosion of materials resulting in shifts and changes to the stage-discharge relationship, and increasing unusable periods due to environmental effects. Hydrologically, the next closest Hydrometric gauge is La Vallee near Burriss and may provide additional data for comparison. Although, this station also has a similar short period of discharge data available.</p>

#	COMMENT (abbreviated)	RRR RESPONSE	EC Additional Comments
2	<ul style="list-style-type: none"> We assumed, based on Figure 2 of the TOR, that flows from creeks and small streams are in the direction of the Pinewood River. 	<p>The assumption is correct. All proposed Project developments excluding a portion of the transmission line are within the Pinewood River watershed; and all associated creeks (Clark, West, Marr, Loslo and Tait) drain to the Pinewood River.</p>	<p>Comment noted.</p>
3	<ul style="list-style-type: none"> The data collected during the 2011 and 2012 field observations - and the decisions taken by the proponent in response to the location of flow measurement stations - seem incomplete,.... The proponent should present a more comprehensive explanation for the decisions made to eliminate measuring stations. 	<p>See response to Comment #1 above. The small systems on site simply do not allow reliable measurement. The WSC flow monitoring stations on the Pinewood River provide better data that have been used to prorate flows for the site area. The WSC stations include Station 05PC011 further downstream on the Pinewood River (watershed area – 461 km²) that operated from 1952 to 1998, and Station 05PC023 just downstream of the RRGp site area (watershed area – 233 km²) that has operated since 2007 and is currently operating.</p>	<p>The pro-rating approach is an appropriate way to estimate the flows at an un-gauged location. If more complex data is required, then another model could be used to weight data from various localities that are hydrologically similar.</p> <p>The gauge station 05PC011 would have greater impacts from the other contributing branch, but it is not active at this time, and with 15 years of climate change, and only a seasonal record for back-up, it is less certain that a “pro-rating” approach is appropriate.</p>
4	<ul style="list-style-type: none"> We feel that, since hydrological data will be used to assess certain environmental concerns that will most-likely be relevant during the entire life-cycle of the project, a more-representative data set should be selected. Since 2011 was an exceptional year with limited rainfall, and that the 2012 survey was performed under frozen conditions, we question whether the data recorded are truly representative of the hydrology conditions on the site,.... The distinction between continuous and manual (discrete) measurements is an important one, as flow is quite variable at certain points in the survey zone. 	<p>Please see responses to Comments #1 and #3, above.</p>	<p>Comment noted.</p>

#	COMMENT (abbreviated)	RRR RESPONSE	EC Additional Comments
5	<p>Methodology: The methodology adopted by the proponent for carrying out the September 2011 and March 2012 low flow field observations appears to be adequate, based on the information presented in the corresponding reports. However, the methodology for flow measurement is complex. Specific procedures are dictated for specific sampling conditions, and data review is performed following sampling. We assume that this methodology for the collection and treatment was followed in the generation of data for the 2011 and 2012 surveys.</p>	<p>Please see responses to Comments #1 through #3 above.</p>	<p>Responses to comments #1-3 do not appear to respond to this question.</p> <p>Please clarify whether the methodology for the collection and treatment was followed in the generation of data for the 2011-2012 survey. If not, what were the deviations?</p>
6	<p>Hydrological Conditions: Rainy-Namakan basin for 2011 overall were dry: <i>'Inflows were near normal for the first part of the year, but conditions became progressively drier through the second half. 2011 precipitation for the Rainy-Namakan basin was 7th lowest in 102 years of records...'</i></p> <ul style="list-style-type: none"> The Manual of British Columbia Hydrometric Standards recommends the selection of alternate sites in these cases. Was this recommendation followed systematically during the field surveys? 	<p>In completing the monitoring campaigns associated with 2011 and 2012, multiple sites within proximity to those depicted within the respective reports were evaluated, consistent with Section 2.1 of the <i>Manual of British Columbia Hydrometric Standards</i>, so as to determine whether more favourable measurement sections were available. In all cases the result of this additional investigation resulted in no more favourable section being identified to those identified within the reporting.</p> <p>However, as site hydrological data are being derived from the Pinewood River WSC stations, as per the above. These stations provide continuous, high quality flow data. With data available for several years, under all applicable flow conditions. The discontinued station (05PC011) was a seasonal station that did not collect winter data (i.e., there are no data from this station for November through February). The currently operating station closer to the site (05PC023) collects year round continuous data.</p>	<p>It should be noted that some of the WSC station's (05PC023) data was estimated under backwater due to ice conditions and for other reasons (such as a result of flooding and debris impacting our instrumentation). The data may be of high quality for those periods that are not estimated.</p> <p>It could be useful to access other seasonal (now discontinued) stations in the general area for a more average hydrological viewpoint (e.g. Sturgeon River near Barwick). As well as the other local station that is currently active though with a short time period (e.g. La Valee River near Burriss).</p>

#	COMMENT (abbreviated)	RRR RESPONSE	EC Additional Comments
7	<p>Procedures: Discharge measurements were carried out with hand-held equipment. The measurement procedure consists partly on the determination of stream depth and velocity at selected intervals across a stream and the measurement of stream velocity at each selected interval.</p> <ul style="list-style-type: none"> It was not possible to verify whether all the recommendations related to the discharge measurement procedures in the B.C. Manual were followed by the proponent (section 4.2.5 -Discharge Measurement). 	<p>Thank you for your comments which have been reviewed. See response to comments above. It is only possible to get spot measurements for the smaller site creek system, for reasons detailed above under Comment #1.</p>	<p>It should be noted that it is very important with very low flows to follow recommendations, and also, if possible to use a tool that has no moving parts – in order to reduce the effects of friction on the measurement of flow.</p>

#	COMMENT (abbreviated)	RRR RESPONSE	EC Additional Comments
8	<p>Flow Monitoring Stations: The 2012 report mentions that all 2011 stations were monitored. But this was not the case: Loslo 1, Marr 2, Pine 1, Pine 3, SW 1A, SW 5 and Tait 2 were not included in the 2012 field report. The 2011 report recommends the removal and relocation of certain flow measurement stations for a number of reasons:</p> <ul style="list-style-type: none"> • No flow, or visible flow, or stream bed dry – unrelated to beaver activity; • No flow, or visible flow, or stream bed dry – related to beaver activity. <p>Due to the uncharacteristically dry conditions during the 2011 survey, we recommend future hydrological studies since this information is still required to characterise flow conditions in the study area and future local water management. In case where beaver activity certainly has redirected flow, additional stations could be added at appropriate location to measure this diverted flow.</p>	<p>As per the above, reliance is placed on WSC records and not site records for continuous data. Relative to representativeness, the entire site area is underlain by thick clay till deposits, except in localized headwater areas where there are local exposures. The lack of exposed granular soils has resulted in a very limited baseflow condition for local watercourses, such that the Pinewood River at 05PC011 has been observed to go to “zero” monthly average flows for just under 10% of the late summer months, and for about 25% of time for March. Frequent zero flow conditions have also been observed for the local site area creeks. Also, beyond flow measurement limitations described above for the local creeks, it is important to stress that site developments are expected to physically displace the majority of the local site area watersheds, such that even if reliable, continuous flow measures could be attained, these could not be attained over the longer period. Reliance is therefore placed on the WSC stations, and site spot flow measurements.</p>	<p>Was there any attempt to correlate the data collected on site by Rainy River dam, with the data at the WSC gauge? Even point data would confirm any “pro-rating” that is suggested as an alternative to more measurements.</p>
9	<p>Sufficiency of Data: The data collected during the 2011 and 2012 field observations are useful but possibly not representative of normal flow conditions due to the abnormally dry conditions in 2011 and the presence of excessive amounts of ice in 2012.</p>	<p>Thank you for your comments which have been reviewed. Please see responses above.</p>	<p>Comment noted.</p>

#	COMMENT (abbreviated)	RRR RESPONSE	EC Additional Comments
10	<p>Supplemental notes: Note the following errors or missing data from the two reports:</p> <p>2011 Report:</p> <ul style="list-style-type: none"> • Pine 2 average discharge value: Table 6-1 reports this value as 0 m³/s whereas in the main text it is reported as 0.0062 m³/s. • West 2 station is not mentioned in Figure 1. 	<p>An erratum will be issued with the baseline report to be submitted as part of the Environmental Assessment (EA) Report.</p>	<p>Comment noted.</p>
11	<p>2012 Report:</p> <ul style="list-style-type: none"> • Table of contents – Photo 9: the station should be Jones 1 rather than Jones 2. 	<p>An erratum will be issued with the baseline report to be submitted as part of the EA Report. Also please note that RRR has had a request from a local landowner to use the term McCallum Creek rather than Jones Creek. This will also be included in the erratum.</p>	<p>Comment noted.</p>

#	COMMENT (abbreviated)	RRR RESPONSE	EC Additional Comments
12	<p>According to the 2011 report,</p> <ul style="list-style-type: none"> • six stations were to be removed, namely Loslo 1, Marr 2, Pine 2, SW1, SW4 and Tait 2; • five stations were to be moved, namely Marr 1, Pine 4, SW1A, Tait 1 and West 1; • two stations were to be moved or removed, namely Jones 2 and SW5, and • twelve stations were to be continued, namely 05PC023, Clark 1, Jones 1, Pine 1, Pine 3, SW2, SW3, SW10, SW13, SW14, West 2 and West 3. <p>However, stations Pine 2, SW1, SW4 and Tait 2 were not removed from the 2012 campaign as was planned in 2011. On the other hand, stations Pine 1 and Pine 3 were not monitored in 2012 (this should have been done according to the 2011 planning). Was this due to an error or was it not monitored for some other reasons (no flow, no access, etc.)?</p>	<p>A decision was made during the March 2012 field program to retain stations Pine 2, SW1, SW4 and Tait 2 for the March 2012 flow measuring campaign. Time limitations did not allow stations Pine 1 and Pine 3 to be visited, but based on results obtained for other small drainages during early March, it was not anticipated that there would be any measurable flow in either station, as virtually all such stations surveyed in early March of 2012 were frozen to bottom.</p>	<p>It should be noted that this data would be hard to correlate with the discontinued dataset (Station 05PC011), since there was no data for the winter season collected there.</p>

From: Davis,Stephanie [CEAA] [<mailto:Stephanie.Davis@ceaa-acee.gc.ca>]
Sent: Thursday, May 23, 2013 5:38 PM
To: Kyle Stanfield
Cc: Daniel, Sheila E; McDonell,Dan [Burlington]; Hill, Rachel (MNR)
Subject: Federal comments on baseline reports B12, B13 and B14.

Kyle,

Please find attached comments from the Ministry of Natural Resources and Environment Canada on:

B12 - RRGP 2012 Terrestrial Baseline
B13 - RRGP 2012 Species at Risk report
B14 - RRGP 2012 Aerial Survey Report

Please send the associated responses to me, Dan and Rachel.

Kind Regards,
Stephanie

Stephanie Davis, BEng

Project Manager | Gestionnaire de projets
Canadian Environmental Assessment Agency | Agence canadienne d'évaluation environnementale
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Rainy River Gold Project (RRGP) – EC comments on 2012 baseline reports
Date: May 21, 2013

B12 - 2012 Terrestrial Baseline Study (December 2012)

Ref #	Section of Baseline report	Page	GENERAL COMMENT	RATIONALE	AREA OF EXPERTISE
EC#1_B12	4.1 - Avian Community	7	EC recommends that the avian community data be presented in the EIS in a standardized format, along with providing a regional context, in this case with respect to Bird Conservation Region 12 (BCR 12) Priority Species.	By providing a regional context comparison to the site level species it will assist EC in evaluating the community data.	Wildlife/SAR
EC#2_B12	4.1 - Avian Community	7	EC recommends the following change (revised wording in red). "The avian species' mean numbers and percent of frequency found within the LSA reflect the area's mosaic of mixed, deciduous-dominated forest, shrubby wetlands, and open field habitats."	During EC's review of the report and the common species summary (Table 2, p. 5), there does not appear to be any "avian species diversity" or "population densities" calculated as referenced in the report. There are only two calculations in Table 2, relative abundance (number of stations each species occurred at) and maximum species abundance (maximum number of individuals by station). Thus, the statement made is incorrect as what is being evaluated is mean number from surveys and frequency - not diversity and population densities.	Wildlife/SAR
EC#3_B12	4.1 - Avian Community	7	EC recommends the following change (revised wording in red) in Table 2. The header "Probability of Occurrence" and "Average Maximum Occurrence" be changed back to what was previously used in 2011: " Mean #** " and " Frequency (%) " (** the mean number of individuals seen across the 29 survey stations, over the two survey periods) as these headings more accurately represent what this data demonstrates.	The new column headings in Table 2 do not correctly reflect what this data demonstrates.	Wildlife/SAR
EC#4_B12	5.0 - Conclusion	14	EC recommends the following change (revised wording in red). "The vast majority of the species observed in the LSA are migratory species and therefore, compliance with the <i>Migratory Birds Convention Act</i> (MBCA 1994), regulations and guidelines for vegetation clearing, as	The date listed for the migratory bird season is currently incorrect.	Wildlife/SAR

			recommended by Environment Canada, needs to be considered during the project's construction and operation phases. In order to minimize the potential for incidental take of any nesting migratory birds, clearing of vegetation and any proposed work activities in migratory bird habitat should be undertaken outside of the active breeding season. Clearing is generally to be avoided from mid-May to August 8.`		
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B13 - 2012 Species at Risk Baseline Study

Ref #	Section of Baseline report	Page	GENERAL COMMENT	RATIONALE	AREA OF EXPERTISE
EC#1_B13	General Comment		<p>Overall the SAR surveys appear thorough, however, EC would note that Western Silvery Aster, is easiest to identify in flower and thus, surveys may have been better timed in the fall period (this species is known to flower in early August to mid-September), but the species' silvery-hairy, lance-shaped leaves and rootstock do help distinguish it as well from other asters.</p> <p>Please confirm that the local OMNR office helped AMEC with regard to survey methods and best timing of surveys for this species.</p>		Wildlife/SAR
EC#2_B13	4.1 - Avian Community	4	<p>EC recommends the following change (revised wording in red) "The avian species' mean numbers and percent of frequency found within the LSA reflect the area's mosaic of mixed, deciduous-dominated forest, shrubby wetlands, and open field habitats."</p>	<p>During EC's review of the report and the common species summary (Table 2, p. 5), there does not appear to be any "avian species diversity" or "population densities" calculated as referenced in the report. There are only two calculations in Table 2, relative abundance (number of stations each species occurred at) and maximum species abundance (maximum number of individuals by station). Thus, the statement made is incorrect as what is being evaluated is mean number from surveys and frequency - not diversity and population densities.</p>	Wildlife/SAR
EC#3_B13	General Comment		<p>EC recommends that the avian community data be presented in the EIS in a standardized format, along with providing a regional context, in this case with respect to Bird Conservation Region 12 (BCR 12) Priority Species.</p>	<p>By providing a regional context comparison to the site level species it will assist EC in evaluating the community data.</p>	Wildlife/SAR
EC#4_B13	4.1 - Avian Community (Table 2)	5	<p>EC recommends the following change (revised wording in red) in Table 2. The header "Probability of Occurrence" and "Average Maximum Occurrence" be changed back to what was previously</p>	<p>The new column headings in Table 2 do not correctly reflect what this data demonstrates.</p>	Wildlife/SAR

			used in 2011: ``Mean #`` and ``Frequency (%)`` (** the mean number of individuals seen across the 29 survey stations, over the two survey periods) as these headings more accurately represent what this data demonstrates.		
EC#5_B13	4.1 - Avian Community (Table 2)	5	EC recommends that a column be added to Table 2 indicating which species are suspected to be nesting in the LSA and a column to otherwise highlight SARA listed species.	This useful information will assist in EC`s review of the EIS.	Wildlife/SAR
EC#6_B13	4.1 - Avian Community (Table 2)	5	Following the standard format in the guidance document from EC (Mining Baseline Desktop Assessment and Survey Requirements) previously provided to proponent will result in a more efficient review of the EIS by EC.	<p>The EC document details the survey information request along with suggested summary table information; these are the recommended survey methods and summaries:</p> <p>i) A complete data set for all 10-minute point count stations, indicating for each station: the survey date(s); time; weather conditions; GPS location; habitat description; and, all species and their abundance on each of the survey dates based on the following intervals and distances: (a) record all birds seen or heard in the first 3 minutes, and separate all birds seen or heard for the first time in the next 2 minutes, and then in the final 5 minutes (i.e., so each bird is recorded only once); (b) record all birds as being: 1) within 50m, or, 2) beyond 50m. If birds move within 50 m after first being detected beyond 50m, they should only be recorded as being within 50m.</p> <p>ii) Overall species summary list(s) showing: Species ranked according to abundance; Species ranked according to distribution across point counts (i.e., % of point count stations at which they were recorded); and, Species ranked according to abundance in each habitat type.</p> <p>iii) Overall summary list(s) of Bird Conservation Region (BCR) priority species showing: Priority species ranked according to abundance; Priority species ranked according to distribution across point counts (i.e., % of point count stations at which they were recorded); Priority species ranked according to abundance in each habitat</p>	Wildlife/SAR

				<p>type; and, Map showing the areas of highest concentration of BCR priority species (e.g., the abundance of priority landbird species could be mapped at the breeding bird survey station locations in the following six categories: <5%, 6-10%, 11-25%, 26-50%, 51-75%, and 76-100%).</p> <p>v) Assessment of the overall 'quality' of the breeding bird community. For example, whether it is typical of the area, or unusual in some aspects.</p>	
EC#7_B13	3.1.3 - Nocturnal Bird Surveys (Owls, Whip-poor-will and Common Nighthawk)	3	The poor timing/conditions of the June 2012 survey for Whip-poor-will should be referenced in the EIS and whether each site was visited during both survey periods.	<p>In 2012, July surveys were done under appropriate timing/ conditions (full moon to 95% full). However, timing of /conditions during the June 2012 survey period were poor (new moon and cloudy conditions) and may have reduced calling rates and detectability of Whip-poor-will. The protocols under the Whip-poor-will Roadside Survey Participant's Guide (Bird Studies Canada), referenced in this report, set specific windows for surveys based on moon phase and do not recommend surveys take place outside of these windows or when the moon is not visible due to heavy cloud cover. It is unclear from the report whether each survey station was visited twice in 2012 (i.e. once during the June survey period and once during the July survey period), or if some stations were visited during just one of the two windows. If the sole visit to some sites occurred during the June 2012 survey period, these surveys may not have been sufficient to record Whip-poor-wills (or Common Nighthawks).</p>	Wildlife/SAR
EC#8_B13	3.2 - Amphibian Surveys	3	The proponent should confirm that timing of the Marsh Monitoring Program surveys were discussed with the Ontario Ministry of Natural Resources.	<p>Typically, the Marsh Monitoring Program protocol calls for three rounds of surveys between April and July, with timing based on minimum night air temperatures. As noted in EC's previous comments on the 2011 Environmental Baseline Studies, because the project falls on private and provincial Crown lands, responsibility for non-migratory birds, mammals, reptiles and amphibians falls to the province.</p>	Wildlife/SAR

B14 - 2012 Aerial Nest Survey (December 2012)

Ref #	Section of Baseline report	Page	GENERAL COMMENT	RATIONALE	AREA OF EXPERTISE
EC#1_B14	3.2 Aerial Survey	2	<p>The report states: "A spring aerial raptor nest survey was undertaken on April 5, 2012."</p> <p>The aerial nest survey seems to have taken place early in the breeding season especially considering that only one visit was completed. Thus, it will be important to keep in mind when completing the EIS that it may not present a complete picture. For example, Broad-winged Hawks may not have returned from migration at the time the surveys took place, unless 2012 was an exceptionally early spring. Merlin & Osprey were observed, however, they may have still been migrating through, thus the occurrences may not represent territory establishment / nest site selection.</p>		Wildlife/SAR

Ministry of
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May 8, 2013

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55 St. Clair Avenue East, Suite 907
Toronto, ON
M4T 1M2Subject: MNR review of AMEC Baseline Study Reports- Rainy River Gold Project
-2012 Aquatic Resources Baseline Report (March 2013)
-2012 Species at Risk Report (December 2012)

Dear Stephanie,

The Ontario Ministry of Natural Resources (OMNR) has reviewed the latest submitted base line study reports for the Rainy River Gold project and offers the following comments:

2012 Aquatic Resources Baseline Report

The methods and effort used to capture fish are well-documented and repeatable. The baseline studies appear to have thoroughly documented the fish species richness of the Pinewood River. However a data gap remains regarding the use of potential northern pike spawning and nursery habitats in the Pinewood River and its tributaries. It is understood Rainy River Resources has intentions to confirm and document spawning and nursery habitats of northern pike, walleye and other large-bodied fish in the watershed this spring. We support this effort and confirm that MNR is considering undertaking a preliminary investigation of lake sturgeon (presence/absence) in the lower reaches of the Pinewood River this spring. Results of this effort, should it occur, will be shared with AMEC.

Section 1.3 Spatial Boundaries, Page 2, lines 20-21 read "*the creeks and streams that are present in the local area do not support a commercial or recreational fishery*". The report should provide supporting references or rationale for this statement. Creeks, streams and ponds in the area support a commercial baitfish industry and is considered a commercial fishery for the purposes of section 35 of the Fisheries Act. Discussion whether fish in creeks and streams support the small but existent recreational fishery of the Pinewood River is also required.

Office Hours 8:30 – 5:00 Monday to Friday
Closed 12:00 – 1:00

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OMNR recognises this report demonstrates efforts to address concerns identified during previous reviews (i.e. the data collected from Sturgeon Creek, the documentation of relative fish abundance and tissue metal concentrations and the characterization of aquatic habitats).

2012 Species at Risk Report

The 2012 SAR report provides a summary of field work undertaken and is generally satisfactory for the assessment of values. As recently outlined, some survey approaches require reconsideration (i.e. timing of Whip-poor-will surveys and the ability to detect SAR using generic survey protocols).

It is acknowledged that Rainy River Gold has chosen not to conduct baseline studies for all of the project alternatives. The study area for the Species at Risk assessment has been limited to address the area of the preferred alternative. OMNR cautions there are risks in taking this approach and advise that should the result of the Environmental Assessment determine selection of another alternative, further baseline information may need to be collected and assessed.

If you have any questions regarding this letter, please contact Rachel Hill, District Planner at (807) 274-8605 or at Rachel.hill@Ontario.ca.

Yours truly,



Matt Myers
Planning and Information Management Supervisor
Phone (807) 274-8632
Fax (807) 274-4438

Cc Sheila Daniels AMEC
Cc Cindy Batista MOE/EAAB
Cc Neal Bennett MNDM
Cc Greg Chapman MNR

From: Kyle Stanfield [<mailto:kstanfield@rainyriverresources.com>]
Sent: Monday, May 27, 2013 11:41 AM
To: Davis, Stephanie [CEAA]; Lashbrook, Ross (ENE); Bennett, Neal (MNDM)
Cc: Daniel, Sheila E
Subject: RRG Additional Baseline Reports available for download

Good Morning – Additional baseline reports for the RRG project are now available per the below link.

Regards



Kyle L. Stanfield P.Eng.
Vice President, Environment & Sustainability

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Rainy River Resources Ltd., 1111 Victoria Avenue East, Thunder Bay, Ontario, Canada P7C 1B7

B3P	KCB SAR Report_2008-2010
P6P	AMEC 2011 SAR Report
B13P	AMEC 2012 SAR Report
B17	AMEC Hydrogeology Baseline Report
B18	AMEC 2013 Hydrogeology Modelling Report
B19	AMEC Socio-economic Baseline Report
B20	AMEC Report on ML/ARD Characterization of Tailings and Mine Rock
B21	AMEC Aerial Mammal Survey Report 2013

From: Kyle Stanfield [<mailto:kstanfield@rainyriverresources.com>]
Sent: Tuesday, May 28, 2013 3:30 PM
To: Davis, Stephanie [CEAA]; Lashbrook, Ross (ENE); Bennett, Neal (MNDM)
Cc: Daniel, Sheila E
Subject: RRGP EA TOC and July Delivery method

Good afternoon – To assist government agencies with their review planning, attached is a copy of the DRAFT EA Table of Contents.

Due to the size of the document (nearly 7,000 pages including Appendices), we will be issuing the document to the government agencies in PDF format and can make a certain number of copies available where necessary.

Thanks, Kyle



Kyle L. Stanfield P.Eng.

Vice President, Environment & Sustainability

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From: Dietrich, Jason P
Sent: Wednesday, May 29, 2013 1:42 PM
To: Martin, Christopher (MNR); Ward, Neville; Bobrowicz, Steve (MNR)
Cc: Kyle Stanfield; Ruthven, Mark C; Daniel, Sheila E; Russell, Dan; Hellinga, Nathan; TC111504
Subject: RRGP Schedule 2 NNLP Uploaded to FWG FTP site

Hello All,

We are pleased to provide a draft version of the Rainy River Gold Project Schedule 2 No Net Loss Plan for your review and comment by the Fisheries Working Group. The plan is currently available on the working group FTP site for download.

Please see below for a reminder on how to access the FTP site. A folder has been created called "RRGP Schedule 2 NNLP - DRAFT for Working Group Review". Please feel free to contact me or Mark Ruthven if you are having difficulty accessing the information.

Best regards,

Jason Dietrich, M.Sc.
Aquatic Ecologist
AMEC

Environment & Infrastructure
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Direct: 1-519-650-7133,
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jason.dietrich@amec.com
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Be more sustainable - think before you print.

From: Stacey Jack
Sent: May-31-13 8:23 AM
To: Davis, Stephanie [CEAA] (Stephanie.Davis@ceaa-acee.gc.ca)
Cc: Kyle Stanfield
Subject: RRGF ROC & VEC Reports to May 1 2013

Good Morning Stephanie;
Please find attached the ROC and VEC tables for the Rainy River Gold Project, current to May 1, 2013.
If you have any questions or comments, please contact me.
Sincerely,
Stacey



Stacey Jack
Community Coordinator

T 807 482 2501 | F 807 482 2834 | sjack@rainyriverresources.com

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Meeting Notes – Township of Chapple

Date: June 11, 2013
Purpose of Meeting: Project update
Location: Chapple Municipal Office
Time: 10:00 am – 11:00 am
RRR Participants: Kyle Stanfield, Stacey Jack

**Municipal
Participants:**

Reeve Peter Van Heyst
Ken Wilson, Council
James Gibson, Council
Geoff Gillon, RRFDC

Peggy Johnson, Clerk
Rilla Race, Council
Randy Both, Roads Supervisor

Greetings were extended by the Township and Rainy River Resources.

Discussion regarding RRR contribution for roads. Kyle to follow up with Peggy.

Peggy provided an update on the landfill study, which will be completed by the consultant on June 14th, 2013.

Kyle provided an update on the proposed acquisition by New Gold. The Township stated that they would like the relationship with New Gold to be the same as that which they have had with Rainy River Resources.

Kyle provided an update on the environmental assessment which is scheduled to be released in mid-July 2013. The Township of Chapple agreed to be a public hosting location for the document. Open Houses are slated for July and August, with the first open house to be hosted in Barwick. Kyle thanked the Township for their letter of support regarding the ToR.

There was discussion regarding the Closure Plan which will be released before Christmas 2013. Kyle also provided an update on some of the discussions he's been having with local stakeholders. James noted that there was there was a good opportunity for the Research Station to be working with the mine.

Peggy requested pictures from RRR to add to their website.

Kyle provided an update on the planning work being undertaken by Andrea Bourrie. Once that work is complete, there will be further discussion between RRR and the Township.

Meeting closed.

From: Daniel, Sheila E
Sent: Thursday, June 13, 2013 8:54 AM
To: 'Davis, Stephanie [CEAA]'; 'Bennett, Neal (MNDM)'; Lashbrook, Ross (ENE)
Cc: TC111504; 'Kyle Stanfield'; 'Stacey Jack'; Simms, David; Russell, Dan
Subject: Rainy River Gold Project - Responses to May 2013 Government Comments on Baseline Reports

On behalf of Rainy River Resources, please find attached responses to the comments received in May from various Government agencies, on the Rainy River Gold Project environmental baseline studies.

Please note that the single set of Environment Canada comments received from the Canadian Environmental Assessment Agency was separated into six responses by topic.

In addition, in response to the comments received, errata have been prepared for inclusion in the two applicable baseline reports going forward (including in the versions to be appended to the draft Environmental Assessment Report). These errata are also attached for your information.

Please issue these responses to the appropriate individuals within the Government agencies on behalf of Rainy River Resources.

Best regards,

Sheila Daniel, M.Sc., P.Geol.
Senior Associate Geoscientist;
Head Environmental Management
AMEC

Environment & Infrastructure
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sheila.daniel@amec.com
amec.com

Business sustainability starts here... AMEC supports SOS Children

From: Hellinga, Nathan

Sent: Tuesday, June 18, 2013 12:55 PM

To: Ruthven, Mark C; Bobrowicz, Steve (MNR); Christopher.Martin@ontario.ca; Dietrich, Jason P; Kyle Stanfield; TC111504; Ward, Neville

Cc: Daniel, Sheila E

Subject: Finalized Meeting Minutes - RRGF Fisheries Workshop Meeting No.4

Attached are the finalized meeting minutes from our May 8th working group meeting. These minutes have been updated to include comments received from Neville.

Cheers,

Nathan Hellinga

Habitat Restoration Specialist

AMEC

Environmental Assessment Group

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**Rainy River Gold Project
Fisheries Working Group – Workshop No. 4
May 8, 2013
DFO Office - Thunder Bay, ON
Meeting Minutes**

Attendees:

Neville Ward DFO
Steve Bobrowicz MNR
Jason Dietrich AMEC
Mark Ruthven AMEC

Phone Participants:

Kyle Stanfield (morning) RRR
Chris Martin MNR
Nathan Hellinga AMEC

	ITEM	ACTION BY	DUE DATE
1.	<u>Project Update and Status</u>		
1.1	Kyle updated the group on the status of the Environmental Assessment process. Provincial Terms of Reference still under review and timeline not clear as to receiving comment. Federal Project Description accepted and EIS Guidelines provided by EC. Single EA submission, draft near completion.		
1.2	Kyle stated that one of the primary concerns of First Nations is the lack of time and resources available for review of documents. RRR has committed to supporting the First Nations and Métis in this regard by providing the draft EA to them in advance of submission to government. RRR will also provided financial support to the First Nations and Métis to facilitate the completion of a technical third party review.		
1.3	RRR has IBAs with six First Nations groups already plus an MOU with another and is planning for as many as six additional agreements.		
1.4	RRR has acquired letters of support from Township of Chapple and First Nations groups to support the alternative methods of fish habitat compensation which include exclusion fencing and off-stream watering. Some of these were provided for inclusion in the NNL Strategy document.		
1.5	Kyle updated the group on the financial status of RRR. RRR has sufficient funds for this project to proceed; despite economic downturn they continue to be in position to advance this project with the goal of a proposed start of construction in August 2014 and start production in 2016.		

1.6	Neville commented that the consultation between RRR and First Nations is extremely beneficial as the provincial and federal governments have a duty to consult with First Nations before issuing permits.		
1.7	Neville asked Kyle if all the First Nations groups have agreed to hire the same consultant. Kyle expanded upon his earlier comment stating that the First Nations groups which were most active in this discussion compiled a list of consultants and that collectively they have selected one of these consultants.		
1.8	Neville asked Kyle if he felt that the First Nations would make the findings of their consultant's review public. Kyle said that he anticipates that it would be shared, but cannot say for certain at this time. Neville expanded that if this report can be shared it would be greatly beneficial as it contributes to the government agencies confidence that the Project has properly consulted with First Nations groups.		
1.9	Kyle expanded on the discussion of the consultant's report, stating that he feels the review by First Nations will involve RRR and First Nations working in a close partnership. RRR is also supporting the Metis to complete their own review of the EA document.		
2.	NNLP Update and Status		
2.1	Mark summarized that AMEC had created a comprehensive NNLP which covered all MMER Schedule 2 and Section 35 items, however the NNLP got incredibly large and cumbersome. It was also known to the team that eventually the document would need to be split into two separate components (Section 35 Authorization offsets and MMER Schedule 2 offsets). The document in the combined form was reviewed by Dr. Ken Minns and he felt it was jumbled and could be better organized. In order to deal with this, it was decided that the team would split the report into two separate documents for the initial draft submission. To explain this division of offsets, the Offset Strategy Document was created to describe the overall process and necessity for two documents.		
2.2	Mark reviewed the MMER process. The primary part of the MMER which relates to fisheries prohibits the placement of a mine waste into waters frequented by fish unless the water is listed on Schedule 2. For the purpose of the RRGP we are assuming that mine waste includes, tailings, mine rock, and mine water.		

3.	<u>Offset Strategy Document</u>		
3.1	Mark discussed the purpose of the Offset Strategy Document which is meant to be read prior to either of the individual NNLPs in order to orient the reader and explain the need for two documents. These documents had to be separated to keep the MMER Schedule 2 amendments and the section 35 habitat impacts separated by process. This was what was required on similar projects.		
3.2	Mark expressed a concern that that the Schedule 2 amendment from Environment Canada may be more complicated if using the alternative means of compensation (implementation of BMPs). Neville stated that DFO has the ultimate say on this and that Environment Canada will not make a determination, but will instead require DFO to provide them with a letter accepting the plan.		
3.3	Mark presented the accounting of like-for-like compensation for Schedule 2 and showed that the impacts and compensation come out at an approximate 1.3:1 compensation ratio, which is higher than the 1:1 compensation ratio often utilized when habitat is being constructed prior to habitat impacts. Mark suggested that the extra 0.3 would help offset any delays in vegetation establishment or other unknowns.		
3.4	Neville asked for confirmation that the like-for-like compensation measures would be built in advance of the impacts. Mark confirmed that is the plan.		
3.5	Neville expressed that doing the offset in this manner will be a benefit as it shows that multiple approaches to achieving no net loss are being utilized.		
3.6	Kyle stated that RRR is attempting to put information into their documents which explains that this project is impacting small streams which do not support a sport fishery so that people reading the report are clearly shown that no lake infilling is being performed as part of this project.		
3.7	Chris stated that one of MNR comments on the Baseline Report will be related to the statement that these areas do not constitute a recreational or commercial fishery, and that MNR would like more clarification as to why this language is used. Kyle agreed with Chris and Neville's comment on this and stated that RRR acknowledges the need to reword this sentence but RRR still wants to include a statement which explains to the public exactly what is being impacted (i.e. small streams).		
3.8	Kyle presented that a concern of many First Nations groups is existing nutrient loading from cattle ranching operations which is part of the reason that the alternative methods of compensation is thought of as a preferred method of habitat compensation.		

3.9	Mark re-initiated discussion on the offset strategy document and explained his goal of getting the document finalized and signed-off concurrently with the individual NNLPs being completed. Mark expressed that there are likely items which will need to be added or removed based on discussion in this meeting.		
3.10	Mark expounded on the timelines with the goal of getting both the Offset Strategy and the Schedule 2 NNLP issued in draft form within the next three weeks.	AMEC / RRR	May 31
3.11	Jason expanded on how the weighted useable area (WUA) was calculated. WUA is calculated by multiplying area by a weighted suitability value (WSV) which is determined based on the suitability of the waterbody for the fishery.		
3.12	Jason explained that for the Schedule 2 NNLP we are assuming that the habitat we are creating is only equal to that which we are removing, which is likely an underestimate of the WSV for the created habitat. In this manner the estimates for the Schedule 2 NNLP are conservative.		
3.13	Mark and Jason reviewed Table 4 which details the impacts and the compensation.		
3.14	Neville suggested either modifying Table 4 slightly or providing more text to explain the calculations of the net gains and the compensation ratios.		
3.15	Chris questioned if WSV's for the existing conditions are the same as those shown in the proposed compensation. Mark and Jason explained that the existing condition WUA values are actually calculated based on the WSV for reaches within each of the creek, thus they are not the same since one creek usually has numerous WSV's associated with it.		
3.16	Mark presented Table 5 (Section 35 offsets) and indicated that the credits for the offsets are currently to be determined and the goal of the discussion in the afternoon is to help determine how these final values will be determined.		
4.	<u>NNLP #1 – MMER Schedule 2 Impacts and Offsets</u>		
4.1	Jason introduced the document and stated that AMEC and RRR will attempt to make the document available to the working group by the end of the week.	AMEC / RRR	May 10
4.2	Jason reviewed the objectives section and specifically the hierarchy of compensation preferences. Mark expressed that based on the new guidance documentation recently released by DFO some of the text may change.		

4.3	Jason explained the approach of the NNLP which is to quantify the quality of habitat using the methodology of habitat units and habitat suitability which was originally introduced by the United States Fish and Wildlife Service (USFWS) in the 1980's. Jason then went on to explain the use of habitat units and weighted useable areas.		
4.4	Jason expressed that one main point Ken Minns made was to be all inclusive, especially on species present, and not to assume that species weren't present because they weren't caught during limited sampling sessions.		
4.5	Jason explained that species were assigned a species habitat weight which was based on abundance, trophic status, and fisheries importance.		
4.6	Abundance information was derived from data spanning 1997 to 2012, the sub-watershed habitat area/total habitat area incorporated into the Species Habitat Weight provides a method to include species not present in a watershed.		
4.9	Fisheries weight was calculated based on a fish being sportfish, baitfish, or other (assigned values of 3, 2, or 1 respectively). Similarly for trophic level piscivores were assigned a value of 2 and non-piscivores a value of 1.		
4.10	Neville, Steve, and Jason discussed the weighting of the abundance, fisheries, and trophic levels. Steve pointed out that fisheries and trophic may be slightly redundant, Neville suggested that perhaps abundance should be higher since new DFO policy seems to focus more on species present, Jason stated that these numbers can be modified. Jason explained to the group that the weighting provided was largely adopted from work that Ken Minns has performed in the past.		
4.11	Jason and Mark suggested the group look over the numbers and the weighting and provide suggestions.	Working Group	May 17
4.12	Jason explained the development of the Habitat Suitability Indices (HSI) and that a number of HSI's were obtained from USFWS, and Golder, and the rest were developed by AMEC based on fish habitat preferences from literature. He also explained how HSI's which AMEC developed used 5 categories, 3 of which are: optimal (1.0), sub-optimal (0.50), and unsuitable (0.0). The remaining 2 are intermediate values. A species final suitability index (SI) is the lowest of any of the assessed suitability indices.		
4.13	Jason suggested that everyone review the habitat types and provide comments as Ken Minns had questioned if certain types were necessary, specifically habitat type 9.	Working Group	May 17

4.14	Jason introduced the calculation for the WUA and explained that Ken Minns had suggested a simplification from our previous formula where the species weight by waterbody was removed. The simplified formula is the one now presented in the Schedule 2 NNLP.		
5.	<u>Lunch</u>		
6.	<u>Discussion of NNLP #2 General Section 35 Habitat Authorization</u>		
6.1	Jason presented a table summarizing the overprinted and offset areas for the Section 35 NNLP. Mark Explained that these numbers do not include roadways, pipe outlets, etc, which are expected to be able to be mitigated using standard best management practices.		
6.2	Jason and Nathan presented the treatment benefits and effects on productivity and explained that treatments are to be performed sequentially (i.e. exclusion fencing would not be performed without off-stream watering).		
6.3	Jason introduced assumptions for the habitat accounting. The first assumption is that there will be sufficient amounts of degraded watercourses to restore.		
6.4	Chris indicated that Dave May has performed an exercise using GIS to identify projects within the Pinewood River watershed. Chris said he thought Dave had identified approximately 30 sites from 100 m to 1000 m in length but Dave focused on streambank restoration projects.		
6.5	Mark suggested that due to the uncertainty as to potential restoration it may be best presented within a separate execution plan which would be provided after the NNLP. Neville stated that this could be done however RRR would need to provide a letter of credit for the estimated cost to perform the required restoration.		
6.6	Chris stated that there are three other major tributaries to the Rainy River which could also be examined for stewardship opportunities. Mark questioned if these other tributaries would fall within the territory of the same First Nations such that those involved in the Project would see direct benefit from the offsets. Chris said that he believed the same First Nations groups are present in the other watersheds.		
6.7	Chris will coordinate with Dave May and have Dave send the working group the information related to potential restoration sites.	Chris	May 17
6.8	Jason presented assumption #2 which is the post treatment suitability value equals the degraded condition suitability value plus the degraded condition suitability value times the percent treatment productivity increase.		

6.9	Jason presented assumption #3 which is that the proponent is credited for the reach weighted useable area in its degraded state plus the factor of productivity increase.		
6.10	Steve pointed out that this accounting may drive the projects selected to actually be in areas with the highest quality habitat as these areas would have the highest WSV and thus would get the highest WUA credit.		
6.11	Neville suggested that once RRR has submitted a letter of credit for stewardship activities then perhaps that money can be used to leverage other funds which would provide even a larger benefit to the Rainy River watershed.		
6.12	Chris asked if overprinted areas which are impacted by agriculture have had reduced suitability indices factored into them. Jason responded that it was assumed that all streams overprinted were not degraded. This was done in order to present a conservative area for the existing condition.		
6.13	Neville suggested that if the focus is solely on fish productivity increases then the socio-economic values are not captured being captured. Mark agreed and suggested that perhaps we can add a value into the WSV which would represent the socio-economic value.		
6.14	Neville suggested that the easiest scenario for permitting and costing, and least controversial method to do this, would be to provide an appropriate amount of direct funding (letter of credit) which would compensate for the habitat loss.		
6.15	Mark questioned how this cost would be calculated as it seems like there would still be a need to quantify the amount of fencing or other restoration which would be required to reach no net loss.		
6.16	Neville then indicated that perhaps an estimated cost to create traditional like-for-like habitat could be used to determine the amount for the letter of credit which could then be drawn upon as stewardship program funding.		
6.17	Chris clarified that Dave May had only looked at the main stem of the Pinewood and one or two tributaries when defining those 30 sites.		

6.18	<p>Mark summarized that AMEC will now evaluate two options:</p> <p>Option A – Attempt to establish habitat unit accounting for watershed restoration implementation and use this to determine costs for the program.</p> <p>Option B – Determine the cost to offset habitat loss through direct habitat creation, this dollar value would then be applied to a letter of credit of which the funds would be used for stewardship stream enhancement programs instead of being utilized to directly create habitat.</p>		
6.19	<p>Jason suggested that the group should now discuss the compensation ratio for calculating costs under option B.</p>		
6.20	<p>Neville indicated that there is probably enough built-in benefit under this scenario to justify a 1:1 ratio since the habitat being directly restored would be better than the existing condition.</p>		
6.21	<p>Mark indicated that AMEC would investigate the potential cost of implementing Option B.</p>	AMEC	May 17
6.22	<p>Neville expressed that he prefers the way the document is now broken into two parts as the MMER Schedule 2 amendment seems more rigid and the Section 35 is based more on policy and interpretation and is likely more flexible.</p>		
6.23	<p>Mark and Neville discussed the watercourse design which would be used to estimate the compensation cost under Option B. Mark indicated that it would be a channel designed with a low flow channel and connected to its floodplain at bankfull. Chris confirmed that most channels in the watershed are in clay and Mark stated that it would be assumed excavations to create/restore channels would simply be into clay.</p>		
6.24	<p>Neville asked about AMEC fisheries survey plans for 2013. Mark stated AMEC is planning on doing follow-up surveys for Walleye (with incidental catches of Lake Sturgeon to be reported). Neville asked about potential follow-up on creeks in which no fish were caught during previous surveys. Jason and Mark explained that since all species are included in the WSV for all of the creeks we have already assumed that all species are present in all watercourses and thus no surveys would be required in the creeks which have no current catch data. Neville was satisfied with regard to this for the NNL strategy and plans.</p>		
6.25	<p>Neville indicated that stream simulation design should be used for culvert sizing on any crossings if possible</p>		
6.26	<p>Neville noticed that Marr Creek was not specifically labeled in Figure provided of the site plan overlay of habitat.</p>		

7.	<u>DFO Comments on 2012 Aquatic Baseline Document</u>		
7.1	Item deferred to be discussed at a later date or through written response by Proponent.		
8.	<u>DFO File Transition</u>		
8.1	Item was deferred during the meeting as Neville was unsure of who would be designated to take over the project. During finalization of the minutes Neville was able to provide an update on this topic. The Rainy River Gold file will go to Sara Eddy in Burlington. Sara will be assigning the project to one of her biologists since the Edmonton office cannot handle anymore mine files at this time.		
9.	<u>Summary of Action Items</u>		
9.1	Issue both the Offset Strategy and the Schedule 2 NNLP issued in draft form within the next three weeks.	AMEC / RRR	May 31
9.2	AMEC and RRR will attempt to make the Schedule 2 NNLP document available to the working group by the end of the week.	AMEC / RRR	May 10
9.3	Jason and Mark informed the group that they can look over the numbers and the weighting and provide suggestions.	Working Group	May 17
9.4	Jason suggested that everyone review the habitat types and provide comments as Ken Minns had questioned if certain types were necessary, specifically habitat type 9. Upon review following the meeting Neville has indicated that he believes habitat type 9 should remain.	Working Group	May 17
9.5	Chris will coordinate with Dave May and have Dave send the working group the information related to potential restoration sites.	Chris	May 17
9.6	AMEC would investigate the potential cost of implementing Option B (cost of habitat replacement) based on standard channel section. The standard channel section will be based on West Creek and will be an enhanced version of habitat type 4.	AMEC	May 17

Ministry of
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Richesses naturellesTel: (807)274-5337
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July 16, 2013

Rainy River Resources Ltd.
1111 Victoria Avenue East
Thunder Bay, Ontario
P7C 1B7

Attention: Kyle Stanfield, Vice President, Environment and Sustainability

Subject: **Review of Draft Fish Habitat Offset Strategy (Revision A) and draft Fish Habitat No Net Loss Plan: MMER Schedule 2 Amendment Waterbodies**

Dear Kyle,

MNR received the draft Fish Habitat Offset Strategy and draft Fish Habitat No Net Loss Plan: Metal Mining Effluent Regulation (MMER) Schedule 2 Amendment Waterbodies. AMEC Environment and Infrastructure requested that MNR provide a review. We are pleased to provide comments on these documents and hope they may be helpful in preparation of final offset plans.

We note that it would be more efficient to receive future final drafts of all three complementary documents simultaneously, including the Fish Habitat No Net Loss Plan: Section 35(2), so that we may comment comprehensively on the entire proposed fish habitat offset approach.

Draft Fish Habitat Offset Strategy

- Consistent with RRR's response to MNR comments on the Rainy River Gold Project 2012 Aquatic Resources Baseline Report, the following statement in Section 1.0 Purpose - "*The creeks and streams that are present in the local area do not support a commercial or recreational fishery*" should be replaced with "*while limited bait fishing does occur within certain project area streams, the area does not support a significant commercial or recreational fishery*"
- Section 3.0 Environmental Effects: It is our preference that the term 'loss' be used over 'displacement' as it is a clearer and a more transparent description of impacts to fish habitat.
- Section 3.0 Environmental Effects – Flow Reductions (Pinewood River): First paragraph of this section discusses Pinewood River flows downstream of McCallum Creek while the second paragraph discusses flows at the junction of Loslo Creek and the Pinewood River. Two reviewers found this organization of flow predictions confusing. In the third paragraph, it is unclear whether the effluent discharge immediately downstream of McCallum Creek is accounted for in the flow reduction prediction at this location.

Office Hours 8:30 – 4:30 Monday to Friday
Closed 12:00 – 1:00

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- Section 3.0 Environmental Effects – Flow Reductions (Pinewood River): It should be clarified whether all flow reduction predictions provided apply at any particular point in time of year or are yearly averages. If yearly averages, these flow reduction predictions should be broken down by month in a tabular or graphic format.
- Given recent confirmation that mature lake sturgeon use the Pinewood River, the MNR requires predicted flow reductions in the lower reaches of the watershed (e.g. at the junction of the Kishkakoosis River and Pinewood River) be identified in this report.
- Lake Sturgeon should be added to Table 2: Fish Species Present in Affected Waterbodies.
- Figure 3: The reason for including '(Clark and West Creeks)' within the contents of the box titled 'Offset Impacts with 'Like for Like' Compensatory Offsets' should be clarified.
- MNR understands and accepts the reasons for pursuing both 'like for like' habitat compensation and alternative offset strategies. We continue to support plans to rehabilitate degraded stream habitats in the Pinewood River watershed.

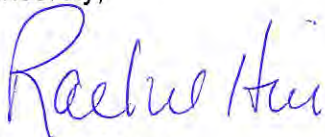
Draft Fish Habitat No Net Loss Plan: MMER Schedule 2 Amendment Waterbodies


- Subsection 3.3.2 Fishery Weight: The description of how fishery weights are assigned stated baitfish are ranked as 2 needs to be explained as the ranking is not consistent with Table 3-5 where some baitfish species have a ranking of 1. Clarification is needed.
- The planned average and maximum depths of West Creek Pond and Clark Creek Pond should be identified in the report.
- It would be helpful if total area of habitat types 3, 4 and 5 overprinted are identified in the report.
- We note habitat Types 3, 4 and 5 are overprinted by mine components and that offset habitat consists of a relatively larger proportion of habitat Type 5. Further rationale for considering large impoundments greater than 11 ha in area as Type 5 habitat, described as ponds 10-50 m wide, would be of value.
- Recognizing the expected changes in habitat types as described in the bullet above, the report could elaborate on the predicted changes to fish community composition and population sizes within the local study area.
- Section 6.0 Measures to Mitigate Impacts to Fish Habitat during Implementation of the Plan: We expect a stronger commitment to avoid direct impacts to fish during the mine construction phase. A description of fish-out protocols and a fish relocation strategy should be included. We also suggest that minimum vegetation buffers (no clear zones) along water bodies be specified and details of when and where specific erosion control measures will be applied.
- A description of measures to be taken, if any, to prevent blockage (beaver damming) of fish migration and dispersal routes throughout West Creek and Clark Creek diversion channels should be provided.

While not specifically a requirement of the Fisheries Act, the MNR suggests that Rainy River Resources consider access to and use of offset habitats by local baitfish harvesters.

Should you have any questions regarding this letter or require further clarification on any of the comments, please contact Christopher Martin, Management Biologist at (807) 274-8649 (Christopher.Martin@ontario.ca) or Rachel Hill, District Planner at (807) 274-8605 (Rachel.hill@ontario.ca).

Sincerely,



 Matthew Myers
Planning and Information Management Supervisor
Fort Frances District

Cc: Sara Eddy, DFO
Sasha McLeod, MOE
Neal Bennett, MNDM
Stephanie Davis, CEAA
Mark Ruthven, AMEC

/cm

Ministry of
Natural ResourcesMinistère des
Richesses naturellesTel: (807)274-5337
Fax: (807)274-4438

July 18, 2013

Rainy River Resources Ltd.
1111 Victoria Avenue East
Thunder Bay, Ontario
P7C 1B7

Attention: Kyle Stanfield, Vice President, Environment and Sustainability

Subject: **Review of 2013 Winter Aerial Survey for Mammals**

Dear Kyle,

Thank you for providing MNR with a copy of the report entitled Rainy River Gold Project 2013 Winter Aerial Survey for Mammals (May 2013). We hope the following comments are of value in preparing and revising the draft environmental assessment for the Rainy River Gold Project.

2013 Winter Aerial Survey for Mammals

- Section 2.0 Study Objectives: Please confirm if the intent was to identify species presence/absence, abundance, or habitat. The conclusions reached in this report are not linked to the study objectives.
- Section 3.2 Aerial Survey: Please identify if the surveyors/observers aware of the potential for elk in the area and if they were able to identify elk tracks correctly.
- Information such as the time since last snowfall, the amount of last snowfall, and lighting conditions at the time of the survey should be identified as this would affect the number of species and quality and quantity of tracks seen.
- Section 4.0 Results and Discussion: The report should explain how the authors determined 'no pattern or preference' to the distribution of white-tailed deer, wolf, red fox, and snowshoe hare tracks. Authors should also describe how the distribution for these species compared to simulated random track distributions.
- Please describe how pine marten tracks were distinguished from fisher tracks.
- Deer winter concentration areas have previously been mapped across the District by MNR and are available through LIO. The report should explain how deer observations from the survey compare to the known deer winter concentration areas (Stratum II high and Stratum I very high classification). It should be noted that one flight may be insufficient to draw meaningful conclusions about deer winter concentration areas.


Office Hours 8:30 – 4:30 Monday to Friday
Closed 12:00 – 1:00*"Your comments regarding our services are welcome at anytime"*

- As the survey did not follow MNR's accepted methodology for identifying and delineating winter habitat for white-tailed deer (Ranta, ed., 1998) we disagree with the statement that "there does not appear to be any preference shown by deer to those winter deer yarding areas...". Without an analysis of how snow conditions, winter severity and time of year affect deer use of available habitats, the conclusions drawn are unsupported.
- The statement "...deer and moose typically benefit from some level of disturbance as one of their preferred items are young saplings which grow in dense patches in areas that have been cleared by fire or as a result of activities such as forestry and mining" should be qualified. While these species do benefit from some level of forest disturbance, it is in conjunction with either natural or artificial regeneration of the forest shrub and tree species, not the absence of such as occurs during mine development and operation when habitat is cleared and removed from the landscape.
- Fort Frances District is home to both wolves and coyotes. Caution should be used when identifying canid tracks from the air as it is difficult to differentiate species based solely on tracks. As well, due to the complexity of canid genetics in the region, it is impossible to differentiate between gray wolves and eastern wolves solely from an aerial survey.

Should you have any questions regarding this letter or require further clarification on any of the comments, please contact Melissa Mosley, Management Biologist at (807) 274-8610 (Melissa.mosley@ontario.ca) or Rachel Hill, District Planner at (807) 274-8605 (Rachel.hill@ontario.ca).

Sincerely,



 Matthew Myers
Planning and Information Management Supervisor
Fort Frances District

Cc: Sasha Mcleod, MOE
Neal Bennett, MNDM
Stephanie Davis, CEAA
Sheila Daniels, AMEC

/mm

From: Hill, Rachel (MNR) [<mailto:rachel.hill@ontario.ca>]

Sent: Friday, July 19, 2013 3:25 PM

To: 'Kyle Stanfield'; Daniel, Sheila E

Cc: 'Davis, Stephanie [CEAA]'; McLeod, Sasha (ENE); Bennett, Neal (MNDM); Mosley, Melissa (MNR); Martin, Christopher (MNR); 'Eddy, Sara'

Subject: MNR review of NNLP and mammal survey reports

Hi Kyle and Sheila,

Attached are the reviews from MNR for the No Net Loss Plan as well as the Aerial Mammal Survey.

Thanks
Rachel

From: Daniel, Sheila E
Sent: Wednesday, July 24, 2013 1:18 PM
To: 'McLeod, Sasha (ENE)'
Cc: TC111504; Agarwal, Sushant (ENE); Davis, Stephanie (CEAA); kstanfield@rainyriverresources.com;
Simms, David; Russell, Dan
Subject: RE: Request air dispersion modelling files for Rainy River EA

Yes we can provide this information. Our team will put together a zip file with the expected MOE needs and will send you a link to a FTP site when the file is available. We expect to be able to provide that on Friday or Monday, the latest.

Best regards,

Sheila Daniel

Tel: 905-568-2929 x 4123
Direct: 905-568-1917 x 4123, Mobile: 416-524-5928
sheila.daniel@amec.com

From: McLeod, Sasha (ENE) [<mailto:Sasha.McLeod@ontario.ca>]
Sent: Wednesday, July 24, 2013 10:45 AM
To: kstanfield@rainyriverresources.com; Daniel, Sheila E
Cc: Agarwal, Sushant (ENE); Davis, Stephanie (CEAA)
Subject: Request air dispersion modelling files for Rainy River EA

Hi Sheila and Kyle,

MOE's air reviewers are wondering if AMEC could provide us with air dispersion modelling input and output files. Please let me know if this is something you can provide to us or add to your website containing the draft EA. If not, please let us know when they might be available to reviewers.

Thank you,
Sasha

Sasha McLeod
Project Officer
Environmental Approvals Branch
Ontario Ministry of the Environment
2 St. Clair Avenue West, Floor 12A
Toronto, ON M4V 1L5
416-314-8214
sasha.mcleod@ontario.ca

From: Kyle Stanfield [<mailto:kstanfield@rainyriverresources.com>]
Sent: Thursday, July 25, 2013 11:04 AM
To: 'rachel.hill@ontario.ca'; 'stephanie.davis@ceaa-acee.gc.ca'
Cc: 'Sasha.McLeod@ontario.ca'; Daniel, Sheila E; 'Neal.Bennett@ontario.ca'; 'Rob.Dobos@ec.gc.ca'; 'Dan.McDonell@ec.gc.ca'; 'Rosanna.Massimi@ec.gc.ca'; 'hhampton@fasken.com'
Subject: Re: RRGP EA TOC and July Delivery method

Hello Rachel and thanks for your note.

The section you have indicated from the Approved Terms of Reference is accurate and describes which tailings management alternatives to be assessed in the environmental assessment. The alternatives evaluation methodology itself is presented earlier in Approved Terms of Reference in Section 5.2. The methodology described therein has been applied to all of the alternative methods for the Rainy River Gold Project and is not unique to the tailings management.

I hope this is helpful.

Best, Kyle

Regards,

Kyle Stanfield P.Eng.
Vice President, Environment & Sustainability

Rainy River Resources Ltd.

o: +1 807 623 1540
m: +1 807 621 6152
f: +1 807 623 0974

From: Hill, Rachel (MNR) [<mailto:rachel.hill@ontario.ca>]
Sent: Tuesday, July 23, 2013 04:57 PM
To: Kyle Stanfield; Davis,Stephanie [CEAA] <Stephanie.Davis@ceaa-acee.gc.ca>
Cc: McLeod, Sasha (ENE) <Sasha.McLeod@ontario.ca>; Daniel, Sheila E <sheila.daniel@amec.com>; Bennett, Neal (MNDM) <Neal.Bennett@ontario.ca>; Dobos,Rob [Burlington] <Rob.Dobos@ec.gc.ca>; McDonell,Dan [Burlington] <Dan.McDonell@ec.gc.ca>; Massimi,Rosanna [NCR] <Rosanna.Massimi@ec.gc.ca>
Subject: RE: RRGP EA TOC and July Delivery method

Kyle, is this the section of the ToR you are referring to?
Rachel

Tailings Management Alternative Methods

The alternatives to be considered in the EA for tailings slurry management include:

- Selection of a site immediately northwest of the open pit; and
- Selection of a more remote tailings site (potentially on lands held by others).

The principal criteria for selection of the TMA arrangement are the following:

- Select an area within reasonably close proximity to the mine site to minimize the overall Project environmental footprint and to achieve economic efficiencies of operation;
- Provide for all tailings storage in a single location;
- Position the TMA in a manner such that drainage from the system can be collected and managed in an integrated manner, in accordance with MMER and Provincial environmental approval requirements;
- Provide for an optimal operations and reclamation scenario for potential ARD management using passive systems to the extent possible, but with an allowance for contingency chemical treatment if required;
- Minimize potential adverse effects to aquatic and terrestrial habitats, including to SAR, recognizing the need to capture a sufficient area of upstream watershed so as to be able to maintain a water cover on the deposited tailings to minimize oxygen exposure and prevent ARD development; and
- Land tenure and existing / potential land uses.

A number of other possible areas for tailings storage are potentially available in the general Project area although potentially subject to land acquisition. All of these potential alternative sites suffer from the disadvantage of either lacking capacity, or being more remote from the open pit and plant site, and therefore more difficult to integrate with other site operations (particularly in regards to water management aspects; see Section 5.4.3). For these reasons, the site to the northwest of the pit is being advanced as the preferred alternative.

Consideration in the EA will also be given to alternative tailings deposition methods, such as thickened tailings and use in mine backfill that have been used at other mining operations.

A comprehensive assessment of mineral waste management alternatives will be provided in the EA, consistent with the alternatives assessment requirements associated with the Federal MMER and in accordance with the Guidelines for the Assessment of Alternatives for Mine Waste Disposal (Environment Canada 2011).

From: Kyle Stanfield [<mailto:kstanfield@rainyriverresources.com>]
Sent: Tuesday, July 23, 2013 3:21 PM
To: Davis,Stephanie [CEAA]
Cc: McLeod, Sasha (ENE); Daniel, Sheila E; Bennett, Neal (MNDM); Hill, Rachel (MNR); Dobos,Rob [Burlington]; McDonell,Dan [Burlington]; Massimi,Rosanna [NCR]
Subject: RE: RRGP EA TOC and July Delivery method

Hello Stephanie - The alternatives assessment presented in the Draft Environmental Assessment Report has been prepared using the methodology that was commented and agreed to as part of the Individual Environmental Assessment Terms of Reference. It has been presented in this format as part of the Draft EA report document so we can obtain feedback from Aboriginal groups, the general public and agencies with comments to be used to finalize the Assessment for Alternatives for Tailings and Mine Rock Storage being developed following the MMER required format.

We certainly recognize that EC will require more detailed information in support of this aspect (multiple accounts analysis for example) but would appreciate any feedback on the contents of the Draft EA report during this phase of the process. We could also issue a draft Alternatives Assessment Report to EC in advance of the Final EA Report, in early September.

Hope that helps.

Regards, Kyle



Kyle L. Stanfield P.Eng.
Vice President, Environment & Sustainability

T 807 623 1540 | C 807 621 6152 | F 807 623 0974 | kstanfield@rainyriverresources.com
Rainy River Resources Ltd., 1111 Victoria Avenue East, Thunder Bay, Ontario, Canada P7C 1B7

From: Davis,Stephanie [CEAA] [<mailto:Stephanie.Davis@ceaa-acee.gc.ca>]
Sent: Tuesday, July 23, 2013 9:32 AM
To: Kyle Stanfield
Cc: McLeod, Sasha (ENE); Daniel, Sheila E; Bennett, Neal (MNDM); Hill, Rachel (MNR); Dobos,Rob [Burlington]; McDonell,Dan [Burlington]; Massimi,Rosanna [NCR]
Subject: RE: RRGP EA TOC and July Delivery method

Hi Kyle,

EC has mentioned Appendix P- Assessment of Alternatives for Tailings and Mine Rock Storage isn't in their version of the draft report.

They have concerns this will seriously hinder their ability to complete a preliminary review. Also, they noted that in other projects the alternatives assessment has been an area which has needed to be revisited and rewritten.

My understanding is that it was going to be included in this version of the draft. If there has been a mistake, can you please release it for review? If more time is needed to complete the assessment, can you give us a date of when it will be released relative to the submission of the final EA/EIS? EC is very eager to see a version as soon as it is available so they can provide comments in advance of the official submission.

As you can imagine, having this info now will strengthen the draft review and minimize issues down the road.

Kind Regards,
Stephanie

From: Kyle Stanfield [<mailto:kstanfield@rainyriverresources.com>]
Sent: May 30, 2013 4:45 PM
To: 'ross.lashbrook@ontario.ca'; Davis,Stephanie [CEAA]; 'Neal.Bennett@ontario.ca'
Cc: 'sheila.daniel@amec.com'
Subject: Re: RRGF EA TOC and July Delivery method

Thanks Ross.

Our intention is to provide these documents along with the Draft EA also to provide for agency review/commentary as suitable.

Best, Kyle

Regards,

Kyle Stanfield,
Vice President, Environment & Sustainability

Rainy River Resources Ltd.

o: +1 807 623 1540
m: +1 807 621 6152
f: +1 807 623 0974

From: Lashbrook, Ross (ENE) [<mailto:Ross.Lashbrook@ontario.ca>]
Sent: Thursday, May 30, 2013 04:42 PM
To: Kyle Stanfield; Davis,Stephanie [CEAA] <Stephanie.Davis@ceaa-acee.gc.ca>; Bennett, Neal (MNDM) <Neal.Bennett@ontario.ca>
Cc: Daniel, Sheila E <sheila.daniel@amec.com>
Subject: RE: RRGF EA TOC and July Delivery method

Hi Kyle,

Thanks for this. I'm canvassing our MOE review team regarding paper copies and will get back to you shortly.

I've noted that a number of the Appendices will not be available for the draft EA stage. Some of these are of specific interest to MOE and others – is there any way that the agencies would be able to provide input on those documents before the formal submission of the final EA?

U Assessment of Alternatives for Tailings and Mine Rock Storage - *not available for draft*

V Air Quality Modelling Report - *not available for draft*

W Sound and Vibration Modelling Report - *not available for draft*

X Contingency and Response Plan - *under development*

Thanks,
Ross.

Ross Lashbrook I Supervisor I Ontario Ministry of the Environment I T: 416.314.7765 E: ross.lashbrook@ontario.ca

From: Kyle Stanfield [<mailto:kstanfield@rainyriverresources.com>]

Sent: May-28-13 3:30 PM

To: Davis,Stephanie [CEAA]; Lashbrook, Ross (ENE); Bennett, Neal (MNDM)

Cc: Daniel, Sheila E

Subject: RRGP EA TOC and July Delivery method

Good afternoon – To assist government agencies with their review planning, attached is a copy of the DRAFT EA Table of Contents.

Due to the size of the document (nearly 7,000 pages including Appendices), we will be issuing the document to the government agencies in PDF format and can make a certain number of copies available where necessary.

Thanks, Kyle



Kyle L. Stanfield P.Eng.

Vice President, Environment & Sustainability

T 807 623 1540 | C 807 621 6152 | F 807 623 0974 | kstanfield@rainyriverresources.com

Rainy River Resources Ltd., 1111 Victoria Avenue East, Thunder Bay, Ontario, Canada P7C 1B7



Fisheries
and Oceans

Pêches
et Océans

**Fisheries Protection
Program**

867 Lakeshore Road
P.O. Box 5050
Burlington, Ontario
L7R 4A6

**Programme de protection de
pêches**

867, chemin Lakeshore
C.P. Box 5050
Burlington (Ontario)
L7R 4A6

Your file *Votre référence*

Our file *Notre référence*

KE-12-0963

July 31, 2013

Mark Ruthven
AMEC Environment and Infrastructure
160 Traders Blvd E., Suite 110
Mississauga, ON L4Z 3K7

Dear Mark,

SUBJECT: Rainy River Resources Limited, Rainy River Gold Project, Draft Offset Strategy and No Net Loss Plan MMR Schedule 2

Fisheries and Oceans Canada (DFO) appreciates the opportunity to provide additional comments on the Rainy River Gold Project Draft Fish Habitat Offset Strategy – Revision A, May 2013 and Fish Habitat No Net Loss Plan MMR Schedule 2 Amendment Waterbodies – Draft, May 2013. DFO previously submitted comments on May 15, 2013.

General Comments

The discussion and figures in both documents identify Clark Creek as being overprinted by mine infrastructure and requiring scheduling under the Metal Mining Effluent Regulations (MMER). Please be advised that the proposed on-line dam/pond construction and subsequent relocation/diversion of Clark Creek to a nearby tributary of the Gallinger Creek system will be subject to authorization under subsection 35(2) of the *Fisheries Act*. The proposed dewatering of Marr Creek downstream the Tailings Impoundment Area will also be subject to authorization under subsection 35(2) of the *Fisheries Act*. Both the Offsetting Strategy and No Net Loss Plan reports will need to be adjusted accordingly.

Draft Fish Habitat Offset Strategy

- 4.0 Offset Strategy – note that the serious harm provisions of the amended *Fisheries Act* have not yet come into force
- 4.0 Offset Strategy – note that offset requirements for the infill in fish habitat from the construction of containment dams/berms for mine infrastructure components are subject to subsection 35(2) of the *Fisheries Act*; the Authorization for these impacts related to the Tailings Impoundment Area (TIA) containment berm(s) will only be issued following listing of the associated waterbodies under Schedule 2 of the MMER.

Canada

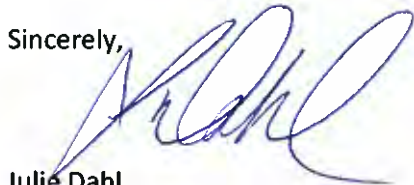
- 4.0 Offset Strategy – regarding the alternative approach to offsetting, DFO will need to see a scientifically defensible approach and quantifiable link to compensating for impacts to the fish communities affected by this project. More detail and discussion is required.

Fish Habitat No Net Loss Plan MMER Schedule 2 Amendment Waterbodies - Draft

- 1.0 Introduction – note that the new serious harm provisions of the *Fisheries Act* have not yet come into force.
- 2.0 Overview of Approach to No Net Loss Planning – it is stated that not all losses will be immediate and that offset works are likely to be completed throughout the life of the mine and possibly through closure. Given that an approved habitat compensation plan must be in place prior to initiating deposits to a tailings impoundment area, please describe the timing of construction for the proposed off-setting measures in relation to project phasing.
- 3.4 Habitat Suitability – please provide a clear rationale for why Lake Sturgeon has not been considered further.
- 6.0 Measures to Mitigate Impacts to Fish Habitat during Implementation of the Plan – mitigation measures regarding intakes/outfalls, fish screens and fish salvage should be included.
- 7.0 Measures Taken to Monitor the Implementation of the Plan – last paragraph should note that the monitoring will be to ensure constructed habitat is consistent with the proposed plan and scheduling under MMER; please note that for waterbodies subject to MMER, subsection 35(2) Fisheries Act authorizations are not required.

Should you have any questions on the above or to discuss these draft plans further, please contact Sara Eddy at 905-336-4535 or Sara.Eddy@dfo-mpo.gc.ca.

Sincerely,



Julie Dahl
Manager, Regulatory Review

Copy:

Sara Eddy, DFO
Dan McDonnell, Environment Canada
Rachel Hill, MNR

From: Eddy, Sara [<mailto:Sara.Eddy@dfo-mpo.gc.ca>]
Sent: July-31-13 2:27 PM
To: Ruthven, Mark C
Cc: Dahl, Julie; Dan.McDonell@ec.gc.ca; rachel.hill@ontario.ca
Subject: DFO Comments - Rainy River Gold Mine

Mark,

Please see attached Fisheries and Oceans Canada's additional comments on the draft Rainy River Offsetting Strategy and No Net Loss Plan MMR Schedule 2 Waterbodies.

Thanks,
Sara

Sara Eddy

905 336-4535 | Fax/télécopieur: 905 336-6285

Sara.Eddy@dfo-mpo.gc.ca

Senior Fisheries Protection Biologist | Biologiste principal, protection des pêches

Fisheries Protection Program | Programme de Protection des Pêches

Central and Arctic Region | Région du Centre et de l'Arctique

Fisheries and Oceans Canada | 867 Lakeshore Road, PO Box 5050, Burlington ON L7R 4A6

Pêches et Océans Canada | Boîte postale 5050, 867, ch. Lakeshore, Burlington ON L7R 4A6

Government of Canada | Gouvernement du Canada

Fisheries and Oceans Canada has changed the way new project proposals (referrals), reports of potential *Fisheries Act* violations (occurrences) and information requests are managed in Central and Arctic Region (Alberta, Saskatchewan, Manitoba, Ontario, Nunavut and the Northwest Territories). Please be advised that general information regarding the management of impacts to fish and fish habitat and self-assessment tools (e.g. Operational Statements) that enable you to determine *Fisheries Act* requirements are available at DFO's "Working Near Water" website at www.dfo-mpo.gc.ca/habitat. For all occurrence reports, or project proposals where you have determined, following self-assessment, that you cannot avoid impacts to fish and fish habitat, please submit to fisheriesprotection@dfo-mpo.gc.ca. For general inquiries you can also call 1 855 852-8320.

From: Stacey Jack
Sent: July-31-13 3:57 PM
To: Davis, Stephanie [CEAA] (Stephanie.Davis@ceaa-acee.gc.ca)
Cc: Kyle Stanfield
Subject: RRGP VEC and ROC Reports to July 1 2013

Hi Stephanie;

Please find attached the VEC and ROC reports for the Rainy River Gold Project. These reports are current to July 1, 2013.

If you have any questions regarding either report, please contact me at your convenience.

Sincerely,

Stacey



Stacey Jack
Community Coordinator

T 807 482 2501 | F 807 482 2834 | sjack@rainyriverresources.com

Rainy River Resources Ltd., 5967 Highway 11/71, PO Box 5, Emo, ON P0W 1E0

From: Kyle Stanfield [<mailto:kstanfield@rainyriverresources.com>]
Sent: Monday, August 12, 2013 10:38 AM
To: Davis, Stephanie [CEAA] <Stephanie.Davis@ceaa-acee.gc.ca>; McLeod, Sasha (ENE) <Sasha.McLeod@ontario.ca>
Cc: Daniel, Sheila E
Subject: FW: RRGP: Air files for MOE

Good morning – Please note the below.

Thanks



Kyle L. Stanfield P.Eng.
Vice President, Environment & Sustainability

T 807 623 1540 | C 807 621 6152 | F 807 623 0974 | kstanfield@rainyriverresources.com
Rainy River Resources Ltd., 1111 Victoria Avenue East, Thunder Bay, Ontario, Canada P7C 1B7

From: Russell, Dan [<mailto:dan.russell@amec.com>]
Sent: Monday, July 29, 2013 9:01 AM
To: Kyle Stanfield
Cc: Daniel, Sheila E; Van der Vooren, Tony
Subject: FW: RRGP: Air files for MOE

Good morning Kyle,

The air dispersion modeling files have been placed on the following FTP site, and are available for the MOE to download. If you would like me to send a note along to them instead of notifying them yourself, please let me know and I would be happy to do so.

Regards,
Dan.

Dan Russell, P.Geo.
Senior Environmental Geoscientist
AMEC Environment & Infrastructure
Environmental Management Group
160 Traders Blvd. East, Suite 110
Mississauga, ON L4Z 3K7
Tel 905.568.2929 x4162
Cell 416.458.1699
dan.russell@amec.com | amec.com

From: Russell, Dan
Sent: Monday, August 12, 2013 10:12 AM
To: Simms, David; Dan.McDonell@ec.gc.ca <Dan.McDonell@ec.gc.ca>
Cc: Sasha.McLeod@ontario.ca <Sasha.McLeod@ontario.ca>; Dobos,Rob [Burlington] <Rob.Dobos@ec.gc.ca>; Stephanie.Davis@ceaa-acee.gc.ca <Stephanie.Davis@ceaa-acee.gc.ca>; Kyle Stanfield <kstanfield@rainyriverresources.com>; Daniel, Sheila E
Subject: RE: Requested climate change report

A copy of the report has been posted on the FTP site below, within the "Climate Change" folder.

Regards,
Dan.

Dan Russell, P.Geo.
Senior Environmental Geoscientist
AMEC Environment & Infrastructure
Environmental Management Group
160 Traders Blvd. East, Suite 110
Mississauga, ON L4Z 3K7
Tel 905.568.2929 x4162
Cell 416.458.1699
dan.russell@amec.com | amec.com

From: Simms, David
Sent: August-12-13 09:47
To: Dan.McDonell@ec.gc.ca
Cc: Sasha.McLeod@ontario.ca; Dobos,Rob [Burlington]; Stephanie.Davis@ceaa-acee.gc.ca; Kyle Stanfield; Daniel, Sheila E; Russell, Dan
Subject: Requested climate change report

Dan

We have a copy of the report but it is too large to e-mail. Will place on an ftp site.

Dave

Your '**standard**' FTP site has been set-up and a 'Test' folder created to ensure everything is working well.

You can use your FTP (file transfer protocol) site to exchange large files with colleagues and clients without using email.

To open your FTP site



Meeting Minutes

MEETING TOPIC:

Meeting Date:	August 12, 2013	Location:	CEAA Ontario Boardroom 312, 55 St. Clair Avenue East, Suite 907, Toronto, ON M4T 1M2
Meeting Time:	13:00 – 15:00	Teleconference Dial-in Number:	N/A
Organizer Contact Information	Name: Stephanie Davis, CEAA Email: stephanie.davis@ceaa-acee.gc.ca		
Participants:	Stephanie Davis CEAA Amy Liu CEAA Jill Aitken CEAA Sasha McLeod MOE Sheila Daniel AMEC Kyle Stanfield Rainy River Resources	Regrets:	Dave Simms AMEC

Purpose: To discuss EA process, the draft Environmental Assessment Report (EAR) review, and the project timeline

Outcome:

- An updated EA schedule
- A thorough understanding of the next steps prior to the formal submission of the EAR

AGENDA

Item	Topic	Speaker	Time
1	Introductions	All	13:00-13:05
2	Update on draft EAR review <ul style="list-style-type: none"> • Feedback from CEAC meeting • Need for future meetings • Technical working groups 	SD (CEAA) SM (MOE)	13:05-13:15
3	Update from RRR <ul style="list-style-type: none"> • Aboriginal consultation activities • Status of New Gold deal 	KS (RRR)	13:15-13:30
4	Discussion of EA schedule <ul style="list-style-type: none"> • Current schedule • Proposed schedule that aligns decisions 	All	13:30-14:15
5	Next steps for draft EAR review <ul style="list-style-type: none"> • Technical meetings • Comment response tables • Incorporation of Aboriginal comments and baseline information • Draft review of Appendix P (Assessment of Alternatives for Tailings and Mine Rock Storage) 	All	14:15-14:45
6	Closing remarks	All	14:45-15:00



ACTION ITEMS & NOTES

Item	Action By
Item 1	
<ul style="list-style-type: none"> N/A 	
Item 2	
<ul style="list-style-type: none"> AMEC to send MOE contacts for technical working groups that RRR has been working with 	Sheila (AMEC)
<ul style="list-style-type: none"> The Agency and MOE will aim to provide RRR/AMEC with draft comments on draft EA to proponent as appropriate prior to Aug 29 deadline for comments. This will depend on how early departments send their comments in. RRR should note these are draft comments for information and they may change prior to official submission. 	Sasha (MOE) and Steph (CEAA)
<ul style="list-style-type: none"> Ask federal-provincial review team about scheduling technical working group meetings with RRR/AMEC in September 	Sasha (MOE) and Steph (CEAA)
<ul style="list-style-type: none"> Provide RRR with further details on comments on draft EA from CEAA Aboriginal advisor and provide to AMEC 	Steph (CEAA)
Item 3	
<ul style="list-style-type: none"> Provide to MOE and CEAA a date for when new proponent name will be made public 	Kyle (RRR)
<ul style="list-style-type: none"> Provide Dillon report (of First Nations comments on draft EA) to MOE and CEAA when available 	Kyle (RRR)
Item 4	
<ul style="list-style-type: none"> Reformat work plan and provide to MOE and CEAA for review 	Sheila (AMEC)
Topic 5	
<ul style="list-style-type: none"> Provide Appendix P to federal-provincial review team as soon as available 	Sheila (AMEC)/ Kyle (RRR)
Topic 6	
<ul style="list-style-type: none"> N/A 	
<p>EIS – Environmental Impact Statement (federal) EA – Environmental Assessment (provincial) EAR – Environmental Assessment Report, the combined EIS/EA report that incorporates federal and provincial assessment requirements.</p>	

CORPORATION OF THE TOWNSHIP OF CHAPPLE

P.O. Box 4
BARWICK, ONTARIO POW 1A0
Phone 807-487-2354 Fax 807-487-2406

OFFICE OF THE CLERK-TREASURER
e-mail: chapple@tbaytel.net

August 19, 2013

VIA EMAIL: comments@rainyriverresources.com

Rainy River Resources Ltd.
1111 Victoria Avenue East
Thunder Bay, Ontario
P7C 1B7

Re: Rainy River Gold Project – Environmental Assessment Report Review

Dear Kyle Stanfield:

The Township of Chapple would like to thank you for the opportunity to make comments on the Draft Environmental Assessment Report. It is a very lengthy document and concern has been expressed over insufficient time to truly do an in depth review.

As you will recall, at a special meeting held December 5, 2012, the Township of Chapple presented a list of impacts and/or concerns for the municipality in the event that a mine be developed. At that time, you advised Council that a majority of their concerns would be addressed in the Environmental Assessment.

In reviewing the Draft Environmental Assessment Report, we were unable to find references to the following issues:

- Loss of Richardson Gravel Pit
- Municipal Petition Drains
- Loss of Assessment vs Gain of Assessment - financial impact to the municipality
- Impact to municipal road system
- Legacy Fund



The Township of Chapple would respectfully request a meeting in the near future with yourself and Andrea Bourrie/Planner to discuss these outstanding issues.

Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in cursive script that reads "Peggy Johnson". The signature is written in black ink and is positioned above the typed name and title.

Peggy Johnson, CMO
CAO/Clerk Treasurer

From: Daniel, Sheila E
Sent: August-20-13 9:10 AM
To: Hill, Rachel (MNR)
Cc: TC111504; 'Davis,Stephanie [CEAA]'; McLeod, Sasha (ENE); Bennett, Neal (MNDM); Mosley, Melissa (MNR); Martin, Christopher (MNR); 'Eddy, Sara'; 'Kyle Stanfield'; Evans, Matt R; Russell, Dan
Subject: Response to MNR review 2013 Aerial Mammal Survey Report

On behalf of Kyle Stanfield, Rainy River Resources, please find attached our response to your comments on the 2013 Aerial Survey Report for the Rainy River Gold Project (issued as Baseline Report B21 and Appendix J-5 of the Draft EA Report). The addendum will be included with future issuances of the report.

Best regards,

Sheila Daniel, M.Sc., P.Geol.
Senior Associate Geoscientist;
Head Environmental Management
AMEC

Environment & Infrastructure
160 Traders Blvd. East, Suite 110, Mississauga ON Canada L4Z 3K7
Tel: 905-568-2929 x 4123
Direct: 905-568-1917 x 4123, Mobile: 416-524-5928
sheila.daniel@amec.com
amec.com

Business sustainability starts here... AMEC supports SOS Children

From: Hill, Rachel (MNR) [mailto:rachel.hill@ontario.ca]
Sent: Friday, July 19, 2013 3:25 PM
To: 'Kyle Stanfield'; Daniel, Sheila E
Cc: 'Davis,Stephanie [CEAA]'; McLeod, Sasha (ENE); Bennett, Neal (MNDM); Mosley, Melissa (MNR); Martin, Christopher (MNR); 'Eddy, Sara'
Subject: MNR review of NNLP and mammal survey reports

Hi Kyle and Sheila,

Attached are the reviews from MNR for the No Net Loss Plan as well as the Aerial Mammal Survey.

Thanks
Rachel

Stakeholder: Ministry of Natural Resources
Point of Contact: c/o Rachel Hill or Matt Myers, Ministry of Natural Resources
Comments received: July 19, 2013
Comments regarding: RRGP 2013 Winter Aerial Survey for Mammals Report

#	COMMENT (abbreviated)	RRR RESPONSE
1	Section 2.0 Study Objectives: Please confirm if the intent was to identify presence/absence, abundance, or habitat. The conclusions reached in this report are not linked to the study objectives.	The intent of the 2013 aerial survey was to confirm the presence / absence of mammal species within the Project Study Area and to identify the locations of habitat areas used by these species. Identifying the locations of animals and their tracks helps to provide evidence of the presence of significant wildlife habitat within the Local Study Area.
2	Section 3.2 Aerial Survey: Please identify if the surveyors/observers aware of the potential for elk in the area and if they were able to identify elk tracks correctly.	<p>Elk were one of the focal species for this survey. Megan Hazell, M.Sc. (AMEC) was the project advisor for this survey; Megan was one of the lead biologists in Ontario's elk reintroduction program and studied elk in the region for four years.</p> <p>Observers were aware of the presence of elk within the Rainy River District resulting from the release of 104 animals near Cameron Lake. The Chronicle Journal reported on October 20, 2012 that elk had been seen as far east as Barwick. Local farmers have told AMEC staff that elk have occurred within a few kilometres of the western boundary of the proposed Project footprint, but they have not been observed east of North Branch.</p> <p>One of the observers (Dr. Evans) worked in Banff National Park for several years and is very familiar with elk tracks. If there had been any questions regarding potential elk tracks, the survey crew could have landed and taken a closer examination, including measurements and photos if necessary.</p>

#	COMMENT (abbreviated)	RRR RESPONSE
3	Information such as the time since last snowfall, the amount of last snowfall, and lighting conditions at the time of the survey should be identified as this would affect the number of species and quality and quantity of tracks seen.	<p>Snow conditions and weather conditions were ideal for a snow tracking survey. Snow last fell on the study area three days prior to the survey and there was little to no wind between last snowfall and the survey. There were no periods of melting and freezing during this time either.</p> <p>At the time of the survey, weather and light conditions were also ideal: clear, sunny, no wind. Tracks were readily detectable in a base of 60 to 90 centimetres of snow.</p>
4	Section 4.0 Results and Discussion: The report should explain how the authors determined 'no pattern or preference' to the distribution of white-tailed deer, wolf, red fox, and snowshoe hare tracks. Authors should also describe how the distribution for these species compared to simulated random track distributions.	The statement of no pattern or preference was the opinion of the field staff based on their field observations, only. An addendum will be issued clarifying the observation.
5	Please describe how pine marten tracks were distinguished from fisher tracks.	An addendum will be issued indicating that the marten tracks are <i>Martes sp.</i> to represent the possibility of those tracks belonging to either species.
6	Deer winter concentration areas have previously been mapped across the District by MNR and are available through LIO. The report should explain how deer observations from the survey compare to the known deer winter concentration areas (Stratum II high and Stratum I very high classification). It should be noted that one flight may be insufficient to draw meaningful conclusions about deer winter concentration areas.	<p>Shapefiles for deer winter concentration areas have been provided to AMEC by the MNR and are presented in Figure 6 of the report (and in the RRGP Draft EA Report).</p> <p>Also, LIO and the Forestry Management Plan for the Crossroute Forest indicate that Stratum I deer yarding areas exist within all intact forest communities occurring within the Local Study Area.</p> <p>The results of our aerial survey correspond to this LIO distribution within forested areas. Our results also indicate considerable use of open agricultural areas. Recorded data (this aerial survey plus four years of baseline surveys for the RRGP) indicates that deer are abundant in the Local Study Area and that they utilize both forest and agricultural habitat even in mid-winter (February 20).</p>

#	COMMENT (abbreviated)	RRR RESPONSE
7	As the survey did not follow MNR's accepted methodology for identifying and delineating winter habitat for white-tailed deer (Ranta, ed., 1998) we disagree with the statement that "there does not appear to be any preference shown by deer to those winter deer yarding areas...". Without an analysis of how snow conditions, winter severity and time of year affect deer use of available habitats, the conclusions drawn are unsupported.	Winter deer yard habitat was provided to RRR by the Fort Frances MNR and is presented in Figure 6. As a result, the methods outlined in Ranta (1998) were not used by AMEC to delineate winter habitat for deer.
8	The statement "...deer and moose typically benefit from some level of disturbance as one of their preferred items are young saplings which grow in dense patches in areas that have been cleared by fire or as a result of activities such as forestry and mining" should be qualified. While these species do benefit from some level of forest disturbance, it is in conjunction with either natural or artificial regeneration of the forest shrub and tree species, not the absence of such as occurs during mine development and operation when habitat is cleared and removed from the landscape.	It is anticipated that clearing of forest for the installation of the transmission line alignment to the mine may create modest browsing opportunities for moose and deer as woody browse vegetation will regenerate along this corridor. This statement will be clarified in an addendum to the report.
9	Fort Frances District is home to both wolves and coyotes. Caution should be used when identifying canid tracks from the air as it is difficult to differentiate species based solely on tracks. As well, due to the complexity of canid genetics in the region, it is impossible to differentiate between gray wolves and eastern wolves solely from an aerial survey.	An addendum will be issued indicating that the wolf sighting and the wolf tracks recorded are <i>Canis sp.</i>

ERRATUM

The following erratum has been prepared in response to comments received on the final 2013 Winter Aerial Survey for Mammals Baseline Report from regulatory agencies.

Section 4 Results and Discussion

P.3: It should be noted that the statement of no pattern or preference to the distribution of white-tailed deer, wolf, red fox, and snowshoe hare tracks was the opinion of the field staff based on field observations only.

P.3: The marten tracks recorded should be identified as *Martes sp.* to represent the possibility of those tracks belonging to other marten species.

P.3 To clarify the statement in the report "*...deer and moose typically benefit from some level of disturbance as one of their preferred items are young saplings which grow in dense patches in areas that have been cleared by fire or as a result of activities such as forestry and mining*"; it is anticipated that clearing of forest for the installation of the transmission line alignment to the mine may create modest browsing opportunities for moose and deer as woody browse vegetation will regenerate along this corridor.

P.3 As the Fort Frances District is home to both wolves (gray and eastern) and coyotes, the wolf sighting and the wolf tracks should be recorded as *Canis sp.*

From: Daniel, Sheila E
Sent: August-22-13 12:18 PM
To: 'Davis, Stephanie [CEAA]'
Cc: TC111504; 'Kyle Stanfield'; McLeod, Sasha (ENE); Russell, Dan
Subject: R1: Response to EC Comments on Closure Presentation

On behalf of Kyle Stanfield of Rainy River Resources (RRR), please pass along the attached RRR response to EC comments regarding the Closure Presentation early this year to members of the government review team as appropriate.

Best regards,

Sheila Daniel, M.Sc., P.Ge.
Senior Associate Geoscientist;
Head Environmental Management
AMEC

Environment & Infrastructure
160 Traders Blvd. East, Suite 110, Mississauga ON Canada L4Z 3K7
Tel: 905-568-2929 x 4123
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sheila.daniel@amec.com
amec.com

Business sustainability starts here... AMEC supports SOS Children

From: Evans, Matt R
Sent: August-22-13 11:14 AM
To: Vandenbroeck, John (MNR); Myers, Matt (MNR); Hill, Rachel (MNR)
Cc: Kyle Stanfield; 'willick@vianet.ca'; Simms, David;
Subject: Final Minutes for June 7 and 25 RRGP SAR meetings

Here are the final minutes for the June 7 and June 25 RRGP SAR meetings.

Thanks very much,

Matt

Matthew Evans, Ph.D.
Environmental Scientist
AMEC

Environment & Infrastructure
160 Traders Blvd. East, Suite 110
Mississauga, ON, Canada, L4Z 3K7
Tel (905) 568-2929 Ext. 4261
Cell (416) 574-7399
matt.evans@amec.com
amec.com

Stakeholder: Environment Canada (Dan McDonnell)
Point of Contact: c/o Stephanie Davis, Project Manager, Canadian Environmental Assessment Agency
Comments received: February 26, 2013
Comments regarding: Conceptual Mine Closure Presentation
Response ID: R1

#	COMMENT (abbreviated)	RRR RESPONSE	DRAFT EA REPORT PRIMARY REFERENCE
	<p>The following information would further assist us in providing advice to the Canadian Environmental Assessment Agency on potential impacts to water quality associated with the project. We believe, for the sake of efficiency, the most practical time to include these items would be during the submission of the federal Environmental Impact Statement (EIS).</p>	<p>Thank-you for your comments. Comment-specific responses are provided below. The information requested was provided within the Draft Environmental Assessment Report (EA Report) for the Rainy River Gold Project (RRGP).</p>	<p>-</p>
1	<ul style="list-style-type: none"> Information describing how baseline surface and groundwater volumes and flow rates are anticipated to be altered by individual mine components (as defined in Section 6 "Scope of the Project" of the federal EIS Guidelines). 	<p>This information was provided in the Draft EA Report at a sufficient level of detail to be able to understand potential environmental impacts and to develop appropriate mitigation measures and/or contingency plans. It is our intent to show how surface water and groundwater could be affected holistically by the entire RRGP development, rather than to try and separate effects to surface water and groundwater from individual mine components.</p>	<p>Sections 7.5, 7.6 and 7.7 Appendix S</p>
2	<p>EC recommends that the mine plans be developed to:</p> <ul style="list-style-type: none"> include measures to control and collect seepage from the operations area for the mine; and, demonstrate that all effluent subject to the monitoring requirements of the MMER will be discharged through a final discharge point(s) where its quality and flow is monitored on a weekly basis. 	<p>RRR intends to control and collect seepage which has a reasonable expectation of containing potential contamination, in accordance with MMER requirements. This information was provided in the Draft EA Report at a sufficient level of detail to be able to understand potential environmental impacts and to develop appropriate mitigation measures and/or contingency plans. Additional detail to support the environmental approvals for the operation can be provided to Environment Canada once developed (post Final EA Report submission).</p>	<p>Section 7.7.3</p>

#	COMMENT (abbreviated)	RRR RESPONSE	DRAFT EA REPORT PRIMARY REFERENCE
3	EC strongly recommends that a conceptual diagram and description of the plans to collect and monitor effluent within the operations area of the mine be prepared. We also recommend that the description include measures to separate contact and noncontact water and to prevent erosion and sediment discharge for all project phases.	The Draft EA Report includes conceptual diagrams demonstrating plans to collect and monitor effluent. Approaches and measures to separate contact and non-contact water are also included in the water management description.	Section 4.12.7 Figures 4-10, 13-2 and 13-3
4	EC is also interested in information on other potential contaminants of concern not identified in Schedule 4 of the MMER when evaluating the impacts of the project on water quality. Information on the predicted concentrations of all contaminants of concern will be useful in this regard for EC to advise on the potential water quality impacts associated with the project. EC recommends that this information be integrated into a water management plan for the project.	Information regarding predicted contaminants of concern was provided in the Draft EA Report. The information has been utilized in the development of the water management plan for the RRGP.	Section 4.12 including Section 4.12.6

#	COMMENT (abbreviated)	RRR RESPONSE	DRAFT EA REPORT PRIMARY REFERENCE
5	<p>An assessment and prediction of water quality for seepage and runoff produced from major mine components (as defined in Section 6 “Scope of the Project” of the EIS Guidelines) and all site water discharges (including groundwater discharge points in lakes and streams, for all phases of the Project). EC recommends that this assessment include:</p> <ul style="list-style-type: none"> • an estimate of the seepage and runoff volumes from the mine component and/or discharge; • water quality characterization of the seepage and runoff from the mine component and/or discharge with comparison to toxicity data; • discharge structures and locations; • potential effects on the receiving environment from all cumulative site water discharges; and, • the description of any mitigation strategies and/or treatment processes implemented to manage effluent before it is released into the receiving environment. 	<p>This information has been provided in the Draft EA Report at a sufficient level of detail to be able to understand potential environmental impacts and to develop appropriate mitigation measures and/or contingency plans.</p>	<p>Section 4.12 (and Sections 7.5, 7.6 and 7.7)</p>
6	<p>A description of contingency plans if there are:</p> <ul style="list-style-type: none"> • significant uncertainties (e.g. high variability in the data and/or predictions) concerning impacts; • considerable risks associated with effluent management (e.g. a release of effluent could permanently damage a sensitive ecosystem, species or fishery); and/or, • potential for impacts of the environment on the project that could lead to adverse effects (e.g. drought conditions that could compromise plans to maintain a water cover on tailings to prevent acid rock drainage). 	<p>A description of contingency measures and plans has been provided in the Draft EA Report within individual topics as appropriate, including as related to malfunctions and accidents. A copy of the RRGP Contingency Response Plan will be provided with the Final EA Report.</p>	<p>Sections 4 and 9</p>

From: Stacey Jack
Sent: August-30-13 9:16 AM
To: Davis, Stephanie [CEAA] (Stephanie.Davis@ceaa-acee.gc.ca)
Cc: 'Aitken, Jill [CEAA]'; 'McLeod, Sasha (ENE)'; Kyle Stanfield
Subject: RRGP ROC and VEC tables to August 1, 2013

Hi Stephanie;

Please find attached the ROC and VEC tables for the Rainy River Gold Project to August 1, 2013. Please note that the tables do not have complete comments from the July 30th Draft EA Open House in Barwick, ON as we are still in the process of finalizing comments from both Open Houses we hosted.

Enjoy the Labour Day weekend.

Sincerely,
Stacey



Stacey Jack
Community Coordinator

T 807 482 2501 | F 807 482 2834 | sjack@rainyriverresources.com

Rainy River Resources Ltd., 5967 Highway 11/71, PO Box 5, Emo, ON P0W 1E0

From: Agarwal, Sushant (ENE)
Sent: August-14-13 3:37 PM
To: McLeod, Sasha (ENE)
Cc: Wan, Rudolf (ENE)
Subject: Rainy River - EA review

Hi Sasha:

Thanks for the opportunity to provide comments on the Rainy River EA report. Attached below are my comments which are mainly focussed on the review of the document Air Quality Assessment Report- Appendix Q. I understand that a review of the air dispersion modelling will be conducted by EMRB based on the modelling files provided by AMEC and made available on August 12, 2013.

1. Please refer Appendix B4 – HCN emissions. Hydrogen Cyanide (HCN) emissions from the ore processing area has been estimated using the procedure defined in the document “Emission estimation technique manual for Gold ore processing Version 2.0, NPI, Govt of Australia”. This documents also refers to the potential release of HCN emissions from the tailing storage areas due to natural degradation of cyanide. At the Rainy River facility, the tailings slurry is described to be pumped to the tailings management area after cyanide destruction. The company should provide emission estimates for the relevant averaging times and the potential impacts of HCN from the tailings area due to destruction of residual cyanide in the slurry.
2. Page 4 of 16, section 4- Project Description indicates that ammonia emissions are expected from the cyanide destruction process using SO₂. Ammonia is also known to be released from the electrowinning stage of the process (NPI, ver 2 document). Accordingly emissions and the associated impacts of ammonia should be provided.
3. Please refer Appendix B5 – Road Dust Emissions.
 - a. Sample calculations for SPM emissions are provided on page 7 of 24 for the road segment HR1. However, reference to HR1 emissions is neither provided in Table 3 or in Table 2. It is not clear if this segment is taken into account in the total road emissions from the facility.
 - b. A control efficiency of 85% is used for estimating SPM emissions from the unpaved haul roads. This is the upper range of control efficiencies that can generally be achieved for unpaved roads using traditional dust suppression methods. The company should provide details of the controls/management measures to be used to achieve this control efficiency of 85% (e.g. frequency of road watering, amount of water used), along with the relevant references in support of these efficiencies. This would also help with the finalization and implementation of the future fugitive dust management plan.

Other related points:

1. I agree with Hosseins comment on the AQ impacts of the construction phase. The project intends to use existing aggregate pits in the study area and thus more details would be needed to justify that the operating phase is more conservative.
2. Potential for malfunction/accident in the sulphur dioxide pressurized vessel, accidental releases of sulphur dioxide and associated contingency/response measures should be discussed in Section 9 on Malfunctions and Accidents.

Thanks,
Sushant

Sushant Agarwal, P.Eng.
Senior Air Review Engineer
Environmental Approvals Branch
Ontario Ministry of the Environment
2 St. Clair Avenue West, Floor 12A
Toronto, Ontario M4V 1L5
Phone: (416) 314-7281; Fax: (416) 314-8452
sushant.agarwal@ontario.ca

From: McLeod, Sasha (ENE) [mailto:Sasha.McLeod@ontario.ca]
Sent: Tuesday, September 03, 2013 8:27 PM
To: kstanfield@rainyriverresources.com; Daniel, Sheila E
Cc: Davis, Stephanie (CEAA)
Subject: Provincial comments so far - RRGP Draft EA

Kyle and Sheila,

Please find attached comments from the following ministries regarding the draft EA for the Rainy River Gold Mine Project. Please let me know if you have trouble opening the files or have any questions and I can help coordinate with the reviewers.

Comments attached:

- MEDTE
- MNDM land tenure and Aboriginal
- MNDM mine rehabilitation
- MNDM socio-economic
- MOE air quality
- MOE air quality
- MOE surface water
- MOE wastewater
- MTCS cultural heritage
- MTO
- OMAFRA

Later this week I expect to provide you with comments from:

- MOE Environmental Assessment Services
- MOE groundwater
- MOE air dispersion modelling (maybe next week)
- MOE waste
- MTCS tourism
- MNR

Sasha

From: Horihan, Jodie (ENE)
Sent: July-29-13 2:08 PM
To: McLeod, Sasha (ENE)
Subject: RE: DRAFT EA AVAILABLE FOR REVIEW - COMMENTS DUE AUG 26 - Rainy River Gold Mine

Hi Sasha,

A review of the above draft EA has been completed, as it relates to Air Quality. In particular, as the document relates to emission estimates and air dispersion modelling and O.Reg 419/05 - local air quality (sections 5.2.2, 5.3, 7.3, 8.5, 10.3, 10.4, 13.2, Appendices F and Q). Comments will not be provided on the monitoring aspects of air quality as that will be provided separately by the Regional Air Quality Analyst.

In summary, the proponent:

- Considered all relevant air contaminants of concern
- Used the correct air dispersion model
- Referenced all current MOE regulations, standards and guidance documents
- Demonstrated that contaminants of concern were within the O.Reg 419 Schedule 3 limits when cumulative effects not considered
- Demonstrated a potential exceedence for PM_{2.5} when cumulative effects and worse case operating scenario used (to be mitigated by Best Management Practices Plan)

Therefore I have no comments or concerns with their draft EA. Contact me if you have any questions. Thank-you.

Jodie Horihan, P.Eng.

Regional Air Compliance Engineer
Northern Region
Ontario Ministry of Environment
5520 Hwy 101 East, PO Bag 3080
South Porcupine ON P0N 1H0
tel: (705) 235-1514 / (800) 380-6615
fax: (705) 235-1520

From: McLeod, Sasha (ENE)
Sent: July 19, 2013 3:48 PM
To: Allen, Paula (ENE); Amalfa, Tony (MOHLTC); Antler, James (MTCS); Ausma, Sandra (ENE); Barnes, Patrick (MNDM); Bennett, Neal (MNDM); Brown, Cindy (MTO); Brown, Kevin (MNR); Brown, Marney (MNR); Cavallaro, Kathleen (NRCAN); Cawston, Jeannette (MNDM); Dickey, Regent (MPMO); Dobos, Rob (EC); Eddy, Sarah (DFO); Fox, Dan (MNR); Gable, Dale (ENE); Galloway, Iain (MTO); Gillon, Jane (MNDM); Godbout, Pierre J.R. (ENE); Haddad, Fadi (NRCAN); Hall, Yvonne (ENE); Hamilton, Don (ENE); Haslam, Simon (ENE); Helfinger, Michael (MEDI); Hess, Katherine (HC); Hill, Rachel (MNR); Horihan, Jodie (ENE); Jewitt, Don (MOL); Jones, Travis (AANDC); Kulpa, Paula (MTCS); Lalani, Melanie (HC); Lashbrook, Ross (ENE); Lo, Grace (MNDM); Ma, Kitty (HC); Martin, Christopher (MNR); Mathieson, Melanie (MNDM); McDonnell, Dan (EC); McFarling, Julie (MNDM); McKever, James (MTO); McLeod, Sasha (ENE); Mosley, Melissa (MNR); Norman, Elizabeth (MNDM); O'Donnell, Cheryl (ENERGY); Paetz, Jennifer (MNDM); Purdon, Rob H. (MNDM); Sliworsky, Gary (OMAFRA); Smith, Brett (ENERGY); Spencer, Paula (ENE); Stajkowski, Drew (ENE); Tovilla, Edgar (ENE); Tyance, Joseph (ENE); Vandenbroeck, John (MNR); VanKralingen, Joan (MNDM); Wan, Rudolf (ENE); Zeit, David (TC)

Cc: O'Hara, Charles (MOI); Barnycz, Michael (MAH); Myers, Matt (MNR); Grant, Mike (MNDM); Brown, Alisdair (ENE); Rawn, Trina (ENE); Davis, Stephanie (CEAA)

Subject: DRAFT EA AVAILABLE FOR REVIEW - COMMENTS DUE AUG 26 - Rainy River Gold Mine

Hi everyone,

As an update to Steph Davis' email below, this is to inform you that the Rainy River Draft EA Report is now ready for your review. Some of you may have already received hardcopies from the proponent. The review period begins today, July 19. **Please send your comments by August 26 at noon to the contacts listed below for your ministry/department.** Please find the complete draft EA in PDF form on CEAA's collaboration website for Rainy River: <https://collaboration.ceaa-acee.gc.ca/WSHome.aspx?ws=RainyRiver&locale=en-CA>. If you've registered, log in with your username and password. If you haven't registered, please contact Steph Davis for access.

I've also reattached the comment table template. We ask that each agency/department use this for comments as it will greatly aid in tracking, comparing and coordinating our federal and provincial comments and issues.

- **Federal** – all comments sent to Steph Davis

Provincial:

MOE – all MOE reviewers to send comments to Sasha McLeod

MNR – all MNR reviewers to send comments to Rachel Hill, who will coordinate and send on behalf of MNR to Sasha

MNDM – all MNDM reviewers to send comments to Neal Bennett, who will coordinate and send on behalf of MNDM to Sasha

All other ministries (OMAFRA, MEDTE, Energy, MHLTC, MTCS, MTO) – send comments to Sasha unless we make other arrangements

Comments will be compiled and forwarded to the proponent shortly after the 26th.

For CEAC members, we've scheduled a meeting on August 7, 1:30-3:30, to discuss how your reviews are going so far and to flag any major issues. We may also have another CEAC meeting closer to the end of the review period if warranted. If you'd like technical sub-group meetings to be set up to discuss your area of expertise with other government reviewers and/or the proponent, please let Steph and myself know.

For the provincial contacts who indicated they just wish to stay informed, I've cc'ed you FYI. For those who wish to be removed from this mailing list, please let me know.

Please let us know if you have any issues accessing the documents or any questions. Thank you and have a nice weekend!

Sasha

Sasha McLeod

Project Officer

Environmental Approvals Branch

Ontario Ministry of the Environment
2 St. Clair Avenue West, Floor 12A
Toronto, ON M4V 1L5
416-314-8214
sasha.mcleod@ontario.ca

Hi all,

In order to assist with the draft EIS/EA report review, the MoE and the Agency have come up with a template for comments. This was developed based on your input from the CEAC meeting. It's similar to the comments template for Hammond Reef but it's in word format.

Please use this table for comments and pass it on to any other experts in your department reviewing the report. If everyone uses a different format it will be difficult to compare comments and track responses later on.

The official review begins this Friday (July 19th). Some of you will likely receive hard copies of reports and/or CDs in the mail before then. Please have your departments comments sent in by **August 26th at noon**. Provincial comments should go to Sasha and federal comments should be sent to me.

Also, the responsibility matrix has been updated to include names. Please feel free to send any corrections my way and it will be reissued next week.

Many thanks,
Stephanie

Stephanie Davis, BEng

Project Manager | Gestionnaire de projets

Canadian Environmental Assessment Agency | Agence canadienne d'évaluation environnementale

Ontario Region | Région de l'Ontario

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From: Helfinger, Michael (MEDTE/MRI)
Sent: August-27-13 10:49 AM
To: McLeod, Sasha (ENE)
Cc: Lashbrook, Ross (ENE); Dupuy, Damian (MEDTE/MRI)
Subject: Rainy River Gold Project Draft Environmental Assessment

Hi Sasha:

Thank you for sharing a copy of the Rainy River Gold Project Draft EA.

MEDTE is not qualified to comment on the potential ecosystem issues raised by the draft EA as listed in the template. Our interest focuses primarily on the projected economic benefits of the project.

We note that, according to the consultant (pp. 12-1 and 12-2), the successful completion of the project would:

- Contribute a total of \$5.5 billion to the provincial economy during the life of the mine, with jobs created along the supply chain throughout Ontario;
- Reverse the structural downturn in the Northwestern Ontario regional economy and associated population decline, which has been driven to a large extent by out-migration of youth and skilled workers;
- Attract new working-age migrants to the region, resulting in modest population growth;
- Develop skills in the local workforce that could later be transferred to other sectors; and
- Bring about improvements to local transportation infrastructure.

In light of these significant projected benefits to the local, regional and provincial economy, MEDTE looks forward to the timely approval of the Environmental Assessment and commencement of the project.

Michael Helfinger, MA, MBA

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From: Bennett, Neal (MNDM)
Sent: August-30-13 11:15 AM
To: McLeod, Sasha (ENE)
Subject: MNDM Draft EA Document Comments

Sasha,

Here are the other comments from MNDM. Hope you had a nice holiday!

Comment - Section 1.5

RRR currently does not have all the proper land tenure for development under Ontario's *Mining Act* based on the project footprint provided by RRR. Tenure for lands must be obtained under the *Mining Act* as the right to extract minerals comes with a mining lease. Various parts of the proposed mine site development currently do not have this tenure in place.

Clarification/Comment – page 2-4

The consultation list expanded in May 2012 as the scope of the project changed from advanced exploration to production. Prior advice was based on an exploration scenario, and was also based on MNDM's knowledge of traditional territories at that time. Therefore as the project moved towards a production decision the potential for impacts encompasses a larger area, and therefore the Crown scoped additional First Nations/Metis communities into the Consultation list.

Comment – page 2-4

Draft EA reads *"In order to allow adequate time for the Aboriginal technical review, the draft EA Report (Version 1) was released to fourteen Aboriginal groups for an independent technical review of the RRGP EA Report."* On page 2-6 and 2-7 there is a list of 16 communities provided to RRR by the Crown. Why were 2 of these communities excluded from the early release of the draft EA document?

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Rainy River Gold Project

Baseline Economic and Social Conditions

Draft EA-Sec 2,3,7

Effects Assessment and Mitigation

Socio- Economic Components

Comments for Consideration

By: Jeannette Cawston NDO, MNM, Fort Frances and Rainy River District

Sec 2 – Participants in the Environmental Assessment

It is important that further engagement is done, especially with the Emo and Rainy River Chamber of Commerce as well as the Real Estate businesses in Fort Frances and Emo who could advise RRR on the true picture of the housing market across the Rainy River District.

Sec 3 – Consultation

It is clear that the stakeholder and Aboriginal people consultation has been extensive to date. Continuing consultation with stakeholders and First Nation communities throughout all phases of the Rainy River Gold Project are vital.

Sec 5 – Description of the Environment

5.13.3.3 – Caliper Lake Provincial Park has been closed by the Province effective May 2013.

5.13.7 – (Township of Emo 2012) The Township of Emo has a water and sewer upgrade capital project underway. The work involves looping main water lines, upgrading pumps and motors at the Emo water treatment plant and expanding the existing lagoon to provide more capacity. The Township received funding through the Municipal Infrastructure Improvement Initiative.

5.13.8.3 – No mention in this section of the Confederation College Fort Frances Campus nor Contact North Ontario's distance education and training network offices in Fort Frances and Emo.

5.13.9 – The Rainy River Health Care Committee has completed construction on the Rainy River Locum Rental House. Visiting locums are very impressed with the facility.

5.13.11 – In Fort Frances Sister Kennedy Centre offers a full range of programs and serves as a *social* setting for Fort Frances seniors. The Community Care Access Centre (CCAC) connects residents with the care they may need, at home and in the community. Fort Frances, Emo and Rainy River have a volunteer based “Meals on Wheels” program.

Sec 7 – **Effects Assessment and Mitigation**

7.18.4.2 – *Potential suitability of the reclaimed mine footprint for agriculture use in the region.*

RRR has been in contact with the Emo Agriculture Research Station and its manager Kim-Jo Bliss to begin discussions on land use upon closure of the Rainy River Gold Project.

7.19.3 – *Where feasible, goods and services will be procured from local and regional suppliers as well as suppliers that can further demonstrate Aboriginal employee content.*

A recommendation could be to have a commitment to develop a procurement policy with the EA.

7.19.3 – *As the mine approaches the end of mine life, RRR will implement strategies to transition the workforce to buffer the effects of job losses, as well as an adjustment committee.*

Recommendation would be to have those strategy plans in place and committed within this EA. i.e. career transition counselling. Further, a timeline for having a Community Adjustment Committee developed should be specified within the EA.

7.20.2.3 – *Monitor regional housing supply.*

RRR has not been in contact with Real Estate business in Fort Frances to discuss the housing supply.

7.20.3.2 - (Township of Emo 2012) The Township of Emo has a water and sewer upgrade capital project underway. The work involves looping main water lines, upgrading pumps and motors at the Emo water treatment plant and expanding the existing lagoon to provide more capacity. The Township received funding through the Municipal Infrastructure Improvement Initiative.

From: Purdon, Rob H. (MNDM)
Sent: July-26-13 2:03 PM
To: Bennett, Neal (MNDM)
Cc: Cooper, Leslie (MNDM)
Subject: Rainy River EIS Comments

Hi Neal,

I am concerned that the proponent is not going to finalize Appendix P (Assessment of Alternatives for Tailings and Mine Rock Storage) as part of the EIS. This is an important component from a mine closure perspective and I am reluctant to provide detailed comments on the EIS as I will likely have to re-visit these comments after being provided with the missing appendix – this adds to the level of effort at a time where I have numerous overlapping time sensitive tasks.

However, in order to provide something in advance of my vacation, I have undertaken a cursory review of the EIS and the Appendices provided and offer the following preliminary comments:

EIS

7.7.1 – Groundwater – Environmental Effects

There is not enough detail provided as to how potential water quality impairments to the Pinewood River originating from the tailings or east waste rock pile will be mitigated. It is not clear in the EIS that there has been adequate characterization of the metal leaching potential of these materials and the “parenthood” statements made as mitigation in the EIS do not add the required clarity.

13.4.1 – Geochemistry FMP – Context and Objectives

“At closure the major portion of the tailings will be flooded to limit exposure to oxygen or covered with clay/clay till overburden” – which will it be?

The proponent should present a clearer concept for long term management of the tailings in support of the EA, especially when it appears that a large portion of the tailings has the potential to be acid generating and/or have a significant potential for metal leaching.

“Any problematic runoff and seepage from low grade ore and encapsulated east mine rock stockpiles will be collected and managed, both during operations and as part of mine closure.”

While this statement may commit the proponent to undertake these activities, it is impossible to determine if the collection and management measures will be effective when no details have been provided.

Appendix E – Draft Conceptual Closure Plan

3.3 Stockpiles

The draft conceptual closure plan calls for a multi-layered cover for the east mine rock pile to inhibit water infiltration and the influx of oxygen. Conceptually this could be a valid approach but more details and costs will need to be provided when the proponent submits a certified closure plan to MNDM for filing.

4.4 Tailings Management Area

The draft conceptual closure plan indicates that “for dam safety reasons, it is preferred that the permanent water cover should not come into contact with the TMA dams and that there will be “a perimeter zone of exposed tailings beach of approximately 200m width” which will be covered with a low permeability layer of overburden to prevent infiltration and oxygenation of the tailings. It is not clear what dam safety concerns drive this, but there could be problems with erosion of the cover on the tailings beaches due to wave action and/or precipitation over the long term. More detail regarding the drivers for this aspect of tailings management is needed.

From a water balance perspective it is not clear that the closure of the TMA proposed in the draft conceptual closure plan will be sufficient. While there will be measures in place to allow emergency overflow, more detail is required to determine if evapotranspiration from the TMA will be sufficient to preclude the need for discharge works. There is no mention of any drainage works to direct overflow to the open pit, however, in Section 4.6.2, the draft conceptual closure plan indicates that “the water management pond will no longer be required once the TMA is fully reclaimed and is capable of generating a runoff of acceptable water quality or the runoff is directed to the open pit to assist with pit flooding/water quality control.” Much more clarity around the long term management of discharge from the TMA is required, both from a water quality and water quantity perspective.

4.5.2 General Infrastructure

The draft conceptual closure plan indicates that the “potential onsite landfill and demolition landfill containing only non-hazardous domestic and demolition wastes will be reclaimed”. This is inconsistent with statements made in the Summary of Draft Environmental Assessment Report (Environmental Impact Statement) which indicates that the preferred alternative is to “use and expand the existing Township of Chapple landfill with continued RRR financial support”.

4.6.2 Impoundment Structures

See the comments regarding overflow from the TMA above.

Appendix G – ML/ARD Mine Rock Tailings

8.2.1 Surrogate Development

While I am supportive of the “surrogate approach” used to construct the block model to determine PAG and NPAG mine rock distributions and support the adjustment of the trendline to ensure that no PAG material is classified as NPAG, the proponent should provide more details regarding how they intend to audit or monitor their work as the mine develops to ensure that PAG material is segregated and handled appropriately. Perhaps this will be presented in the missing Appendix P...

It is my recommendation that periodic static and kinetic testing is performed during operations to confirm that the surrogate characterization method remains valid with respect to changes and/or variability in the ore and waste rock. The proponent should develop an auditing program for consideration.

8.3 ARD Onset Times

This section indicates that “without appropriate mitigation measures such as the planned encapsulation of PAG mine rock, hot spots could be sufficiently developed to have noticeable acid on-set after 5 years and more pronounced acid onset from unprotected PAG rock could be evident within 10 years post exposure.” I am at a loss to find details regarding the “planned encapsulation” in the documents submitted other than those provided with the draft conceptual closure plan (as noted above) and cannot provide further comments.

Appendix H - Hydrogeology Baseline Report

3.3.4.3 - Bedrock

It is interesting that data collected from the deeper boreholes show “reasonably rapid” climatic responses but indicates that there is no real connection between the shallow aquifer (e.g. above the Pleistocene Aquitard) and the deeper bedrock aquifer. The proponent concludes there are only limited groundwater inputs to the Pinewood River watershed. The presence of upward gradients and fairly widespread artesian conditions speaks to an area or areas of significant recharge which drive the climatic responses in the deeper aquifers and this is captured in the conceptual model.

As the inputs to the Pinewood River watershed originate from only the shallow surficial alluvium/peat, any shallow groundwater impairment from tailings areas, waste rock dumps and low grade ore stockpiles could report to the river and compromise water quality. While options to mitigate these impacts could be presented in Appendix P, it is absent from the document.

I hope to re-visit these comments and the EIS in more detail once the proponent provides Appendix P.

Let me know if you have any questions/concerns.

Cheers!

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August 8, 2013

MEMORANDUM

TO: Sasha McLeod
Project Officer
Environmental Assessment Services Section
Environmental Approvals Branch

FROM: Stefanos Habtom
Senior Wastewater Engineer
Environmental Approval Services Section
Environmental Approvals Branch

RE: Rainy River Gold Mine Draft Environmental Assessment

I have reviewed the Rainy River Gold Mine Draft Environmental Assessment Report to assess the draft EA report in terms of the mandate of the Environmental Approval Services Section, EAB, under Section 53 of the *Ontario Water Resources Act* (OWRA) and I provide the following review comments for your consideration.

When reviewing Rainy River Gold Mine Draft Environmental Assessment Report, particular attention was given to the following sections of the draft EA report with respect to the mandate of the wastewater unit of the EAB:

1. Rainy River Gold Project – Draft Environmental Assessment Report (Environmental Impact Statement) – Volume I Summary dated July 2013, prepared by AMEC.
2. The following sections of the report titled “Rainy River Gold Project – Draft Environmental Assessment Report (Environmental Impact Statement) – Volume II (Main Text) dated July 2013, prepared by AMEC” :
 - a) 3.0 – Consultation Summary
 - b) 4.0 – Project Description
 - c) 5.0 – Description of the Environment – 5.6.3 – Water Quality
 - d) 6.0 – Evaluation of Alternatives – 6.7 Process Plant Effluent Management
 - e) 13.0 – Reporting and Environmental Management Plans
 - f) 15.0 – Other Approvals Required

Review comments for the specific sections are as follows:

1. Section 7.2 – Alternative Methods – Rainy River Gold Project Volume 1 Summary has identified the best alternative for process plant effluent management as in-plant cyanide destruction and heavy metal precipitation using the SO₂/Air treatment process, followed by the natural degradation in the tailings management area. It should be noted that for Environmental Compliance Approval (ECA) purposes the final design and performance of the proposed process effluent management system will be required to meet the design effluent objectives based on the assimilative capacity study of the receiving surface water (Pinewood River).
2. Section 3.2.2 - Distribution of Draft EA for Aboriginal Review - Rainy River Gold Project – Draft Environmental Assessment Volume II (Main Text) indicates that financial resources have been allocated to the Aboriginal Groups for an independent technical review of the RRGP EA Report. It should be noted that before submitting an application for an ECA, RRGP shall make all efforts to address all outstanding concerns raised in the final EA by the independent technical reviewer with potential impact to the natural environment.

With respect to the mandate of the Environmental Approval Services Section, EAB, the draft EA for the Rainy River Gold Mine provides adequate assessment of process wastewater treatment alternatives and selection of the preferred alternative. As outline above, more details will be required in the final EA and during the ECA application period.

If you require any additional information, please do not hesitate to contact me at (416) 314 8298.

Yours sincerely,



Stefanos Habtom, P. Eng.

c: Edgar Tovilla, P. Eng., Supervisor (A), Environmental Approval Services Section, EAB

Reference #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS or ToR	Summary of Comment	Rationale	Proposed Action	EA or Regulatory
MOE-SW-1	Paula Spencer – MOE - Surface Water Specialist	Surface Water Wastewater/Effluent Impacts of mine effluent		4.12.6 7.6.1.2	<p>Section 4.4.1 of MOE Procedure B-1-5 requires that the low flow statistic (7Q20) is used as the design flow for the receiving system. The 7Q20 documented in Table 5-21 of the draft EIS is 8 m³/day, (which is essentially zero flow), indicating that the Pinewood River has no assimilative capacity. Because the Pinewood River has no assimilative capacity, effluent quality will be required to meet very stringent criteria (i.e. PWQO) at all points of discharge to the Pinewood River.</p> <p>The current proposal for effluent discharge to the Pinewood River is not consistent with MOE Water Quality Management Policies 1, 2 and 5.</p> <p>The Pinewood River is the only receiving waterbody identified in the draft EIS. An assessment of alternate discharge locations may be appropriate given the very low flows observed in the Pinewood River.</p>	<p>The Pinewood River has been proposed as the primary surface water receptor for the mine's final effluent. The hydrological component of the EIS indicates that there is insufficient flow in the Pinewood River and the assimilation capacity of this small river would be exceeded if it was to receive the mine's effluent.</p> <p>Based on the current information within the EIS, only effluent quality criteria equivalent to PWQO (or background) would be consistent with this Ministry's water quality management policies and Procedure B-1-5 (Deriving Receiving-Water Based, Point-Source effluent Requirements for Ontario Waters, July 1994).</p>	<p>The proponent needs to provide more information on how very stringent effluent criteria will be met at the proposed discharge points to the Pinewood River.</p> <p>The proponent should also include an assessment of any alternative discharge options in the revised EIS document.</p>	EA Environmental Compliance Approval (ECA)
MOE-SW-2	Paula Spencer – MOE - Surface	Surface Water Wastewater/Effluent		4.12.5 4.12.6 7.6.1.2	<p>The proponent must consider the lack of assimilative capacity in the Pinewood River when designing the proposed</p>	<p>The current proposal includes SO₂/Air treatment for cyanide destruction and lime precipitation of metals, with 60 days of aging in</p>	<p>The proponent should provide documentation to the Ministry on alternative treatment</p>	EA ECA

	Water Specialist			Table 4-4 Table 7-14	treatment system, in order to produce a very high quality effluent that can meet stringent criteria at all direct discharge points to the Pinewood River. Alternative treatment processes should be proposed to the Ministry for evaluation.	the Tailings Management Area (TMA) and/or Water Management Pond (WMP). A constructed wetland is proposed for treatment of a portion of the effluent to improve water quality. Based on predicted effluent quality in Table 7-14 and Table 4-14, the proposed treatment processes are unlikely to be adequate to meet highly restrictive effluent criteria needed to protect aquatic life in the Pinewood River.	processes that can achieve a higher quality of effluent, taking into consideration the need to meet very stringent effluent criteria (ie. PWQO).	
MOE-SW-3	Paula Spencer – MOE - Surface Water Specialist	Surface Water Wastewater/Effluent		4.12.6 Table 4-4	<p>Table 4-4 outlines the expected effluent quality after cyanide destruction (SO₂/Air) and 60-day aging in the Tailings Management Area (TMA)/Water Management Pond (WMP). For several parameters, concentrations increase from “Test at Time 0” to the 60-day aging results. Clarification is needed on why concentrations of boron, cadmium, lead, zinc, and thiocyanate increase over the 60-day aging period.</p> <p>Modified receiver targets have been proposed for several contaminants of concern (CofC). Further information is needed on the potential impacts of using these modified targets on the Pinewood River.</p> <p>In the revised EIS, the proposed effluent criteria should be clearly documented in order to assess potential impacts to the</p>	<p>Table 4-4 includes expected effluent quality after cyanide destruction and a 60-day aging period. It is assumed that the effluent quality in the final column represents the predicted water quality of the final effluent that will be discharged to the Pinewood River. Several parameters (free cyanide, antimony, cadmium, copper, and zinc) exceed PWQO’s. The proponent has included modified receiver targets; however, further information is needed on the potential impacts of the modified targets on the receiver given the lack of assimilative capacity in the Pinewood River.</p>	<p>The proponent should provide the following in the revised EIS:</p> <ol style="list-style-type: none"> 1. Predicted effluent quality at the discharge point (points) 2. Clarification on why concentrations of several CofC’s increase over the 60-day aging period 3. Further information on the potential impacts of modified targets on the Pinewood River. 4. Clarification on the expected retention time of effluent to achieve required effluent quality. 	EA ECA

					<p>Pinewood River.</p> <p>Section 4 and Section 7 state that water from the TMA will be transferred to the WMP and allowed to age for a minimum of one month, whereas Table 4-4 refers to 60-day aging tests to assess the effectiveness of natural degradation and to predict effluent quality. Clarification is needed on the expected retention time, taking into consideration the very stringent effluent criteria that will be required prior to discharging to the Pinewood River. In addition, the water balance must reflect the expected retention time required to meet effluent criteria.</p>			
MOE-SW-4	Paula Spencer – MOE - Surface Water Specialist	Surface Water Wastewater/Effluent Water Quantity Management		4.12.7 7.6.1.1	<p>Section 7 states that the majority of treated effluent from the TMA will be piped to the Pinewood River during the months of April, May, October, and November to take advantage of maximum receiving water capacity for water quality control. This water will be discharged assuming a 1:1 dilution ratio in the Pinewood River during the above mentioned months. However, based on Procedure B-1-5 and the 7Q20 low flow statistic, the Pinewood River does not provide any assimilative capacity. The Water Discharge Pond will</p>	<p>Section 4 describes the proposed discharge scenarios (based on flow in the Pinewood River). Because the effluent will be required to meet very stringent criteria, the proponent needs to reconsider the proposed discharges timeframes and the ability to store water if effluent criteria are not being achieved.</p>	<p>The proponent needs to ensure all water discharged to the Pinewood River meets effluent criteria. Updates to the proposed effluent treatment components and revised effluent discharge pathways should be included in the EIS.</p> <p>In addition, the revised EIS should include updates to the water balance to reflect the</p>	EA ECA

					<p>decant to the constructed wetland from June-September and December-January. Flows in excess of wetland capacity will be directed to the Pinewood River to prevent damage to the constructed wetland due to high flows.</p> <p>The proponent should note that any water discharged to the Pinewood River must meet stringent effluent criteria (ie. PWQO's). If water does not meet discharge criteria, it must be stored onsite until effluent limits are met.</p> <p>The water balance should include adequate storage, including contingency storage, in the event discharge limits are not being achieved for extended periods of time (several years). Neither Figure 4-12 nor Section 4.12.8 describes plans for contingency water storage. This should be discussed in the revised EIS.</p>		potential need to store water onsite for extended periods of time.	
MOE-SW-5	Paula Spencer – MOE - Surface Water Specialist	Surface Water		6.19.1 Appendix T – Table 5	<p>The expected pit lake scenario predicts that concentrations of COC's will be high initially due to seepage from the East Mine Rock Stockpile (EMRS). Concentrations in the upper pit lake will increase after stratification as a result of loading from the pit walls as they mineralize.</p> <p>The spillway will discharge</p>	After mining operations cease, the open pit will be flooded. In the preferred scenario, the pit will be flooded to the elevation of a spillway approximately 72 years after closure and will passively discharge to the Pinewood River. Steady state concentrations will be reached 300 years after closure. In order to assess potential impacts to the Pinewood	The proponent needs to assess potential impacts to surface water from the pit lake discharge, including potential contaminant loadings, and include this in the revised EIS. In addition, the proponent needs to consider alternate	EA

					<p>passively to the Pinewood River approximately 72 years after closure in the preferred scenario. Initial discharge at 72 years will exceed PWQO for all parameters (by several orders of magnitude in some cases) except Molybdenum and Arsenic (exceeds interim PWQO and CWQG). After 300 years, considered to be the steady state concentrations, PWQO will be exceeded for the following parameters: Fe, Al, and Cr.</p> <p>Metal loadings from the pit walls seem to be optimistic and assume that water chemistry will be similar to background conditions in the long term (300 years). The MOE's experience at other sites is that once exposed, the pit walls can contribute significant metals to the water, making it necessary to treat the pit water prior to discharge to the natural environment.</p> <p>Because the Pinewood River has no assimilative capacity, pit lake discharge will be required to meet very stringent discharge criteria at the point of discharge to the receiver.</p>	<p>River from pit lake discharges, an estimation of the contaminant loading to the Pinewood River and an assessment of potential long term impacts associated with this discharge are necessary. In addition, the proponent needs to consider options that provide for a shorter timeframe to establish the pit lake. Surface water discharge, which exceeds PWQO, to a very low flow receiver, for several hundred years, is concerning, and alternate scenarios need to be assessed.</p>	<p>scenarios for establishing the pit lake (ie. shorter timeframes) and achieving a higher quality discharge.</p>	
MOE-SW-6	Paula Spencer – MOE - Surface	Surface Water Water Quantity		4.12 6.11	<p>The EIS states that the project will require 3,000,000 m³/year of fresh water during operations. For initial start-up of the project,</p>	<p>Further information is needed to assess the impacts of proposed water takings on the watershed. The information presented in the</p>	<p>The proponent needs to provide further information on the potential impacts of</p>	EA PTTW

	Water Specialist				<p>water will be taken from the Pinewood River. The 7Q5, 7Q10, and 7Q20 are less than 50 m³/day for the Pinewood River.</p> <p>The preferred alternative for water taking during operations is water from the West Creek. Lack of information on West Creek hydrology does not allow for assessment potential impacts to this system.</p> <p>In addition, further information needs to be provided regarding the use of Off Lake, Burditt Lake, Little Pine Lake or Boundary Lake, which are described in the Water Supply Alternatives section (6.11).</p> <p>The site water balance needs to include adequate fresh water storage to supply water during periods of low flow or winter conditions.</p>	EIS suggests that the Pinewood River may not be an acceptable water source. In addition, information on proposed alternate sources of water is very limited.	water taking on the proposed surface water sources. In addition, further information is needed on how water taking limitations will affect the site water balance.	
MOE-SW-7	Paula Spencer – MOE - Surface Water Specialist	Surface Water		Table 4 and 6 – Appendix T	Seepage from the TMA and ERMS will eventually discharge into Pinewood River. Expected water quality information in Appendix T indicates C of C's will exceed PWQO. Because the Pinewood River has no assimilative capacity, seepage will be required to meet very stringent criteria at the point of discharge. The proponent will	The impacts of seepage from the TMA and mine rock stockpiles needs to be further assessed given that estimated concentrations of CofC's (outlined in Appendix T) exceed PWQO's and seepage will be discharging to a very low flow receiver (Pinewood River).	The proponent should include the following in the revised EIS: <ol style="list-style-type: none"> 1. Quantification of potential seepage 2. Predicted loadings of CofC's from seepage 3. Assessment of potential impacts from discharge of 	EA ECA

					need to quantify potential seepage and provide expected loading calculations. In addition, potential surface water impacts should be assessed and included in the revised EIS.		seepage to surface water receivers	
MOE-SW-8	Paula Spencer – MOE - Surface Water Specialist	Surface Water		4.19.2 4.6.2	The west mine rock stockpile (WMRS) will contain NPAG, while the EMRS will store PAG. Section 4.19.2 states that ARD in the WMRS will not be an issue. In addition, NPAG rock is being proposed as an aggregate source for on-site construction. Extensive testing, following accepted protocols, will be needed to ensure that the waste rock is accurately classified based on potential acid generating properties.	Previous experience at minesites has identified NPAG rock as a significant contributor of metal leaching and acid rock drainage (ARD). The proponent should provide a contingency plan in the event that ongoing monitoring reveals that the NPAG rock is creating an ARD issue.	The proponent should provide contingency plans for the WMRS and NPAG used in construction, in the event that ARD issues are identified through monitoring programs.	EA
MOE-SW-9	Paula Spencer – MOE - Surface Water Specialist	Surface Water Wastewater/Effluent Hydrology		4.12.7.3 4.12.8 7.6.1.1	The flow in the Pinewood River is very low during the winter months. It is not typical for northern minesites to discharge effluent in winter conditions. Water balance calculations should account for potential difficulties with winter discharge to ensure adequate storage capacity. In addition, the proponent is reminded that all discharge entering the Pinewood River will	The proponent should clarify whether they intend to discharge effluent to the Pinewood River during the winter months. Section 4 and section 7 are contradictory. Table 4-5 includes operating periods spanning over the winter months. In addition, there are multiple references to winter discharge in the document. Winter discharge is not typical for northern mine sites, as it is more difficult to meet effluent quality criteria in the winter conditions	The proponent needs to clarify whether effluent will be discharged in winter conditions and how the water balance will be affected. In addition, the proponent is reminded that all effluent discharged to the Pinewood River will need to meet very	

					need to meet restrictive effluent criteria. It is unlikely effluent quality will meet required criteria during the winter months because ammonia and cyanide breakdown is greatly reduced in winter climatic conditions.	and surface water flows are generally greatly reduced in small rivers. The reliance on winter discharge of effluent may result in inadequate storage capacity and affect water balance calculations.	restrictive criteria.	
MOE-SW-10	Paula Spencer – MOE - Surface Water Specialist	Surface Water		Appendix I	The volume of data prohibits a detailed review and assessment of statistical methods.	<p>The purpose of baseline studies is to characterize the physical, chemical, and biological aspects of potentially impacted watersheds.</p> <p>The design of the baseline surface water monitoring program needs to include multi-year seasonal sampling to identify temporal variability associated with the collected data and to identify trends over time. Monitoring programs must be designed to statistically detect changes from baseline conditions.</p> <p>Surface water, sediment, benthic, fish community and fish tissue samples should be collected from all locations within the predicted zone of influence of the project including direct discharge locations, surface drainage locations, areas of water taking, and areas that may be influenced by groundwater seepage.</p> <p>The following needs to be considered when selecting sampling locations:</p> <ul style="list-style-type: none"> • adequacy to produce high 	The proponent should note that adequate baseline data will be required as part of the provincial permitting process.	ECA

						<p>quality samples that can be replicated;</p> <ul style="list-style-type: none"> effectiveness of the location to define baseline conditions; use of the location for long term evaluation of potential effects of the project; and development of a reference condition for the watershed to facilitate comparisons with non-impacted watersheds and to evaluate watershed changes. 		
MOE-SW-11	Paula Spencer – MOE - Surface Water Specialist	Surface Water		Figure 4-8	The proponent should provide documentation to clarify all discharges that will be reporting to the Pinewood River and any other surface water receiver. For example, on Figure 4-9, there is no discharge pathway from the WDP to the Pinewood River; however, section 4.12.7.1 states that flows in excess of wetland capacity will be directed to the Pinewood River to prevent damage to the wetland due to high flows.	Given the extremely large volume of material provided in this EA document it is difficult to confirm the discharge pathways that will report to surface water receivers.	The proponent should provide documentation to clarify all direct discharges that will be reporting to surface water receivers.	EA ECA
MOE-SW-12	Paula Spencer – MOE - Surface Water Specialist	Surface Water		Appendix I	Data should be collected using advanced sampling and analytical protocols for mercury to define baseline conditions, determine potential loadings, and to monitor the potential impacts of the project over time.	The EIS did not describe the potential for mercury loadings from the project to the downstream watershed. This information is needed to assess potential impacts to the Pinewood River and/or other surface water receivers.	Additional information is needed to predict the potential impact of mercury loadings to surface water receivers.	EA

MTCS's Review of the Rainy River Draft Environmental Impact Statement

Date submitted: August 30, 2013

Reference #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS or ToR	Summary of Comment	Rationale	Proposed Action	EA or Regulator
Assign Comment Reference Number (Department /Ministry and number e.g. CEAA-1 or MNR-1)		Aboriginal (including potential rights impacts, traditional use of lands and resources) General - Concern General - EA Type General - Consultation General - Logistics General - Project Risks Geology Groundwater (including water quality and quantity) Human Health Hydrology Monitoring Natural Hazards Navigable Waters Physical and Cultural Heritage (including Archaeology)	Provide the specific section(s) and page number(s) from the EIS Guidelines or ToR related to the comment	Provide the specific volume(s), section(s) and page number(s) from the EIS of the information being referenced	Provide an explanation of the issue of concern	Describe the rationale for why issue of concern is important for environmental assessment purposes.	Describe any action recommended	Pick EA, Regulatory Instrument or Both. Please state which regulatory instrument you are referring to.
MTCS	Amy Didrikson, Heritage Planner	Physical and Cultural Heritage (including Archaeology)	EIS	Volume 1 Section 6.12 Archaeology and Traditional Land Use Page 18	The section heading should read "Cultural Heritage Resources and Traditional Land Use" instead of "Archaeology and Traditional Land Use".	This section describes background information gathered pertaining to archaeological resources, as well as built heritage resources and cultural heritage landscapes (all considered "cultural heritage resources" based on current terminology), in addition to traditional land use.	Revision	N/A (Terminology)
MTCS	Amy Didrikson, Heritage Planner	Physical and Cultural Heritage (including Archaeology)	EIS	Volume 1 Section 6.12 Archaeology and Traditional Land Use Page 18	There are two built heritage assessments referenced in this section ("a cultural (built) heritage assessment [which] was completed in 2013 and will be followed up as per Ministry of Tourism, Culture and Sport guidance", and the "inventory of cultural heritage landscapes and built heritage [which] has been compiled and is being followed up on during 2013"). Please clarify the scope and purpose of each.	There appears to be overlap between the two studies of built heritage (and cultural heritage landscapes) described in this section. MTCS has not been circulated on either assessment/inventory and wishes to understand the purpose and rationale of each.	Clarification	EA
MTCS	Amy Didrikson, Heritage Planner	General - Concern	EIS	Volume 1 Section 7.2 Alternative Methods	This section states that alternative methods were considered for a number of project elements, which do not appear to include the East Access Road. Clarification is needed regarding whether	It is noted that a different route is proposed for the East Access Road in the EIS versus the ToR document. Please clarify the rationale behind the change.	Clarification	EA

MTCS's Review of the Rainy River Draft Environmental Impact Statement

Date submitted: August 30, 2013

Reference #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS or ToR	Summary of Comment	Rationale	Proposed Action	EA or Regulator
				Page 19	or not alternatives were considered in the routing of the East Access Road.			
MTCS	Amy Didrikson, Heritage Planner	Physical and Cultural Heritage (including Archaeology)	EIS	Volume 1 Section 12.0 Monitoring and Environmental Management Plans	It is unclear what is meant by "heritage resources" and "heritage management". Clarification is required regarding the types of cultural heritage resources to be examined as part of the follow-up monitoring programs (FMPs) and environmental management systems.	MTCS would like to ensure that: (i) built heritage resources, (ii) cultural heritage landscapes; and, (iii) archaeological resources will all be examined as part of the follow-up monitoring programs (FMPs) and environmental management systems.	Clarification	EA
MTCS	Amy Didrikson, Heritage Planner	Physical and Cultural Heritage (including Archaeology)	EIS	Volume 2 Section 1.7.3 Appendices Page 1 - 12	The title to Appendix M ("Heritage Resources Baseline") does not accurately reflect the range of cultural heritage resources considered in this section. This section should read "Cultural Heritage Resources Baseline".	The term "Cultural Heritage Resources" is understood to include archaeological resources, built heritage resources and cultural heritage landscapes.	Revision	N/A (Terminology)
MTCS	Amy Didrikson, Heritage Planner	Physical and Cultural Heritage (including Archaeology)	EIS	Volume 2 Section 5.2.1 Background	This section states that the natural environment studies have included aspects such as: <ul style="list-style-type: none"> • Archaeology and cultural resources 	The term "cultural resources" is unclear. Our ministry uses the term "cultural heritage resources" to capture archaeological resources, built heritage resources and cultural heritage landscapes.	Revise the following aspect described in this section: <ul style="list-style-type: none"> • Archaeology and Cultural Heritage Resources 	N/A (Terminology)
MTCS	Amy Didrikson, Heritage Planner	Physical and Cultural Heritage (including Archaeology)	EIS	Volume 2 Section 5.2.1 Background	This section states that an assessment of "Cultural (built) heritage" was undertaken by Unterman McPhail Associates. It is unclear whether this assessment addressed cultural heritage landscapes.	The term built heritage resources is not understood to include cultural heritage landscapes. Therefore, if both types of cultural heritage resources were assessed by Unterman McPhail this should be clarified in the document.	Clarification.	EA
MTCS	Amy Didrikson, Heritage Planner	Physical and Cultural Heritage (including Archaeology)	EIS	Volume 2 Section 5.2.18 Archaeology Page 5-38	This section states that "Archaeological and Cultural Resource studies are classified into four stages (1 through 4)". As explained in our comments on the Terms of Reference, archaeological assessments do not address known or potential built heritage resources or cultural landscapes.	The EIS should contain consistent and accurate terminology with respect to cultural heritage resources.	Revise this section to state that "Archaeological Assessments are classified into four stages...."	N/A
MTCS	Amy Didrikson, Heritage Planner	Physical and Cultural Heritage (including Archaeology)	EIS	Volume 2 Section 5.2.19 Cultural Heritage Landscapes and Built Heritage Resources Page 5-39	The definition for built heritage resources from the PPS is provided, but not cultural heritage landscapes.	Definitions for built heritage resources and cultural heritage landscapes should both be provided in this section to acknowledge both types of cultural heritage resources addressed in this section.	Revise the first paragraph of this section with definitions for both built heritage resources and cultural heritage landscapes.	N/A (Terminology)
MTCS	Amy Didrikson, Heritage Planner	Physical and Cultural Heritage (including Archaeology)	EIS	Volume 2 Section 5.2.19 Cultural Heritage Landscapes and Built Heritage Resources Page 5-39	It is unclear whether the scope of Unterman McPhail's heritage impact assessment included the new access road proposed as part of this EA.	We are concerned that a component of the project works (the new proposed East Access Road) has been evaluated without baseline information on built heritage resources and cultural heritage landscapes.	Clarify in this section whether the study area of Unterman and McPhail's heritage impact assessment includes the route of the proposed new East Access Road.	EA

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Reference #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS or ToR	Summary of Comment	Rationale	Proposed Action	EA or Regulator
MTCS	Amy Didrikson, Heritage Planner	Physical and Cultural Heritage (including Archaeology)	EIS	Volume 2 Section 5.2.19 Cultural Heritage Landscapes and Built Heritage Resources Page 5-40	This section states that "Representatives of MTCS were contacted to determine whether there are cultural heritage resources (such as those listed in Table 1 under Part IV of the Ontario Heritage Act, road bridges listed in the Provincial Government Ontario Heritage Bridge Guideline, Ontario Heritage Trust easement properties or Federally recognized properties) within or beside the RRGF site and proposed Highway 600 re-alignment". MTCS does not provide information on behalf of the Ontario Heritage Trust, or on behalf of the Federal Government. Please clarify the information sources for this information in this section.	The Ontario Heritage Trust and the Federal Government should be contacted directly for information on easement properties and Federally recognized properties, as they are the purveyors of this information. If these public bodies have been contacted already, this should be clarified in the EIS.	Contact the Ontario Heritage Trust and the Federal Government (Parks Canada) for information on easement properties and National Historic Sites, respectively.	EA
MTCS	Amy Didrikson, Heritage Planner	Physical and Cultural Heritage (including Archaeology)	EIS	Volume 2 Section 5.11 Aboriginal Traditional Land Use Page 5-167	We would like to re-iterate our comment submitted to you on the ToR that traditional knowledge / traditional land use (TK/TLU) information should be sought regarding cultural heritage resources, which would include historical use of the area.	There is no indication in the EIS that TK/TLU studies have sought information with respect to cultural heritage resources, specifically historical use and associations the subject property may have with historic events, activities or persons.	Provide further documentation as to how cultural heritage resource (and historic use) information has been sought through TK/TLU studies.	EA
MTCS	Amy Didrikson, Heritage Planner	Physical and Cultural Heritage (including Archaeology)	EIS	Volume 2 Section 5.14.2 Registered Archaeological Sites Page 5-166	This statement is incorrect: "In Ontario, archaeological sites are protected under Ontario Heritage Act Regulation 170/04". "Archaeological sites" are defined under O. Reg 170/04, but are protected under the Ontario Heritage Act.	The statement currently included does not accurately interpret the applicable legislation.	Revise the statement to read, "In Ontario, archaeological sites are protected under the Ontario Heritage Act".	Regulatory (Ontario Heritage Act)
MTCS	Amy Didrikson, Heritage Planner	Physical and Cultural Heritage (including Archaeology)	EIS	Volume 2 Section 5.15 Cultural Heritage Landscapes and Built Heritage Resources Page 5-168	The definition for built heritage resources from the PPS is provided, but not cultural heritage landscapes.	Definitions for built heritage resources and cultural heritage landscapes should both be provided in this section to acknowledge both types of cultural heritage resources addressed in this section.	Revise the first paragraph of this section with definitions for both built heritage resources and cultural heritage landscapes.	N/A (Terminology)
MTCS	Amy Didrikson, Heritage Planner	Physical and Cultural Heritage (including Archaeology)	EIS	Volume 2 Section 5.15 Cultural Heritage Landscapes and Built Heritage Resources Page 5-169	This section states that a copy of the Unterman McPhail built heritage and cultural heritage landscape report will be provided in the final EA Report as Appendix M-3. Can this report be provided to MTCS in advance of the release of the final EA Report so that we can pro-actively provide comment?	MTCS would like the opportunity to review the Unterman McPhail report in advance of the release of the Final EA Report so that we may pro-actively provide comment on the range and extent of the built heritage resources and cultural heritage landscapes which were examined.	Include a commitment to provide a copy of the Unterman McPhail report to MTCS in advance of the release of the Final EA Report in Table 14-1 and section 14 of the EIS Report.	EA
MTCS	Amy Didrikson, Heritage Planner	Physical and Cultural Heritage (including Archaeology)	EIS	Volume 2 Section 5.15.2 Cultural Heritage Landscapes and Built Heritage	This section states that "Representatives of MTCS were contacted to determine whether there are cultural heritage resources (such as those listed in Table 1 under Part IV of the Ontario Heritage Act, road bridges listed in the	The Ontario Heritage Trust and the Federal Government should be contacted directly for information on easement properties and Federally recognized properties, as they are the purveyors of this information. If these	Contact the Ontario Heritage Trust and the Federal Government (Parks Canada) for information on easement properties and National	EA

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Date submitted: August 30, 2013

Reference #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS or ToR	Summary of Comment	Rationale	Proposed Action	EA or Regulatory
				Resources Page 5-169	Provincial Government Ontario Heritage Bridge Guideline, Ontario Heritage Trust easement properties or Federally recognized properties within or beside the RRGPs and proposed Highway 600 re-alignment". MTCS does not provide information on behalf of the Ontario Heritage Trust, or on behalf of the Federal Government. Please clarify the information sources for this information in this section.	public bodies have been contacted already, this should be clarified in the EIS.	Historic Sites, respectively.	
MTCS	Amy Didrikson, Heritage Planner	Physical and Cultural Heritage (including Archaeology)	EIS	Volume 2 Section 7.1.1.2 Cultural Heritage Landscapes and Built Heritage Resources Page 5-168	Please correct the typo in the following bullet: <ul style="list-style-type: none"> Cultural heritage resources (including archaeological resources, built heritage landscapes and cultural heritage resources archaeology); 	MTCS does not recognize the term cultural heritage landscapes archaeology.	Revision	N/A (Terminology)
MTCS	Amy Didrikson, Heritage Planner	Physical and Cultural Heritage (including Archaeology)	EIS	Volume 2 Section 7.2.2 Selected Valued Socio-Economic Components Page 7-10	Please revise the following paragraph: <p>"Project activities also have the potential to affect: housing stock; community services (such as health care and general community services); traffic patterns, traffic volumes and the state of existing road infrastructure; the sustainability of local communities; human health; and archaeological and cultural heritage resources".</p>	MTCS understands the term "cultural heritage resources" to include archaeological resources, built heritage resources and cultural heritage landscapes.	Revision	N/A (Terminology)
MTCS	Amy Didrikson, Heritage Planner	Physical and Cultural Heritage (including Archaeology)	EIS	Volume 2 Section 7.2.2 Selected Valued Socio-Economic Components Page 7-11	The third paragraph states: "The proposed RRGPs may overlap areas that have cultural values such as burial or ceremonial sites, although none have been identified to date". This does not appear to be accurate read alongside the Rainy River Gold Project Environmental Assessment High-level Review Report, prepared by Dillon Consulting in July 2013, on behalf of a number of First Nations groups. This report states on page 14 that First Nations have expressed concern that the site could have burial sites, particularly around muskeg areas.	The EIS report should include a complete account of the consultation to-date. The current stipulation in the EIS that burial sites have not yet been identified could be revised to more clearly indicate that there is the potential for burial sites in the area based on consultation with local First Nations.	Revise the text on page 7-11 to read: <p>"The proposed RRGPs may overlap areas that have cultural values such as burial or ceremonial sites. Consultation to date with local First Nations has confirmed that such sites may exist on the site".</p>	EA
MTCS	Amy Didrikson, Heritage Planner	Physical and Cultural Heritage (including Archaeology)	EIS	Volume 2 Section 7.2.1 Cultural Heritage Resources Effects Assessment Page 7-168	Please revise the following statement: "The assessment of archaeological and cultural heritage resources is regulated by the Province of Ontario under the Ontario Heritage Act under license from the MTCS".	MTCS licenses archaeologists, and as a result regulates archaeological assessments in Ontario. However, this statement includes the term cultural heritage resources which refers to built heritage resources and cultural heritage landscapes. MTCS does not license professionals who assess built	Revision	Regulatory (Ontario Heritage Act)

MTCS's Review of the Rainy River Draft Environmental Impact Statement

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Reference #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS or ToR	Summary of Comment	Rationale	Proposed Action	EA or Regulator
MTCS	Amy Didrikson, Heritage Planner	Physical and Cultural Heritage (including Archaeology)	EIS	Volume 2 Section 7.22.1 Cultural Heritage Resources Effects Assessment Page 7-169	Please revise the following statement: "Cultural heritage value is established in Ontario based on a number of indicators identified in the Standards and Guidelines", which does not accurately reflect how cultural heritage value or interest is determined for built heritage resources or cultural heritage landscapes.	heritage resources or cultural heritage landscapes specifically. O.Reg. 9/06 outlines the criteria used to determine whether or not a built heritage resource or cultural heritage landscape is of cultural heritage value or interest. The MTCs Standards and Guidelines for Consultant Archaeologists relates exclusively to archaeological resources.	Revise the statement as follows: "Cultural heritage value for archaeological sites is established in Ontario based on a number of indicators identified in the Standards and Guidelines".	EA and regulatory (Ontario Heritage Act)
MTCS	Amy Didrikson, Heritage Planner	Physical and Cultural Heritage (including Archaeology)	EIS	Volume 2 Table 7-48 Significance Determinations of Residual Effects After Mitigation – Human Environment Page 7-226	This table includes a VSEC row labeled "cultural heritage resources" which appears to refer to archaeological resources.	MTCS understands cultural heritage resources to include archaeological resources, built heritage resources, and cultural heritage landscapes.	Revise this row to read "Archaeological Resources"	N/A (Terminology)
MTCS	Amy Didrikson, Heritage Planner	Physical and Cultural Heritage (including Archaeology)	EIS	Volume 2 Table 7-48 Significance Determinations of Residual Effects After Mitigation – Human Environment Page 7-226	This table includes a VSEC row labeled "Built Heritage Resources", which should be supplemented by "Cultural Heritage Landscapes" to ensure the full suite of cultural heritage resources are included as part of the analysis.	The outstanding built heritage resource and cultural heritage landscape assessment by Unterman McPhail needs to be fully reflected in this table.	Revise this VSEC row to read "Built Heritage Resources and Cultural Heritage Landscapes".	N/A (Terminology)
MTCS	Amy Didrikson, Heritage Planner	Physical and Cultural Heritage (including Archaeology)	EIS	Appendix L Socio-economic baseline Page v	Please correct the reference to the Ministry of Tourism, Culture and Sport in the glossary (which currently refers to our Ministry as the Ontario Ministry of Tourism and Culture).	Our Ministry has recently been renamed to the Ontario Ministry of Tourism, Culture and Sport.	Revise the glossary and all subsequent references to read the "Ontario Ministry of Tourism, Culture and Sport".	N/A
MTCS	Amy Didrikson, Heritage Planner	Physical and Cultural Heritage (including Archaeology)	EIS	Appendix O Comprehensive Alternatives Assessment Tables Page v	It is unclear how, for certain alternative methods, it has been determined that the effect on built heritage and cultural heritage landscapes is "N/A". For example, aggregate extraction can affect built heritage resources and cultural heritage landscapes depending on proximity. Water taking from lakes could impact cultural heritage landscapes, depending on the extent of the water taking. In addition, it is unclear how the proponent has concluded that "no apparent" effects on built heritage and cultural heritage landscapes will result from the Highway 600 Re-alignment, the power supply alternatives or the	The rationales behind the conclusions regarding cultural heritage resources are not explained in the accompanying text in section 6.	Clarify.	EA

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Reference #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS or ToR	Summary of Comment	Rationale	Proposed Action	EA or Regulatory
					Transmission Line Routing when the assessment by Unterman and McPhail on built heritage and cultural heritage landscapes has not yet been completed.			

Ministry of Transportation

Northwestern Region
Corridor Management Section
615 South James Street
Thunder Bay, Ontario P7E 6P6



Phone: (807) 473-2117
Fax: (807) 473-2168

August 30, 2013

Emailed To: sasha.mcleod@ontario.ca
(3 Pages)

Environmental Approvals Branch,
Ontario Ministry of the Environment,
2 St. Clair Avenue West,
Floor 12A,
Toronto, ON
M4V 1L5

Attention: Sasha McLeod, Project Officer

**Re: Rainy River Resources Gold Project
Draft Environmental Assessment
Ministry of Transportation Review Comments**

Dear Sasha:

Further to the above, this Ministry has reviewed this document and provided comments as required. These comments are provided below. As per the discussion during the Coordinated EA Committee Meeting on August 23, 2013, it was requested that these comments be provided by today's date.

Part of this proposed project will be the relocation/realignment of a portion of Provincial Highway 600 which currently crosses the proposed location of the open pit mine. This relocation is listed and described as part of the project in some locations, but not in others.

From a general perspective, we found this draft report to be confusing, with references to the relocation/realignment of Provincial Highway 600 and the affects of this scattered throughout the report.

While there may be some advantage to including these references within the particular sections and subsections in the report, this Ministry would have preferred to have a full and detailed section dedicated to this Highway 600 relocation/realignment. For the purposes of this project, this ensures that this Ministry's review, and that of others, is based on all of the relevant information being in one location so a complete picture is easily available.

We spent a considerable amount of time crossing and criss-crossing the document in an attempt to ensure that, not only will this Ministry's interests be thoroughly considered, but also those of others that will be affected by this relocation.

These scattered references to this Highway 600 relocation/realignment also make it very difficult to have this document reviewed by such other technical sections within this Ministry as Traffic, Geotech, Planning and Design, Environmental and Operations.

Consequently, this Ministry would like to see such a compiled section incorporated into this document.

The last sentence of the second paragraph in subsection 4.15 states that “the re-aligned Highway 600 will be constructed by RRR to Provincial (Ministry of Transportation) standards so that RRR can pursue transfer of the road to the Province after construction”.

This statement essentially summarizes this Ministry’s perspective regarding this Highway 600 relocation/realignment. Ultimately, the design and acceptability of the relocated/realigned portion of Highway 600 will be captured in a legal agreement between the proponent and this Ministry.

Also in subsection 4.15, the draft EA states that the crossing of the Pinewood River will be designed in accordance with the Highway Drainage Design Standard (MTO 2008). However, this crossing will also have to be designed in accordance with the Canadian Highway Bridge Design Code (CHBDC 2006).

There are to be no references in this Draft EA document to design and location parameters for this relocated portion of Highway 600, as none have been officially agreed to by this Ministry, or determined by the EA process. For example, subsection 4.1 states that “the major proposed project components are expected to include: ...gravel-surfaced, Highway 600 re-alignment; ...”. The reference to gravel surface as the expectation of a relocation/realignment design parameter is to be removed in this Draft EA document. As well, all such design references should also be removed.

There are utilities currently located within the Highway 600 right-of-way. There does not appear to be any discussion on how these utilities going to be accommodated with the Highway 600 realignment. The proponent has also talked about a water line within the current and proposed Highway 600 right-of-way along that portion of Highway 600 extending west from the project site and then south along the proposed Pine River Road to the Pinewood River. The location and discussion of this within the draft report could not be found.

In subsection 6.15.2, on page 6-80. the statement is made that MTO supports Alternate C. This statement is incorrect as MTO has not stated a preference for any of the studied alternatives. While the proponent and the Municipality have indicate their preference, this Ministry has consistently stated that the EA will determine the preferred alternative location for the relocated portion of Highway 600. Consequently, all such references to a selected realignment by MTO are to be removed from the document.

In fact, Table O-11 compares several alternatives for the re-alignment of Highway 600, undertaking a comparative evaluation of the overall advantages and disadvantages of each. It is noted that all of the alternatives had similar advantages and disadvantages for the

majority of the indicators. After reviewing the information in the table, it is difficult to determine why Alternative C was the preferred alternative.

In subsection 4.9, the draft document states that “there are currently no plans to develop onsite construction or permanent accommodations if sufficient accommodations can be found in local communities. The option of accommodation complexes are retained herein in the event that suitable offsite permanent accommodations are not available”. Considering the anticipated size of the workforce, both during construction, and after during the operation of the mine, this aspect of development of this project should be addressed in this document. For example, the location, design, and construction of accommodation should be touched on, as well as the governmental perspective on such types of development.

There are references throughout the document to various legislation that are applicable to this proposed project. There are references to the Highway Traffic Act with respect to the Ministry of Transportation (ie. the 4th bullet point on page 15-2) but no references to the Public Transportation and Highway Improvement Act, which is the governing legislation for most of the actions of this Ministry with respect to development along provincial highways.

This Ministry had asked the proponent to undertake a Traffic Impact Study, not only for the affects of the proposed development on Highway 600, but also on the proposed access road that is proposed to connect Highway 71 to the project area and Roen Road along Korpi Road. Besides providing additional access to the project area, this road will also provide access to the residents on Marr Road who will be cut off when Highway 600 is re-aligned. There does not appear to be any discussion on this part of the project.

The above comments do not represent an all encompassing review. Rather, and in summary, the Ministry of Transportation would like to see a dedicated section within the Draft EA that focuses on the Highway 600 realignment. Once this has been prepared, this Ministry will then be in a position to undertake a thorough review of the Draft EA.

Should you have any questions, please do not hesitate to contact me at your convenience.

Yours truly,

Original Signed & Filed

Jim McKeever
Corridor Management Planner

From: Sliworsky, Gary (OMAFRA)
Sent: September-03-13 12:02 PM
To: McLeod, Sasha (ENE)
Subject: RE: RRG Draft EA - reminder deadline for comments

Sasha,

I have no comments from an agricultural standpoint. Any initial concerns related to water are more than adequately covered by MOE and MNR.

Gary

From: McLeod, Sasha (ENE)
Sent: September 3, 2013 10:42 AM
To: Agarwal, Sushant (ENE); Allen, Paula (ENE); Antler, James (MTCS); Bennett, Neal (MNDM); Brown, Cindy (MTO); Didrikson, Amy (MTCS); Gable, Dale (ENE); Godbout, Pierre J.R. (ENE); Habtom, Stefanos (ENE); Hall, Yvonne (ENE); Hamilton, Don (ENE); Haslam, Simon (ENE); Helfinger, Michael (MEDTE/MRI); Hill, Rachel (MNR); Horihan, Jodie (ENE); Jewitt, Don (MOL); McKeever, James (MTO); O'Donnell, Cheryl (ENERGY); Sliworsky, Gary (OMAFRA); Smith, Brett (ENERGY); Spencer, Paula (ENE); Stajkowski, Drew (ENE); Tyance, Joseph (ENE)
Cc: Davis, Stephanie (CEAA)
Subject: RRG Draft EA - reminder deadline for comments

Hi provincial review team,

As you are aware, the deadline for submitting your comments to me on the Rainy River Gold Mine draft EA was Friday, August 30. This is a reminder to please send your comments as soon as possible this week (week of Sept 3). The proponent is expecting provincial comments this week.

Thank you to those who have provided comments already. Your comments will be sent to RRR in the next day or so. If I have any questions I'll email you individually. For the ministries outstanding, if I haven't heard from you, I'll follow up separately about when to expect your comments.

After all comments are submitted, we expect to receive the proponent's responses. Then we expect technical working group meetings will be held among the relevant fed and prov agencies and the proponent to discuss comments/responses – as required. The feedback you've provided so far on the technical sub-groups will aid in setting these up.

Please let me know if there's anything else.

Thanks,
Sasha

Daniel, Sheila E

Subject: Rainy River Gold Class EA

From: Kyle Stanfield
Sent: Tuesday, September 03, 2013 12:10 PM
To: 'Cyrus.Elmpak-Mackie@HydroOne.com' <Cyrus.Elmpak-Mackie@HydroOne.com>
Cc: 'Roman.Dorfman@HydroOne.com' <Roman.Dorfman@HydroOne.com>; 'Sasha.McLeod@ontario.ca' <Sasha.McLeod@ontario.ca>; 'stephanie.davis@ceaa-acee.gc.ca' <stephanie.davis@ceaa-acee.gc.ca>
Subject: RE: Rainy River Gold Class EA

Thank you Mr. Elmpak for the HydroOne comments on the Environmental Assessment of the Rainy River Gold Project. As you know, the project is subject to a Provincial Individual Environmental Assessment as agreed with the Ministry of the Environment in the spring of 2012. Sasha McLeod with the Ministry of the Environmental Approvals Branch in Toronto is the Provincial lead coordinator for the Environmental Assessment and is responsible for ensuring that all Provincial Environmental Assessment requirements (including any Class EA) aspects are met.

The project is also subject to a Federal Standard Environmental Assessment underway and harmonized with the concurrent Provincial process. The Draft Environmental Assessment was issued by Rainy River Resources in July of 2013 and is currently being commented on by both Provincial and Federal regulatory agencies so your input is indeed timely.

I will pass your comments on to our engineers who are managing this project aspect with their consultant Wayne Clarke at SanZoe Consulting. Someone from the engineering team will be in touch with Roman Dorfman to discuss the aspects below in more detail.

Sincerely,

Kyle Stanfield
Rainy River Resources
807-621-6152

From: Cyrus.Elmpak-Mackie@HydroOne.com [Cyrus.Elmpak-Mackie@HydroOne.com]
Sent: Tuesday, September 03, 2013 10:56 AM
To: comments
Cc: ierullo@HydroOne.com; Roman.Dorfman@HydroOne.com; w.d.kloostra@HydroOne.com
Subject: Rainy River Gold Class EA

Dear Mr. Stanfield,

In our initial review, we have confirmed that Hydro One Transmission facilities are located within immediate vicinity of the proposed site in your study area. Please allow appropriate lead-time in your project schedule in the event that proposed development impacts Hydro One infrastructure which requires relocation or modifications, or needs an outage, that may not be readily available.

In planning, please note that developments should not reduce line clearances and limit access to our facilities at any time in the study area of your Proposal. Any construction activities must maintain the electrical clearance from the transmission line conductors as specified in the Ontario Health and Safety Act for the respective line voltage.

The integrity of the structure foundations must be maintained at all times, with no disturbance of the earth around the poles, guy wires and tower footings. There must not be any grading, excavating, filling or other civil work close to the structures.

Note that existing rights of ways may have provisions for future lines or already contain secondary land uses (i.e. pipelines, water mains, parking, etc). Please take this into consideration in your planning.

Once details are known and it is established that your development will affect Hydro One facilities including the rights of way, please submit plans that detail your development and the affected Hydro One facilities to:

Roman Dorfman, Hydro One Real Estate Management
185 Clegg Road, Markham L6G 1B7
Phone: (905) 946-6273
roman.dorfman@HydroOne.com

Please note that the proponent will be responsible for costs associated with modification or relocation of Hydro One facilities, as well as any added costs that may be incurred due to increase efforts to maintain our facilities.

Regards,

Cyrus Elmpak-Mackie
Hydro One Networks Inc.
Transmission Asset Management
416.345.1265

From: McLeod, Sasha (ENE) [<mailto:Sasha.McLeod@ontario.ca>]
Sent: Wednesday, September 04, 2013 12:25 PM
To: kstanfield@rainyriverresources.com; Daniel, Sheila E
Cc: Davis, Stephanie (CEAA)
Subject: More provincial comments - RRGD Draft EA

Please find attached comments from MOE's noise and groundwater reviewers. I've updated the tracking lists below.

From: McLeod, Sasha (ENE)
Sent: September 3, 2013 8:27 PM
To: kstanfield@rainyriverresources.com; sheila.daniel@amec.com
Cc: Davis, Stephanie (CEAA)
Subject: Provincial comments so far - RRGD Draft EA

Kyle and Sheila,

Please find attached comments from the following ministries regarding the draft EA for the Rainy River Gold Mine Project. Please let me know if you have trouble opening the files or have any questions and I can help coordinate with the reviewers.

Comments attached:

- MEDTE
- MNDM land tenure and Aboriginal
- MNDM mine rehabilitation
- MNDM socio-economic
- MOE air quality
- MOE air quality
- MOE surface water
- MOE wastewater
- MTCS cultural heritage
- MTO
- OMAFRA
- [MOE noise](#)
- [MOE groundwater](#)

Later this week I expect to provide you with comments from:

- MOE Environmental Assessment Services
- MOE air dispersion modelling (maybe next week)
- MOE waste
- MTCS tourism
- MNR
- [MNDM additional comments](#)

Sasha

From: Davis,Stephanie [CEAA] [<mailto:Stephanie.Davis@ceaa-acee.gc.ca>]
Sent: Wednesday, September 04, 2013 5:33 PM
To: kstanfield@rainyriverresources.com
Cc: Daniel, Sheila E; Simms, David; Liu,Amy [CEAA]; Aitken,Jill [CEAA]
Subject: Rainy River Draft EIS - federal comments

Kyle,

Please find attached comments from Fisheries and Oceans Canada, Health Canada, Natural Resources Canada and Transport Canada. Comments from the Agency and Environment Canada will be sent tomorrow.

With respect to meetings, CEAA would be fine with having a meeting to discuss our comments prior to the receipt of responses from AMEC. It can be one of the first ones we book. For the other departments, the experts would prefer to receive responses in advance.

One of the concerns highlighted in the review was the availability of water on site. My recommendation would be to work towards addressing these comments first and we can hold a technical meeting shortly after transmission to discuss.

Kind Regards,
Stephanie

Stephanie Davis, BEng

Project Manager | Gestionnaire de projets
Canadian Environmental Assessment Agency | Agence canadienne d'évaluation environnementale
Ontario Region | Région de l'Ontario
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Government of Canada | Gouvernement du Canada

For reasons of computer security, this office has prohibited the use of automated response tools to indicate when we are away from the office. If I do not respond to your message, I may be away from the office. Kindly contact our office reception at 416 952 1576 for immediate attention.

Pour des raisons de sécurité informatique, ce bureau interdit l'utilisation des outils de réponse automatisés pour indiquer quand nous sommes absents du bureau.

Si je ne réponds pas à votre message, il se pourrait que je sois absent du bureau. Veuillez communiquer avec notre service d'accueil en composant le 416 952 1576 pour obtenir une réponse rapidement.

Reference #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS or ToR	Summary of Comment	Rationale	Proposed Action	EA or Regulatory
Assign Comment Reference Number (Department/Ministry and number e.g. CEAA-1 or MNR-1)		Aboriginal (including potential rights impacts, traditional use of lands and resources) Accidents & Malfunctions Acoustic Environment (including Noise and Vibration) Atmospheric Environment (including Air Quality) Cumulative Effects Decommissioning and Reclamation Effects of the Environment on the Project (incl. Climate Change) Fish and Fish Habitat Fishery General - Concern General - EA Type General - Consultation General - Logistics General - Project Risks Geology Groundwater (including water quality and quantity) Human Health Hydrology Monitoring Natural Hazards Navigable Waters Physical and Cultural Heritage (including Archaeology) Socio-Economic Environment Surface Water (including water quality and quantity) Terrain and Soils Transportation Vegetation Visual Impacts Wastewater/Effluent Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	Provide the specific section(s) and page number(s) from the EIS Guidelines or ToR related to the comment	Provide the specific volume(s), section(s) and page number(s) from the EIS of the information being referenced	Provide an explanation of the issue of concern	Describe the rationale for why issue of concern is important for environmental assessment purposes.	Describe any action recommended	Pick EA, Regulatory Instrument or Both. Please state which regulatory instrument you are referring to.
DFO-1	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 8.2 p. 32	Volume 1, Summary	Clarify "harmful" alteration, as per <i>Fisheries Act</i>		Clarification in text	Regulatory (<i>Fisheries Act</i>)
DFO-2	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 8.2 p. 32	Volume 1, Summary	Additional discussion is required regarding the restoration works as proposed compensation			EA and Regulatory (<i>Fisheries Act</i>)
DFO-3	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 4.12.7 p.4-30	Volume 2, Draft Environmental Assessment Report	Where is the emergency spillway located in relation to the West Creek Diversion? Where will the spillway discharge to?		Clarification	EA and Regulatory (<i>Fisheries Act</i>)

				(Environmental Impact Statement)	Will sufficient water be released from the West Creek Pond to ensure continuous flow to the West Creek Diversion and support fish habitat year round?			
DFO-4	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 4.12.7.4 p.4-33	Volume 2, Draft Environmental Assessment Report (Environmental Impact Statement)	States that the initial 450m of the West Creek diversion channel will operate as the emergency spillway for the West Creek pond. Additional detail on the design of this spillway and its function will be required for <i>Fisheries Act</i> regulatory approvals.		Clarification	Regulatory (<i>Fisheries Act</i>)
DFO-5	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 4.12.8 p.4-34		States that in dry years, the West Creek Pond may have insufficient water for use in processing; will the West Creek diversion have water flow year round?		Clarification	
DFO-6	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 4.19.1 p.4-41		States the reclaimed open pit may be on-line with a spillway to the Pinewood River or the diversion of West Creek. Has consideration been given to contouring an upper portion of the pit to create a shallow littoral zone, if the intention is to have the pit become part of a productive aquatic system?		Clarification	Regulatory (<i>Fisheries Act</i>)
DFO-7	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 5.1.1 p.5-2		The document states "...DFO and MNR have requested that the effect on aquatic habitats of the middle and lower reaches of the Pinewood River of the water taking for process plans needs be assessed." The next statements are regarding water quality. DFO was requesting further information regarding how the wetted width of the downstream watercourse, and thus fish habitat, may be affected by water taking activities. Additional text on the water taking activities throughout the project life cycle and impacts on fish and fish habitat is needed, including timing, duration and		Additional information required	EA

					extent.			
DFO-8	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 5.2.15 p.5-34		Note that the federal <i>Species at Risk Act</i> applies to aquatic species where they are found, not only on federal lands.		Clarification	EA
DFO-9	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 5.8.2 p.5-83		Note that Lake Sturgeon were found downstream in the Pinewood River in 2013		Clarification	EA
DFO-10	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Table 5.24 p.5-190		Add a footnote that Lake Sturgeon was found in 2013 in the lower Pinewood River		Clarification	
DFO-11	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 6.5		This section will need to be revised based on the discussions between DFO and AMEC		Revision	EA and Regulatory (<i>Fisheries Act</i>)
DFO-13	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 6.5.1 p.6-26		Delete wording "might be more attractive to DFO and EC". This alternative would not require overprinting waters frequented by fish.		Revision	EA
DFO-14	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 6.8.1 p.6-44		May need to reword portions of this section based on discussion with DFO		Revision	EA and Regulatory (<i>Fisheries Act</i>)
DFO-15	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 6.8.2 p.6-47		<i>Fisheries Act</i> s.35(2) is missing from the discussion on permits required		Revision	EA
DFO-16	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 6.9.1 p.6-52		Provide clarification of the location of the process plant to the tributary of West Creek; will mitigation measures be in place to protect fish habitat at this site?		Clarification	EA and Regulatory (<i>Fisheries Act</i>)
DFO-17	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 6.9.2 p.6-55		There is no discussion in the document on the effects of blasting on the aquatic environment. Potential impacts as a result of blasting in the open pit to the Pinewood River should be considered. Follow DFO's Guidelines for the Use of Explosives In or Near Canadian Fisheries Waters.		Revision	EA and Regulatory (<i>Fisheries Act</i>)
DFO-18	Sara Eddy,	Fish and Fish Habitat	Section		Off Lake and Burditt Lake are		Clarification	EA and

	Senior Fisheries Protection Biologist	Fishery	6.11.1 p.6-64		identified as potential alternative water sources for the project. Have aquatic assessments and baseline studies been undertaken for these lakes?			Regulatory (<i>Fisheries Act</i>)
DFO-19	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 6.11.2 p.6-69		Additional information on how water taking from the Pinewood River during construction may affect the wetted width of the watercourse and how the magnitude and timing of water taking will impact fish and fish habitat is needed.		Additional text	EA and Regulatory (<i>Fisheries Act</i>)
DFO-20	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 6.15.1 p.6-81		There is no discussion on new water crossings associated with the alternative routes and potential impacts to the natural environment		Additional text	EA and Regulatory (<i>Fisheries Act</i>)
DFO-21	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 6.17.1 p.6-85		States the only significant watercourse crossing of the transmission line is the outlet of Beadle Lake. Provide more detail on this crossing in the document		Clarification	EA and Regulatory (<i>Fisheries Act</i>)
DFO-22	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 6.19.1 p.6-96		Will the outlet constructed from the open pit to the Pinewood River on closure be designed to allow fish movement?		Clarification	EA and Regulatory (<i>Fisheries Act</i>)
DFO-23	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 6.19.7.1 p.6-122		Additional discussion regarding how much will the West Creek Pond be lowered at closure, how this will affect fish and fish habitat at the site and downstream and how fish passage will be facilitated at the dam is needed.		Additional text	EA and Regulatory (<i>Fisheries Act</i>)
DFO-24	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 7.2.1 p.7-7		Lake Sturgeon have been found in the Pinewood River; correct statement that presence has not been confirmed		Clarification	EA
DFO-25	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 7.5.1 p.7-26		The potential for impacts to fish and fish habitat from pipeline crossings has not been noted previously in the document. Additional discussion is needed.		Clarification	EA and Regulatory (<i>Fisheries Act</i>)
DFO-26	Sara Eddy, Senior Fisheries Protection	Fish and Fish Habitat Fishery	Section 7.5.1.1 p.7-27		Clarification on whether the constructed wetland area is intended to "support" fish during its operation as a		Clarification	EA

	Biologist				treatment facility or whether fish will be excluded from it			
DFO-27	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 7.5.1.1 p.7-27		During low flow and precipitation years, is the intent that no water will be discharged from the West Creek Pond to the diversion channel? Include a discussion on downstream impacts to fish and fish habitat as a result of this water taking Will the dam at the pond be a complete barrier to fish movement in the system?		Clarification	EA and Regulatory (<i>Fisheries Act</i>)
DFO-28	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 7.5.1.3 p.7-29		Is the seasonal connectivity between the up and downstream of the West Creek based on flow or fish passage? What is the timing and duration for the diversion channel to flow intermittently?		Clarification	EA and Regulatory (<i>Fisheries Act</i>)
DFO-29	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 7.5.3 p.7-32		Additional discussion is needed on the funding of restoration initiatives as habitat compensation		Clarification	EA and Regulatory (<i>Fisheries Act</i>)
DFO-30	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 7.5.4 p.7-33		More detail is required on the offset strategy and no net loss plans. Conceptual models of these should be appended to the EIS. Additional detail on the two plans (MMER vs. s.35 (2)) should be included in the text. The proposed restoration initiative does not fit the definition of habitat banking; this section and should be reworded.		Revision	EA and Regulatory (<i>Fisheries Act</i>)
DFO-31	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 7.5.5 p.7-33		Provide detail on the two plans under development – separate s.35(2) from MMER		Revision	EA and Regulatory (<i>Fisheries Act</i>)
DFO-32	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 7.6.1.1 p.7-34		Will these water takings affect wetted width of the water courses and available fish habitat? Include DFO Freshwater		Clarification	EA and Regulatory (<i>Fisheries Act</i>)

					Intake End-of-Pipe Guidelines as mitigation			
DFO-33	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 7.6.1.3 p.7-39		Change “do not usually result in harmful alterations of the watercourse...” to “HADD of fish habitat”. Should clarify that given the sensitivity of fish and fish habitat and impacts of the proposed work, <i>Fisheries Act</i> authorization is not likely required		Revision	EA and Regulatory (<i>Fisheries Act</i>)
DFO-34	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 7.6.1.3 p.7-39		How will the proponent determine when additional flows from the constructed wetland are necessary to be released to the Pinewood River?		Clarification	EA and Regulatory (<i>Fisheries Act</i>)
DFO-35	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 7.6.2 p.7-40		As per previous comments, provide clarification regarding the two offsetting plans required for MMER vs. s.35(2)		Revision	EA and Regulatory (<i>Fisheries Act</i>)
DFO-36	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 7.6.3 p.7-41		Prefer “maintain current fish habitat productivity” over “maintenance”		Clarification	EA
DFO-37	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 7.17.5 p.106		Additional discussion the proposed watershed restoration program is needed		Revision	EA and Regulatory (<i>Fisheries Act</i>)
DFO-38	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Table 7.9 p.7-184		May need to adjust the table based on discussions with DFO		Revision	EA and Regulatory (<i>Fisheries Act</i>)
DFO-40	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 8.2.1 p.8-4		Burditt Lake is identified as an alternative water source for the project. Have aquatic assessments and baseline data been compiled for this waterbody? Discussion on impacts to fish and fish habitat has not been included.		Additional text	EA and Regulatory (<i>Fisheries Act</i>)
DFO-41	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 8.6 p.8-10		Note that in terms of federal aquatic Species at Risk, the only species in the area that has been assessed is Lake Sturgeon, found in the lower reach of the Pinewood River		Clarification	EA
DFO-42	Sara Eddy, Senior Fisheries	Fish and Fish Habitat Fishery	Section 13.10 p.13-10		<i>Fisheries Act</i> authorizations typically do not include water quality monitoring provisions		Clarification	Regulatory (<i>Fisheries Act</i>)

	Protection Biologist							
DFO-43	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 13.5.3 p.13-13		Deleterious substances (s.36 of the <i>Fisheries Act</i>) are administered by Environment Canada; EC should be consulted regarding deposits, rather than DFO		Revision	EA
DFO-44	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 15.1 p.15-1		DFO's mandate is to conserve and protect fish and fish habitat. Update to read: Harmful alteration or disruption, or destruction of fish habitat Recommend expanding this section to provide further detail on the role of DFO		Revision	EA and Regulatory (<i>Fisheries Act</i>)
DFO-45	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Section 15.2 p.15-3		A federal SARA permit is not required because there are no Schedule 1 aquatic species at risk or species at risk on federal lands.		Clarification	EA
DFO-46	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Table 15.1 p.15-4		Update <i>Fisheries Act</i> Authorization to: Harmful alteration or disruption, or destruction of fish habitat Description of approvals – authorizations may not be required for all of the activities listed depending on sensitivity of fish and fish habitat, design, impacts. For example, water crossings for the access roads. Surface water flows may also cause disruptions to watercourses. Should add caveat "Potentially" to the start of the section and list the works that may require authorization		Revision	Regulatory (<i>Fisheries Act</i>)
DFO-47	Sara Eddy, Senior Fisheries Protection Biologist	Fish and Fish Habitat Fishery	Appendix D12		Will the final 2013 aquatic baseline report be made available?		Clarification	EA and Regulatory (<i>Fisheries Act</i>)

Ref #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS or ToR	Summary of Comment	Rationale	Proposed Action	EA or Regulatory
HC-1	A.Denning, Regional EA Coordinator, HC	General-Logistics		Main report	The report is presented with the text separated from all associated tables and figures which are presented at the end of each section. This layout is confusing and requires the reviewer to flip from the text portion to the end of the section to review the referenced tables and figures.	Reviewing the document would be easier if the appropriate tables and figures were provided with the text where they are referenced.	Please insert tables and figures in text where they are referenced.	EA
HC-2	A.Denning, Regional EA Coordinator, Health Canada	Atmospheric Environment		7.3.1.1	The EIS states that without dust mitigation, it is probable that the air concentrations of particulate matter 2.5 microns or less in diameter (PM _{2.5}) will exceed the Ontario local air quality standards. Isoleths for total particulate matter (PM _{tot}), HCN (hydrogen cyanide) and nitrogen oxides (NO _x) are provided; however, the isopleth for PM _{2.5} , which was predicted to exceed its air quality standard, is not presented.	It would be useful to see the isopleth for PM _{2.5} in order for HC to review the location(s) of the elevated PM _{2.5} and the proximity to nearby residences.	Please provide the isopleth for PM _{2.5} .	EA
HC-3	A.Denning, Regional EA Coordinator, HC	Atmospheric Environment		Table 7-4	According to this Table, PM _{tot} and PM _{2.5} associated with operational activities are at 71.7% and 95.6% of their applicable air quality criteria. HC adheres to the principles of the Canada-Wind Standards (which have been referenced in the EIS for PM _{2.5}), which include Keeping Clean Areas Clean (KCAC) and Continuous Improvement (CI) (CCME, 2000) ² . Particulate air pollution is considered a non-threshold contaminant, meaning that health impacts may occur at any level of exposure.	Given the potential health issues associated with exposure to elevated particulate matter, it is important to minimize emissions to the extent possible.	Please consider all technologically and economically feasible mitigation measures to reduce particulate matter emissions to the extent possible given the potential for adverse health effects associated with inhalation exposure.	EA

² Canadian Council of Ministers of the Environment. 2000. Canada-Wide Standards for Particulate Matter and Ozone. http://www.ccme.ca/assets/pdf/pmozone_standard_e.pdf

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					Therefore, it is suggested to attempt to minimize air quality degradation to the greatest extent possible through state-of-the-art design and operation, especially when project-related and/or cumulative effects are a substantial fraction of applicable standards or objectives.			
HC-4	A.Denning, Regional EA Coordinator, HC	Atmospheric Environment		Table 7-4	Nitrogen oxides (NO _x) associated with operational activities are predicted to be at 56.8% of the applicable air quality criteria. Although the predicted levels are lower than the criteria, the exposure of residential receptors to NO _x is expected to increase, because the NO _x releases were attributed to blasting activities (Section 7.21.1.1 (Potential Releases of Potential Contaminants of Concern)). Nitrogen oxides are acute respiratory irritants and thus HC advises that all technologically and economically feasible technologies be employed to reduce emissions to the extent possible.	Given the potential acute respiratory issues associated with exposure to elevated levels of nitrogen oxides, it is important to minimize emissions to the extent possible.	Please consider all technologically and economically feasible mitigation measures to reduce NO _x emissions to the extent possible for adverse health effects associated with inhalation exposure.	EA
HC-5	A.Denning, Regional EA Coordinator, HC	Atmospheric Environment		Table 7-4	Manganese associated with operational activities is predicted to be at 83.6% of its applicable air quality criterion. Inhalation exposure to elevated manganese has been shown to have neurological effects, ranging from fine motor control issues in the fingers, hands and wrists, to neurofunction effects in adults and children, including increased prevalence of	Given the potential health issues associated with exposure to elevated levels of manganese, it is important to minimize emissions to the extent possible.	Please consider all technologically and economically feasible mitigation measures to reduce manganese emissions to the extent possible and ensure that any air monitoring	EA

Ref #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS or ToR	Summary of Comment	Rationale	Proposed Action	EA or Regulatory
					parkinsonian-type symptoms ³ . Even though the predicted levels are below the applicable criteria, human exposure to manganese is expected to increase substantially as a result of the project because there are no current sources for airborne manganese in the area. Thus, all available technologies should be employed to reduce releases to the extent possible. In addition, HC advises including manganese in any air quality monitoring program developed for the project.		program(s) includes monitoring for manganese.	
HC-6	A.Denning, Regional EA Coordinator, HC	Atmospheric Environment		13.2.1 13.2.2 13.2.4	The report indicates that air quality monitoring requirements are expected to be stipulated in the provincial approval for construction and operation. Section 13.2.2 (Methods for Measuring Effects) indicates that dustfall samples will be collected monthly during non-winter period for the construction, operation and active reclamation phases. Section 13.2.4 (Reporting) indicates that the proponent intends to provide the monitoring results annually. Given that several air contaminants are predicted to approach their applicable provincial air quality criteria, and some substances, such as NO _x can have acute adverse effects on humans, it is important to ensure that any air monitoring program will provide results in a	It is important to have a monitoring program that can detect elevated contaminant concentrations in ambient air in order to ensure that mitigation is implemented in a timely manner in order to minimize human exposure.	Please consider an ambient air monitoring program that provides sufficient information in order to determine the duration and number of events which result in elevated air contaminants. This program should produce results in a timely manner such that appropriate mitigative measures can be implemented to minimize the	EA

³ Health Canada. 2010. Human Health Risk Assessment for Inhaled Manganese – Document Summary. <http://www.hc-sc.gc.ca/ewh-semt/pubs/air/manganese-eng.php>

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					timely manner (ideally in real-time) such that additional mitigation can be implemented during the events where these concentrations are elevated. It is important that these exceedences be reported as close to the time when they occur as possible (rather than on a monthly or annual basis) in order to minimize the number and duration of any exceedences.		potential for adverse health effects.	
HC-7	A.Denning, Regional EA Coordinator, HC	Atmospheric Environment		General comment/ disclaimer	Please note that HC relies on other government departments, such as Environment Canada, to evaluate the accuracy of air quality modeling.	HC assumes that air modeling was conducted using correct and accepted and/or validated methods.	If another department identifies concerns with the model results, HC may have additional comments with respect to air quality and human health effects.	EA
HC-8	A.Denning, Regional EA Coordinator, HC	Acoustic Environment		Table 7-7	(Please note that HC does not currently have published guidelines outlining acceptable noise levels and advocates the use of the Ontario Ministry of the Environment's (MOE) sound level limits as appropriate criteria/ benchmarks to compare to current and future predicted noise levels at nearby human receptors.) The table presents predicted sound levels at various receptor locations around the project site. Several of these locations are approaching or at	Given that there are uncertainties in model results, noise levels at nearby receptors may exceed predicted levels. If they exceed provincial noise criteria, additional mitigation beyond what was described in the	Please consider additional mitigation, including formal complaint-response system, that may be utilized where noise levels may exceed acceptable Ontario provincial noise criteria.	EA

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					the Ontario provincial noise standard ⁴ of 40 dBA for evening and night-time hours (POR 12 is at 38 dBA; POR 13 is at 38 dBA; POR 14 is at 39 dBA and POR15 is at 40 dBA). Given that there are uncertainties in predicted operational noise values, actual noise levels during operation may exceed 40 dBA. In order to address potential noise exceedences, HC suggests that the proponent consider proposing additional mitigation measures to limit noise at affected receptors where this uncertainty exists. Health Canada advises that the proponent also consider implementing a formalized complaint-response system which would include a mechanism for confidential reporting, documentation/tracking of complaints, follow-up with complainants, and routine analysis of complaint data to help identify potential/additional noise mitigation measures, as necessary.	EIS may be warranted, including the implementation of a formalized complaint-response system.		
HC-9	A.Denning, Regional EA Coordinator, HC	Groundwater (including water quality and quantity)		5.7.5 7.7.1 5.1 of Summary Doc.	Section 5.7.5 (Water Wells) indicates that there are a possible 21 wells within a radius of approximately 2 km of the edge of the proposed open pit. Section 7.7.1 (Groundwater; Environmental Effects) states that modeling of the open pit indicates that the zone of influence is expected to extend	Depending on the number of wells within the zone of influence that are not acquired by RRR, drinking water supplies may be impacted	Please provide a discussion about how groundwater supplies in the vicinity of the project will be protected and what monitoring and mitigation	EA

⁴ Ontario Ministry of the Environment. 1995. Sound Level Limits for Stationary Sources in Class 3 Areas (Rural). Publication NPC-232.

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					<p>approximately 2.5 to 3.5 km from the edge of the pit by the end of mining. Section 7.7.1 (Groundwater; Environmental Effects) also states that through land acquisition, Rainy River Resources Ltd. (RRR) will own all of the identified water supply wells within the predicted zone of influence, and as such, no adverse effects on drinking water supplies are expected on water supply wells not owned by RRR, all of which are outside of the zone of influence. Based on this, it appears that RRR intends to purchase all of the houses within 3.5 km of the proposed open pit. Section 5.1 (Land Ownership) of the Summary Document indicates that the company will not require the forced re-settlement of any individual families. If the purchase of all nearby homes does not occur, HC advises that RRR identify potential mitigation strategies that would be used to ensure that drinking water supplies are not impacted. In addition, depending on the accuracy of the hydrogeological modeling, impacts may extend beyond 3.5 km, which may affect drinking water supplies at houses that are farther away than predicted.</p>	by project activities.	measures will be implemented in the event that drinking water supplies are compromised by project activities.	
HC-10	A.Denning, Regional EA Coordinator, HC	Groundwater (including water quality and quantity)		6.11.1	The EIS indicates that depending on water needs at the project site, groundwater may be used as a potential water supply, particularly during the early stages of the project.	If groundwater is used for project activities, this may impact private well users	Please provide a discussion about how groundwater use at the site may impact	EA

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					It is not clear whether this alternative was evaluated in the overall hydrogeological modeling in determining the zone of influence and the numbers and locations of potentially affected private well users.	which are located farther away from the project site than modeling may have predicted.	groundwater users in the vicinity of the project site.	
HC-11	A.Denning, Regional EA Coordinator, HC	Groundwater (including water quality and quantity)		5.2.7	The EIS indicates that private wells were surveyed to determine their locations, however, it does not appear that any of these wells were sampled to evaluate water quality or quantity. It would be useful to have baseline chemistry and well yield data for these private wells in order to evaluate any changes that may occur due to project activities.	It is useful to have baseline data on drinking water quality and quantity at nearby private wells in order to evaluate any future project-related changes.	Please consider conducting well yield measurements (to evaluate current water quantity) and chemical analysis (to evaluate current water quality) in all private drinking water wells that may be impacted by the project in order to obtain accurate baseline information on these nearby wells.	EA
HC-12	A.Denning, Regional EA Coordinator, HC	Groundwater (including water quality and quantity)		7.4.1	The EIS discusses vibrations due to blasting, however, there is no discussion about the potential for vibrations to affect nearby drinking water wells such as through increasing turbidity or even well collapse.	Depending on the location and the type of well construction, blasting or other activities causing vibrations may affect drinking water wells.	Please provide a discussion about the potential for vibrations from project activities to affect nearby drinking water wells.	EA
HC-13	A.Denning, Regional	Groundwater (including water		7.7	Please note that HC relies on other government departments, such as	HC assumes that hydrogeological	If another department	EA

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	EA Coordinator, HC	quality and quantity)			Natural Resources Canada, to evaluate the accuracy of hydrogeological modeling which evaluates the potential effect of the project on local groundwater conditions and drinking water supplies.	modeling was conducted using correct and accepted and/or validated methods.	identifies concerns with the model results, HC may have additional comments with respect to drinking water quality and quantity.	
HC-14	A.Denning, Regional EA Coordinator, HC	Human Health		7.21	The EIS cites the World Health Organization provisional tolerable weekly intake consumption guidelines for cadmium and lead (on a microgram per kilogram body weight basis). A daily consumption rate for cadmium and lead was then calculated based on an adult (70 kg) person. Given that both of these substances are not considered to be carcinogenic via the ingestion route of exposure, it is more appropriate to use the most sensitive receptor (a toddler, body weight of 16.5 kg) ⁵ when calculating the daily consumption rate. HC advises that the proponent recalculate consumption rates using a toddler instead of an adult.	Assuming an adult exposure scenario may underestimate the potential risk to the most sensitive human receptor (i.e. toddler).	Please recalculate daily ingestion rates for the toddler in order to ensure that the most sensitive human receptor is evaluated.	EA
HC-15	A.Denning, Regional EA Coordinator, HC	Human Health		7.21.1.2	The EIS indicates that based on knowledge acquired to date, there is no harvesting of plants in the general vicinity of the project site. However, the EIS indicates that hunting for White-tailed Deer and Moose does occur in the area. The proposed	Standard sampling and analytical methods should be employed in order to ensure the results are	Please consider country foods collection and analysis as per HC guidance, and re-evaluate human exposure to other	EA

⁵ Health Canada. 2010. Federal Contaminated Site Risk Assessment in Canada. Part I: Guidance on Human Health Preliminary Quantitative Risk Assessment (PQRA). Version 2.0. Prepared by Contaminated Sites Division, Safe Environments Directorate. September.

Ref #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS or ToR	Summary of Comment	Rationale	Proposed Action	EA or Regulatory
					approach to evaluate the health of these species is by monitoring White-tailed Deer liver tissue if local hunters are willing to provide samples. HC recommends that sampling and analysis be undertaken in accordance with HC's guidance on human health risk assessment for country foods (HC, 2010) ⁶ . In addition, if new information becomes available indicating that Aboriginal peoples do harvest plants in the vicinity of the project site, HC advises that the potential contamination of these foods should be evaluated.	valid and applicable.	country foods should new information become available indicating that Aboriginal peoples do collect other country foods from the area that may be affected by project-related activities.	
HC-16	A.Denning, Regional EA Coordinator, HC	Electric and Magnetic Fields		4.1 6.18.2	One project component involves the construction and operation of a 230 kV transmission line. Section 6.18.2 of report indicates that the transmission line will generate electromagnetic fields and that there may be public concern associated with potential human health effects. No specific public/aboriginal concerns related to electric and magnetic fields were identified in the EIS.	In the event that concerns are expressed about EMF, additional information can be collected.	If concern is expressed, the following assessment of EMF effects can be undertaken, including: 1) A discussion on the current state of scientific knowledge with respect to possible health effects from EMF exposure and a review of current exposure guidelines and/or position statements from	

⁶ Health Canada. 2010. Federal Contaminated Site Risk Assessment in Canada. Supplemental Guidance on Human Health Risk Assessment for Country Foods (HHRA_{Foods}). Prepared by Contaminated Sites Division, Safe Environments Directorate. October.

Ref #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS or ToR	Summary of Comment	Rationale	Proposed Action	EA or Regulatory
							health-related organizations (e.g. World Health Organization 2007a ⁷ and 2007b ⁸ , Federal-Provincial-Territorial Radiation Protection Committee 2008 ⁹ , International Commission on Non-Ionizing Radiation Protection (ICNIRP) 2010a ¹⁰ ,b ¹¹) 2) Identification of all potential sources of EMF and potential human residents in the project area; 3) Assessment of background EMF levels at selected	

⁷ WHO (2007a). Fact sheet No. 322. Electromagnetic fields and public health: Exposure to extremely low frequency fields. www.who.int/mediacentre/factsheets/fs322/en/index.html

⁸ WHO (2007b). Environmental Health Criteria Monograph No.238. Extremely Low Frequency Fields. http://www.who.int/peh-emf/publications/Comple DEC_2007.pdf

⁹ Federal-Provincial-Territorial Radiation Protection Committee (2008). Response Statement to Public Concerns Regarding Electric and Magnetic Fields (EMF) from Electrical Power Transmission and Distribution Lines. www.hc-sc.gc.ca/ewh-semt/radiation/fpt-radprotect/emf-cem-eng.php

¹⁰ ICNIRP (2010a). Guidelines for Limiting Exposure to Time-Varying Electric and Magnetic Fields (1 Hz - 100 kHz). <http://icnirp.de/documents/LFgdl.pdf>

¹¹ ICNIRP (2010b). Fact Sheet on the ICNIRP Guidelines for Limiting Exposure to Time-Varying Electric and Magnetic Fields (1 Hz - 100 kHz). <http://icnirp.de/documents/FactSheetLF.pdf>

Ref #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS or ToR	Summary of Comment	Rationale	Proposed Action	EA or Regulatory
							<p>locations at the proposed site prior to construction, and their corresponding estimated levels after construction; and</p> <p>4) A description of measures that will be taken to mitigate potential public concern over project-related EMF exposure.</p>	

Reference #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS or ToR	Summary of Comment	Context/Rationale	Information Request/ Comment/ Recommendation	EA or Regulatory
NRCan -1	NRCan	Geology Terrain and Soils		Volume 1, Sections 4.0, 6.3 to 6.5, 7.0; Volume 2, Sections 5.1, 5.2.1 to 5.2.5, 5.4, 5.5; Volume 3, Appendix H, Section 2.0	N/A	The information provided on surficial geology was reviewed to assess whether the stripping or the removal of the overburden during the mining process was accurate and may not have an adverse impact on the environment.	Baseline data for overburden geology and soils are complete. Sufficient information has been provided to characterize the affected environment.	EA
NRCan -2	NRCan	Hydrogeology		Volume 3, Annex H and S Volume 2, Sections 4.0, 5.0, 6.0, 6.3 – 6.5, 7.0, 8.0 10-13	Baseline hydrogeology, hydrogeology modeling and the proposed monitoring program were reviewed to assess the environmental impacts.	In the hydrogeology modelling report (Volume 3 Annex S p.25 and fig. 3.5), a few of the zones of influence (ZOIs) associated with the pumping of the open pit have been extended outside the model boundaries using interpolation. This procedure is somewhat unusual, as it is commonly accepted that any stress feature (e.g., pumping well) should not interfere with the boundaries of a numerical model to ensure proper	Information Request 1: NRCan requests that the proponent explain why they chose the interpolation approach instead of increasing the size of the numerical model to ensure that none of the ZOIs interfere with the model boundaries. Information Request 2: NRCan requests that the proponent discuss the implications of the interpolation approach on the open pit dewatering pumping rates, the size of the ZOIs	EA

Reference #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS or ToR	Summary of Comment	Context/Rationale	Information Request/ Comment/ Recommendation	EA or Regulatory
						simulations. NRCan understands that the choice of northern boundary was selected according to the potentiometric map under current conditions (i.e. without pumping), but from the presented simulations, this hydraulic boundary is likely to shift gradually as the pumping of the open pit progresses, a situation that cannot be represented by the current numerical model.	and the particle tracking for the corresponding simulations. Information Request 3: NRCan requests that the proponent discuss the necessity of modifying the current numerical model and its planned updates (every three years following the exploitation of the open pit) to account for new boundaries.	

Note: The comments include NRCan's technical comments related to Geology, terrain and Soils and Hydrogeology. Comments relating to geochemical characterization of the mine rock and the mine rock management plans will follow.

Reference #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS or ToR	Summary of Comment	Rationale	Proposed Action	EA or Regulatory
TC-1	Ana Hamid, Environmental Officer (on behalf of David Zeit)	Transportation			<p>Transport Canada does not have any specific comments to provide at this time.</p> <p>Transport Canada is responsible for the administration of the <i>Navigable Waters Protection Act</i> (NWPA), which prohibits the construction or placement of any “works” in navigable waters without first obtaining approval. If any of the related project undertakings cross or affect a potentially navigable waterway, the proponent should prepare and submit an application in accordance with the requirements as outlined in the Application Guide, available at: http://www.tc.gc.ca/eng/marinesafety/oepp-nwpp-guide-2053.htm.</p> <p>Based on the current project description it seems Transport Canada’s involvement may just be an approval for a bridge over the Pinewood river. The waterbodies that are within the footprint of various mine components - West Creek, Clark Creek, Teeple Municipal Drain - are not deemed navigable. The Pinewood River, which is navigable downstream closer to where it empties into Rainy River, may be considered 'Minor' or non-navigable in the mine site. From the air, it appears to be shallow with quite a bit of aquatic vegetation.</p> <p>The proponent should review the Minor Works and Waters (Navigable Waters Protection Act) Order, established to outline the specific standards and criteria under which Transport Canada considers a work or waterway as a minor and does not require an application under the NWPA. The proponent should assess whether their work or impacted waterway, in this case the Pinewood River, meets the criteria as described and therefore falls within one of the excluded classes. An application will only be required if it is determined that the work / waterway cannot meet the criteria established for that particular class of exclusion.</p> <p>Any questions about the NWPA application process should be directed to the Navigable Waters Protection Program at (519) 383-1863 or NWPontario-PENontario@tc.gc.ca.</p> <p>Any project-specific questions can be directed to Caroline Deary as she is the Navigable Waters Officer handling this and all MPMO files. Her contact information is as follows:</p> <p>Caroline Deary</p>			Regulatory

					Navigable Waters Protection Officer Transport Canada - Coast Guard Helicopters 28 Waubeek Street , 1st Fl Parry Sound, ON P2A 1B9 (705) 774-9547 Caroline.deary@tc.gc.ca			
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Ministry of the Environment

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September 4, 2013

TO: Sasha McLeod
Project Officer
Environmental Approvals Branch

FROM: Pierre J.R. Godbout
Senior Noise Engineer
Environmental Approvals Branch

RE: Noise Review Comments
Rainy River Gold Project
EA FILE No.: 05-09-02
Noise EA File No.: E-0012-13

This office was requested to review the report entitled "Acoustic Assessment Report, Rainy River Gold Project" prepared by AMEC Environment & Infrastructure, dated June 2013 and signed by Alireza Seifzadeh.

The above noted report supports a proposed open pit, underground mine and process plant denoted as The Rainy River Gold Project (RRGP), located approximately sixty-five kilometres northwest of Fort Frances in the Township of Chapple, Ontario.

The report includes noise predictions due to the operation of: a) underground ventilation fans; b) blast-hole drills; c) excavators; d) track dozers; e) front-end loaders; f) motor graders; g) on-site truck traffic; h) primary crusher; i) dust collectors; j) emergency generator testing; and k) substation transformers. Daytime, evening and nighttime sound levels were predicted for RRGF operations into two operational scenarios: 1) Year 2015 (i.e. beginning of the project); and 2) Year 2020 (i.e. peak operation year). The noise predictions were conducted at the "worse-impact location" (corresponding to 4.5 metres above grade) of 18 points of reception surrounding the proposed RRGF. The noise predictions were in the range of 35 to 45 dBA during the day and 31 to 40 dBA during evening / night. The predicted sound levels include the effect of physical and operational noise control measures that will be inherent to RRGF operations.

The following are our noise review comments:

- (1) Vacant Lots: the report addressed existing residential dwellings surrounding the RRGF with distance setbacks in the range of 2,609 to 6,095 metres. Aerial photography indicates that there are several other structures in the intervening lands

between the reported points of receptions and the proposed RRGP, such as structures on Georgeson Road, Roen Road, Hwy 600, McMillan Road and Tait Road. Confirmation should be included in the report that there are no additional existing points of reception and/or vacant lots amenable to future noise sensitive developments in the intervening lands between the existing residences and the proposed RRGP. If additional noise sensitive receptors are present, all noise sensitive receptors should be assessed, including, if applicable, the worst-case potential points of reception on vacant lots, using the proper setbacks as defined by the Township of Chapple. A clear aerial photography area map showing the names of nearby roads and the location of all applicable (previously and newly identified) points of reception should be included in the report.

- (2) Night-time Operations: the report indicates the site is expected to operate 24 hours per day and 7 days per week, with the continuous operation of all sound sources (including haul trucks, front end loaders and all other vehicular activity) throughout the day and night hours (with the exception of the testing for emergency generators, which will occur only during day hours). If additional noise sensitive points of reception are located in the intervening lands between the existing residences and the proposed RRGP, as per paragraph 1, this operation may cause the sound levels to exceed the night-time limit of 40 dBA at the nearest applicable receptors. Additional noise control measures may be required such as limiting the operations to the daytime hours only.
- (3) Ore process plant: the report indicates that “sound emissions from the ore process plant will be minimal as most of the plant equipment is enclosed within the plant building”. All noise sources on-site must be assessed, including but not limited to sources that may be associated with the process plant such as stacks, fan blowers, sound emanating from building openings, etc.
- (4) Tables 1 through 3: these tables should be reformatted to Tables A1 through A3, as per Appendix A referenced below, and should include the following information:
 - (a) The following information need to be included in Table A1 for all significant noise sources (i.e. sources that are audible outside the facility):
 - i. Source ID's: preferably same as ESDM Source ID's
 - ii. Source Description
 - iii. Source Power Level: 1/1 Octave Band Sound Power Levels in dBA
 - iv. Source Location: Indoor or Outdoor
 - v. Source Characteristics: Steady, Quasi Steady Impulsive; Impulsive; Buzzing; Tonal; Cyclic
 - vi. Noise Control Measures: Silencer/Acoustic Louver/Muffler; Acoustic Lining/Plenum; Barrier/Berm/Screening; Lagging; Acoustic Enclosure; Other; Uncontrolled
 - (b) The following information need to be included in Table A2 for all significant noise sources (i.e. sources that are audible outside the facility) and for all noise sensitive areas (Points of Reception, POR's):
 - i. Source ID's: preferably same as ESDM Source ID's
 - ii. Distance to POR in metres
 - iii. Sound Level at POR (Leq) in dBA

- (c) The following information need to be included in Table A3 for all noise sensitive areas (Points of Reception, POR's):
- i. Point of Reception ID's
 - ii. Point of Reception Description
 - iii. Sound Level at POR (Leq) in dBA
 - iv. Verified by Acoustic Audit: Yes or No
 - v. Performance Limit (Leq) in dBA
 - vi. Compliance with Performance Limit: Yes or No. In the event the Acoustic Assessment Report demonstrates that the facility is not in compliance with the limits set in Publication NPC-205, the Acoustic Assessment Report should include a Noise Abatement Action Plan (NAAP) required to achieve compliance with the governing noise limits, that includes but is not limited to the following:
 1. required Noise Control Measures (both physical and administrative) to reduce the noise emissions from the facility to comply with the limits set in Publication NPC-205; and
 2. a timetable for implementation of the Noise Control Measures (both physical and administrative), including the date for achieving compliance with the applicable sound level limits for the facility.
- (5) Land Use Zoning Designation Plan of the surrounding area complete with legend and scale is missing. The zoning plan is required within a radius of 1,000 metres. Refer to Appendix A referenced below.
- (6) Scaled Area Location Plan showing the locations/elevations of the facility's noise sources and the surrounding points of reception as well as the topography and ground cover of the intervening lands between the facility and the surrounding points of reception is missing. The area location plan is required within a radius of 1,000 metres. Refer to Appendix A referenced below.
- (7) Noise Source Data: the information provided to support the source sound power level data used in the report should be clearly identified. Pages that include manufacturer sound data should clearly show which sound source ID the data corresponds to. Source ID "TD" and "Tuck_XQ" shown in Appendix A have a calculated sound power level that is lower than their reported sound pressure level. Appendix A source IDs do not match the source ID used in Table 2 of the report. Any assumptions, such as but not limited to the hourly truck traffic count used for line sources, should be provided.
- (8) Sound Level Calculations: one sample sound level calculations should be provided for the worst case (i.e. the closest and most exposed) point of reception.

In summary, the submitted noise report does not adequately address the proposed RRGP noise impact and therefore, a revised noise report is required. The revised noise report should address the above noted comments and, if applicable due to the addition of new points of reception, should also recommend the necessary noise control measures to ensure that the sound levels will be in compliance with the applicable sound level criteria. Please note that the required revised Acoustic Assessment Report must be prepared in accordance with the "Basic Comprehensive Certificates of Approval (Air), User Guide, Appendix A - Supporting Information for an Acoustic Assessment Report or Vibration Assessment Report Required by a Basic

Comprehensive CofA" prepared by the Environmental Assessment and Approvals Branch, Version 2.0, April 2004 (available at: http://www.ene.gov.on.ca/stdprodconsume/groups/lr/@ene/@resources/documents/resource/std01_079111.pdf) and must contain a completed and signed revised AAR Checklist (available at: http://www.ene.gov.on.ca/stdprodconsume/groups/lr/@ene/@resources/documents/resource/std01_079148.pdf).

We trust the above noise review comments would be of assistance to you.

If you have any questions, please contact Pierre Godbout, P.Eng., MBA at 416-212-4205.

A handwritten signature in black ink, appearing to read "Pierre Godbout", written over a horizontal line.

Pierre J.R. Godbout, P.Eng., MBA
Senior Noise Engineer

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August 21, 2013

MEMORANDUM

To: Sasha McLeod
Project Officer
Environmental Approvals Branch

From: Simon Haslam
Regional Hydrogeologist (in-training)
Technical Support Section, Northern Region

Re: Rainy River Gold Project
Environmental Assessment Draft Review

This letter is intended to make you aware that since I, Simon Haslam, am not fully licensed as a professional engineer or geoscientist, I am working as an engineering intern (EIT) under the direct supervision of Alisdair Brown, P.Eng., Groundwater Group Leader (A). Therefore, my review of the Rainy River Gold Project draft Environmental Assessment was completed under this supervision and all comments provided by me were reviewed by Alisdair Brown before submission. This procedure is used for all reviews completed by me at the Ministry of the Environment and follows the appropriate guidelines set out by the Professional Engineers of Ontario (PEO) and the Association of Professional Geoscientists of Ontario (APGO).

If you have any questions or concerns regarding this working arrangement please don't hesitate to contact myself or Alisdair to discuss.

Regards,

Simon Haslam, MASC, EIT
Regional Hydrogeologist (in-training)

Reference #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS or ToR	Summary of Comment	Rationale	Proposed Action	EA or Regulatory
MOE-GW-1	MOE Groundwater Specialist	Groundwater		Appendix S— Page 15	<p>The hydrogeological model neglected major surface features that will affect groundwater onsite, including the tailings management area (TMA) and the east mine rock stockpile. Their exclusion in modeling is not considered conservative and has the potential to impact the site water balance.</p> <p>The report states that these features will increase the recharge to the groundwater onsite and not including them in the model is conservative and will tend to slightly overpredict the size of the drawdown cone towards these features. A similar effect is expected due to the increased recharge, explained on Page 17 of Appendix S, caused by the lowering of the water table that will allow recharge where artesian conditions did not allow recharge previously.</p> <p>It is the reviewer's opinion that these operational features may increase the seepage of water into the open pit relative to what has been modeled. The report should evaluate how these features would alter flow rates for the pit de-watering and how these increased rates would affect the zone of influence (ZOI) and the total volume of water discharging from the de-watering wells.</p>	<p>Although it is agreed that these features will act to increase recharge, they also have the potential to increase local water levels and the magnitude of seepage to the pit. The impact of this additional seepage needs to be fully evaluated, particularly since the receiver of the pit dewatering efforts is volume sensitive. This revision to the modeling would enhance the accuracy in seepage rate prediction and the potential for dewatering effects on the Pinewood River.</p> <p>The issue of omitting these features was raised in a memo sent to the MOE Senior Environmental Officer by Alisdair Brown, MOE Regional Hydrogeologist on January 2, 2013, regarding Groundwater Modeling Assumptions. At the time, the Consultant's justification for not including these features in the model was that their final geometries were not known at the time. It is the opinion of the reviewer that estimated geometries and timelines for construction would still provide valuable and necessary information to the model.</p>	These features should be added to the hydrogeological model to ensure accurate model results or the omission of these features needs to be more thoroughly justified from a hydrogeological perspective in the EA.	EA
MOE-GW-2	MOE Groundwater Specialist	Groundwater		Page 4-11 and Appendix S— Page 15	<p>The hydrogeological model does not address the potential to induce consolidation due to dewatering; or settlement in the thick clay layers onsite due to the loading associated with surface features such as the TMA and the east mine rock stockpile. While this subject is mentioned in Section 4, a full description of the expected behavior of the thick clay layers when subject to loading and the potential consequences does not appear to be present.</p> <p>Settlement of the clay layers could result in significant changes to local drainage, which could affect the stability of these features or cause local flooding. Flooding could result in mercury release and methylation.</p>	When exposed to significant loading or de-watering, clay units tend to compress and consolidate. The significant dewatering and surface loadings will likely cause consolidation in the underlying clay layers, affecting the local physiography. Significant subsidence of the ground surface could impact structural stability of surface features and/or induce localized flooding, either of which would have associated environmental impacts.	The potential for such consolidation should be considered, with likely environmental or structural impacts and mitigation and contingency options discussed in the EA.	EA
MOE-GW-3	MOE Groundwater Specialist	Groundwater		Page 5-75	Based on the results of the hydrogeological model, it was stated by the Consultant that a volume of seepage from the TMA and the mine rock	The impacts of the seepage from mine rock stockpiles and the TMA need to be more thoroughly assessed with an	The expected attenuation of contaminants within the subsurface and the loading to the river due to	EA

					<p>stockpiles will not be captured by the seepage collection ditches surrounding these features. It is expected that this seepage will discharge to the Pinewood River after a period of time. While the water quality of these seepages is estimated in Appendix T, the expected contaminant attenuation within the subsurface and the contaminant loading to the river are not present. This information is required to assess the impact that groundwater discharge will have on the Pinewood River.</p>	<p>estimate of the expected contaminant loadings. Since it is estimated (Appendix T) that the concentrations of almost all contaminants of concern within some seepage water will be in exceedance of PWQO criteria, it is requested that the impact of these high levels of contamination be estimated and discussed within the EA.</p>	<p>groundwater discharge should be quantified with potential impacts discussed in the EA.</p> <p>It would be beneficial to incorporate these contaminant loadings into the hydrogeological model since justification of the results may be required during the permitting stage to better understand the quality and quantity of seepage and potential impact to receptors.</p> <p>Due to the extremely low assimilative capacity of the receiver, it may be necessary to show that discharging water is in compliance with PWQO.</p>	
MOE-GW-4	MOE Groundwater Specialist	Groundwater		Appendix S— Figure 3-2	<p>The hydrogeological model domain needs to be extended to reduce potential boundary effects. Significant changes in head are observed at the bottom boundary of the model domain (Appendix S, Figure 3-2) and it is believed that these changes could introduce inconsistencies in the simulated results. An extension of the model domain, or justification as to why it is not necessary, is needed.</p> <p>The simulated changes in head could be sensitive to the relationship between horizontal and vertical permeability utilized in the model, with sensitivity likely increasing with depth. This ratio was not found in the draft EA. This ratio and the sensitivity of the model to this ratio are important in understanding the interactions and interpreting results and need to be included in the final EA.</p> <p>The elevated errors in predicted head values observed with depth could be attributed to the issues noted above.</p>	<p>It is the reviewer's opinion that the hydrogeological model domain should be of sufficient size as to observe no changes in head at the bottom boundary. Significant changes at this boundary could unrealistically alter the simulated results, introducing errors. The potential effects of these significant changes in head should be discussed and, if increasing the size of the model domain is not required, further justification must be provided.</p> <p>Field measured bulk permeabilities are typically representative of horizontal permeabilities, while vertical permeabilities are generally defined as a ratio between horizontal and vertical permeabilities. This ratio influences the simulated drawdown cone and changes in head with depth. An understanding of this relationship, how this relationship was determined in the EA, and the sensitivity of the model to this relationship are needed to interpret the simulated results. This information is requested for the final EA.</p> <p>Potential evidence of discrepancies in the model with depth is present in the relationship between the computed and observed groundwater levels summarized in Figure 2-3 of Appendix S (both A and B), where the deepest layer analyzed, layer 6, shows the most inconsistent results.</p>	<p>For the final EA, the size of the model domain should be increased to a size which yields no changes in head at the bottom boundary or the size of the model domain must be more thoroughly justified with respect to model accuracy.</p> <p>The relationship between vertical and horizontal permeability and an analysis of the sensitivity of the hydrogeological model to this relationship should be provided and justified in the EA.</p>	EA
MOE-GW-5	MOE Groundwater	Groundwater		Page 6-100	<p>The preferred alternative for closure of the open pit involves flooding of the pit. Since pre-development</p>	<p>Existing ground water levels at the mine site are above the ground surface.</p>	<p>The magnitude and impacts of the contaminant loading expected from</p>	EA

	Specialist				local water levels are above the ground surface, it is expected that the pit will eventually fill completely and a floodway will be constructed to permit discharge directly to the Pinewood River. While the expected water quality of the flooded pit is estimated in Appendix T, the expected contaminant loading to the river does not appear to be estimated. Since some contaminant concentrations within the pit lake are expected to be in exceedance of PWQO criteria, an estimation of the loading is needed to help assess the impact to the receiver.	Therefore, once flooded, the pit lake will be discharged via a floodway to the Pinewood River. The elevated levels of some contaminants expected in this discharging water will impact the river due to the low flow within the river. An estimation of the contaminant loading to the river from the pit lake and a discussion of potential long term impacts to the water body are required.	the pit lake discharge to the Pinewood River should be discussed in the EA. Due to the extremely low assimilative capacity of the receiver, it may be necessary to show that discharging water is in compliance with PWQO.	
MOE-GW-6	MOE Groundwater Specialist	Groundwater		Page 6-100	The post-closure rising of the local water table could result in the partial saturation of mine rock stockpiles. Partial saturation of the stockpiles could result in acid rock drainage (ARD) generation if potentially acid generating (PAG) rocks are subjected to fluctuations in water levels. This concept was not discussed in the draft EA and should be considered in the final EA.	The elevated water level associated with the flooding of the pit will likely act to raise the water table in large surface features such as the mine rock stockpiles. If the water table were to fluctuate within a stockpile containing PAG rocks, the conditions for potential ARD or metal leaching could develop. A discussion of the potential for such an impact and the related consequences is needed.	The environmental impacts of increasing local groundwater levels within large surface features should be discussed in the EA with consideration to the conditions for ARD. It may be beneficial to include these large surface features in the hydrogeological model to assess the profile of the water table within them.	EA
MOE-GW-7	MOE Groundwater Specialist	Groundwater		Page 7-43 and Appendix S— Figure 5-1	A monitoring program for water levels, water quality, flow discharges, and receiving water aquatic life and habitat maintenance is discussed in the draft EA. While the program appears to be sufficient, further consideration of the program will be made during the permitting stage.	A more thorough description of the monitoring program will be required for the permitting stage. For example, trigger criteria will need to be defined for contaminants of concern and an extended (long term) monitoring program should be developed.	No immediate action required for the EA.	
MOE-GW-8	MOE Groundwater Specialist	Groundwater		Page 11-1	While this did not impact my review, just note that Tables 7-39 and 7-40 are referenced at the end of section 11.1 where I believe Tables 7-47 and 7-48 are the tables of interest.		Correct for the final EA.	EA
MOE-GW-9	MOE Groundwater Specialist	Groundwater		Appendix H	The draft EA did not include a thorough baseline study regarding the water quality and quantity of the domestic use wells within or surrounding the expected ZOI. However, the proponent did mention verbally that such a study would be conducted prior to mine development. This communication took place during a site visit with MOE staff (Alisdair Brown, Drew Stajkowski, and Simon Haslam) and a representative of the proponent (Mark Vancook). This baseline study is necessary to assess the background conditions of the domestic use wells in the project area as a record for comparison in the event of any well issues that may arise during the life of the project.	It would be prudent for the proponent to have a record of the pre-development conditions of surrounding domestic use wells to assess the validity of potential complaints and to quantify any changes that may be observed. If degraded water quality and/or quantity complaints are issued during the life of the project, it could be difficult to show that the RRGP was not at fault without the information from such a baseline study.	Conduct a baseline study of the water quality and quantity of the domestic use wells within and surrounding the ZOI to establish pre-development conditions. It will be the responsibility of the proponent to remediate any water quality or quantity issues associated with domestic use wells that can be attributed to the project.	EA

From: Davis,Stephanie [CEAA] [<mailto:Stephanie.Davis@ceaa-acee.gc.ca>]
Sent: Thursday, September 05, 2013 5:48 PM
To: kstanfield@rainyriverresources.com
Cc: Daniel, Sheila E; Simms, David; McDonell,Dan [Burlington]; Liu,Amy [CEAA]; Aitken,Jill [CEAA]
Subject: RRGP Draft EIS review comments

Kyle,

Please find attached Agency comments, Environment Canada comments and some supplementary guidance from our Aboriginal Affairs Advisor.

Regards,
Stephanie

Stephanie Davis, BEng

Project Manager | Gestionnaire de projets
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From: Dekker, Corey [CEAA] [mailto:Corey.Dekker@ceaa-acee.gc.ca]
Sent: August-16-13 2:38 PM
To: Davis, Stephanie [CEAA]
Subject: Examples of proponent's input flowing from s. 9.2 of guidelines

Hi Steph,

To provide RR with some examples of how other proponents have responded to the info requirements set out for RR in section 9.2 of the EIS Guidelines, I propose sharing sections of Avanti's EIS for the Kitsault project out in BC. Sections 4, 16, and 17 provide some examples of what we are looking for. Specifically:

Background information, traditional territory map, other information on potential or established rights (as provided by the group)

- See Kitsault, **section 16.0**, **section 17.0**, and **Appendix 16A**

Overview of key comments and concerns and responses/how they were addressed – summarize in a stand-alone section or cross-reference to other EIS sections

- See Kitsault **section 4.0**, including appendices particularly **4.1A**, **4.4A**

Summary of engagement activities that have occurred and that are planned

- See Kitsault **section 4.0**, including appendices

Corey Dekker

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Reference #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS or ToR	Summary of Comment	Rationale	Proposed Action	EA or Regulatory
Assign Comment Reference Number (Department/Ministry and number e.g. CEAA-1 or MNR-1)		Aboriginal (including potential rights impacts, traditional use of lands and resources) Accidents & Malfunctions Acoustic Environment (including Noise and Vibration) Atmospheric Environment (including Air Quality) Cumulative Effects Decommissioning and Reclamation Effects of the Environment on the Project (incl. Climate Change) Fish and Fish Habitat Fishery General - Concern General - EA Type General - Consultation General - Logistics General - Project Risks Geology Groundwater (including water quality and quantity) Human Health Hydrology Monitoring Natural Hazards Navigable Waters Physical and Cultural Heritage (including Archaeology) Socio-Economic Environment Surface Water (including water quality and quantity) Terrain and Soils Transportation Vegetation Visual Impacts Wastewater/Effluent Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	Provide the specific section(s) and page number(s) from the EIS Guidelines or ToR related to the comment	Provide the specific volume(s), section(s) and page number(s) from the EIS of the information being referenced	Provide an explanation of the issue of concern	Describe the rationale for why issue of concern is important for environmental assessment purposes.	Describe any action recommended	Pick EA, Regulatory Instrument or Both. Please state which regulatory instrument you are referring to.
Rainy River Gold Mine Draft EIS - Summary								
EC-1			EIS Guidelines Section 4 – Summary of Environmental Impact Statement	Summary & Section 8.0; Pg. 29	Currently the Summary (Executive Summary) provides insufficient information to help the general reader to understand the full scope and conclusion of the environmental assessment for the project.	As outlined in the EIS Guidelines (Section 4), without a complete Summary detailing the assessment of the project and its effects the general public may be misled by the information presented. For example, the VEC analysis is not appropriately captured in this Summary. Without the conclusions from this analysis the general public may not be	EC recommends that the Summary VEC analysis tables (Table 7-47 & 7-48) be included in the Summary. EC also recommends that the Summary be revised to include appropriate cross-references, the same section numbering as the	EA

						<p>aware of the project's impacts and mitigations (e.g. SAR, fish and migratory birds).</p> <p>The Summary also does not easily lead a reader to more detailed information in the main report. For example, section headings and numbering in the Summary should match the sections in Volume 2 and the summary currently lacks any cross references in the text which would help direct the reader for the detailed information.</p>	<p>main report, and the summaries from the alternatives evaluated (conclusions from each of the alternatives assessments) - as this seems to be the most descriptive summaries of the approaches chosen (e.g. Water Management Strategy details).</p>		
EC-2			<p>EIS Guidelines</p> <p>Section 4 – Summary of Environmental Impact Statement & Section 7.1.3 – Effects of the environment on the project</p>	<p>Summary; Pg. 35</p>	<p>On p.35 it the Summary states that:</p> <p>“Climate change is not considered to be a significant environmental factor due to the widely differing timescales over which both the project and climate change take place.”</p> <p>EC agrees that this statement generally applies over the operational phase of the mine (~next 20 yrs) but the proponent does not demonstrate that this is the case over the post-closure period.</p>	<p>In this area, the range of climate in the observed record related to natural variability is likely sufficient to characterize the range over the period of mine operation. However, beyond this period, more pronounced temperature and precipitation differences beyond the range of observed natural climate variability are likely to emerge.</p>	<p>Upon the completion of the further examination of the data as requested in comments EC81 & EC82 (below), EC requests that the proponent revise this statement to acknowledge that a consideration of the range of possible climate change conditions and potential impacts of climate change post-closure is warranted.</p>	EA	
Rainy River Gold Mine Draft EIS – Volume 2; Section 0 – Front Piece									
EC-3		<p>General Concern / Wildlife (Terrestrial and/or Aquatic, including Species at Risk)</p>	<p>EIS Guidelines</p> <p>Section 3.5 – Presentation and organization of the EIS</p>	<p>Section 0 – Glossary; Pg. ix</p>	<p>The EIS does not currently list any species' Latin name and uses only common names in the report. This is not a normal standard as it can result in confusion regarding which species is actually being discussed.</p>	<p>In the “Front Piece” of the EIS (Glossary section) all species discussed in the report could be listed with both their common name and the Latin name to reduce confusion.</p>	<p>EC recommends that the proponent include a Glossary of species Latin and common names.</p>	EA	
EC-4	All water reviewers	Hydrology	<p>EIS Guidelines</p> <p>Section 3.5 –</p>	<p>General Comment</p>	<p>Many of the water components needed for EC's review were either missing or</p>	<p>During EC's review of the various water management strategies it was very difficult</p>	<p>EC recommends that a separate appendix be provided compiling all of</p>	EA	

			Presentation and organization of the EIS & Section 9.1.2 – Biophysical environment (Water Resources)		difficult to find as: they were often buried in the 4 th level of heading sub-bullets (which does not appear in the Table of Contents) and/or they were scattered throughout the report in pieces of information without a single comprehensive description of the water management approach.	to gain a complete picture of what is being proposed. Without a full understanding it will be difficult to complete a comprehensive review of the environmental effects of this project on surface and ground water systems.	the sub-sections containing pieces of the water management strategy within the report into a single comprehensive presentation. This will also help eliminate inconsistencies within the described implementation of the strategy.	
EC-5		Hydrology	EIS Guidelines Section 3.5 – Presentation and organization of the EIS & Section 9.1.2 – Biophysical environment (Water Resources)	General comment	Significant information is either missing from the report or difficult to find which rationalizes how the hydrological calculations were made.	Insufficient information was provided to check whether hydrological calculations were made appropriately for the water budget. This is especially important in determining whether the TMA will have sufficient water to remain wetted through dry periods.	(see previous note above EC-4) EC recommends that, in the separate appendix referred to above, it describes how hydrologic calculations were made with an accompanying rationale. Specific emphasis should be placed on calculations which show that the TMA will be flooded after active mining.	EA
EC-6		Effluent Surface Water Fish and Fish Habitat	EIS Guidelines Section 8.1 – Assessment of alternatives for mine waste disposal	General Comment on the Project Description Section 4.0	A baseline map could not be found which detailed the current locations of all water bodies (rivers, creeks, ponds, tributaries, muskegs, etc.) that fall under the project site layout, including their flow path and their continuity into the mine site.	Providing this information will enable one to understand which natural fish frequented water bodies traverse through the tailings management area, waste rock, low grade ore and overburden stockpiles. This is key information as it is used to determine whether or not there is a potential requirement for a MMER Schedule 2 TIA regulatory amendment. This request information was also mentioned in EC's comments on the Conceptual Mine Closure Presentation (Feb. 26, 2013).	The proponent is requested to provide a baseline map showing the current locations of all water bodies (rivers, creeks, ponds, tributaries, muskegs, etc.) that fall under the project site layout, including their flow path and their continuity into the mine site.	Both
EC-7		Hydrology	EIS Guidelines Section 5.6 – Project Components & Section 9.1.2 – Biophysical environment	Section 4.5 - Minewater Management; Pg. 4-8	In the 2nd paragraph, the report mentions a second standby system to provide increased capacity for stormwater management but does not provide further clarification.	The capacity of stormwater can directly influence the quality of runoff coming from the project site.	EC recommends that the proponent provide further clarity regarding the mentioned standby system and how it is intended to function.	EA

			(Water Resources)					
EC-8		Effluent	EIS Guidelines Section 9.1.2 – Biophysical environment (Acid Rock Drainage/Metal Leaching)	Section 4.6.2 - Mine Rock; Pg. 4-11 to 4-12	The first paragraph states that “geochemistry studies are well advanced to understand the extent of potential acid generation and metal leaching from the mine rock.” However, in the discussion regarding the selection of materials to be used for mine site construction there is no discussion of segregation based on metal leaching potential.	While the mine rock may be non-potentially acid generating, there is still the potential for metal leaching which can negatively affect surface and ground water quality. Geochemical characterization of this material is critical to understanding the potential impacts on water quality, and the mitigation measures that would need to be implemented to prevent such impacts from occurring.	EC recommends that the proponent provide an assessment of the metal leaching potential of these materials to determine whether they can be used for construction purposes.	EA
EC-9		Effluent	EIS Guidelines Section 9.1.2 – Biophysical environment (Terrestrial Environment-Geology and Geochemistry) & (Acid Rock Drainage/Metal Leaching)	Section 4.8 - Tailings Management; Pg. 4-18	The 2 nd paragraph states that dams will be constructed with NPAG rock. Rock that is NPAG may be potentially metal leaching and therefore would not be suitable for dam construction.	While the mine rock may be non-potentially acid generating, there is still the potential for metal leaching which can negatively affect surface and ground water quality. Geochemical characterization of this material is critical to understanding the potential impacts on water quality, and the mitigation measures that would need to be implemented to prevent such impacts from occurring.	EC recommends that the proponent provide an assessment of the metal leaching potential of these materials to determine whether they can be used for construction purposes.	EA
EC-10		Hydrology	EIS Guidelines Section 9.1.2 – Biophysical environment (Water Resources) & (Acid Rock Drainage/Metal Leaching)	Section 4.8 - Tailings Management; Pg. 4-18, & Section 8.4.2; Fig. 4-5, Pg. 8-7	It is unclear if the flood lines will ensure that tailings are not deposited directly into McCallum Creek in high flow events and that flow from McCallum Creek will not encroach on the TMA.	The dam around the TMA is left open at the high end of the site so that runoff can enter the TMA. However, the TMA is in close proximity to McCallum Creek at the northeast end of the “North Dam”. Flood lines should be investigated to ensure that adequate separation (e.g. via a dam) is provided to prevent entry of water or tailings from the TMA directly into McCallum Creek.	EC requests that flood lines be generated for this section of West Creek and/or additional length of the “North Dam” be investigated to ensure separation of the TMA from the creek and this information be provided in the report.	EA
EC-11		Effluent	EIS Guidelines Section 5.2 – Regulatory framework and the role of government & Section 5.6	Section 4.8 - Tailings Management; Pg. 4-21	The report describes that water is to be discharged to the environment through the constructed wetland or through a pipeline to the Pinewood River. However, a number of important related details have not been provided, including:	Water treatment is considered a major component of the mine design given the potential for metal leaching to the environment from the pits, waste rock, overburden and low grade ore stockpiles. Additional information on the proposed effluent	EC recommends that the proponent provide clarification on the intended use of the wetland for water treatment, and provide preliminary information on the proposed locations for the final	Both

			Project components & Section 9.1.2 – Biophysical environment (Water Resources)		1) What is the purpose of the constructed wetland and what criteria will be used to determine when effluent is discharged through the wetland? 2) Will the final discharge point for effluent be located at the Water Discharge Pond before entering the wetland?	management and discharge options is necessary to determine the impacts to water quality and whether these impacts can be mitigated. This request information was also mentioned in EC's comments on the Conceptual Mine Closure Presentation (Feb. 26, 2013).	effluent discharge point(s).	
EC-12		Atmospheric Environment & Decommissioning and Reclamation & Natural Hazards	EIS Guidelines Section 9.1.2 – Biophysical environment (Atmospheric Environment and Climate)	Section 4.8 – Tailings Management; Pg. 4-20	The report uses the term “realistic worst case” but does not further define this.	This clarification is needed to better understand the design of the TMA and what extreme conditions (precipitation) would cause either a failure in containment (resulting in discharge) or loss of aquatic cover for closure.	EC recommends that the proponent indicate what “realistic worst case” maximum level of precipitation the TMA will be designed to hold and the “realistic worst case” minimum level of precipitation that is needed in order to maintain an aquatic cover throughout the post-closure phase.	EA
EC-13		Hydrology	EIS Guidelines Section 5.6 – Project components & Section 9.1.2 – Biophysical environment (Terrestrial Environment-Geology and Geochemistry) & (Water Resources)	Section 4.8 Tailings Management; Pg. 4-20; & Appendix H	Based on information provided within the report, it appears that limited investigation has been done on soils under the TMA to determine potential for seepage.	Information on the permeability of soils under the TMA is required for to determine seepage estimates. If soils are too permeable then additional site preparation may be required and/or an additional source of water may need to be implemented to keep the tailings saturated after closure.	EC recommends that the proponent verify the permeability of soils under the TMA and address contingencies for either reducing permeability or providing for additional water to maintain a water cover on TMA.	EA
EC-14		Hydrology	EIS Guidelines Section 5.6 – Project components & Section 9.1.2 – Biophysical environment (Water Resources)	Section 4.8 – Tailings Management ; Pg. 4-18 & 4-20 & Table 4-5; Pg.4-50 & Figure 4-5; Pg. 4-61, & Section 6.19.4.1 – Alternatives	(Reoccurring topic in report) The 2 m depth of water over the final tailings is not consistent with what is shown in the EIS (e.g. Figure 4-5 appears to show a 1 m water cover). It is also unclear how a minimum of 2 m of water for final closure will be provided and maintained.	Without clear information relating to the water cover for the TMA throughout the post closure phase it cannot be determined if it can be successfully maintained indefinitely. Maintenance of the water cover over the tailings is required to prevent ARD. All relevant sections of the reports (specifically Section 4.8) should clearly refer to the final depth of the	EC requests that the proponent revise figures and text as appropriate, to consistently describe the depth of water cover needed on the TMA. It is also requested that the relevant sections be cross-referenced.	EA

				(Stabilize and Permanent Flooding); Pg. 6-112		aquatic cover.		
EC-15		Hydrology Effluent	EIS Guidelines Section 5.6 – Project components & Section 9.1.2 – Biophysical environment (Water Resources)	Section 4.11 – Aggregates; Pg. 4-22	From the review of the report it is unclear if there will be any ditching around the aggregate pit. This raises the concern of whether runoff from the aggregate pit can enter West Creek Pond or the West Creek Diversion? The report also indicates that aggregate may be used for tailings dam filters and that NPAG rock may be used as an aggregate source. Has the Proponent characterized this rock for metal leaching potential?	Details on the proposed management of seepage and runoff from all of the mine components are necessary to assess the effects of the potential release of leachate to the environment. Rock from the aggregate pit could be potentially metal leaching which can negatively affect surface and ground water quality. Geochemical characterization of this material is critical to understanding the potential impacts on water quality, and the mitigation measures that would need to be implemented to prevent such impacts from occurring. This request information was also mentioned in EC's comments on the Conceptual Mine Closure Presentation (Feb. 26, 2013).	EC recommends that the proponent provide an assessment of the metal leaching potential of the aggregate materials to determine whether they can be used for construction purposes and whether there is the potential for metal leaching from the aggregate pit.	EA
EC-16		Hydrology	EIS Guidelines Section 9.1.2 – Biophysical environment (Atmospheric Environment and Climate) & (Water Resources)	Section 4.12.1 – General Approach; Pg. 4-24	From review of the report it is unclear if there will be enough flow to maintain the wetland to be used as a treatment area.	Extended low precipitation periods must be considered. Such conditions would likely result in extended low to no flow periods to the wetland.	EC requests that the proponent identify contingencies that will be used to keep the wetland viable during prolonged dry periods if this is necessary.	EA
EC-17		Hydrology	EIS Guidelines Section 9.1.2 – Biophysical environment (Atmospheric Environment and Climate) & (Water Resources)	Section 4.12.3 – Water Supply for Process Plant Operations; Pg. 4-25, & Table 5-14	The report states "Ample water storage is available in the water management pond and the tailings management area pond to provide plant water during the winter months or during prolonged summer or fall drought."	Justification and analysis should be provided for this statement to ensure that consecutive high evaporation and low precipitation years are considered. Seasonal and annual evaporation rates can be expected to be significantly larger than the mean values provided in Table 5-14 due to natural variability. Consecutive low precipitation, high evaporation years could put the water budget for the	EC suggests that rationale should be provided for data inputs chosen for the analysis (e.g. evaporation, precipitation, and other pertinent climatic data). The analysis should include a range of seasonal and annual precipitation and evaporation data to demonstrate that the	EA

						project into a deficit.	system is robust enough to withstand a range of climate conditions including a multi-year drought over the operation of the mine.	
EC-18		Hydrology	EIS Guidelines Section 9.1.2 – Biophysical environment (Acid Rock Drainage/Metal Leaching)	Section 4.12.3 - Water Supply for Process Plant Operations; Pg. 4-26 & Section 4.6.2 – Mine Rock; 4-11	The last paragraph indicates that the east mine rock stockpile stores PAG and non-PAG mine rock, but the 4th paragraph of Section 4.6.2 (Mine Rock) indicates that it stores PAG mine rock only.	There appears to be conflicting information being presented in these two sections	EC recommends that the text be clarified/corrected	EA
EC-19		Effluent	EIS Guidelines Section 5.2 – Regulatory framework and the role of government & Section 5.6 – Project Components & Section 9.1.2 – Biophysical environment (Acid Rock Drainage/Metal Leaching) & (Water Resources)	Section 4.12.5 - Tailings Management Area Water Management; Pg. 4-28	The proponent is proposing natural degradation of remaining cyanide in the TMA after SO ₂ /Air Treatment. Effluent aging is proposed to occur over the summer months within the TMA. Laboratory experiments undertaken by the Proponent indicate that 60 days of aging is required to produce effluent that meets federal and provincial criteria. This raises the question of whether the tailings management area pond and water management pond have the capacity to store water over an extended retention time if natural degradation is not sufficient to produce effluent that meets federal and provincial criteria. Also, how will this water be managed and treated?	Water treatment is considered a major component of the mine design given the potential for metal leaching to the environment from the pits, waste rock, overburden and low grade ore stockpiles. Information on the proposed effluent treatment and management options is necessary to determine the impacts to water quality and whether these impacts can be mitigated.	EC recommends that the proponent provide information on the capacity for effluent storage, and the proposed mitigation and treatment measures to manage the waste water in cases where the water does not meet effluent discharge criteria.	EA
EC-20		Hydrology	EIS Guidelines Section 5.2 – Regulatory framework and the role of government & Section 5.6 – Project components	Section 4.12.6 - Final Effluent Quality and Discharge; Pg. 4-28	From review of this subsection two points were raised: 1) It is not clear how much final effluent will be discharged from the Water Management Pond to the Pinewood River via the pipeline and to the constructed wetland. There	Water management and treatment is considered a major component of the mine design given the potential for metal leaching to the environment from the pits, waste rock, overburden and low grade ore stockpiles. Adequate information on the proposed effluent management and discharge	1) EC requests that the proponent correct the conflicting information regarding how effluent will be discharged through the wetland and describe the wetland's purpose. Possibly some clarification could be achieved through a comparison hydrograph	Both

			& Section 9.1.2 – Biophysical environment (Acid Rock Drainage/Metal Leaching)		also seems to be conflicting information on when final effluent will be discharged through the wetland and what the purpose is of discharging final effluent through the wetland. 2) It is indicated numerous times in Section 4 that the constructed wetland discharges to the Pinewood River. In fact, the constructed wetland discharges to Loslo Creek, which then discharges to the Pinewood River.	options is necessary to determine the impacts to water quality and whether these impacts can be mitigated. This request information was also mentioned in EC's comments on the Conceptual Mine Closure Presentation (Feb. 26, 2013).	showing current flows and modified/new flows over the year – this could also be useful in the Summary. 2) EC requests that the proponent correct the text stating that the wetland discharges into the Pinewood Creek to instead state that it discharges into Loslo Creek.	
EC-21		Hydrology	EIS Guidelines Section 5.2 – Regulatory framework and the role of government & Section 5.6 – Project components & Section 9.1.2 – Biophysical environment (Acid Rock Drainage/Metal Leaching)	Section 4.12.7.1 - Preliminary Pond Designs; Pg. 4-30	In the 2nd last paragraph, the proponent indicates that the water discharge pond will receive decanted water from the water management pond and runoff from the local catchment area (100 ha). Since the decanted water from the water management pond is being diluted by runoff in the water discharge pond, the final discharge point should be considered to be at the water management pond, and hence, the constructed wetland would not be considered as part of the effluent treatment system.	MMER does not permit the dilution of effluent prior to meeting Schedule 4 (Authorized Limits of Deleterious Substances). This request information was also mentioned in EC's comments on the Conceptual Mine Closure Presentation (Feb. 26, 2013).	It is EC's opinion that the final point of discharge for MMER monitoring will be at the water management pond (excluding the constructed wetland from the effluent treatment system). In the Final EIS please note the changes incorporated to address this decision.	Both
EC-22		Hydrology & Effluent	EIS Guidelines Section 5.2 – Regulatory framework and the role of government & Section 5.6 – Project components & Section 9.1.2 – Biophysical environment (Acid Rock Drainage/Metal Leaching)	Section 4.12.7.2 - Runoff and Seepage Collection; Pg. 4-31 – 4-32	Insufficient details are provided on the role and function of all of the water management components proposed for the site in terms of seepage and runoff. For example, the Proponent states that runoff and seepage collected in the ditches along the overburden and mine rock stockpiles will be retained in terminal collection ponds until it meets criteria and would then be discharged to the environment. It is not clear if the water from these collection points will be	Details on the proposed management of seepage and runoff from the mine components are necessary to assess the effects of the potential release of leachate to the environment. The Proponent needs to provide enough information about mitigation measures for reviewers to be able to assess their expected effectiveness. Information about mitigation measures is critical to being able to assess whether the Project will have significant environmental effects with appropriate mitigation measures in place. This	1) EC recommends that a Figure be provided that shows all proposed drainage ditches for the mine site, including the ditches that divert runoff away from then site. 2) EC requests more information about the Sediment Ponds 1 & 2. Provide clarification on whether effluent from the collection ponds will be pumped to the water discharge pond or if the effluent will be discharged to the receiving environment	Both

					pumped to the water discharge pond for final discharge.	request information was also mentioned in EC's comments on the Conceptual Mine Closure Presentation (Feb. 26, 2013).	directly from the individual collection ponds. 3) In the 2nd paragraph, it mentions runoff collection ponds. EC requests more information about these ponds and where they will discharge to.	
EC-23		Hydrology	EIS Guidelines Section 5.2 – Regulatory framework and the role of government & Section 5.6 – Project components & Section 9.1.2 – Biophysical environment (Acid Rock Drainage/Metal Leaching)	Section 4.12.8 - Water Balance Overview; Pg. 4-35 & Table 4-4; Pg. Pg. 4-49	1) In the 2nd last bullet, the proponent indicates that surplus water from the TMA pond will be transferred to the water management pond from June through August where it will be allowed to age from a minimum of one month. However, the suggested plant discharge in Table 4.4 is for 60-day aging. 2) The cyanide concentration at Time 0 is much less than the 3 to 6 mg/L mentioned in Section 4.7.6 (Cyanide Use and Destruction). 3) It is helpful to have direct comparison in the Table 4-4 to the Canadian Environmental Quality Guidelines (CEQGs).	The Proponent needs to provide enough information about mitigation measures for reviewers to be able to assess their expected effectiveness. Information about mitigation measures is critical to being able to assess whether the Project will have significant environmental effects with appropriate mitigation measures in place.	1) EC requests further clarification is provided in terms of the aging period that effluent would be held in the water management pond. Additionally, if the retention time is only 1 month then Table 4.4 needs to be revised to show the discharge for 30-day aging. 2) EC requests clarification on why the cyanide concentration is less at Time 0 then mentioned in Section 4.7.6 3) EC recommends that it would be useful to incorporate CEQGs into Table 4-4.	EA
EC-24		Hydrology	EIS Guidelines Section 9.1.2 – Biophysical environment (Atmospheric Environment and Climate & Water Resources)	Section 4.12.8 – Water Balance Overview; Pg. 4-34 & Figure 4-12; Pg. 4-64,	It is assumed that the numbers being presented here are based on annual averages. However, there are seasonal variations to precipitation as well as individual events of high precipitation and runoff. These variations do not appear to be considered in the EIS.	It should be demonstrated that the precipitation can be stored and/or controlled to the extent required to be used for mitigation of ARD (factoring in natural variations). It should be shown that it is practical to build infrastructure that will handle large quantity water events (i.e. high intensity rainfall and/or snowmelt) to the extent required to maintain the water budget during prolonged drought conditions.	EC recommends that analysis be provided that shows that water can be distributed throughout the year sufficiently and that infrastructure can be designed to use the water as indicated. Specifically, attention should be given to how much of the runoff will actually be useable in the water balance and how much may need to be “spilled” because	EA

							infrastructure cannot handle high runoff events. Attention should also be given to seasonal variations.	
EC- 25		Hydrology	EIS Guidelines Section 7.1.3 – Effects of the environment on the project & Section 9.1.2 – Biophysical environment (Atmospheric Environment and Climate & Water Resources)	Section 4.19.3 – Tailings Management Area; Pg.4-42 & Table 4-5; Pg.4-50 & Section 6.19.4.1 – Alternatives; Pg.6-112 & Figure 4-5; Pg. 4-42 & Table 5-14	(Reoccurring topic in the report) Evaporation of water over the tailings during extended drought periods could significantly draw down the depth of water over the tailings. Based on the need for 2 m of water above the tailings, a greater depth than 2 m needs to be considered to account for loss of water during dry periods.	Water balance calculations used as the basis for the design of the tailings management area should consider the range of climate conditions that may be encountered including consecutive years with high evaporation and low precipitation. In some years seasonal and annual evaporation rates can be expected to be significantly larger than the mean values provided in Table 5-14 due to natural variability. Consecutive low precipitation, high evaporation years could put the water balance for the project into a deficit impacting the ability to maintain watercover and prevent ARD.	Rationale should be provided for data inputs chosen for the analysis (e.g. evaporation, precipitation, and other pertinent climatic data). The analysis should include a broad range of seasonal and annual precipitation and evaporation data (well beyond annual mean values) to demonstrate that the system is robust enough to withstand a range of climate conditions including drought conditions. EC suggests that the proponent also conduct a sensitivity analysis using a multi-year period (EC suggests 7 years) using consecutive years with below average precipitation and above average evaporation in order to simulate the response to a lengthy (i.e. 7 year) drought condition. As well potential impacts of possible climate change on hydrology post-closure should also be considered. This analysis should incorporate the recommendations in Section 8.5 (Climate Change).	EA
EC-26		Surface Water	EIS Guidelines	Table 4-5 – Summary of	The Summary of RRGP Ponds (Table 4-5) does not	Table 4-5 is missing information on the Sediment	EC requests revision of Table 4-5 to reflect the	EA

			Section 9.1.2 – Biophysical environment (Water Resources)	RRGP Ponds; Pg. 4-50	include all ponds that have been mentioned in the EIS that are to be built.	ponds (2), Clarks Creek pond and the runoff collection ponds.	missing water features.	
EC-27		Effluent Surface Water Fish and Fish Habitat	EIS Guidelines Section 5.2 – Regulatory framework and the role of government & Section 8.1 – Assessment of alternatives for mine waste disposal & Section 9.1.2 - Biophysical environment (Acid Rock Drainage/Metal Leaching)	Figure 4-1 (Site Plan Ultimate Footprint) ; Pg. 4-53	The use of a natural water body frequented by fish for mine waste disposal requires an amendment to the <i>Metal Mining Effluent Regulations</i> (MMER) to add the waterbody to Schedule 2 of the MMER. Under the regulations mine waste is not restricted to waste rock and tailings only but also includes overburden, low grade ore stockpiles as well as liquid effluent from mine water management facilities (e.g., process water or water collected in seepage ponds and ditches). The Proponent's site plan shows a number of water management features (e.g., water management pond, water discharge pond, sediment pond, stockpile pond, and constructed wetland) that are under the mine footprint. It is not clear as to whether or not the locations and footprints of the above mine water management facilities would impact a natural water body frequented by fish.	This information is required by EC with respect to the determination of whether or not these mine water management facilities impact natural water bodies frequented by fish. If so these water bodies would need to be added to Schedule 2 of the MMER for the project to be able to proceed as proposed. This request information was also mentioned in EC's comments on the Conceptual Mine Closure Presentation (Feb. 26, 2013).	EC recommends that the information related to the potential for various solid mine wastes (other than tailings and waste rock) and liquid effluent associated with various mine water management facilities to impact natural waterbodies frequented by fish needs to be provided by the Proponent in the EIS.	Both
EC-28		Hydrology	EIS Guidelines Section 9.1.2 - Biophysical environment (Atmospheric Environment and Climate) & (Acid Rock Drainage/Metal Leaching)	Figure 4-12; Pg. 4-75 & Table 5-14- Mean Evaporation Rate ; Pg. 5-180	Based on a TMA area from Figure 4-5 and mean evaporation rate provided in Table 5-14 it may be possible to get evaporation volumes for the TMA up to 2 times greater than reported in Figure 4-12.	If evaporation is greater than anticipated this could increase the potential for water shortages during operation and after closure.	EC requests that the proponent provide detailed calculations and rationale for all aspects of the water budget of the TMA.	EA
EC-29		Hydrology	EIS Guidelines Section 7.1.3 – Effects of the	Figure 4-12; Pg. 4-75 & Table 6-5; Pg. 6-	It is unclear how runoff was calculated throughout numerous sections of the EIS.	Runoff is important in the overall water budget calculations. It appears that	EC requests that the proponent provide details explaining specifically how runoff	EA

			environment on the project & Section 9.1.2 - Biophysical environment (Atmospheric Environment and Climate) & (Water Resources)	136 & Table 7-12; Pg. 7-185		change variability in evaporation/evapotranspiration may not have been included.	was calculated, and this information should be included and referenced within the EIS.	
Rainy River Gold Mine Draft EIS - Volume 2; Section 5 – Description of the Environment								
EC-30		General / Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	General Section 5 & Section 7	Within the report usage of the common name "Northern Bat" is confusing as the more commonly used name (e.g. on COSEWIC) is "Northern Myotis".	Northern Bat should be identified as "Northern Myotis" to reduce common name confusion	EC recommends that the proponent change "Northern Bat" to "Northern Myotis" in the EIS.	Both
EC-31		General / Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	General Section 5 & Section 7	Presentation of data relating to Whip-poor-will and Common Nighthawk in Section 5 and Section 7. Throughout the EIS, there is a heavy weighting on Whip-poor-will. Most of the content presented could also be used for Common Nighthawk.	The Whip-poor-will and Common Nighthawk have a large degree of similar usage of their ecosystem niche and thus have a high degree of transferrable assessment information between the two.	EC requests that the proponent include information relevant to Common Nighthawk (or nightjars) in the Whip-poor-will sections where appropriate.	Both
EC-32		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	Section 5.2.11.1 - Aerial Surveys; Pg. 5-26	The EIS states that aerial surveys took place on February 20, 2013 and were used to detect, among other things, the presence of wolves which may indicate the location of rendezvous sites.	The timing of these surveys likely does not allow the location of rendezvous sites to be inferred from wolf observations as these activities primarily occur in late summer early fall.	EC requests that the proponent remove this inference unless supporting information can be presented to support the link between wolf observations and the location of rendezvous sites during the survey time period.	Both
EC-33		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	Section 5.2.12.1 - Breeding Bird Point Counts; Pg. 5-29	There were at least four different breeding bird point count surveys completed (BBS, FBMP, MMP, Nightjar) used to evaluate the breeding bird density in the NLSA.	There were two different consultants which used different survey methodologies to estimate the breeding bird populations in the NLSA. This may lead to discrepancies between the different datasets and affect the breeding bird density estimates.	EC requests that the proponent describe, in detail, if discrepancies exist and if so, how they were rectified.	Both
EC-34		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment	Section 5.2.12.1 - Breeding Bird Point Counts; Pg. 5-29	The EIS states that survey "stations were selected using 1:20,000 scale satellite imagery".	2007 FRI information is available from the OMNR, covering the entire NLSA and is standardized across the province within all Forest	EC requests that the proponent describe the rationale for not using the FRI information (as was used for habitat	Both

			(Birds, Wildlife and their Habitat)			Management Units. FRI information complies with, or can be converted to Ecosite (ELC) information.	summaries) to direct survey station selection.	
EC-35		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	Section 5.2.12.1 - Breeding Bird Point Counts; Pg. 5-29	The EIS states that "At each station, all birds seen or heard during a 10-minute period, rather than the suggested 5-minute listening period in OBBA (2001) were recorded on a datasheet".	Were the surveys recorded in separate 5-min increments in order that they conform to FBMP standards?	EC requests that the proponent describe how the data was recorded (methodology) with respect to the recording time.	EA
EC-36		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	Section 5.2.12.3 - Nightjars; Pg. 5-31	The EIS states that "KCB conducted two targeted whip-poor-will surveys in June of 2010" and "AMEC recorded Eastern Whip-poor-will during the 2011 nocturnal owl surveys and initiated targeted whip-poor-will surveys in June 2012."	A previous EC request regarding the timing of these surveys was fulfilled, however no indication that the surveys took place during the appropriate time can be found in the EIS.	EC requests that the proponent indicate the timing of these surveys in the EIS to avoid any confusion.	Both
EC-37		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	Section 5.2.12.4 - Marsh Birds; Pg. 5-31	The EIS states that "Surveys conducted by KCB followed methodology outline in the Marsh Monitoring Program..."	There is no indication regarding the timing (date) of these surveys. Also the MMP protocol requires a 15 minute survey period for each station a playback recording of the 4 species listed and a Common Moorhen/American Coot call.	EC requests that the proponent indicate the date these surveys took place along with a justification as to why the survey period was 10 minutes as opposed to 15 and why the 5 th call was omitted.	EA
EC-38		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	Section 5.2.15 - Species at Risk; Pg. 5-34	The EIS states that "In Ontario, the Federal <i>Species at Risk Act</i> only applies on Federal lands and defers the responsibility of regulating SAAR on private lands the <i>Endangered Species Act</i> "	SARA does not defer the responsibility of regulating SAR on private lands. SARA applies equally to private and public lands. For some species listed under both the SARA and the ESA, federal/provincial cooperation takes place in developing a federal recovery strategy.	EC requests that the proponent remove this statement and include a paragraph for SARA to accompany the existing paragraph for the ESA.	Both
EC-39		Hydrology	EIS Guidelines Section 9.1.2 - Biophysical environment (Water Resources)	Section 5.6.2 - Surface Water Flows; Pg. 5-61 & Table 5-20; Pg. 5-185	The EIS does not appear to provide the rationalization for why prorating flows from WSC station 05PC023 upstream, that has data year round, to WSC station 05PC011 downstream is applicable. Noting that the watershed area of WSC station 05PC023 is 233 km ² and WSC station 05PC011 is 461 km ² , prorating of flows may not be appropriate (please refer to previous EC	This analysis is sufficient if all that is required is that winter month flows are near zero. If flow estimates are required with more accuracy then more rationale should be provided for the prorating of flows.	EC requests that the proponent provide the rationalization for prorating flows and the verification that the additional watershed area included in WSC station 05PC011 responds similar to the watershed of WSC station 05PC023 should be documented and/or undertaken if it is identified that a more	EA

					comments submitted on Baseline report for Low Flow Surface Water).		accurate estimation of the flow is required.	
EC-40		Hydrology	EIS Guidelines Section 9.1.2 - Biophysical environment (Water Resources)	Section 5.6.2 – Surface Water Flows, Paragraph 3; Pg. 5-61 & Table 5-21; Pg. 5-186	“To estimate annualized...the derived mean monthly flows shown in Table 5-21...”	Mean monthly flows are not shown in Table 5-21.	EC recommends that the proponent ensure that this is the correct reference.	EA
EC-41		Hydrology	EIS Guidelines Section 9.1.2 - Biophysical environment (Surficial Geology) & (Water Resources)	Section 5.7.2.1 – Overburden and Shallow Bedrock; Pg. 5-69 & Appendix H, Figure 2-2: Regional Overburden Geology	The glaciolacustrine clay at the site is varied in places and contains sand lenses and gravel. There is also some bedrock exposure that may provide paths of high permeability due to fractures in the rock.	Leakage of water out of the TMA through soil may be greater than anticipated due to local permeable soils. If leakage of water out of the TMA is greater than anticipated then this could cause more frequent drying of tailings resulting in ARD as well as greater potential for transport of the ARD out of the TMA through groundwater.	EC recommends that the proponent complete local soil investigation to ensure that the soils at the TMA are relatively impermeable before the use of the TMA. If they are not additional, alternate mitigation may be required.	EA
EC-42		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	Section 5.9.2.1 - Species at Risk; Pg. 5-104	(Third paragraph)The EIS states that “Black Ash Hardwood Forest (B089, B105 and B130) covers just 401.5 ha of the NLSA and represents 0.01% of the total area.”	The value listed here is incorrect (ha or percentage).	EC requests that the value be adjusted accordingly.	EA
EC-43		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	Section 5.9.2.2 - Coniferous Swamp; Pg. 5-105	(Second paragraph)The EIS states that “Most swamps within the NLSA occur in close proximity to each other (about 1 km apart) and are hydrologically connected to permanent or intermittent watercourses. Such features may make them significant for wildlife movement and distribution of plant species.”	As stated in the EIS, swamp habitat is important for wildlife, yet there is no reference to how swamp habitat will be restored or rehabilitated upon site closure. This habitat type is particularly difficult to restore given that swamps rely on an interaction between water, soil and vegetation.	EC requests that the proponent either acknowledge the difficulty in restoring this habitat type or describe, perhaps in the reclamation section, what approach and techniques would be taken or applied to ensure this habitat type exists on the site footprint upon closure.	EA
EC-44		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	Section 5.10.1.2 – Birds (Migratory Breeding Birds – Colonially-nesting Birds); Pg. 5-118	The EIS states that “Ecosite data indicates that 101 habitat features covering 16,325 ha of forested habitat are present in the NLSA which may provide suitable tree / shrub colonially-nesting bird breeding habitat.”	These species have very specific nesting requirements and therefore the generalized area listed here could have been refined to reduce the area of potential habitat (i.e. proximity to a stream or hardwood swamp).	EC requests that the proponent either refines the area estimate or note that the habitat features are specific and could be found with the general forested area.	EA
EC-45		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines	Section 5.10.1.2 - Birds	The EIS states that “A Provincial species of Special	The Golden-winged Warbler is listed as Threatened under the	EC requests that the proponent refer to both	Both

			Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	(Migratory Breeding Birds – Shrub / Early Successional Birds); Pg. 5-120	Concern, the Golden-winged Warbler...”	Federal Species at Risk Act.	the provincial and federal listing for this species.	
EC-46		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	Section 5.10.1.5 - Species at Risk and Provincially Rare Species Pg. 5-125	The EIS states that “On private land, these prohibitions apply only to listed aquatic species and migratory birds that are also listed in the <i>Migratory Birds Convention Act</i> . In Ontario, the <i>Federal Species at Risk Act</i> only applies on Federal lands and defers the responsibility of regulating SAR on private lands to the <i>Endangered Species Act</i> .”	SARA does not defer the responsibility of regulating SAR on private lands. SARA applies equally to private and public lands. For some species listed under both the SARA and ESA, federal provincial cooperation takes place in developing a federal recovery strategy.	EC recommends that the proponent remove this statement and include a paragraph for SARA to accompany the existing paragraph for the ESA.	Both
EC-47		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	Section 5.10.2.4 – Species at Risk or Provincially Rare Mammals; Pg. 5-129	In the EIS the following title heading is confusing “SAR or Provincially Rare Mammals” as the paragraph following only concerns the Little Brown Myotis and Northern Bat which have only been assessed in COSEWIC and is not federally listed as a SAR.	As this is a final sub-section this title needs to be corrected or more text added that relates to the assessment for any federal SAR mammals	EC requests that the proponent correct the heading or add text as indicated.	Both
EC-48		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	Section 5.10.3.3 - Species at Risk and Provincially Rare Species; Pg. 5-134 & Section 5.10.6 - Species at Risk and Provincially Rare Species; Pg. 5-136	In the EIS (Sections 5.10.3.3 and 5.10.6) the title heading “Species at Risk and Provincially Rare Species” is confusing as it does not correctly reflect what is contained within.	These titles should be changed to “ Federal Species at Risk and Provincially Rare Species” for clarification	EC requests that the proponent correct the heading.	Both
EC-49		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	Section 5.10.3.3 – Species at Risk and Provincially Rare Species; Pg. 5-134 & Section 5.10.6.2	In the EIS each of the introductory paragraphs for Section 5.10.3.3 and Section 5.10.6.2 do not clearly identify the federal status of the birds	Each paragraph needs to be re-written to present the listed status more clearly for the birds (both federally and provincially).	EC requests that the proponent rewrite the paragraphs as indicated.	Both

				- Threatened Species; Pg. 5-137 & Section 5.10.6.3 - Special Concern Species; Pg. 5-139				
EC-50		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	Section 5.10.3.1 - Aerial Insectivores; Pg. 5-133	The EIS states that "Olive-sided Flycatcher is a SAR and is addressed further in Section 5.9.5."	It should be noted that COSEWIC has assessed Eastern Wood-Pewee as Special Concern and it is currently under consideration for listing under SARA.	EC requests that the proponent also include Eastern Wood-Pewee in its own section as is done with other SAR.	Both
EC-51		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	Section 5.10.6.2 - Eastern Whip-poor-will; Pg. 5-138	The EIS states that "This species shuns both wide-open spaces and dense forest..." and "Whip-poor-will surveys conducted by KCB and AMEC between 2010 and 2012 have recorded a total of 51 observations during the 2012 surveys."	EC suggests that "shuns" is not really the right word for this sentence. Were the 51 observations recorded in 2012 or from 2010 and 2012?	EC recommends that the proponent choose another word than "shun". Also to please clarify whether the survey period identified was in either 2012 or from 2010 and 2012.	Both
EC-52		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	Section 5.10.6.2 - Golden-winged Warbler; Pg. 5-140	The EIS states that "It is apparent that this species prefers larger tracts of forest habitat that contains."	This sentence is incomplete.	EC requests that the proponent add additional content to complete this sentence.	Both
EC-53		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	Section 5.10.6.2 - Common Nighthawk; Pg. 5-140	The EIS states that "Common Nighthawk is Federally designated as Threatened..."	It should be clarified that COSEWIC "Designates" a species, whereas, SARA "Lists" a species	EC requests that the proponent be consistent with wording throughout the document correcting the terminology to reflect that a species is "designated" under COSEWIC and "listed" under SARA.	Both
EC-54		Hydrology	EIS Guidelines Section 9.1.2 - Biophysical environment (Atmospheric Environment and Climate) &	Table 5-11; Pg. 5-178 & Table 5-14; Pg. 5-180	Minimum annual precipitation values (475.8 mm) and mean annual evaporation (538 mm) indicate that short term water deficits could result in exposure of tailings to the atmosphere and/or short term water shortages. For	Losses due to evaporation and their impacts to short term water shortages are underestimated.	EC recommends that the proponent complete an assessment of drought conditions (e.g. the representative 7 year drought).	EA

			(Water Resources)		comparison purposes evaporation rates for the Lake Superior basin can be greater than 700 mm per annum.			
EC-55		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	Table 5-27; Pg. 5-199	The "Likelihood of Potential SAR occurring within the NLSA" table uses the term "Statistics Canada".	It is assumed that this typo should instead use the term "Special Concern".	EC recommends that the proponent remove "Statistics Canada" and replace with "Special Concern" where appropriate within the document.	Both
EC-56		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	Figure 5-16; Pg. 5-200	In reviewing the Breeding Bird Survey Locations map a deficiency was noted.	There is a significant gap in bird survey locations shown particularly in the southwest portion of the transmission corridor.	EC requests that the proponent indicate why these sections were not surveyed and describe any effect on the breeding bird density estimates.	Both
Rainy River Gold Mine Draft EIS - Volume 2; Section 6 – Evaluation of Alternatives								
EC-57		General – Logistics	EIS Guidelines Section 8.1 – Assessment of alternatives for mine waste disposal	Section 6.5 – Mine Rock and Overburden Management; Pg. 6-27 & Section 6.8.1 – Alternative C; Pg. 6-47	The EIS states in the evaluation of Alternative C and E "As long as Schedule 2 can be obtained within approximately 10 months following the completion of the Environmental Assessment".	The details and timing for MMER and Schedule 2 Amendments are outlined in the "MPMO Agreement for the Rainy River Gold Project" and "Short Companion Document" (to be posted on the MPMO's webpage www.mpmo-bggp.gc.ca).	EC recommends that this understanding of the details and timing be indicated by the proponent.	Both
EC-58		General - concern	EIS Guidelines Section 8.1 – Assessment of alternatives for mine waste disposal	Section 6.8.1 – Alternative C; Pg. 6-45	The first paragraph of Alt. C states "...the title to which has already been acquired by RRR. Alternative B has a footprint..."	Typo – it should read Alternative " C "	EC requests that the proponent correct the typo.	Both
EC-59		Hydrology	EIS Guidelines Section 9.1.2 - Biophysical environment (Water Resources)	Section 6.11.1 – Alternatives; Pg. 6-62	(First paragraph) Runoff coefficient values for predevelopment condition is given as 0.028 and developed as 0.446 but no rationale was given for these numbers.	Runoff coefficients are important in determining how much water will be available on site, specifically how much water will be available as runoff to the TMA.	EC requests that the proponent provide the rationalization in developing the coefficient values.	EA
EC-60		Hydrology	EIS Guidelines Section 9.1.2 - Biophysical environment (Acid Rock	Section 6.19.4.3 – Summary Evaluation; Pg. 6-115	It is not clear how the proposed option of partial cover and flooding will completely prevent the formation of ARD.	Complete flooding will prevent ARD by limiting the diffusion of oxygen to the tailings. Complete cover of the tailings with low permeability overburden will limit ARD by	EC recommends that the proponent reconsider full flooding or full coverage, or provide more rationale on how this combination of techniques will work.	EA

			Drainage/Metal Leaching) & (Water Resources)			limiting the amount of water that reaches the tailings. A combination of the two could leave potential for significant ARD due to gaps and edges as it is unclear how the two mitigations will work in combination. With rise and fall of water levels in the proposed pond this could result in wetting and drying of at least a 100 m to 200 m perimeter of tailings around the pond with potential for ARD.	Also, consideration needs to be made as to whether the fluctuating water levels in the tailings will create unacceptable amounts of ARD. This comment should also be considered with the comment above.	
Rainy River Gold Mine Draft EIS - Volume 2; Section 7 – Effects Assessment and Mitigation								
EC-61		Inaccurate information / typo	N/A	Section 7.1.2 - Effects Analysis; Pg. 7-5	The last paragraph states “Summary tables of significance are presented at the end of this section (Tables 7-38 and 7-39)...” This information actually is presented in Table 7-47 & 7-48	Inaccurate information / typo	EC requests that the proponent correct the last paragraph as follows: “Summary tables of significance are presented at the end of this section (Tables 7-47 and 7-48)...”	EA
EC-62		Nature Hazards Hydrology	EIS Guidelines Section 7,1.3 – Effects of the environment on the project & Section 9.1.2 - Biophysical environment (Atmospheric Environment and Climate) & (Water Resources)	Section 7.1.3 - Effects of the environment on the project; Pg. 7-12 & Section 8.2 – Water Supply Availability; Pg. 8-1 & Section 8.4 Nature Hazards Pg. 8-6 and 8-7	The EIS Guidelines indicate that the EIS will take into account how local conditions and natural hazards, such as severe and/or extreme weather conditions and external events (e.g. flooding, ice jams, landslides avalanches, fire, outflow conditions and seismic events) could adversely affect the project and how this in turn could result in impacts to the environment (e.g., extreme environmental conditions result in malfunctions and accidental events). The EIS does not appear to assess the effect from ice jams / early spring melt conditions where there is the potential for flooding or water shortages at the site, including: 1) It is not clear whether the	Ice jam-related flooding events had great impacts on the local environment and might have potential impacts on the gold mine project operations (including the potential significant loss of the annual precipitation from the proposed storage as water flows off the site due to the onsite storage being filled with ice and backwater effects in local watercourses or at onsite pond outlets), which should be addressed in the reports, including the EIS and Hydrology Appendices.	EC suggests adding the information to address ice jam-related flooding events that will effect on the project operations, potential impact/damage to the TMA and the environment. The ice jam-related flooding events should be considered in natural hazards and the hydrological assessment. For example, snowfall on the Rainy and Namakan river basins during the winter of 1996-1997 was significantly above the average. An early spring (April 8-15) runoff in 1997 with accompanying warm temperatures resulted in an ice jam-related flood threat to the Town of Rainy River, Ontario near the mouth	EA

					<p>method used to calculate the "Environmental Design Flood" takes ice into account.</p> <p>2) The potential impact from ice hazard on the proposed soil cover in terms of erosion/damage from the ice on the remaining pond in the TMA does not appear to be assessed.</p> <p>The main EIS report (Section 8.4, page 8-7) indicates that "Other items identified in the EIS Guidelines as potential events (ice jams, landslides and avalanches) are not credible events for the RRGP".</p>		of Rainy River. This event should be reflected in the EIS and Hydrology Appendix.	
EC-63		Hydrology	EIS Guidelines Section 9.1.2 - Biophysical environment (Atmospheric Environment and Climate) & (Water Resources)	Section 7.6.1.1 – Water Flow Effects; Pg. 7-34 to 7-35 & Table 7-12; Pg. 7-185	The rationale for runoff calculations was not given; however, it would appear that evaporation of stored water on site is only considered at the average value. For comparison purposes, evaporation rates could be greater than 700 mm per annum in the Lake Superior watershed basin. This could be significant, especially in low precipitation periods.	This could have significant impact on the ability to keep tailings wet for mitigation after site closure and the water budget during the active mining years.	EC requests that the proponent provide rationale for runoff calculations and ensure that high levels of evaporation of ponded water on site is considered and accounted for.	EA
EC-64		Effluent Surface Water	EIS Guidelines Section 5.2 – Regulatory framework and the role of government & Section 8.1 – Assessment of alternatives for mine waste disposal & Section 9.1.2 - Biophysical environment (Acid Rock Drainage/Metal Leaching)	Section 7.6.1.1 – Water Flow Effects; Pg. 7-36	The EIS states "The majority of treated tailings management area effluent discharge will be by pipeline to the Pinewood River just downstream of the McCallum Creek outflow. The discharge will normally occur during the months of April, May, October and November, to take advantage of maximum receiving water assimilative capacity for water quality control. Greater river assimilative capacity is required during these discharges, because there will be no supplementary wetland treatment..." (Pg. 7-36). Please note that MMER does not allow for mixing.	The proponent should be aware that the MMER does not allow for a mixing zone. Therefore the effluent must meet MMER requirements at the point of discharge. Greater assimilative capacity will not affect whether the effluent is in violation of MMER limits. The MMER prescribe what are considered to be the minimum acceptable release standards for all metal mines in the country in the context of the federal Fisheries Act. Environment Canada strongly supports the implementation of more stringent limits at any	EC requests that the proponent provide clarification text throughout the EIS where it mentions assimilative capacity and mixing that MMER does not allow for a mixing zone.	Both

						<p>individual facility by other jurisdictions when it has been determined by the jurisdiction in question that such standards are required to maintain the desired water and fish habitat quality at the site.</p> <p>On that basis, Environment Canada supports the proposed position of provincial officials in Ontario that the Rainy River Gold Mine be required to meet the Provincial Water Quality Objectives.</p>		
EC-65		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	Section 7.8.1 - Environmental Effects; Pg. 7-45	The EIS states that "Open country habitats are also typically artificial, created by human activity and tend to continue to be habitually disturbed by human activity.	There was likely some historic open country habitat in the NLSA, however they are likely disturbed. We caution the use of the term "artificial".	EC recommends that the proponent provide some supporting evidence of historical open country habitat (if available).	EA
EC-66		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	Section 7.12.1.1 - Area Sensitive Woodland Breeding Birds; Pg. 7-61	The EIS states that "Most woodland sensitive songbird species are protected under the <i>Migratory Birds Convention Act</i> ,....."	The MBCA does not use the term songbirds	EC requests that the proponent use the same terminology as the heading "area sensitive woodland breeding birds".	Both
EC-67		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	Section 7.12.1.1 - Area Sensitive Woodland Breeding Birds; Pg. 7-62	The EIS states that "Vegetation removal from Woodlands 156 and 173 will be limited to the transmission corridor..."	Perhaps the most important aspect of the transmission corridor is not removal of the habitat but rather the fragmentation of habitat particularly with respect to woodland habitat. While fragmentation within the site footprint is not a particularly high concern because of the removal of most or all vegetation will occur, the transmission corridor stretches over 16 kilometres in length and bisects some of the larger woodland and forest patches in the NLSA. To a lesser extent the new Highway 600 route will also increase fragmentation in the NLSA	EC requests that the proponent evaluate the transmission corridor and new Highway 600 route as they relate to fragmentation effects.	Both


EC-68		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	Section 7.12.1.2 - Area Sensitive Marsh Breeding Birds; Pg. 7-62	The EIS states that "As a result, foraging waterfowl could potentially ingest sediments associated with such facilities."	The statement leads into a larger issue of ingesting inorganic elements /compounds either directly (ingesting sediment) or via the food chain (e.g. invertebrate foraging). This could affect waterfowl, marsh birds and shorebirds which could feed in the tailings ponds.	EC requests that the proponent to provide evidence that such feeding activities do not adversely affect wildlife and / or including mitigation or monitoring programs to lessen or evaluate the effect on wildlife.	Both
EC-69		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	Section 7.12.3 – Mitigation; Pg. 7-66	The EIS states that "Restoration of disturbed habitats at closure to habitats capable of supporting a diversity of wildlife species".	The statement is ambiguous, from a wildlife perspective. Restoration to the pre-existing condition, where possible, is the desired closure condition. Species population\ management concerns may present opportunities to deviate from this baseline condition where this may be of benefit to rare species or SAR.	EC recommends that the proponent change the wording to something like "restoration to the pre-existing condition, where possible is the desired closure condition. Species population\ management concerns may present opportunities to deviate from this baseline condition where this may be of benefit to rare species or SAR."	Both
EC-70		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	Section 7.12.3 – Mitigation; Pg. 7-66	The EIS states that "Enforcement of speed limits along proposed mine access roads to reduce the potential adverse effects of increased vehicular traffic associated with RRGP..."	Monitoring might be an efficient means to determine the seasonal/daily/geographic patterns of avian use of roads, and therefore better inform mitigation. For example, if Common Nighthawks are observed roosting on roads between 10:00 pm and midnight during June & July, then the daily scheduling of road use by mine rock haul trucks could be adjusted accordingly.	EC requests that the proponent include monitoring activities where practical and beneficial for mitigation refinement.	EA
EC-71		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	Section 7.12.5 - Significance Determination; Pg. 7-68	The EIS states that "Given the homogenous forest cover of the NRSA, these results indicate that abundant breeding habitat for woodland area sensitive songbirds will remain and that birds displaced by mine activities will colonize surrounding lands."	The NRSA is highly fragmented with a patchwork of open country, wetland and forest habitat. The project footprint will remove large woodland features and fragment others. Please provide a sound rationale for this statement.	EC requests that the proponent provide a sound rationale for statement "Given the homogenous forest cover of the NRSA, these results indicate that abundant breeding habitat for woodland area sensitive songbirds will remain and that birds displaced by mine activities will colonize surrounding lands."	Both
EC-72		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines	Section 7.15.1.1 - Environmental	The EIS states that "Mine construction and operation is	Increased artificial lighting might influence foraging	EC requests that the proponent provide	Both

			Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	Effects; Pg. 7-78	anticipated to occur both night and day so that additional artificial lighting will be required".	effectiveness for Common Nighthawk and Whip-poor-wills.	mitigation details or monitoring activities in order to minimize or evaluate the impact of additional lighting on aerial foragers.	
EC-73		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	Section 7.15.1.1 - Environmental Effects; Pg. 7-78	The EIS states that "Road mortality could occur with increased traffic as whip-poor-wills are known to roost on gravel roads within their preferred habitat. Foraging individuals or displaying males may also collide with vehicles."	Common Nighthawks are known to roost on roads, especially after dusk foraging sessions, therefore the effect of road mortality on both species of nightjars needs to be considered.	EC requests that the proponent provide mitigation details or monitoring activities in order to minimize or evaluate the impact of increased road usage on nightjars.	Both
EC-74		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	Section 7.15.1.1 - Environmental Effects; Pg. 7-78	The EIS states that "The MNR has expressed concerns... as well as in the ESA permit application".	Whip-poor-will is also covered by SARA.	EC requests that the proponent include references to SARA regarding Whip-poor-will.	Both
EC-75		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	Section 7.16.1.1 - Common Nighthawk; Pg. 7-90	The EIS states that "Vegetation clearing for RRGP construction will remove 1,352 ha...".	The clearing activities must happen outside of the period when nighthawks are on site.	EC requests that the proponent provide the vegetation clearing timing window or application of other mitigation.	Both
EC-76		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	Section 7.16.1.1 - Common Nighthawk; Pg. 7-90	The EIS states that "Increased road mortality..."	Monitoring should be considered to gauge the level of nighthawk activity on and in the vicinity of roads. The monitoring results will inform mitigation planning, i.e., scheduling traffic to avoid peak time periods when nighthawks are observed roosting on gravel. In addition to nighthawks that breed on site, there will likely be a seasonal insurgence of migrant nighthawks from the boreal region, with foraging activity over clearings including roads earlier than dusk, i.e., during early August. More mitigation may be required to avoid or minimize collisions with this seasonal increase in nighthawk density. Flocks of nighthawks are likely to pass	EC requests that the proponent provide mitigation details or monitoring activities in order to minimize or evaluate the impact of increased road mortality on nighthawks.	Both

						through the area for a few days in early August; foraging over wetlands or grassy clearings, and this activity could be during daylight hours, e.g. 4:00 pm to dusk.		
EC-77		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	Section 7.16.1.2 - Golden-winged Warbler; Pg. 7-91	The EIS states that "Based on the results of 2011 and 2012 field studies, the removal of vegetation for RRGP components will likely displace approximately 15 to 17 Golden-winged Warbler pairs."	Are these based on density and habitat estimates or just the number of birds detected during surveys?	EC requests that the proponent provide additional details regarding the estimate of displaced Golden-winged Warbler pairs.	Both
EC-78		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	Section 7.16.1.7 - Black-billed Magpie; Pg. 7-92	The EIS states that "The Black-billed Magpie is a Provincially rare species and is protected under the <i>Migratory Birds Convention Act</i> ."	The Black-billed Magpie is not covered by the MBCA.	EC recommends that the proponent remove this reference.	EA
EC-79		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	Table 7-47 - Significance Determinations of Residual Effects after Mitigation – Natural Environment; Pg. 7-217	The EIS states that "Vegetation Communities and Rare Plants – Effects are reversible".	The effects are not entirely reversible especially with respect to hydrology.	EC recommends that the proponent adjust the wording.	EA
EC-80		Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	EIS Guidelines Section 9.1.2 - Biophysical environment (Birds, Wildlife and their Habitat)	Section 7.7.1 – Environmental Effects; Pg. 7-42 & Figure 7-11 - Model Predicted Drawdown in the PLGD/Shallow Bedrock; Pg. 7-247	In the EIS Section 7.7.1 (Environmental Effects on Groundwater) it does not evaluate any potential impact on vegetation (migratory bird habitat) over the 70+ years it will take before the drawdown has disappeared.	Potentially the drawdown from the open pit will have a long term impact on the existing vegetation within the project area. This may result in the loss of wildlife habitat.	EC requests that the proponent provide an assessment of the effect of this on vegetation.	EA
Rainy River Gold Mine Draft EIS - Volume 2; Section 8 – Effects of the Environment on the Project								
EC-81		Effects of the Environment on the Project -- Climate Change	EIS Guidelines Section 7.1.3 – Effects of the environment on the project	Section 8.5 – Climate Change; Pg. 8-9	The Proponent's assessment of potential future climate change in the region does not represent the <i>range</i> of potential future climate change and related uncertainties. The proponent cites mean annual seasonal temperature and precipitation projections	It is not sufficient to rely on simulations from a single model or an ensemble median to characterize the range of possible future climate change.	EC requests that the proponent provide seasonal and annual temperature and precipitation projections from a number of models for a range of emission scenarios (these can be obtained from the published literature).	EA

					<p>from Colombo <i>et al.</i> 2007. These projections are based on simulations from a single model for two emission scenarios.</p> <p>The Proponent also cites median annual precipitation and temperature increases from IEESC (2012).</p>		<p>EC also requests that the proponent provide some discussion of projected temperature increases on evaporative processes and potential impacts of prolonged future dry spells on water balance particularly on the water cover for the TMA to prevent acid mine drainage in the post-closure period (see comment EC-20).</p>	
EC-82		Effects of the Environment on the Project -- Climate Change	EIS Guidelines Section 7.1.3 – Effects of the environment on the project	Section 8.5 – Climate Change; Pg.8-9 to 8-10.	<p>The Proponent evaluated the linear trend in the observed stream flow record from Rainy River (at Manitou Rapids). They report that there is an uptrend if the full record is considered (1929 onwards) and that the trend from 1940 onwards is “virtually flat”. Based on this assessment, the Proponent states (p 8-10; bold emphasis added) that:</p> <p>“It would therefore appear on balance that runoff regimes in the region are likely to remain close to their current levels, with a high degree of year-to-year variability. Water balance determinations which have been used in the design the RRGP water management system and closure strategy (including flooding of the open pit), are unlikely to change during the life of the RRGP, and are unlikely to change appreciably over the longer-term, within the accuracy of predictive models”.</p> <p>EC notes that the Proponent does not provide sufficient support to convincingly demonstrate that this statement is correct.</p>	<p>EC notes that, regardless of the strength or sign of historical trends, observed changes cannot be used to make direct inferences about future climate/hydroclimate.</p> <p>Projected impacts of climate change on hydrology should be based on hydrological modeling derived from projections of future climate from climate model simulations.</p> <p>In addition, evaluation of a trend from a single flow record does not necessarily reflect a regional signal (this is especially true if the flow is not natural).</p>	<p>EC recommends that the proponent either remove or modify this statement or provide support, noting the anticipated range in future hydroclimate conditions, from the published literature (or undertake appropriate analyses).</p>	EA

Appendices								
EC-83		Geochemistry Effluent	EIS Guidelines Section 9.1.2 - Biophysical environment (Acid Rock Drainage/Metal Leaching)	Appendix G - Report of Metal Leaching/Acid Rock Drainage Characterization of Mine Rock and Tailings	The EIS has not provided rationale for not undertaking field kinetic tests for tailings.	Field based kinetic tests for ML-ARD potential are more realistic in terms of actual site conditions compared to the lab-based static and kinetic tests. Although the Proponent has undertaken field kinetic tests for waste rock samples, there appears to be no field kinetic test undertaken for tailings samples.	The proponent is requested to provide information on field kinetics tests on tailings samples.	EA
EC-84		Geochemistry Effluent	EIS Guidelines Section 9.1.2 - Biophysical environment (Acid Rock Drainage/Metal Leaching)	Appendix G - Report of Metal Leaching/Acid Rock Drainage Characterization of Mine Rock and Tailings	The Proponent has undertaken short-term leach tests for waste rock and tailings samples. However, the Proponent has stated in both cases that short-term leach results are not directly applicable to actual leaching conditions. Could the Proponent clarify as to what they mean by that statement and further indicate what the actual leaching predictions are for waste rock and tailings?	It is important for the reviewers to understand the actual leaching conditions that would be generated from tailings and waste rocks. Clarification is required since the Proponent's statement that "short-term leach results are not directly applicable to actual leaching conditions " appears to be confusing.	The proponent is requested to provide a clarification on what the relationship is between the short term leach results and the actual leaching conditions. The Proponent is also requested to explain what the actual leaching predictions are for waste rock and tailings given the clarification on the relationship between the short term leach results and the actual leaching conditions.	EA
EC-85		Geochemistry Effluent	EIS Guidelines Section 9.1.2 - Biophysical environment (Acid Rock Drainage/Metal Leaching)	Appendix G - Report of Metal Leaching/Acid Rock Drainage Characterization of Mine Rock and Tailings	The EIS has indicated that the release of some parameters (e.g., aluminum) will be considered in more detail with the ongoing kinetic testing program; however no timeline has been given for the completion of this ongoing kinetic testing program?	It appears that the kinetic tests for waste rocks with respect to the long-term release of some metals such as aluminum are not yet complete.	The proponent is requested to provide the timeline for the completion of the kinetic testing program.	EA
EC-86		Geochemistry Effluent	EIS Guidelines Section 9.1.2 - Biophysical environment (Acid Rock Drainage/Metal Leaching)	Appendix G - Report of Metal Leaching/Acid Rock Drainage Characterization of Mine Rock and Tailings	The EIS has indicated that selenium is elevated in both the waste rock and tailings samples. For waste rock, the pH represents neutral to alkaline conditions. The Proponent has indicated that based on short-term leach tests, metal leaching under neutral pH conditions are unlikely to occur. No explanation has been provided as to when favourable conditions are	Clarification is required on neutral pH metal leaching for selenium due to the potentially deleterious nature of selenium on water quality and aquatic life.	The proponent is requested to provide an explanation of when the favourable conditions are present in the samples and why selenium leaching under neutral pH is not expected to occur.	EA

					present in the samples (e.g., elevated Se concentrations and neutral pH), why selenium metal leaching under neutral pH conditions would not occur.			
EC-87		Effluent Surface Water Fish and Fish Habitat 	EIS Guidelines Section 8.1 – Assessment of alternatives for mine waste disposal	Appendix P – Assessment of Alternatives for Tailings and Mine Rock Storage	EC has noted that the Assessment of Alternatives for Mine Waste Disposal has not been completed.	This deficiency is considered major and should be addressed before EC can undertake a review of the complete EIS. This is necessary to determine the significance of effects on the environment of the proposed mine waste management options.	The Proponent should provide an assessment of alternatives for mine waste disposal in accordance with EC guidelines. The Proponent has indicated that a draft will be provided to EC as soon as possible.	Both
EC-88		Atmospheric Environment	EIS Guidelines Section 9.1.2 – Biophysical environment (Atmospheric Environment and Climate)	Appendix Q – Air Quality Assessment Report	The proponent appears to have only conducted AQ assessment for the operation phase of the project and claims that activities in the construction phase use similar mining equipment as during operations (bounding/worse case phase). No specific construction phase AQ assessment appears to have been undertaken.	An AQ assessment for the construction phase needs to be conducted in order to verify that the operation phase of the project is the bounding case and to ensure compliance with standards are achieved throughout this phase.	EC recommends that the EIS assess AQ impacts from all phases of the project including assessment of short term AQ impacts from site preparation and construction activities with the main focus on NOx, TSP, PM10 and PM2.5.	EA
EC-89		Atmospheric Environment	EIS Guidelines Section 9.1.2 – Biophysical environment (Atmospheric Environment and Climate)	Appendix Q – Air Quality Assessment Report	As part of the AQ assessment for operation phase, the proponent has identified sources of air emissions (section 5.2) that are included in the dispersion modeling assessment but does not appear to include exhaust emissions from mining equipment and heavy machinery such as bulldozers, loaders and trucks.	All sources of emissions have to be considered for assessment as the EA process is not limited to O.Reg.419/04 requirements. The AQ assessment should also include substances that are emitted during different phases of the project and not only be limited to compounds that are part of O.Reg.419/04. For example PM10 is not included in the assessment, also some of the other key compounds generated from diesel/gasoline combustion related to mobile sources (both on road/off road) such as VOCs, PAHs, Benzene, Acrolein, Formaldehyde, Acetaldehyde have not been assessed.	EC recommends that the EIS should assess all sources of emissions including non-point sources including compounds like PM10 (which was identified in the EIS Guidelines).	

EC-90		Atmospheric Environment	EIS Guidelines Section 9.1.2 – Biophysical environment (Atmospheric Environment and Climate)	Appendix Q – Air Quality Assessment Tables 5 and 6 Pg. 25	Maximum gust wind speed listed in Tables 5 and 6 (Appendix Q, page 25) is actually maximum hourly wind speed rather than wind gusts. Maximum gust wind speed should be about doubled the listed values.	Wind is a critical meteorological parameter in the dispersion of air pollutants.	EC recommends that if the maximum gust wind speed data were used in air quality dispersion modeling, the air quality assessment should be rerun using correct wind gust data. Otherwise, the wind speed values listed in Tables 5 and 6 should be replaced by maximum gust wind speed.	EA
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Reference #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS or EA	Summary of Comment	Rationale	Proposed Action	EA or Regulatory
CEAA-1	Stephanie Davis, Project Manager	General - EA Type	EIS Guidelines Part 2 Section 4 –Summary and Content of the EIS		The draft EIS Summary is too general. To strengthen it, references to the draft EIS report need to be inserted for readers seeking additional information.	Page 7 of the EIS Guidelines states 'The summary will have a sufficient level of detail for the reader to learn and understand the entire project, potential impacts, mitigation measures proposed by the proponent, the residual effects and the conclusions regarding significance.'	Insert references to the draft EIS report for readers seeking additional information.	EA
CEAA-2	Stephanie Davis, Project Manager	Aboriginal (including potential rights impacts, traditional use of lands and resources)	EIS Guidelines Part 2 Section 4 –Summary and Content of the EIS. EIS Guidelines Section 9.2.	Draft EIS Summary, Section 2.0, Page 5. Draft EIS. Section 2.3 , Tables 2-1, 2-2.	The draft EIS states 'The Aboriginal groups engaged in discussions regarding the RRGP were identified using the following criteria..' This section does not mention federal direction to the proponent with respect to Aboriginal engagement. The list of groups also does not include all of the communities identified by CEAA. Please see the letter to Rainy River Resources dated September 10, 2012 for more information.		Insert information on federal direction regarding Aboriginal engagement. Add additional groups identified to the list. These changes also need to be made in the main text of the draft EIS report.	EA
CEAA-3	Stephanie Davis, Project Manager	General - Consultation	EIS Guidelines Part 2 Section 4 –Summary and Content of the EIS	Draft EIS Summary, Section 3.0.	This section mentions a number of topics raised by the public during engagement discussions. More information is needed on what specific issues were raised and the proponent's response (which is missing).	Page 7 of the EIS Guidelines states the EIS Summary shall include a summary of the issues raised and the proponent's responses.	Include a table outlining the specific issues raised and the proponent's response. This could be brought forward from Appendix D.	EA
CEAA-4	Stephanie Davis, Project Manager	Aboriginal (including potential rights impacts, traditional use of lands and resources)	EIS Guidelines Part 2 Section 4 –Summary and Content of the EIS	Draft EIS Summary, Section 3.0.	This section mentions a number of topics raised by the Aboriginal groups during engagement discussions. More information is needed on what specific issues were raised and the proponent's response (which is missing).	Page 7 of the EIS Guidelines states the EIS Summary shall include a summary of the issues raised and the proponent's responses.	Include a table outlining the specific issues raised and the proponent's response. This could be brought forward from Appendix D.	EA

Reference #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS or EA	Summary of Comment	Rationale	Proposed Action	EA or Regulatory
CEAA-5	Stephanie Davis, Project Manager	General - EA Type	EIS Guidelines Part 2 Section 4 –Summary and Content of the EIS	Draft EIS Summary, Section 4.0.	This section mentions only one of the proposed designated activities.	Including all of the designated activities gives a more accurate reflection of the regulatory context.	List all planned activities that will be captured under the <i>Regulations Designating Physical Activities</i> . The following activities were identified during the review of the Project Description: 8. The construction, operation, decommissioning and abandonment of a facility for the extraction of 200 000 m ³ /a or more of ground water or an expansion of such a facility that would result in an increase in production capacity of more than 35%. 15. The construction, operation, decommissioning and abandonment of (c) a gold mine, other than a placer mine, with an ore production capacity of 600 t/d or more; The Agency requests that the proponent also confirm whether 15(b) applies. (b) a metal mill with an ore input capacity of 4 000 t/d or more; These updates also need to be made in the main text of the draft EIS report.	EA
CEAA-6	Stephanie Davis,	General - Consultation	EIS Guidelines Part 2 Section 4 –Summary	Draft EIS Summary, Section	The last paragraph in this section “Area benthic communities exhibit	This paragraph is very technical and is better	Recommend rewriting this paragraph in more general	EA

Reference #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS or EA	Summary of Comment	Rationale	Proposed Action	EA or Regulatory
	Project Manager		and Content of the EIS	6.6.	a low to moderate..."	suited to the EIS than the EIS Summary (the document the public participation is based on).	terms.	
CEAA-7	Stephanie Davis, Project Manager	Effects of the Environment on the Project (incl. Climate Change)	EIS Guidelines Part 2 Section 4 –Summary and Content of the EIS EIS Guidelines Section 7.1.3, Effects of the environment on the project EIS Guidelines Section 8, Alternative means of carrying out the project	Draft EIS Summary, Section 7.2 Alternative Methods, Water Supply. Draft EIS, Section 6.11.3 Draft EIS, Section 8.2.1	The EIS Summary mentions that Burditt Lake and Off Lake are not considered viable alternatives for water supply on site. This is also mentioned in section 6.11.3, the alternatives assessment for water supply in the main draft EIS document. However, water taking from Burditt Lake is considered as a contingency water source in the main text of the draft EIS (section 8.2.1, Insufficient Water). This would imply the option is feasible and may be used for start-up and initial operations.		Clarify the proposal for water taking in Burditt Lake in the draft EIS Summary and in the draft EIS. If it is considered viable, assess impacts associated with water taking from the Burditt Lake system within the EA.	EA
CEAA-8	Stephanie Davis, Project Manager	General - EA Type	EIS Guidelines Part 2 Section 4 –Summary and Content of the EIS	Draft EIS Summary, Section 8.2 Effects Analysis.	The information in this section does not include enough detail. For example, after reading the effects on air quality the reader does not have an understanding of how the effect could occur, the pollutants that would be emitted, what mitigation is proposed or the geographic extent or magnitude of the effect. Based on the comments received during the public periods, these are issues of concern.	Page 7 of the EIS Guidelines states 'The summary will have a sufficient level of detail for the reader to learn and understand the entire project, potential impacts, mitigation measures proposed by the proponent, the residual effects and the conclusions regarding significance.'	Include additional text to address deficiencies. Including effects tables such as 7-47(or portions of the tables) from Section 7 of the draft EIS is one way to potentially minimize the amount of text that will need to be added. However, please see comments on effects tables below for more info (CEAA-20).	EA
CEAA-9	Stephanie Davis, Project	General - EA Type	EIS Guidelines Part 2 Section 4 –Summary and Content of the EIS	Draft EIS Summary, Section 8.2 Effects	When mentioning the impacts to air will cease upon closure and reclamation, the summary should	Provides the reader with context to understand the effect.	Insert the mine life.	EA

Reference #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS or EA	Summary of Comment	Rationale	Proposed Action	EA or Regulatory
	Manager			Analysis.	reiterate the mine life.			
CEAA-10	Stephanie Davis, Project Manager	General - EA Type	EIS Guidelines Part 2 Section 4 –Summary and Content of the EIS	Draft EIS Summary, Section 11.0.	The residual effects are not specified.	Page 7 of the EIS Guidelines states 'The summary will have a sufficient level of detail for the reader to learn and understand the entire project, potential impacts, mitigation measures proposed by the proponent, the residual effects and the conclusions regarding significance.'	Include information on residual effects for each VEC (where a residual effect exists). Insertion of updated tables from Section 7 of the draft EIS could satisfy this requirement. However, please see comments on effects tables below for more info (CEAA-19).	EA
CEAA-11	Corey Dekker, Senior Aboriginal Affairs Advisor	Aboriginal	EIS Guidelines Section 9.2	Draft EIS Section 2.3	Baseline data on Aboriginal groups history, location, Treaty rights, and traditional territory (if available) is absent in the draft EIS document. There does not appear to be a section that sets out who the groups are. This information is needed in order to determine if there are potential effects on Aboriginal Treaty rights and related interests.	To enable the federal Crown to discharge the legal duty to consult, the Agency has asked for this information to be included in the EIS.	Provide descriptions of each Aboriginal groups' (as per the list provided in CEAA's letter to Rainy River Resources dated September 10, 2012) history, location, Treaty rights and traditional territory. See attached email dated 16/08/2013 for examples from other CEAA projects.	EA
CEAA-12	Stephanie Davis, Project Manager	Aboriginal	EIS Guidelines Section 3.3.	Draft EIS, Section 3.0. page 3-6	Please explain why not all of the groups identified for engagement (Northwest Angle #33 Northwest Angle 37 Anishinabe of Wauzhushk Onigum (Rat Portage)) were given copies of the EIS for review.	These groups were also on the list of groups to be engaged as part of the federal EA.	Provide explanation.	EA
CEAA-13	Stephanie Davis, Project Manager	Aboriginal	EIS Guidelines Section 3.3.	Draft EIS, Appendix D.	The reviewer cannot find a record of engagement with Rat Portage FN.	The Agency has requested the proponent engage with Anishinabe of Wauzhushk Onigum (Rat Portage) as part of the EA.	Provide records of contact.	EA
CEAA-14	Stephanie Davis, Project	General - Consultation	EIS Guidelines Sections 3.3. and 15.1	Draft EIS, Section 3.3.2	This section (comments received during the preparation of the draft EIS) would be strengthened by	This would demonstrate RRR's objectives with respect to effective	Provide a reference to Table 12-1 outlining how the project changed since	EA

Reference #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS or EA	Summary of Comment	Rationale	Proposed Action	EA or Regulatory
	Manager				including a reference to Table 12-1 outlining how the project changed since originally proposed as a result of consultation with stakeholders.	engagement had been met.	originally proposed as a result of consultation with stakeholders.	
CEAA-15	Stephanie Davis, Project Manager		EIS Guidelines Section 13.1.1 Methodology, Significance of adverse environmental effects	Draft EIS, Section 7.1.2 Effects Analysis	<p>The text states “a predicted environmental effect is not likely to be significant if”</p> <ul style="list-style-type: none"> • It has a low magnitude and/or geographic extent or; • Of short term duration including residual effects (i.e. the effect itself is of short term duration); or • Is likely to occur very infrequently (or not at all with little potential for long lasting effects. <p>Can you please clarify, does this mean if there is an effect with a high magnitude but a low geographic extent it be considered insignificant?</p> <p>Using the second set of criteria, what if the effect was of short duration but of high magnitude?</p>	Clarification is needed in order to understand the proponent's evaluation of significance.	Please clarify	EA
CEAA-16	Stephanie Davis, Project Manager	General - EA Type	EIS Guidelines Section 10.1.1 Methodology, Environmental Effects	Draft EIS, Section 7.1.2 Effects Analysis, Page 7-5	<p>The draft EIS states ‘The effects assessments presented in this section are for the expected maximum effect expected to occur during any stage of the RRGP life.’</p> <p>Effects are only presented in the draft EIS for the phase where maximum effect is expected to occur. This is usually the</p>	<p>The EIS Guidelines states that the proponent will indicate the project's effects during all phases of the project (see page 27 of the EIS Guidelines).</p> <p>In particular, the analysis needs to be expanded to cover all</p>	Revise the text describing the methodology to reflect an effects assessment for all phases of the project (i.e. construction, operation, maintenance, foreseeable modifications and closure and decommissioning. Include a description of effects during all phases for each VEC and VSEC.	EA

Reference #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS or EA	Summary of Comment	Rationale	Proposed Action	EA or Regulatory
					operational phase.	phases so that the residual impacts can be incorporated into the cumulative effects analysis.		
CEAA-17	Stephanie Davis, Project Manager	General - EA Type	EIS Guidelines Section 12.1.1 Residual Environmental Effects; 13.1.1 Significance of Adverse environmental effects, Methodology	Draft EIS, Section 7.3 and 7.4	The residual effects section is missing for some VECs. In these instances, the significance criteria are still applied. Determination of significance is normally only applied when there are residual effects.		Where the residual effects section is missing for the VEC/VSEC, describe the residual effects even if very small or deemed insignificant. Revise the effects assessment for each VEC and VSEC to ensure that determination of significance is applied where there are residual effects.	EA
CEAA-18	Stephanie Davis, Project Manager	General - EA Type	EIS Guidelines Section 12.1.1 Residual Environmental Effects	Draft EIS Section 7, Tables 7-47 and 7-48.	These tables do not set out the residual effects on each VEC or VSEC. Significance criteria appear to be applied to potential effects.		Add a column setting out residual effects before applying significance criteria.	EA
CEAA-19	Stephanie Davis, Project Manager	General - EA Type	EIS Guidelines Section 10.1.2 and 10.1.3	Draft EIS Section, 11.2, Tables 11-3 and 11-4.	Tables 11-3 and 11-4 of the draft EIS appear to satisfy the requirements in section 10.1.2 and 10.1.3 of the EIS Guidelines. However, this section in the EIS Guidelines refers to the effects assessment prior to mitigation being applied.		In order to address this, the Agency requests that RRR amend tables 7-47 and 7-48 by adding a column in between 'potential effect' and 'proposed mitigation' that identifies whether the VEC/VSEC is linked to section 5 of CEAA 2012. The column should use a 'Yes' or 'No' system to specify whether any of the five criteria listed below in section 10.1.2 or 10.1.3 apply: <ul style="list-style-type: none"> changes to 	EA

Reference #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS or EA	Summary of Comment	Rationale	Proposed Action	EA or Regulatory
							<p>components of the environment within federal jurisdiction;</p> <ul style="list-style-type: none"> • changes to the environment that would occur on federal or transboundary lands; • changes to the environment that are directly linked or necessarily incidental to federal decisions; • effects of changes to the environment on Aboriginal peoples; and • effect of changes to the environment that are directly linked or necessarily incidental to federal decisions. <p>If the answer is yes, provide detail of the changes to the environment or the effects of changes to the environment for the VEC/VSEC in question within the text portion of section 7 of the draft EIS and carry it through the assessment (including mitigation, residual effects and determination of significance).</p> <p>If further guidance is required, Agency HQ has</p>	

Reference #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS or EA	Summary of Comment	Rationale	Proposed Action	EA or Regulatory
							proposed a teleconference to discuss expectations regarding section 5 of the Act.	
CEAA-20	Stephanie Davis, Project Manager	General - EA Type	EIS Guidelines Section 14, Summary Tables		Some information within this list appear to be missing in the summary tables included in the draft EIS (e.g. relationship of identified Valued Components to Aboriginal groups' potential or established Aboriginal and Treaty rights and related interests).		Please make sure all requested information is present in summary tables. If you have questions on how to incorporate the information, the Agency can provide additional advice on how to fulfill this requirement.	EA
CEAA-21	Stephanie Davis, Project Manager				The Agency requests a conformity table to aid with the review during the first 30 days of the official submission.		Please include a conformity table which shall clearly indicate which section of the EIS fulfills the sections in the EIS Guidelines. Include this in the official EIS submission.	EA
CEAA-22	Stephanie Davis, Project Manager				Please confirm public and Aboriginal comments sent to the proponent by the Agency have been responded to in Appendix D. (Additional copies can be provided if needed).		Please confirm.	EA
CEAA-23	Stephanie Davis, Project Manager				An additional comment relating to accidents and malfunctions in the cumulative effects section will be sent shortly.		To be confirmed.	EA

From: McLeod, Sasha (ENE) [<mailto:Sasha.McLeod@ontario.ca>]
Sent: Friday, September 06, 2013 4:27 PM
To: kstanfield@rainyriverresources.com; Daniel, Sheila E
Cc: Davis, Stephanie (CEAA)
Subject: More provincial comments - RRGP Draft EA

Please find attached additional comments: MOE waste, MOE air modelling, MOE Environmental Assessment Services, Min Energy, MNR, MTCS tourism, additional MNDM. I've updated the tracking list below. I have not heard whether MOL will be providing comments.

Have a nice weekend.

Sasha

From: McLeod, Sasha (ENE)
Sent: September 3, 2013 8:27 PM
To: kstanfield@rainyriverresources.com; sheila.daniel@amec.com
Cc: Davis, Stephanie (CEAA)
Subject: Provincial comments so far - RRGP Draft EA

Kyle and Sheila,

Please find attached comments from the following ministries regarding the draft EA for the Rainy River Gold Mine Project. Please let me know if you have trouble opening the files or have any questions and I can help coordinate with the reviewers.

Comments attached:

- MEDTE
- MNDM land tenure and Aboriginal ([now revised as noted below](#))
- MNDM mine rehabilitation
- MNDM socio-economic
- MOE air quality
- MOE air quality
- MOE surface water
- MOE wastewater
- MTCS cultural heritage
- MTO
- OMAFRA
- MOE noise
- MOE groundwater – [revised slightly, see attached \(new comment 9\)](#)
- [MOE waste](#)
- [MOE air modelling](#)
- [MOE EAS](#)
- [Ministry of Energy](#)
- [MNR – 2 attachments](#)
- [MTCS tourism](#)
- [MNDM – addition of 2 comments to land tenure and Aboriginal comments sent previously](#)

Early next week I expect to provide you with comments from:
- [MOE Aboriginal Affairs Branch](#)

Sasha

Project: Draft EA for the Rainy River Gold Mine Project

Commenter: Ministry of the Environment, Environmental Assessment Services (Sasha McLeod)

Reference #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS	Summary of Comment	Rationale	Proposed Action	EA or Regulatory
Volume 1								
EAS-1	Sasha McLeod, Project Officer	General - EA Type		Throughout	The EA uses a name for the proponent that may become outdated, which could cause confusion as to who the proponent is.	Proponent has indicated the proponent name for the project may change.	Change proponent and project names to new names as appropriate. Make a clear connection that the new proponent name is the same proponent that is bound to the Voluntary Agreement between MOE and the proponent.	Neither – administrative
EAS-2	Sasha McLeod, Project Officer	General - Consultation		Volume 1 – Summary 2.0 Participants in EA Page 5	Page 5 indicates MNDM provided provincial direction on the list of Aboriginal communities to consult. However, direction was also given by other ministries including MOE, MAA and MNR (see comment EAS-9). Please clarify all agencies that were involved in determining the list of communities to consult.	Proponents are required to work with MAA and AANDC, with assistance from MOE and agencies as necessary, to determine the list of Aboriginal communities to be consulted for the project, per MOE's ToR Code of Practice and general practice.	The EA should state all provincial and federal agencies that were involved in developing the list of Aboriginal communities to consult.	EA
EAS-3	Sasha McLeod, Project Officer	General - EA Type		Volume 1 – Summary 18 References Page 18-19	The reference MOE 2009a, Code of Practice: Preparing and Reviewing ToRs for EA in Ontario, appears to be incorrect and should be 2009d.	n/a	Correct typo.	Neither – administrative

Reference #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS	Summary of Comment	Rationale	Proposed Action	EA or Regulatory
Volumes 2 and 3								
EAS-4	Sasha McLeod, Project Officer	General - EA Type		1.3 Project Components Page 1-3	Section 1.3 indicates that “Primary construction phase activities will include: <ul style="list-style-type: none"> Completion of engineering studies and environmental approvals process” Please note construction may only begin after completion of the environmental approvals processes.	Construction of certain works may not proceed without the appropriate approvals in place.	Consider clarifying the project phasing to indicate that the appropriate approvals will be obtained prior to any construction that is subject to the approvals.	Neither - clarification
EAS-5	Sasha McLeod, Project Officer	General - EA Type		1.6.2 Provincial Framework Page 1-7	Section 1.6.2 indicates the ToR was approved in May 2013 but this should also indicate whether the EA was prepared in accordance with the ToR.	It should be made clear that the EA was prepared in accordance with the approved ToR, which is a requirement of the EAA.	Add clarification.	EA
EAS-6	Sasha McLeod, Project Officer	General - Consultation		1.6.4 Other Regulatory Aspects Page 1-8 -AND- 3.3.2 [Comments and Concerns] Received during the Preparation of the Draft EA Report Page 3-10	These sections states numerous times that stakeholders and Aboriginal groups have provided considerable support for the RRGP and that the evidence is in Appendix D-7. For example, page 1-8 states, “RRGP has received very strong support from Municipal and Provincial government, as well as First Nations to date.” Page 3-11 states, “RRR has received considerable support for the RRGP from stakeholders during this period, as demonstrated in part, by the letters	The Ministry of the Environment is the approving body for the EA. As such, it is misleading and inappropriate to say that the province is providing strong support for the project while the EA process is underway. In addition, statements indicating that certain stakeholders provide strong support could be misleading or de-emphasize the fact that a number of stakeholders have raised concerns.	The statements indicating that the provincial government supports the project should be removed. Statements indicating the project is receiving strong support from other stakeholders should be further clarified or justified.	Neither - clarification

Reference #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS	Summary of Comment	Rationale	Proposed Action	EA or Regulatory
					<p>of support provided in Appendix D-7.”</p> <p>While there are some letters in the appendix stating support for the project, there are also many letters stating concerns and providing comments that are not indicative of support.</p> <p>Please ensure summary statements about consultation accurately reflect the submissions received.</p>			
EAS-7	Sasha McLeod, Project Officer	General - EA Type		1.7.2 Volume 2: EA Report Page 1-10	<p>In section 1.7.2, within the description of section 6 (Evaluation of Alternatives), please add references to the applicable appendices in order to aid the reader in finding this information.</p> <p>This was done for the description of section 5, which is helpful.</p>	The EA should be user-friendly, particularly since it is such a large document. Any help in finding relevant sections is appreciated.	Consider adding additional guides in the EA to help readers find related information.	Neither – administrative
EAS-8	Sasha McLeod, Project Officer	General - EA Type		2.1 Potentially Affected and Interested Stakeholders Page 2-2 -AND- 3.3.1.1 Stakeholders Page 3-8	<p>On page 2-2, the ministry is called the Ministry of Economic Development and Trade. On page 3-8, the ministry is called the Ministry of Economic Development and Innovation.</p> <p>Please change both references and any other references in the EA to the “Ministry of Economic Development, Trade and Employment.”</p>	The ministry’s name changed within the past year. Ministry names should be accurate and up to date.	Change ministry name throughout EA as applicable.	Neither – administrative

Reference #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS	Summary of Comment	Rationale	Proposed Action	EA or Regulatory
EAS-9	Sasha McLeod, Project Officer	General - Consultation		2.3 Potentially Affected and Interested Aboriginal Groups Page 2-3	<p>Similar to comment EAS-2, Section 2.3 indicates MNDM was initially consulted to determine the list of Aboriginal communities to be consulted, and that “in May 2012, the Provincial government identified changes and considerably expanded the list of Aboriginal groups RRR is to consult or notify about mine development.”</p> <p>It is correct that in May 2012, a discussion involving MOE, MAA, MNDM and MNR provided further direction on the list of communities to be consulted. This information should be added. Further, Appendix D, Table I-2, page 8 recognizes MNDM, MOE and CEEA were consulted regarding the list.</p>	Proponents are required to work with MAA and AANDC, with assistance from MOE and agencies as necessary, to determine the list of Aboriginal communities to be consulted for the project, per MOE’s ToR Code of Practice and general practice.	The EA should state all provincial and federal agencies that were involved in developing the list of Aboriginal communities to consult.	EA
EAS-10	Sasha McLeod, Project Officer	General - Consultation		3.3.2 [Comments and Concerns] Received during the Preparation of the Draft EA Report Page 3-10	<p>Section 3.3.2 presents comments received during preparation of the EA, including with local municipalities and government agencies (3.3.2.1) and Aboriginal groups (3.3.2.2).</p> <p>These sections provide a cursory overview of comments and do not provide responses to those comments. This section should be more descriptive and summarize specific comments received, indicate which agencies provided</p>	<p>The main body of the EA should help reviewers and readers understand the key issues that have been raised during the EA process and how the issues have been addressed.</p> <p>MOE’s Code of Practice for Preparing and Reviewing EAs, Section 4.3.7, sets out MOE’s expectations on what should be reported in the consultation summary of the EA.</p>	Provide more detail in Section 3 about what concerns have been raised by specific groups and how the issues have been/will be addressed. A table summarizing this added text is also recommended within Section 3.	EA

Reference #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS	Summary of Comment	Rationale	Proposed Action	EA or Regulatory
					the comments, and indicate how the comments were addressed. These details are necessary in understanding what the stakeholder concerns are. Then the full details should be provided in an appendix.			
EAS-11	Sasha McLeod, Project Officer	General - Consultation		3.2.2 [Consultation Activities] During Preparation of the EA Report Page 3-7	Section 3.2.2 indicates open houses were held but does not provide a summary of comments received during the open houses and proponent's responses to the comments. Also, under the subheading Community Open Houses on page 3-7, this mentions RRR held two open houses on November 10, 2012 and June 15, 2013, but then goes to say the second open house was held in Mitaaanjigaming on November 20, 2012. Is this an error? Please clarify where the June 15, 2013 open house was held.	The EA must contain an accurate and complete Record of Consultation.	Include within section 3 a summary of comments received during public events, including how many people attended, how many comments were received, what the issues were, and proponent responses, and clarify open house dates.	EA
EAS-12	Sasha McLeod, Project Officer	General - Consultation		3.3.3 [Comments and Concerns] Received During Preparation of the Final EA Report -AND- 3.4 Outstanding	As stated in the report, these sections are not complete.	The EA must contain a complete Record of Consultation.	Please ensure sections 3.3.3 and 3.4 are completed, including summaries of key issues that were raised by specific agencies and how they were responded to.	EA

Reference #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS	Summary of Comment	Rationale	Proposed Action	EA or Regulatory
				Issues and Concerns Page 3-12				
EAS-13	Sasha McLeod, Project Officer	General - EA Type		4.19 Decommissioning and Reclamation Plan Page 4-41	Section 4.19 states that during the passive phase of post-closure (after 2034), "Environmental monitoring and potentially effluent quality management may occur during this passive period of reclamation." This statement should clarify whether or not environmental monitoring will occur during passive reclamation. It appears that this monitoring will occur since Appendix E, Conceptual Closure Plan, indicates there will be long-term monitoring of the project site.	The EA is required to include a monitoring framework, which should consider all phases of the proposed undertaking. Refer to section 4.3.5 of MOE's Code of Practice for Preparing and Reviewing EAs.	Clarify that environmental monitoring will occur in the passive reclamation phase and consider referencing Appendix E for further details on post-closure monitoring.	EA
EAS-14	Sasha McLeod, Project Officer	General - EA Type	ToR sections 5.3.9 and 5.3.11	6.9 Buildings, Facilities and Areas 6.13.1 Hazardous Solid Waste Pages 6-51 and 6-71 -AND- Appendix O Alternatives Tables	Section 6.9 provides two alternatives for buildings and facilities, the process plant complex and explosive facility. However, these alternatives are not included in Appendix O. Section 6.13.1 indicates two hazardous waste alternatives will be described in the EA. However, these are not assessed in either Section 6 or Appendix O.	These alternatives need to be described as per commitments in sections 5.3.9 and 5.3.11 of the ToR.	Include the alternatives assessments for buildings and facilities in Appendix O, and provide the assessment of alternatives for hazardous waste in Section 6 and Appendix O.	EA

Reference #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS	Summary of Comment	Rationale	Proposed Action	EA or Regulatory
EAS-15	Sasha McLeod, Project Officer	General - EA Type		7.1.2 Effects Analysis Page 7-4 -AND- Tables 7-47 and 7-48	<p>In section 7.1.2, the methodology indicates that the overall significance of an effect is rated as Level I, II or III based on whether 4 of the attributes used to evaluate significance are assessed as Level I, II or III. If only these 4 (magnitude, extent, duration, frequency) are used in the assessment, what is the purpose of listing the other attributes (context/value, reversibility, likelihood)? Why are these attributes not important for determining overall significance?</p> <p>In addition, in Tables 7-47 and 7-48, the context/value and reversibility attributes are given Level rankings, implying that these are included in the determination of overall significance. It is a bit confusing which columns in the table are actually being used to determine overall significance. For example, when the levels for air quality are averaged, it results in 2 (intermediate effect), while the overall significance is “not significant”.</p> <p>Please clarify how methodology for determining significance of effects was applied.</p>	The EA report should include a clear methodology for how the significance of effects was assessed, including a logical link from the assessments to the conclusions.	Clarify the methodology, including which criteria were used to determine overall significance. Provide reasons why certain criteria are not used to determine overall significance.	EA

Reference #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS	Summary of Comment	Rationale	Proposed Action	EA or Regulatory
EAS-16	Sasha McLeod, Project Officer	General - EA Type		Tables 7-47 and 7-48 Pages 7-216 and 7-223	Please explain why Table 7-47 (Significance Determination – Natural Environment) combines the columns Magnitude and Geographic Extent while Table 7-48 (Significance Determination – Human Environment) separates them? This could be interpreted that a finer grain/more detailed analysis was used for the socio-economic effects but a less detailed analysis was used for natural environment effects.	The EA report should include a comprehensive analysis of effects and significance for all environmental components.	Clarify the methodology used.	EA
EAS-17	Sasha McLeod, Project Officer	General - EA Type		Table 7-48 Page 7-226	In Table 7-48, the box in row Human Health, column Socio-economic Context is missing text and the row Built Heritage Resources needs to be completed.	The EA report must include a complete assessment of effects for all environmental components.	Include the missing text.	EA
EAS-18	Sasha McLeod, Project Officer	General - EA Type		13.1 Background Page 13-2	Section 13.1 states, “RRR expects that it will be responsible to carry out the FMP and further, that the involved Federal and Provincial agencies and authorities will be responsible for ensuring implementation of the FMP.” The province is responsible for enforcing non-compliance with a proponent’s monitoring plans and commitments using appropriate levers. The proponent is responsible for ensuring that the monitoring plans get implemented in the time and manner that the	The proponent is responsible for implementing monitoring plans and reporting on progress and compliance to the government. The reviewer understands that federally, the implementation of a follow-up plan will be a condition of the EA decision statement. The proponent will be responsible for carrying out the plan and submitting the associated summary reports to the Canadian Environmental Assessment Agency, as well as MOE, for review. Similarly to the provincial authorities, it would also	Revise text to read: “RRR expects that... the involved... agencies and authorities will have a review and monitoring role regarding RRR’s implementation of the FMP and require RRR to take corrective action for non-compliance as appropriate ”	EA

Reference #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS	Summary of Comment	Rationale	Proposed Action	EA or Regulatory
					proponent commits to in the EA.	require RRR to take corrective action if issues relating to non-compliance arise.		
EAS-19	Sasha McLeod, Project Officer	General - EA Type		15.1.2 Provincial Environmental Approvals Process Page 15-1	Section 15.1.2 indicates there are 5 provincial agencies that could be involved with approvals/permits – MNDM, MOE, MNR, MTO and OEB, and includes bullet points for each to explain what types of approvals may be required. The next paragraph indicates MTCS may also be involved in permitting project components. A bullet point could be added to specify which MTCS permits might be required, in addition to listing those expected from MNDM, MOE, MNR, MTO and OEB.	The proponent is required to specify other approvals that may be required after the EA process is completed. The comment seeks to add clarity on expected permits from MTCS.	Consider adding clarifying text.	Neither – administrative
EAS-20	Sasha McLeod, Project Officer	General - EA Type		15.1.3 Municipal Approvals Process Page 15-2	In section 15.1.3, please change the name Ministry of Municipal Affairs to “Ministry of Municipal Affairs and Housing.”	Ministry names should be accurate and up to date.	Change ministry name throughout EA as applicable.	Neither – administrative
EAS-21	Sasha McLeod, Project Officer	General - EA Type		15.2, 15.3, 15.4 Federal, Provincial and Municipal Approvals Page 15-3	Consider combining the following sections as they seem somewhat repetitive: - 15.2 (Federal Approvals) with 15.1.1 (Federal Government Environmental Approvals Process) - 15.3 (Provincial Approvals) with 15.1.2 (Provincial Environmental Approvals Process) - 15.4 (Municipal Approvals)	Unless these sections need to remain separated, these sections could be combined for conciseness.	Minor text streamlining.	Neither – administrative

Reference #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS	Summary of Comment	Rationale	Proposed Action	EA or Regulatory
					with 15.1.3 (Municipal Approvals Process)			
EAS-22	Sasha McLeod, Project Officer	General - EA Type		Table 15-2 Anticipated Provincial Environmental Approvals Page 15-5	Please add to Table 15-2 that an EA approval (screening or individual EA) from MOE may be required under the waste management regulation, O. Reg. 101/07, for the proposed on-site demolition landfill.	The proponent is required to specify other approvals that may be required after the EA process is completed.	Add potential EA screening or approval requirement for the proposed demolition landfill.	EA
EAS-23	Sasha McLeod, Project Officer	General - EA Type		Appendices: D-10, D-11, M-3, P, V	The draft EA is missing appendices D-10 (Draft EA Public Notices), D-11 (Draft EA Handouts), M-3 (Cultural Heritage Assessment), P (Mineral Waste Alternatives Assessment) and V (Contingency Response)	These appendices are required as part of the final EA.	Ensure the final EA includes missing appendices, including public notices for the final EA, comments received on the final EA and the proponent's responses.	EA

From: O'Donnell, Cheryl (ENERGY) [mailto:Cheryl.O'Donnell@ontario.ca]
Sent: September-06-13 10:57 AM
To: McLeod, Sasha (ENE)
Cc: Smith, Brett (ENERGY); Arkin, Eli (ENERGY)
Subject: RE: Rainy River draft EA - comments forthcoming?

We had no comments.

Thanks

From: McLeod, Sasha (ENE)
Sent: September 6, 2013 10:42 AM
To: Smith, Brett (ENERGY); Arkin, Eli (ENERGY); O'Donnell, Cheryl (ENERGY); Jewitt, Don (MOL); Antler, James (MTCS)
Subject: Rainy River draft EA - comments forthcoming?

Good morning,

I'm following up on the government review stage of the Rainy River Gold Mine draft EA. Can you please let me know if I can expect comments from you and, if so, when you expect to send them to me? The proponent is anticipating all provincial comments this week. If you need more time, please let me know how much time you'll need.

Jim, I know you indicated you expect to provide your comments this week. Please confirm if this is still the case.

I'll try contacting everyone by phone if I haven't already heard back by end of day.

Please let me know if you have any questions.

Thanks!
Sasha

Sasha McLeod
Project Officer
Environmental Approvals Branch
Ontario Ministry of the Environment
2 St. Clair Avenue West, Floor 12A
Toronto, ON M4V 1L5
416-314-8214
sasha.mcleod@ontario.ca

From: Bennett, Neal (MNDM)
Sent: September 4, 2013 12:03 PM
To: McLeod, Sasha (ENE)
Subject: Additional MNDM comments on Draft EA Document

Sasha,

In light of our call I will add these to my comments on the draft EA report.

Comment:

MNDM agrees with EAB comments regarding the lack of detail provided on landfill assessments in the draft conceptual Closure Plan.

Comment:

The Draft Conceptual Closure Plan (Appendix E) must follow Schedule 2 of Regulation 240/00 and note section 8.1 for Aboriginal Consultation.

Neal Bennett
Mineral Exploration and Development Consultant
Ministry of Northern Development and Mines
Mineral Development and Lands Branch
Suite B002, 435 James Street South
Thunder Bay, ON P7E 6S7
Tel: 807-475-1362
Fax: 807-475-1112
Email: neal.bennett@ontario.ca

From: Bennett, Neal (MNDM)
Sent: August 30, 2013 11:15 AM
To: McLeod, Sasha (ENE)
Subject: MNDM Draft EA Document Comments

Sasha,

Here are the other comments from MNDM. Hope you had a nice holiday!

Comment - Section 1.5

RRR currently does not have all the proper land tenure for development under Ontario's *Mining Act* based on the project footprint provided by RRR. Tenure for lands must be obtained under the *Mining Act* as the right to extract minerals comes with a mining lease. Various parts of the proposed mine site development currently do not have this tenure in place.

Clarification/Comment – page 2-4

The consultation list expanded in May 2012 as the scope of the project changed from advanced exploration to production. Prior advice was based on an exploration scenario, and was also based on MNDM's knowledge of traditional territories at that time. Therefore as the project moved towards a production decision the potential for impacts encompasses a larger area, and therefore the Crown scoped additional First Nations/Metis communities into the Consultation list.

Comment – page 2-4

Draft EA reads *“In order to allow adequate time for the Aboriginal technical review, the draft EA Report (Version 1) was released to fourteen Aboriginal groups for an independent technical review of the RRGP EA Report.”* On page 2-6 and 2-7 there is a list of 16 communities provided to RRR by the Crown. Why were 2 of these communities were excluded from the early release of the draft EA document?

Neal Bennett

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Resource Extraction Activity (for areas not designated under the ARA)

Status of Surface and Mineral Rights	Aggregate Pit (sand and gravel)	Consolidated Aggregate Quarry (bedrock such as sandstone)	Underground Aggregate Mining of Aggregates	Surface Mining Non-Aggregate Minerals (e.g. quarry, open pit) (see definition below)	Underground Mining Non-Aggregate Minerals
Unpatented Mining Claim (sand and gravel reserved to the Crown)	Aggregate Resources Act (ARA) Permit	Aggregate Resources Act (ARA) Permit – can only be issued to the holder of the unpatented mining claim	Not Permitted	Not Permitted	Not Permitted
Mining Lease per the Mining Act (sand and gravel reserved to the Crown)	Aggregate Resources Act (ARA) Permit	Aggregate Resources Act (ARA) Permit – can only be issued to the lessee	Mining Act Approval	Mining Act Approval	Mining Act Approval
Patented Surface Rights (sand and gravel reserved to the Crown)	Aggregate Resources Act (ARA) Permit	Aggregate Resources Act (ARA) Permit	Crown Mining Rights – If staked Mining Act Approval	Crown Mining Rights – If staked Mining Act Approval	Crown Mining Rights – If staked Mining Act Approval
Patented Surface Rights (sand and gravel not reserved to the Crown)	no MNR approval	no MNR approval	Crown Mining Rights – If staked Mining Act Approval	Crown Mining Rights – If staked Mining Act Approval	Crown Mining Rights – If staked Mining Act Approval
Patented Land – Surface and Mineral Rights (sand and gravel reserved to the Crown)	Aggregate Resources Act (ARA) Permit	Aggregate Resources Act (ARA) Permit	Mining Act Approval	Mining Act Approval	Mining Act Approval
Patented Land – Surface and Mineral Rights (sand and	no MNR approval	no MNR approval	Mining Act Approval	Mining Act Approval	Mining Act Approval

gravel not reserved to the Crown)					
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Aggregate as defined under the ARA: gravel, sand, clay, earth (does not include topsoil and peat), shale, stone, limestone, dolostone, sandstone, marble, granite and rock (does not include non aggregate minerals)

***Non-Aggregate Minerals** are: metallic ores, asbestos, graphite, kyanite, mica, nepheline, syenite, talc, wallastone, andalusite, barite, coal, diamond, gypsum, kaolin, lepidolite, magnesite, petalite, phosphate, rock, salt, sillimanite and spodumene.

Forest Resource Extraction

The clearing of trees on Crown land, or the clearing of Crown trees on patented land, requires approval under the Crown Forest Sustainability Act in the form of a Forest Resource License (FRL). The issuance of any FRL will be subject to Ministry review and assessment against the regulations, standards, and guidelines prescribed by the Crown Forest Sustainability Act.

Where trees on the Crown land to be cleared are not encumbered by another License, the Minister may issue a FRL directly to a proponent.

Where trees on the Crown land to be cleared have already been licensed to another party (e.g. an SFL-holder such as Resolute Forest Products), the Minister may only issue an FRL after the proponent and the License-holder agree on matters prescribed in regulations. The instrument documenting this agreement is commonly referred to as an “*Overlapping Agreement*”, which is prepared by the License-holder. When the Ministry receives verification of the agreement between the parties, a FRL may be issued.

Crown trees on patented (i.e. privately held) lands may also be directly licensed to the proponent, however, the Ministry will not typically proceed without confirmation of the notification and consent of the landowner. The Property Title, or Letters Patent, for each privately-held property will outline which tree species are “Reserved” to the Crown. Please note that two Crown tree “Reservations” are common in the Fort Frances District, specifically; “all trees”, and “all Pine trees”. In the case of the Reservation limited to Pine trees, trees of other species are the legal property of the land owner. It also should be noted that wood harvested from private land and which is not reserved to the Crown, is subject to a document called a “Clearance of Timber” before it can be transported to area mills. The Clearance may be obtained, prior to transport, from the District Office or the destination mill.

To prepare a FRL, the MNR will require information such as total area to be cleared of trees, species of trees, estimated volumes, and duration of operations. Where Crown trees are to be cleared from Patented Lands, the Ministry will require a copy of the Property Title and documentation confirming the consent of the land owner. Given the location of the proposed clearing of trees, you may obtain a copy of the Property Title from the Land Titles Office in Fort Frances.

Reference #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS or ToR	Summary of Comment	Rationale	Proposed Action	EA or Regulatory
Assign Comment Reference Number (Department/Ministry and number e.g. CEAA-1 or MNR-1)		Aboriginal (including potential rights impacts, traditional use of lands and resources) Accidents & Malfunctions Acoustic Environment (including Noise and Vibration) Atmospheric Environment (including Air Quality) Cumulative Effects Decommissioning and Reclamation Effects of the Environment on the Project (incl. Climate Change) Fish and Fish Habitat Fishery General - Concern General - EA Type General - Consultation General - Logistics General - Project Risks Geology Groundwater (including water quality and quantity) Human Health Hydrology Monitoring Natural Hazards Navigable Waters Physical and Cultural Heritage (including Archaeology) Socio-Economic Environment Surface Water (including water quality and quantity) Terrain and Soils Transportation Vegetation Visual Impacts Wastewater/Effluent Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	Provide the specific section(s) and page number(s) from the EIS Guidelines or ToR related to the comment	Provide the specific volume(s), section(s) and page number(s) from the EIS of the information being referenced	Provide an explanation of the issue of concern	Describe the rationale for why issue of concern is important for environmental assessment purposes.	Describe any action recommended	Pick EA, Regulatory Instrument or Both. Please state which regulatory instrument you are referring to.
		DRAFT ENVIRONMENTAL ASSESSMENT FOR RAINY RIVER RESOURCES – MNR REVIEW and COMMENTS						

1	Rachel Hill District Planner	General Comment		EA Overall	The report is put together in a format that was clear and easy to follow. The report described the project in pretty good detail that provided the reader with a fair understanding of what was being proposed. However the report review would have been more complete with full appendices.	Full descriptions of all sections of the report would have provided a more thorough review.	Final Report to be complete	EA
2	John Van den Broeck SAR Biologist	SAR		EA Overall	Throughout the document there is confusion on the status of SAR, It is important to consistently and accurately portray the status of various – some examples to follow	The status of a species is critically important under the SAR legislations and important in consultation for future authorizations	Review the document to ensure that the correct status is applied to all species.	
3	Rachel Hill District Planner	General EA Project Description		EA Overall	Definitions are missing.	A thorough understanding of terms is required by everyone.	The EA needs to have a section that provides for a glossary of terms.	
4	Rachel Hill District Planner	General EA Maps/Visuals		EA Overall	The graphics that were provided were good, but more of them are needed.	For example, a graphic is needed of the West Creek and Clark Creek diversions. Also, one good reference map with all mining works and ancillary works should be included on one map for a collective picture of the project. (a map like Fig 4-1 but that shows the tailings pipeline(s), and all of the transmission line, as well as the water management pipeline etc	Provide additional maps for the diversions and for the entire project.	
5	Rachel Hill District Planner	EA Summary Land Ownership		Vol 1 Section 5.1 Pg 9 And Fig 1-2 of Vol 2	A description of the various land tenures that are described is needed: Patented whole, surface rights only, mineral rights only, leasehold only, unpatented mining claims, and license of occupation.	A clear understanding of the project is important.	Please describe what these types of land tenure mean.	
6	Christopher	EA Summary		Volume 1.	Statement regarding lake	It is important to report	Either acknowledge lake	

	Martin, Biologist	Fish and Fish Habitat Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		pg. 15	sturgeon in lower Pinewood River should clarify that only 1 sturgeon was found by RRR. Otherwise the statement fails to acknowledge that 3 adult lake sturgeon in total were captured in the lower Pinewood River in 2013.	all current knowledge of threatened species that may potentially be impacted by the RRGP.	sturgeon netted by MNR or revise to "... a single fish was netted during Rainy River Resources" baseline studies in the lower reaches of the Pinewood River."	
7	Christopher Martin, Biologist	EA Summary Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Volume 1. Pg. 16	Column titles of species at risk table are not strictly comparable – confusing to include Ontario species list (SARO) but federal legislation (SARA). Under ESA, Peregrine Falcon is currently listed as SC and both bat species are listed as END.	Clear, accurate documentation.	Consider replacing SARO with ESA and removing COSEWIC column. Revise conservation status for Peregrine Falcon and 2 bat species.	
8	Rachel Hill District Planner	EA Summary Aggregates		Vol 1 Pg 25	Clay till is considered an aggregate under the ARA. The issue of whether or not aggregates is subject to the ARA depends on the land tenure. (see table provided as a separate attachment)	The proponent may have prematurely concluded a permit may not be required.	Given the delay in the mining lease application, the proponent should reassess the aggregate sources and land tenure using the information provided.	EA/regulatory
9	Rachel Hill District Planner	EA Summary Water Supply		Vol 1 Pg 25	The description presented on water supply needs to include the contingency plan of the 25 km pipeline to Off/Burditt.	The way it is currently described here, a pipeline to Off/Burditt is not being presented as an option, it is not clear whether it is or is not.	The report needs be clear on whether or not the suggested plan for taking water from Off/Burditt lakes or any other lakes is being presented.	EA
10	Rachel Hill District Planner	EA Summary Reclamation and Closure		Vol 1 Page 29	The summary states there were a number of alternatives considered for reclamation and closure, but they are not presented any where in the report or the Conceptual Closure Plan	A clear understanding of the project, specifically the alternative analysis is important.	Please identify when these alternatives were considered, and provide details in the report consistent with other alternatives.	requirement
11	Rachel Hill District Planner	General EA Project Description		Vol 2 section 4.3.3	Need a better description of the open pit, (figures 4-1,4-2, 4-3 do not have scales.) Figure 4-10 – please provide information on the reclaim barge and label mine rock pond.	A clear understanding of the project is important	Please provide the missing information.	EA
12	Rachel Hill District Planner	General EA Project Description		Vol 2 section 4.3	Section 1 describes an area that has been selected for tailings management (Pg 1-3), that measures approx 1500ha	A clear understanding of the project is important	Please provide clarification or additional description/maps of the area selected for the TMA.	EA

					but it is not shown where this is. The Figures show the 750ha proposed TMA.			
13	Rachel Hill District Planner	General EA Project Description		Vol 2 section 4.3	It is not entirely clear the difference between site water management and mine water management	A clear understanding of the project is important	More description is required.	
14	Rachel Hill District Planner	General EA Project Description		Vol 2 section 4.6.2	Please confirm that additional monitoring and possible treatment will be needed for the water collected in the ditches around the NPAG rock stockpile, and not the AGP stock pile.	A clear understanding of the project is important	Confirm if this is correct.	
15	Rachel Hill District Planner	General EA Project Description		Vol 2 Pg 4-20	It is stated that details of potential remedial measures for the TMA construction will be presented later, based on performance observations and monitoring data. It is not understood what remedial measures during construction are. And a better time estimate is required.	A clear understanding of the project is important	Please provide more details and a better description of what this means and a better timeline of when it is expected to be presented.	
16	Rachel Hill District Planner	General EA Water Management Supply for Process Plant		Vol 2 section 4, 6 and 8	<p>The description for a plan for additional water supply needs to be provided up front. Especially since it is identified there is concern for water supply during start up, during winter months and during drought.</p> <p>It is confusing that the plan to take water from nearby lakes is not identified in section 4. But is identified in section 6, and in Appendix O8 where the alternative is concluded to be unacceptable.</p> <p>Water supply issues are presented in section 8 as potentially having significant impacts to the project and the contingency plan of a pipeline to Burditt and Off Lakes was identified as an option. MNR</p>	A clear understanding of the project is important and needs to be presented fairly to the public.	<p>1) MNR requires a complete picture of the water supply issues be addressed in one section as this element has a great deal of importance to the project, the agencies and the public.</p> <p>(2) MNR requires that the report identify alternatives for the pipeline (ie graphics that show alternative locations for the pipeline as well as alternative comparisons of the selected lakes.</p> <p>3) MNR requires an assessment of impacts to drawing of water from Burditt lake by 10 cm during low water events, as well as drawing of water from Off Lake, and any other lakes that are selected as</p>	

					has concerns that this was not presented in the Terms of Reference and various pipeline routes presented for comment.		alternatives 4) please identify how the details on all aspects of water supply were presented to the public, (ie were the contingency plan and the alternatives assessment presented at the public meetings)	
17	Melissa Mosley Management Biologist	Surface Water Wildlife		Vol 2 s.4 s.4.5 s.4.12	There are no figures showing the infrastructure for the water intake from the Pinewood River below McCallum Creek and for the effluent discharge into the River below the Creek, nor details of the pipelines (ie buried or above ground?) Aboveground pipelines may negatively impact wildlife movement in the area, especially near the Pinewood River corridor.	This information is required to make a determination on provincial approvals that may be required (LRIA).	Please provide figures showing the location and associated infrastructure of these 2 pipelines. Please provide details on the type of pipelines to be constructed.	RI (LRIA)
18	Melissa Mosley Management Biologist	Wastewater/Effluent/ Surface Water (including water quality and quantity)/ Terrain and Soils		Vol 2 s.4.6.2 p. 4-12, Figure 4-1	It is unclear how runoff from the west mine rock stockpile and overburden stockpile will be contained within ditches and not run directly into Loslo Creek. There does not appear to be sufficient distance between these features for adequate separation for a diversion ditch. There also exists the potential for the Creek to exceed its channel under flood conditions and mix with the stockpile runoff.	A clear understanding of the project is important	Please provide a revised description and drawing.	
19	Melissa Mosley Management Biologist	Wastewater/Effluent/ Surface Water (including water quality and quantity)/ Terrain and Soils		Vol 2 s.4.6.2 p. 4-12, Figure 4-1, 4-10	It is unclear which ponds are being referred to in the text here. Figures 4-1 and 4-10 show labeled ponds Sediment Ponds 1 &2, and Stockpile Pond, but the pond below the low grade ore stockpile is unnamed.	A clear understanding of the project is important	A reference to Figures 4-1 and 4-10 would be helpful here to understand the description given of the stockpile ponds and runoff. Label the pond below the Low Grade Ore Stockpile in all appropriate figures.	
20				Vol 2		A clear understanding		

	Melissa Mosley Management Biologist	Wastewater/Effluent/ Surface Water (including water quality and quantity)/ Terrain and Soils		s.4.6.2 p. 4-12, Figure 4- 1, 4-10, 4-12	It is unclear how water from Sediment Ponds 1&2 will be managed. No water balance is given in later text/figures, as is given for the Mine Rock Pond (assumed to be the pond below the Low Grade ore Stockpile)	of the project is important	Include information on water management for Sediment Ponds 1 & 2	
21	Melissa Mosley Management Biologist	Surface Water (including water quality and quantity)/ Hydrology		Vol 2 s.4.7.1 p. 4-13, Figure 4- 1, 4-10	The Process Plant appears to be constructed on top of a tributary to the West Creek Pond. How will this be dealt with? It is unclear if the trib will be diverted around the process plant.	A clear understanding of the project is important	Please clarify if the Process Plant will be constructed overtop of the tributary to West creek Pond. If yes, please provide detail on how the trib will be dealt with (diverted, etc)	
22	Melissa Mosley Management Biologist	Surface Water (including water quality and quantity)/ Hydrology		Vol 2 s. 4.12.4 p.4-27, Figure 4- 11	General Flow direction arrows indicate water from the West Creek diversion channel draining into the constructed wetland. However the text states that there will be no contact between these 2 water sources. It is unclear whether or not water from these 2 sources will be in contact or not.	A clear understanding of the project is important	Please correct map arrows and clarify if water from the West Creek diversion channel will be in contact with the constructed wetland.	
23	Melissa Mosley Management Biologist	Surface Water (including water quality and quantity)/ Hydrology		Vol 2 s. 4.12.4 p.4-27	“Other” water needs have not been accounted for in the water balance. These needs could be significant and not able to be met by the described sources.	The information presented does not have enough detail. A clear understanding of the project is important.	Please include estimates of “Other” water needs, and whether the source is fresh water or not.	
24	Melissa Mosley Management Biologist	Wildlife Surface Water Hydrology		Vol 2 s.4.12.5 p. 27	There is no information on strategies to prevent use of the TMA by wildlife, including waterfowl. Wildlife may be attracted to the open expanses of water.	The information presented is missing detail. A clear understanding of the project is important.	Please include information on wildlife aversion strategies to ensure wildlife do not use or enter the TMA.	
25	Christopher Martin, Biologist	Wastewater/Effluent		Volume 2, Project Description, Section 4.12.7.2, pg. 4-31	First paragraph suggests runoff from west mine rock stockpile is captured by the mine rock pond adjacent to the east mine rock stockpile.	Clear, accurate documentation is required for correct understanding of the project.	Clarify if „west” is a typographical error or if there are plans to divert/pump west rock stockpile runoff to the mine rock pond.	EA

26	Melissa Mosley Management Biologist	Surface Water		Vol 2 s.4.12.7.2 p.4-32 Figure 4-1	It is unclear what “terminal collection ponds” are being referred to in Figure 4-1. If these are the Sediment Ponds in Fig 4-1, then labels should be included showing how water from these ponds fit into the overall water management plan, and if water from these ponds will be released directly into the environment or not.	The information presented is missing detail. A clear understanding of the project is important.	Please clarify what is being referred to as what “terminal collection ponds” in the text and figures. Include these ponds in the overall water management plan (text and figures).	
27	Melissa Mosley Management Biologist	Surface Water (including water quality and quantity)/ Wastewater/Effluent/ Fish and Fish Habitat		Vol 2 s.4.12.73 Pg 4-32	Details regarding the utility of the constructed wetland are missing. There is no information on how long it will take before the wetland has suitable vegetation for water treatment, or whether it will be functional for the start of mine production and treatment of tailings effluent.	The information presented is missing detail. A clear understanding of the project is important.	An expected time frame of wetland construction, natural/planted vegetation establishment, etc is needed.	
28	Melissa Mosley Management Biologist	Wildlife Fish & Fish Habitat Hydrology		Vol 2 s. 4.14 p.36	No area has been identified for a potential landfill site on any of the maps. This should be displayed. There is no discussion of strategies to prevent/ reduce attracting wildlife to the non-hazardous waste onsite.	The information presented is missing detail. A clear understanding of the project is important.	Potential site for landfill site should be displayed on maps. Infrastructure associated with a potential landfill should be discussed, as should strategies to prevent attracting wildlife to the site.	
29	Christopher Martin, Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Volume 2, Description of the Environment, S5.1.1; pg 5-2	Recognizing that it is a safe assumption migratory corridors exist within the NLSA, how was it determined there were migratory corridors „associated with aquatic systems and associated riparian habitats“? Baseline studies generally did not involve tracking fish or wildlife movements.	Clear, accurate documentation. Ensure conclusions are consistent with data collected and analyses.	Present evidence for use of watercourses as migration routes. If the precautionary principle is used to assume migratory corridors for fish and aquatic wildlife, also apply it to terrestrial wildlife.	EA
30	Christopher Martin, Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Volume 2, Description of the Environment, S5.2.1; pg 5-5	The spatial coverage of most baseline studies did not include the area of all transmission line alternatives.	Accurate assessment of alternatives requires a similar level of understanding of the	Provide rationale for not conducting baseline studies in area of all transmission line corridor alternatives.	EA

						natural environment in all areas impacted.		
31	Christopher Martin, Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Volume 2, Description of the Environment, S5.2.1; pg 5-6	It would be helpful to provide a comprehensive list of environmental baseline studies used to inform the draft EA.	Clear, accurate documentation.	Consider changing list of „primary environmental baselines studies“ to „all environmental baseline studies“ and include list of all studies used to inform the draft EA.	EA
32	Christopher Martin, Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Volume 2, Description of the Environment, S5.2.11.1; Pg. 5-26	Ability to observe muskrat houses, wolf and bear dens during an aerial survey seems very limited. Animal movement corridors may not be determined by incidental observations. The specific criteria used to identify seasonal concentration areas and animal movement corridors were not provided.	Baseline studies need to support alternatives assessment and mitigation measures in draft EA.	Provide support to concept that aerial surveys are suited to recording muskrat houses, wolf and bear dens. Provide criteria used to identify seasonal concentration areas and animal movement corridors.	EA, Authorization to destroy dens (FWCA)
33	Christopher Martin, Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Volume 2, Description of the Environment, S5.2.11.3; Pg. 5-28	Franklin's ground squirrel, American Badger, Grey Fox and Eastern wolf may be more readily observed/recorded using live traps (e.g. Sherman live-trap), and sand-trap or hair-trap scent stations. Limitations of survey methods used were considered during MNR's review of sections 6 and 7.	Baseline studies need to support alternatives assessment and mitigation measures in draft EA.	No action needed	EA
34	Christopher Martin, Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Volume 2, Description of the Environment, S5.2.12.1; Pg. 5-28	While considerable breeding bird survey effort was applied, notable gaps in coverage of the RRGP footprint remain, including the southwest section of the preferred transmission line corridor, all other transmission line corridor alternatives, portions of preferred Hwy 601 reroute and water management pipeline, Hwy 601 re-route alternatives, east section of the tailings management area, explosives facility, overburden stockpile, low grade ore stockpile and mine rock pond.	Baseline studies need to support alternatives assessment and mitigation measures in draft EA. Proponent is responsible for ensuring bird species at risk are not harmed/harassed and their habitats are not damaged/destroyed.	1) In areas of RRGP footprint where spatially distinct alternatives do not exist, provide rationale for decision not to survey breeding birds and information used to determine likelihood of bird species at risk presence. (In areas of apparently similar habitat - possibly TMA - a species accumulation curve may help to demonstrate the surveys conducted captured most species) 2) In areas of RRGP footprint where spatially distinct alternatives do exist, provide rationale for	EA, Potential ESA implications

							decision not to apply equal survey effort to all areas impacted by alternatives.	
35	Melissa Mosley Management Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Vol 2 s5.2.12.7 p5-32	No SWH Ecoregion criteria schedules have been developed for Ecoregion 5S yet. Use of SWH Ecoregion 3E Criteria Schedules for the NRSA is inappropriate here..	Inappropriate use of SWH Ecoregion Criteria Schedule. Use of Schedule 3E may have led to missing potential significant wildlife habitats to search for.	Please remove references to this criteria schedule.	
36	John Van den Broeck SAR Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		5.2.12.6 (5-32)	As per MNR comment 2, Barn Swallow and Chimney Swift are Threatened species , Not special concern		Please amend.	
37	Christopher Martin, Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Volume 2, Description of the Environment, S5.2.13; Pg. 5-33	The specific criteria used to identify seasonal concentration areas were not provided. Reptile and amphibian species of conservation concern expected to be encountered in NLSA were not identified.	Clear, accurate documentation. Baseline studies need to support alternatives assessment and mitigation measures in draft EA.	Provide criteria used to identify seasonal concentration areas. Report the reptile and amphibian species of conservation concern that were potentially expected in the NLSA.	EA
38	Christopher Martin, Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Volume 2, Description of the Environment, S5.2.13; Pg. 5-33	The specific criteria used to identify amphibian movement corridors were not provided. Baseline studies did not involve tracking amphibian movements. Limitations of survey methods used were considered during MNR's review of sections 6 and 7.	Clear, accurate documentation. Baseline studies need to support alternatives assessment and mitigation measures in draft EA.	No action required.	EA
39	Christopher Martin, Biologist	Fish and Fish Habitat		Volume 2, Description of the Environment, S5.8.2; Pg. 5-83	Walleye and northern pike are classified as keystone species without supporting references.	Clear, accurate documentation is required for correct understanding of the project	Provide supporting references for statement that walleye and northern pike are keystone species.	EA
40	Christopher Martin, and Melissa Mosley - Biologists	Fish and Fish Habitat (Sturgeon) Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Volume 2, Description of the Environment, S5.8.2; Pg. 5-83 and Table 5-24 S5.8.19 Pg 5-100 S5.8.19 Pg 5-100	Lake sturgeon, THR (ESA), were not included on the list of fish species in the Pinewood River. Catch of lake sturgeon in the Pinewood River in 2013 is missing from these sections Catch of lake sturgeon in the Pinewood River in 2013 is missing.	Clear, accurate documentation is required for correct understanding of the project It is important to report all current knowledge of threatened species that may potentially be impacted by the RRGF	Include lake sturgeon in Pinewood River fish list, reflecting 2013 AMEC and MNR netting results. Please include catch of lake sturgeon in text. Please update statement re: catch of SAR accordingly. Please update table to	EA

					Statement "Sampling in the vicinity of the RRGP..." is vague. The Lake of the Woods-Rainy River population of lake sturgeon is designated as Special Concern by COSEWIC (2006). It is not yet regulated under SARA.		include lake sturgeon and include COSEWIC lake sturgeon designation. Please clarify if statement applies to NRSA or NLSA.	
41	Melissa Mosley Management Biologist	Vegetation		S5.9.1.1 P5-101	The NRSA lies within ecoregion 5S, and immediately adjacent to ecoregion 4S not 4W. Use of SWH Ecoregion Criteria Schedules for 3E is inappropriate for this ecoregion. Species composition is markedly different in 5S than either 4W or 3E.	Important to reference correct ecoregion and potential species composition and vegetation communities. An accurate description of the NRSA/ NLSA and vegetation within is required as the basis of the EIS.	Please correct ecoregion type and remove references to SWH schedule 3E. Please review literature for ecoregions 5S and 4S and update this section accordingly.	
42	Christopher Martin, Biologist	Vegetation		Volume 2, Description of the Environment, S5.2 and S5.9.1.1; Pg. 5- 102	Results of wildlife habitat screening exercise in S5.9.1.1 is referenced under a number of subsections in S5.2. The screening exercise should be described first under S5.2.10.	Clear, accurate documentation is required for correct understanding of the project	Describe wildlife habitat screening exercise under Baseline Study Methodology, S5.2.10. In Sections 5.2.11 – 5.2.15, please clarify when and how wildlife habitat screening was used to focus the location of field surveys.	EA
43	Christopher Martin, Biologist	Vegetation		Volume 2, Description of the Environment, S5.9.1.1; Pg. 5- 103	MNR's ecosite data may or may not indicate presence of rare vegetation communities.	Ensure conclusions are consistent with data collected and analyses.	Suggested wording change: "The ecosite data provided by MNR suggests that no rare vegetation communities exist within the NLSA."	EA
44	Christopher Martin, Biologist	Vegetation		Volume 2, Description of the Environment, S5.9.1.2; Pg. 5- 103	Considerable amounts of rare plant survey effort have occurred on Rainy River, Rainy Lake and Lake of the Woods; survey effort elsewhere in Fort Frances District has not been thorough enough to conclude that the "species are associated with	Baseline studies need to support alternatives assessment and mitigation measures in draft EA. Ensure conclusions are consistent with data collected and analyses.	Remove inference that rare plants „associated with“ Rainy River, Rainy Lake or Lake of the Woods are unlikely to occur in the NLSA.	EA

					... the watercourse/waterbodies of Rainy River, Rainy Lake or Lake of the Woods.”			
45	Christopher Martin, Biologist	Vegetation		Volume 2, Description of the Environment, S5.9.3.	Among other habitats, MNR suggested rare plant surveys be focused in “Ecosite 12/open canopy forest with shallow soils over bedrock” (ELC B012) as per Nov. 22, 2012 e-mail and Vandebroek (2006). B012 habitats in area of preferred transmission line corridor proximal to the mine site were not surveyed.	Baseline studies need to support alternatives assessment and mitigation measures in draft EA.	Explain why rare plant surveys were not focused in ELC=B012 habitats.	EA
46	Christopher Martin, Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Volume 2, Description of the Environment, S5.10.1.1; Pg. 5-110, 5-115.	MNR e-mails (Oct. 10 and Nov. 20, 2012) did not specifically identify forests that support winter deer yards or area-sensitive bird species as significant wildlife habitat (SWH), though such areas do require consideration. SWH is not mentioned further in sections 6.0 and 7.0, so its emphasis in section 5.0 is puzzling.	Clear, accurate documentation is required for correct understanding of the project	Recognizing significant wildlife habitat has legal implications only in the context of Ontario’s Planning Act, 1990, please clarify importance/relevance of SWHs in the context of this environmental assessment. Remove reference to MNR’s identification of SWH and/or provide SWH definition specific for this environmental assessment.	EA
47	Melissa Mosley Management Biologist	Wildlife (Terrestrial)		Vol 2 S5.10.1.1 P5-110	Table 12.6 indicates 22 species of mammals exist within the NLSA.		Revise text.	
48	Melissa Mosley Management Biologist	Wildlife (Terrestrial)		Vol 2 S5.10 (entire section)	As above	As above	Remove all references to SWH Ecoregion Criteria Schedule 3E. Optional-replace with reference to Significant Wildlife Habitat Technical Guide (2000).	
49	Melissa Mosley Management Biologist	Wildlife (Terrestrial)		Vol 2 S5.10.1.1 P5-111	Deer are abundant in both anthropogenically-disturbed and undisturbed habitats in the Rainy River/ Fort Frances District	Additional information	Update wording to reflect abundance of deer in areas other than agricultural or anthropogenically-influenced habitats.	
50	Melissa Mosley	Wildlife (Terrestrial)		Vol 2 S5.10.1.1	Moose occur in many other	Correction needed	Update wording to reflect	

	Management Biologist			P5-111	habitats other than boreal- it is not a strictly boreal species.		occurrence of moose in Great-Lakes St. Lawrence forests (deciduous, mixed-wood habitats), in addition to boreal.	
51	Melissa Mosley Management Biologist	Wildlife (Terrestrial)		Vol 2 S5.10.1.1 P5-111	A Provincial Elk summary report is available for reference, as is additional occurrence information from the Lake Of the Woods Elk Committee. Elk from the Lake of the Woods release population have been documented immediately on, as well as south, east, west and north of the NLSA. Elk have been confirmed and have potential to occur within the NLSA.	Incorrect information	Update text to reflect distribution of LOW elk in the NLSA/NRSA.	
52	Melissa Mosley Management Biologist	Wildlife (Terrestrial)		Vol 2 S5.10.1.1 P5-111	<p>Deer wintering areas and winter deer concentration areas (yards) are identified through aerial surveys, not desktop exercises with ecosite data. These areas have been previously identified by MNR and provided in shapefile format to the proponent.</p> <p>Winter deer concentration areas (yards) are sub-categorized based on usage. The largest and most contiguous area of high-usage deer concentration areas in WMU 10 occurs in and immediately adjacent to the NLSA. The footprint of the mine and infrastructure will directly affect and destroy a portion of this habitat.</p> <p>There is less than 10 000 ha of winter deer concentration area (Stratum 1, rank 3&4) in the Pinewood R watershed, and less than that within the NLSA</p>	Clear, accurate documentation. The reference to deer winter habitat identified in the Crossroute Forest is incorrect/used out of context. MNR identifies deer winter concentration areas based on MNR methodology (Ranta 1998), and the baseline survey methodology does not support the statements made here	<p>Remove reference to Crossroute Forest Management Plan. Remove reference to deer winter habitat based on ecosite data.</p> <p>Correct text to reflect true area of winter deer concentration areas (yards) (Stratum 1, rank 3&4) within the NLSA.</p>	

53	Blank row							
54	Melissa Mosley Management Biologist	Wildlife (Terrestrial)		Vol 2 S5.10.1.1 P5-111	The Crossroute FMP does not indicate that MAFA's are not present within the NLSA. MAFA surveys have not been conducted by the MNR within WMU 10, therefore there is the potential for MAFA's still to exist there.	Incorrect information.	Revise text to clarify that MAFA surveys have not been conducted in WMU 10.	
55	Melissa Mosley Management Biologist	Wildlife (Terrestrial)		Vol 2 S5.10	There is no mention throughout this section of the Ecological Zones or Wildlife Management Units the NLSA and NRSA fall within. There is no mention of how big-game-deer, elk, bear, and moose species are managed within these Zones and WMU's, nor what MNR's management objectives for these species are within the Zones and WMU's.	Clear, accurate documentation is required for correct understanding of the project	Please update section with information on Ecological Zones (Black bear and Cervid) and WMU's, and management strategies and population objectives for deer, elk, bear, and moose within these Zones and WMU's.	
56	Melissa Mosley Management Biologist	Wildlife (Terrestrial)		Vol 2 S5.10.1.1 P5-114	Three additional bat species are known to occur in the Rainy River/Fort Frances District: the eastern red bat, northern myotis, hoary bat, and silver-haired bat.	Update needed.	Please update this section with the additional bat species.	
57	Melissa Mosley Management Biologist	Wildlife (Terrestrial)		Vol 2 S5.10.1.1 P5-114	Use of the SWH Ecoregion 3E Criteria Schedule is incorrect, and should not be used as the basis for not identifying bat habitat within the study area.	Correction needed.	Please amend.	
58	Melissa Mosley Management Biologist	Wildlife (Terrestrial)		Vol 2 S5.10.1.2 P5-118	Double-crested cormorants also nest near the NRSA.	Missing information	Add double-crested cormorant to the list of colonial ground-nesting bird species.	
59	Melissa Mosley Management Biologist	Wildlife (Terrestrial)		Vol 2 S5.10.1.2 P5-121	Records from the Atlas of Breeding Birds of Ontario show many more raptor and owl species near the NRSA than stated in the EA	Missing information	Please amend	
60				Vol 2				

	Melissa Mosley Management Biologist	Wildlife (Terrestrial)		S5.10.1.6 P5-125	Paragraph 2 onwards under s5.10.1.6 belongs under s5.10.1.5.		Move text to s5.10.1.5	
61	Melissa Mosley Management Biologist	Wildlife (Terrestrial)		Vol 2 S5.10.2.1 P5-126	<p>It is important to note the distinction between deer wintering areas (Stratum 2) and winter deer concentration areas (yards) (Stratum 1). Stratum 2 areas can be thought of as the winter concentration area in its entirety, while Stratum 1 is the core of the winter concentration area, where deer will be restricted to under severe winter conditions. Winter concentration areas (yards) are sub-categorized based on usage. MNR considers ranks 3 and 4 to be the most important core concentration area, as these areas have demonstrated use during severe winter conditions. The largest, and most contiguous area of high-usage deer concentration areas in WMU 10, and the FF District, occurs in and immediately adjacent to the NLSA. Deer winter concentration areas are considered by MNR to be Significant Wildlife Habitat.</p> <p>It is incorrect to conclude that due to the high concentration of deer seen in the NLSA that winter deer concentration areas (yards) are widespread across the region. Field investigations merely confirmed the usage of high usage Stratum 1 habitat within the NLSA.</p>	Does not acknowledge presence of deer SWH. Affects environmental effects significance determination.	Revise text to indicate presence of deer Significant Wildlife Habitat in and adjacent to the NLSA. Remove reference to „habitat features... indicate likely suitable yarding habitat”. Remove reference to widespread deer yarding habitat. Include text reflecting importance of Stratum 1, rank 3 and 4 deer winter concentration areas in and adjacent to the NLSA.	
62	Melissa Mosley	Wildlife (Terrestrial)		Vol 2 S5.10.2.1	MAFA surveys have not been	Incorrect information.	Revise text.	

	Management Biologist			P5-127	conducted in WMU 10, therefore it is incorrect to state that there are no possible moose movement corridors in the NLSA.			
63	Melissa Mosley Management Biologist	Wildlife (Terrestrial		Vol 2 S5.10.2.2 P5-127	Table 12.6 indicates 22 species of mammals exist within the NLSA.	Clarification needed.	Revise text.	
64	John Van den Broeck SAR Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Vol 2 5.10.3.1 (5-132)	It is unclear how significance is being assessed in terms of SC species –ie GWWA habitat – see 7.16 (7-89)	Clear, accurate documentation is required for correct understanding of the project	Please clarify	
65	John Van den Broeck SAR Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Vol 2 5.10.3.3 (5-134)	The list of Avian SAR and Provincially rare species is incomplete. (eg Barn Swallow, Whip-poor-will ect)	Incomplete list of Avian SAR	Update list	
66	John Van den Broeck SAR Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Vol 2 5.10.4 (5-135)	While no nest were observed it is suspected that Snapping turtle nesting occurs with the NLSA	Missing information	Outline that Snapping turtle are SC	
67	John Van den Broeck SAR Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Vol 2 5.10.6 (5-136 to)	Under Threatened add - Lake Sturgeon Under SC - Rusty Black Bird has no Provincial status – Federally listed. The list of Provincial Rare species excludes the plant species observed. (New England violet, Field sedge) Also, through further record review muskroot was indentified within the NLSA.	Missing information	Please amend	
68	John Van den Broeck SAR Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Vol 2 Table 5-27	This table represented preliminary scoping of the project in advance of field assessment work – many of the “Likelihood of Occurrence data should be updated with assessment results (ie Confirmed within the NLSA or not detected, likelihood remains low ect.). Table also requires updating with additional species (ie bats)	A clear understanding of the project is important	Please update table.	

69	Melissa Mosley Management Biologist	Wildlife (Terrestrial)		Vol 2 S5.10.6.2 P5-137	Trapping records do indicate that grey foxes occur in the NLSA, as the trapline from which they were trapped overlays the east mine rock stockpile and transmission corridor. It is therefore logical to conclude that grey foxes are present.	A clear understanding of the project is important	Revise text to reflect occurrence of grey fox.	
70	Melissa Mosley Management Biologist	Fishery		Vol 2 s.5.12.2.4 p5-149	The baitfish industry is a commercial fishery in Ontario, as defined by the Fisheries Act. The use of the area by baitfish harvesters therefore constitutes a commercial fishery.	A clear understanding of the project is important	Revise text to indicate presence of a commercial fishery (baitfish harvest).	
71	Melissa Mosley Management Biologist	Fishery		Vol 2 s.5.12.2.4 p5-149	Lake sturgeon are present in the Pinewood River (NRSA).		Please clarify area referred to by "RRGP site". NLSA or NRSA?	
72	Melissa Mosley Management Biologist	Fishery		Vol 2 s.5.12.2.4 p5-149	Detailed habitat investigations for lake sturgeon have not yet occurred in the Pinewood River, therefore it is incorrect to state "... no specific habitat was identified...".	Incorrect information	Revise text to clarify no known habitat has been identified.	
73	Christopher Martin, Biologist	General - EA Type		Volume 2, Evaluation of Alternatives, S6.1.2; Pg. 6-2 and Table 6.1.	Evaluation of „alternatives to“ the project did not strictly follow criteria in the Approved ToR. Rather, many criteria (environmental components in Table 6.1) appear to have been adopted from MNR's Class EA for Resource Stewardship and Facility Development Projects.	Clear, accurate documentation is required for correct understanding of the project	Clarify reference to use of criteria developed in the ToR.	EA
74	Rachel Hill District Planner	Assessment of alternatives - ranking		Vol 2 Pg 6-2 and 6-3	It is appreciated that RRR has demonstrated that some impacts will be more significant than others and that an attempt to rank the significance from low to high. The proponent has identified 4 elements in section 6.1.3 that will have some degree of	The transparency of how the impacts were assessed is important. It is understood there will be impacts of some kind with a project of this magnitude.	The report should identify there will be impacts to the four areas identified as having a ranking of 4. It should be identified what the intermediate value of 4 is.	

					impact. However more clarity is needed for the numerical value of 4.			
75	Rachel Hill District Planner	Assessment of alternatives – tailings management areas		Vol 2 section 6.8.2 Pg 6-46	Alternative B has been selected as the preferred alternative, based on human environment/socio economic perspective. But has the highest significance to the environment It would appear the alternative was selected largely on cost.	The transparency of how the alternatives were assessed and weighted is important.	There needs to be a better description of how the performance objectives and evaluations were assessed. There is more clarification needed on: 1) why Alternative A would not be feasible (ie pg 6-47 why there would be more difficulty obtaining environmental approvals, 2) why there is an unfavorable tailings storage to dam fill ratio when it appears to be comparable to B 3) why the land tenure would be an issue when there is a very small portion of area that is not RRG that could not be purchased or avoided). 4) why the cost estimate for alternative A is stated to be 60M on pg 6-49 but only 46M for the dam cost differential, 5) why there is not a breakdown of the 60M estimated on Pg 6-49. 6) And why there is no cost estimate for option B. From the analysis in the report, it does not seem to justify environmental impacts.	
76	Rachel Hill District Planner	Assessment of Alternatives- Aggregates		Vol 2 Section 6.10.2 Pg 6-56-61	Whether or not aggregate sources are subject to the ARA depends on 1) land tenure (if under a mining lease or under a mining claim) 2) reservations for private patent (sand and gravel) Refer to attached table	Clarity on whether approvals for aggregate will be needed will be important for the start up.	Given the delay in the mining lease application, the proponent should reassess the aggregate sources and land tenure using the information provided.	

					provided with these comments			
77	Rachel Hill District Planner	Assessment of Alternatives – transmission line		Vol 2 section 6.18, Pg 6-89 And Appendix O Table 0-13	Alternative A has been selected as the preferred alternative. Although the report identifies it was the preferred alternative in all 5 categories, it would appear the preferred alternative was based on cost. Table O-13 Pg 150 does not include maintenance in the analysis.	The transparency of how the alternatives were assessed and weighted is important.	<p>1) There needs to be a better description of the transmission line (ie what is the ROW required for a 230KV line) how the performance objectives and evaluations were assessed.</p> <p>2)) Please better describe the topography and the forest composition of each alternative (ie forest composition, vol of merchantable timber to be harvested, area of wetland to be crossed, and number and width of water crossings)</p> <p>3) Please provide details on maintenance requirements. The assessment has not included whether or not chemical tending will be needed and the associated effects as well as cost. Chemical tending is a common application for control of tree growth.</p> <p>4) Please provide references/information to support the statement on pg 6-93 that suggests there is an effect/concern to humans from electromagnetic field exposure.</p> <p>The statement on Pg 6-92 requires more clarity. A) If chemical tending will be used for maintenance the assessment needs to include impacts to fish habitat. B) which SAR are</p>	

							being referred to in the context of a adverse impact? And more description is needed on how the potential benefits of the transmission line to Whip-poor-will, Boblink, and Barn Swallow. MNR does not agree there will be any benefits to Boblink and Barn Swallow, and it is a extremely low probability that there will be benefits to Whip-poor-will.	
78	Christopher Martin, Biologist	Fish and Fish Habitat Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Volume 2, Evaluation of Alternatives, Table 6.1 – Fish, aquatic resources and habitats, Terrestrial Wildlife and Natural Heritage Features	At minimum, mine development is expected to „threaten the ... distribution ... of the component“ (fish, terrestrial wildlife, natural heritage features) which is not consistent with a significance level 3. Given historical and current impacts of previous mine developments on local fish and wildlife populations, level 3 appears overly optimistic.	Ensure conclusions are consistent with data collected and analyses.	Consider assigning significance level 4 for impacts to fish, aquatic resources and habitats, terrestrial wildlife and natural heritage features. If the „natural heritage feature“ component is redundant with others, remove it.	EA
79	Christopher Martin, Biologist	Ecological Integrity		Volume 2, Evaluation of Alternatives, Table 6.1 – Ecological Integrity.	It seems extremely difficult to justify ranking impacts to ecological integrity, as defined in the Provincial Parks and Conservation Reserves Act 2006, less than level 5. Maintaining ecological integrity is not a management priority outside of provincial parks and conservation reserves in Ontario.	Ensure conclusions are consistent with data collected and analyses.	Suggest removing ecological integrity as an environmental component from Table 6.1.	EA
80	Christopher Martin, Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Volume 2, Evaluation of Alternatives, Table 6.1 – Vegetation and habitat.	Agree with assessment, and suggest opportunities may exist to design habitat for various wildlife (e.g. amphibians, bird species at risk) in proposed West Creek Pond and Clark Creek Ponds.	Provides RRR another opportunity to demonstrate environmental stewardship.	Please contact FF District MNR office to discuss further.	EA
81	Christopher Martin, Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk) Vegetation		Volume 2, Evaluation of Alternatives, Pg.	Many environmental baseline study results are not mentioned in descriptions of	Baseline studies need to support alternatives assessment and	Provide further details of important wildlife and vegetation components	EA

				6-7, Appendix O.	advantages and disadvantages of the alternatives. As one example, the "... type and quality (functionality) of terrestrial habitat that would be displaced or altered" is rarely addressed.	mitigation measures in draft EA. Ensure conclusions are consistent with data collected and analyses.	impacted by alternatives (including process plant and explosives facility) within 6.0 Evaluation of Alternatives and Appendix O. Also see comment 82.	
82	Christopher Martin, Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk) Vegetation		Volume 2, Evaluation of Alternatives	As recorded in the September 21, 2012 baseline meeting between MNR and AMEC (point 7 of minutes), showing the spatial relationship of project footprint alternatives and specific environmental „values" would allow reviewers to better visualize and understand impacts.	Baseline studies need to support alternatives assessment and mitigation measures in draft EA. Ensure conclusions are consistent with data collected and analyses.	As in Figure 6-3 (and to some degree Figure 7-12a), provide maps showing the spatial relationship of project footprint alternatives (including process plant and explosives facility) to specific environmental „values" deemed important to conserve (e.g. woodlands supporting area-sensitive birds, rare plant occurrences, etc.).	EA
83	Christopher Martin, Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Appendix J-1, Table J-2; pg. 14, 16-18	The Ontario Herpetofaunal Atlas is used as a reference for bird observations and Christmas Bird Count is used as reference for herptile observations. It is surprising that Common Redpoll was observed during a Breeding Bird Survey.	Clear, accurate documentation is required for correct understanding of the project	Correct use of footnotes 9 and 10 and clarify observation of Common Redpoll during Breeding Bird Survey in Appendix J-2.	EA
84	Christopher Martin, Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk) Vegetation		Appendix O. Effect on resource management objectives	There is no mention of MNR resource management objectives related to fish and fish habitat, deer, moose, bear, species at risk and Crown forest management.	Clear, accurate documentation is required for correct understanding of the project	Include opportunities or challenges related to MNR resource management objectives under the appropriate indicator for all project alternatives.	EA
85	Christopher Martin, Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Appendix O. Table 0-2, Effects on terrestrial species and habitat	Baseline studies generally did not involve tracking fish or wildlife movements or plant dispersion (see MNR-5).	Baseline studies need to support alternatives assessment and mitigation measures in draft EA. Ensure conclusions are consistent with data collected and analyses.	Cite evidence "that open pit would not negatively influence plant dispersion and wildlife movement corridors". If this claim is speculated due to existing and ongoing disturbance of the proposed open pit area, clarify.	
86	Christopher Martin, Biologist	Fish and Fish Habitat		Appendix O. Table 0-2, Effects on fish and aquatic habitat (and S7.5.1.3, pg. 7-	Discussion of how 1, 647m ³ of water taken daily from West Creek Pond for mineral processing operations may affect fish habitat offset is	Potentially affects quality of fish habitat offset.	Provide more details on expected fluctuations in West Creek Pond throughout the year as a result of water management	EA, Fisheries Act

				29)	lacking.		activities.	
87	Christopher Martin, Biologist	General – EA Type Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Volume 2, Evaluation of Alternatives S6.2.2, pg. 6-7. Appendix 0. Table 0-2, 0-6, 0-10.	Both mine water management alternatives apply mitigation to minimize effects to the natural environment. A performance of „preferred“ is therefore inappropriate as per definition provided in S6.2.2, Effects to the Natural Environment. Comment also applies to Ore Processing Alternatives, Tailings Management Area Alternative A, Domestic Sewage Management alternatives 1 and 2, Transmission Corridor Alternative D, etc.	Clear, accurate documentation. Ensure conclusions are consistent with data collected and analyses.	For the first mine water management alternative, change effects to the natural environment summary rating from preferred to acceptable. Because most alternatives apply at least some mitigation to reduce environmental impacts, it may be more efficient to revise the definition of „preferred“ to „requires least amount of mitigation to minimize adverse effects to the natural environment and is superior to acceptable alternatives.“	EA
88	Christopher Martin, Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Appendix 0. Table 0-3 and 0-6, Effects on terrestrial species and habitat	In S5.1.1, pg. 5-2 it was assumed there were migratory corridors „associated with aquatic systems and associated riparian habitats“. Impacts of mine rock and overburden and tailings management areas on these potential movement corridors are not addressed.	Ensure conclusions are consistent with data collected and analyses.	Either address potential negative impacts on assumed movement corridors or report „none apparent or known“ for this indicator for all project component alternatives in Appendix O.	EA
89	Christopher Martin, Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Appendix 0. Table 0-9, Effects on terrestrial species and habitat	Additional disadvantages of developing an onsite landfill include removal of additional terrestrial wildlife habitat, human-wildlife conflict and wildlife poisoning.	Baseline studies need to support alternatives assessment and mitigation measures in draft EA. Ensure conclusions are consistent with data collected and analyses.	Consider additional disadvantages of onsite landfills to the natural environment.	
90	Christopher Martin, Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk) Fish and Fish Habitat		Volume 2, Evaluation of Alternatives, S6.15.1, pg 6-81; Appendix 0, Table 0-11.	For 3 highway re-routing alternatives, description of water crossings and their potential environmental impacts is lacking.	Ensure conclusions are consistent with data collected and analyses.	Describe water crossings and their potential environmental impacts for all highway re-routing alternatives.	
91	Christopher Martin, Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Volume 2, Evaluation of Alternatives,	In addition to positive effects on some wildlife, creation of forest edge habitat also has	Baseline studies need to support alternatives assessment and	1. Consider additional disadvantages of power supply alternatives to the	EA

				S6.17-6.18. Appendix 0. Table 0-12 and 0-13. Effects on terrestrial species and habitat	detrimental effects on forest-interior/area-sensitive species by rendering habitat unsuitable (Robbins et al. 1989) and reducing reproductive success(Askins 1994; Schlaepfer et al. 2002); creates a barrier to dispersal and gene flow in populations (Spellerberg 1998; Trombulak and Frissell 2000); and supports colonization of invasive species, particularly plants (Spellerberg 1998, personal observations). It is unlikely that bobolink and barn swallow will use the transmission line corridor as breeding habitat as these species are limited by field area/distance-to-edge requirements and presence of suitable nesting structures respectively.	mitigation measures in draft EA. Ensure conclusions are consistent with data collected and analyses.	natural environment. Also see comments 81 and 82. 2. Address difference in magnitude of habitat removal and fragmentation impacts among transmission corridor alternatives. 3. See comment 87 regarding transmission corridor alternative D. 4. Given large magnitude of impacts, justify why an „unacceptable“ summary rating for effects to the natural environment was not applied to any of the transmission corridor alternatives.	
92	Christopher Martin, Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Table 0-17, Effects on terrestrial species and habitat	Concerns related to quality of aquatic and wetland habitat in rehabilitated tailings management area.	Affects evaluation of alternative.	Include more detail on typical approaches to rehabilitating tailings ponds at other mine sites and expected quality of resulting aquatic and wetland habitats for wildlife. Will benthos, turtles, diving ducks, etc. likely be exposed to toxins? Will toxins bioaccumulate in food chains?	EA
93	Christopher Martin, Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Volume 2, Effects assessment and Mitigation, S7.0	Numerous statements are made in Section 7.0 about displaced wildlife expected to colonize new habitats in the NLSA and NRSA.	Affects environmental effects significance determination.	Cite evidence that displaced wildlife do not experience resource competition, territorial aggression from conspecifics, dispersal-related mortality, or other fitness-reducing impacts. Otherwise, describe negative impacts experienced by displaced wildlife.	EA, potential ESA implications

94	Christopher Martin, Biologist	General – EA Type		Volume 2, Effects Assessment and Mitigation, S7.1.2, pg. 7-4 and Table 7-2.	Do not support the statement that “if a Level 1 rating is achieved for any of the attributes involving magnitude/geographic extent, duration or frequency ... then the effect is considered to be not significant”. This is an extremely conservative form of risk analysis, where Level 1 ratings have a disproportionate influence on the overall significance determination. Also do not support criteria used to rate magnitude and geographic extent effects on terrestrial habitat (including wetlands) and wildlife (including SAR). Given the large magnitude of proposed development (21.7 km ² terrestrial habitat overprinted), an effect „confined solely to project lands” can readily be of significant consequence.	Ensure conclusions are consistent with data collected and analyses.	Recognizing that the RRGp is one of the single largest projects ever proposed in the Rainy River area: 1. Revise effects analysis methodology 2. Revise criteria used to rate magnitude and geographic extent effects on terrestrial habitat and wildlife.	EA
95	Rachel Hill District Planner	General EA – Land Use Designation		Vol 2 Section 7 Pg 7-108	The report does not mention the Crown Land Use Policy Atlas (CLUPA) Mine development is within the General Land Use Area (GLUA) G-2581 (Agricultural Hinterland). The primary land uses of this area are sport fishing, forestry and deer management. The Transmission line options A and D overlap with GLUA G-2601 (Nestor Falls/Morson) and G-2573 (Pipestone Chain of Lakes) both of which have a focus to protect existing tourist, recreational and cottaging interests.	Although all three of these GLUAs allow mining activities, the EA needs to reference how these existing primary land uses will be addressed	Provide a description in this section that speaks to the land use policies in MNRs CLUPA and provide reference to where/how they are addressed.	EA/Policy

96	Christopher Martin, Biologist	Fish and Fish Habitat		Volume 2, Effects Assessment and Mitigation, S7.5.1.1, pg 7-27	It is stated that West Creek Pond will contribute limited to no flow to the West Creek diversion channel during low flow conditions.	Affects quality of fish habitat offset.	Explain why exacerbating low flow conditions in the West Creek diversion fish habitat offset is acceptable.	EA, Fisheries Act
97	Christopher Martin, Biologist	Fish and Fish Habitat		Volume 2, Effects Assessment and Mitigation, S7.6.1.3, pg 7-39	Full evaluation of water crossings requires more details of watershed and proposed structure.	Affects environmental effects significance determination. Additional opportunities for mitigation.	Provide watershed size, slope and wetland area upstream of water crossing location and culvert or bridge sizing calculation. Propose specific culvert size(s) or bridge size for crossing. MNR recommends considering structure suitable for passing Q ₁₀₀ and installation of clear-span bridge to maintain natural channel width and substrate. Provide more details on short and long-term sediment control measures.	EA, Lakes and Rivers Improvement Act
98	Christopher Martin, Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Volume 2, Effects Assessment and Mitigation, S7.8.1, pg 7-46	Question the statement that "woodlands will retain their important ecological functions".	Affects environmental effects significance determination.	Include more detail on area-sensitive species observed in affected woodlands and habitat requirements of such species. See comment 82.	EA
99	Christopher Martin, Biologist	Vegetation		Volume 2, Effects Assessment and Mitigation, S7.8.1, pg 7-46 and S7.8.5	With specific reference to New England Violet and Field Sedge, speculation about species" population sizes and/or describing impacts of mine development in the context of a larger landscape (NLSA, NRSA) is unconvincing justification for a significance determination. This comment also applies more generally throughout the EA.	Affects environmental effects significance determination.	Either provide evidence that New England Violet and Field Sedge should not be considered rare plants; cite primary literature indicating removal of 3 or fewer occurrences of these species is unlikely to impact overall stability and/or genetic diversity of populations; or remove speculation about population size and draw conclusions accordingly.	EA
100	Christopher Martin, Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Volume 2, Effects Assessment and Mitigation, S7.9.5	Impacts to deer are considered not significant because "winter deer yarding areas are abundant throughout the	Affects environmental effects significance determination.	Describe circumstances under which the RRGP would have significant impacts to ungulates.	

					NRSA" and deer are "numerous" and "ubiquitous". Impacts to moose are considered not significant "given the low density of moose in the region." Apparently opposing rationale is used to justify non-significant impacts to ungulates.		See also comment #94.	
102	Christopher Martin, Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Volume 2, Effects assessment and Mitigation, Table 7-18.	Common gallinule are very rarely observed in Rainy River district. American Coot are regular breeders.	Clear, accurate documentation is required for correct understanding of the project	Confirm that common gallinule were observed and that American coot were not observed.	EA
103	Christopher Martin, Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Volume 2, Effects assessment and Mitigation, S7.13.1, pg 7-69.	Forest Management Guide for Conserving Biodiversity at the Stand and Site Scales (OMNR 2010) provides direction for conserving common raven, great-horned owl and American kestrel habitat.	Clear, accurate documentation is required for correct understanding of the project	Consider OMNR (2010) as an additional useful reference.	EA
104	Christopher Martin, Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Volume 2, Effects assessment and Mitigation, S.7.8-7.16(Government, Aboriginal and Public Comments and Concerns)	MNR has indicated that furbearer dens, beaver dams and raptor nests are protected by the Fish and Wildlife Conservation Act. MNR has also provided comments regarding additional specific wildlife habitats in need of consideration via e-mails (Oct. 10 and Nov. 20, 2012).	Clear, accurate documentation is required for correct understanding of the project	Include protection of furbearer dens, beaver dams and raptor nests as specific concerns identified by MNR. Document additional MNR comments and concerns regarding various wildlife habitats in appropriate sections.	EA, FWCA
105	Christopher Martin, Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Volume 2, Effects assessment and Mitigation, S.7.13.3, pg. 7-73	Mitigation of impacts to nesting bald eagles lacks detail.	Affects environmental effects significance determination.	Provide specific measures to be implemented to reduce adverse effects to bald eagle breeding success.	
106	Christopher Martin, Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Volume 2, Effects assessment and Mitigation, S.7.14.3, pg. 7-77	Amphibians that move to tailings management area may experience reduced fitness and/or survival.	Additional opportunities for mitigation.	Consider also placing silt fencing around the tailings management area to discourage amphibian immigration.	
107	Christopher Martin, Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Volume 2, Effects assessment and Mitigation, S.7.16.1.4, pg. 7-93	All breeding habitats of Canada Warbler require consideration. The observation that Canada Warblers occur at relatively low densities in the NRSA does not necessarily imply	Ensure conclusions are consistent with data collected and analyses.	Provide evidence that Canada Warbler populations are not limited by breeding habitat availability, remove statement that habitats within the NRSA are not	EA

					their habitats are not „critical” or unimportant.		critical, or otherwise clarify meaning of „critical habitat”.	
108	Christopher Martin, Biologist	Fish and Fish Habitat		Volume 2, Effects assessment and Mitigation, S.7.17.5, pg. 7-106 and 7.18.7.1, pg. 7-120	Draft EA states “the local creeks that are present do not support a commercial or recreational fishery.”	Ensure conclusions are consistent with data collected and analyses.	Re-word consistently with amended baseline studies and draft fish habitat offset plan: “while limited bait fishing does occur within certain project area streams, the area does not support a significant commercial or recreational fishery.”	EA, Fisheries Act
109	Christopher Martin, Biologist	Effects of the Environment on the Project (incl. Climate Change)		Volume 2, Effects of the Environment on the Project, S8.4.2, pg. 8-7 (and S4.8)	As extreme flood events may occur during the life of the mine it is important to ensure tailings management area dams are designed to minimize risk of downstream sediment loading.	Clear, accurate documentation is required for correct understanding of the project	Provide more detail on layered composition of tailings management area dam and spillway (Are they capped with blast rock of sufficient size to withstand erosion during high flows? Will exposed clay till withstand erosion?). Describe sediment capturing capabilities of water management pond, in a flood scenario.	EA, Fisheries Act
110	Christopher Martin, Biologist	Cumulative Effects	Terms of Reference, S7.2.3, pg.85	Volume 2, Cumulative Effects, S10.1	Consistent with comments on the Terms of Reference, I do not support restricting the analysis of cumulative effects to the existing environmental baseline. Statement that “it would be the responsibility of the proponents of any such [future] projects to take the effects of the RRGP into consideration” is inconsistent with the approach taken in this EA.	Affects cumulative effects assessment.	Baseline studies have not analyzed or modeled impacts of past projects and activities on the environment. As one example related to migratory birds, a more rigorous analysis of cumulative effects could model expected abundances of birds under historical (pre-agricultural clearing) landscape conditions within the RRGP footprint using already established bird-habitat relations. Then impacts of the RRGP on birds could be determined relative to historic conditions (cumulative effect). Likely, cumulative impacts to forest-interior birds will be more severe than reported in Table 7-18 while impacts	EA

							to open-country and shrubland birds may be negligible, depending on expected historical forest age-class distribution.	
111	Christopher Martin, Biologist	Monitoring		Volume 2, Monitoring and Environmental Management Plans, S13.7.2, pg 13-18.	Effects on mammals may also include road-related mortality.	Additional monitoring opportunities.	Consider documenting road-related mortalities of mammals and other species.	EA
112	Melissa Mosley Management Biologist	Wildlife Fish & Fish Habitat Hydrology		Vol 2 s.6.2.2 p.6-7	Water flows or conditions suitable for spawning is an important criteria that needs to be considered as well. Maintenance of fish habitat does not necessarily accomplish this, nor does ensuring fish passage. The right flows at the right time of year are also crucial.	Clear, accurate documentation is required for correct understanding of the project	Please revise text to include Maintenance of water flows or conditions suitable for fish passage and spawning activity.	
113	Rachel Hill District Planner	Water Supply		Vol 2 Section 6.11 Pg 6-64	MNR is concerned about the causal reference to other local water sources such as (Off Lake and Burditt Lake) being water sources for start up and low water events. This is an addition to the approved ToR and there are few details. Issues: public concern, lack of consultation during the ToR, 12-20km pipeline, location/alternatives	A clear description and understanding of the project is required.	The report needs to confirm whether or not the plan to take water from Off Lake or Burditt Lake 1) is a possibility, 2) as an alternative to water supply, 3) if is a potential plan then alternatives need to be provided, assessment of effects provided, and further consultation since it was not included in the ToR	EA
114	John Van den Broeck SAR Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Vol 2 7.15	The context of Lake Sturgeon should inform the reader that this threatened species has been confirmed in the receiving waters.	There is uncertainty of the range of LS within the system. Impacts could include hydrological impacts. (taking water, especially at startup when taking 20% Pinewood April flows is anticipated, -storing spring flows) .	This needs to be scoped out in 7.15 as was done for other Regulated SAR	
115	John Van den Broeck SAR Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Vol 2 S7.15.1.1; S7.15.1.5 7-82); Table 7-2	The EA states that RRGP – related effects on local or region Whip-poor-will populations are considered to		The MNR requests that the factors outlined be considered in the assessment of Overall	

				<p>be not significant. This assessment has been based on two of five variables (magnitude of extent and reversibility) being ranked as level 1.</p> <p>1) The magnitude of the effect has been classified within the report as level 1, however, consistent with definition provided within the EA the magnitude of effect should be classified as a Level III given sound from the RRGP will likely disturb Eastern Whip-poor-will adjacent to project land (S7.15.1.1s.). Therefore, the RRGP is likely to meaningfully affect off-property species at risk, consistent with a Level III rating for magnitude and geographic extent criteria. Also see comment MNR-94.</p> <p>2) Given the above, only 1 of 5 attributes is attributed to a level 1 ranking; reversibility. In this case there is no identified timeline when this would be achieved or necessarily any supporting, or refuting information to suggest that territorial reestablishment will or will not occur post development.</p> <p>3) Importantly, the approach for assessment of significance has failed to capture the context of this species at the RRGP site as we currently understand it.</p> <ul style="list-style-type: none"> • Occupancy at this site is known for up to 70 years. • Apparently suitable areas remain unoccupied • Home ranges of birds 		Significance.	
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					<p>are significantly larger than reported elsewhere</p> <ul style="list-style-type: none"> Whip-poor-will populations are showing significant decline -2.6%/year (1968-2006) in Ontario. Eco Region 5S2, in which the project lies, has been extensively surveyed and currently there are less than 100 known occupied territories, This would suggest that between 10-20% of the known territories in this Eco Region will be impacted. Whip poor will are forest dependent 			
116	John Van den Broeck SAR Biologist	Wildlife (SAR)		Vol 2 7.15.2.1	The area of Bobolink habitat impacted outlined in the EA is inconsistent with the requirement of the ESA – which identifies occupied contiguous habitat - Based on this criteria (Van den Broeck) the analysis has indicated that approximately 350 ha of habitat will be impacted and require authorization under the Act.	Clear, accurate documentation is required for correct understanding of the project	This requires reassessment in the context of the revised footprint	
117	John Van den Broeck SAR Biologist	Wildlife (SAR)		Vol 2 7.15.2.1	The period of interest for Bobolink is to July 31st. not August 15 as outlined.	Incorrect information	Please amend	
118	John Van den Broeck SAR Biologist	Wildlife (SAR)		Vol 2 7.15.3.3 (pg7-87)	Under Barn Swallow mitigation is missing details.	Missing information	outline that the activity (removal of structures occupied by nest(s)) will be registered with the MNR as per ESA requirements of O. Reg 176/13	
119	John Van den Broeck SAR Biologist	Wildlife (SAR)		Vol 2 7.16 (7-89)	Arrowhead spiketail identified within NLSA Green faced clubtail and Midland Clubtail were identified through the records	Missing information.	Update section	

					review and have been omitted from the section Similarly, muskroot known with NLSA			
120	John Van den Broeck SAR Biologist	Wildlife (Wildlife (SAR)SAR)		Vol 2 7.16.1.2 (7-91)	The analysis of impacts on Golden-winged warbler appears to exclude data (occurrences) provide by MNR – stand 80.	Missing information.	Update impact assessment to include other occupied stands	
121	John Van den Broeck SAR Biologist	Wildlife (SAR)		Vol 2 7.16.1.2 (7-91)	The statement that the removal of early succession habitat may provide potential habitat is in contradiction to habitat requirements for this species at this site... namely early succession poplar forest	Clear, accurate documentation is required for correct understanding of the project	Reconsider impact assessment	
122	John Van den Broeck SAR Biologist	Wildlife (SAR)		Vol 2 7.16.1.5 (7-93)	There is local information on Red-headed Woodpecker		Consider the following paper Elder D.H and J. Van den Broeck, 2009. Red-headed Woodpecker Habitat Preferences in the Rainy River Area of Ontario. Ontario Birds Vol27 No.3	
123	John Van den Broeck SAR Biologist	Wildlife (SAR)		Vol 2 7.16.1.6 (7-94)	It is legal to harvest and consume snapping turtles.	Clear, accurate documentation is required for correct understanding of the project.	Please identify if there are concerns with contaminants and consumption of snapping turtles.	
124	D.F A/IRM Tech	Surface water: Potential water-taking from BurdittLk.: Approx. volume of 1.5Mm3.		Vol 2 Section 8.2.1:Page 8.3; second paragraph.	This is understood to be a maximum of 0.214Mm3/ month.	Clear, accurate documentation is required for correct understanding of the project	Please confirm	
125	D.F. A/IRM Tech	Surface water: Potential water-taking from BurdittLk.		Vol 2 Section 8.2.1 General	If more than 0.375Mm3/month; notification to District crucial due to lake level management concerns.	Clear, accurate documentation is required for correct understanding of the project	Comment on contingency scenario.	
126	D.F A/IRM Tech	Surface water: discharge from Mine Site		Vol 2 *Section 8.2.1:Page 8.3; fourth paragraph.	States discharge water would have to be “exceptionally good.”	Clear, accurate documentation is required for correct understanding of the project	Please indicate how this description relates to required specifications.	
127	D.F. A/IRM Tech	Surface water: discharge from Mine site		Vol 2 Section 8.2.1,	Speaks of “.limited, if	Clear description is required for correct	Please provide indication of how manageable a lack of	

				Page 8-3, fourth paragraph	any,assimilative capacity” referring to the Pinewood River. Later in section reader is informed“limited..assimilative capacity” is readily manageable.	understanding of the project	assimilative capacity would be.	
128	Marney Brown	Hazards - Fire		Vol 2 Section 8.4.3	Consider implementation of additional design features to minimize risk of damage from encroaching wildfires	Identify additional measures to prevent damage / disruption from wildfires.	Should consider access to and from site, smoke impacts, risk to facility / structures, infrastructure. Mitigation strategies from above comment on 9.4.2.2 could also apply (ie. development of buffer areas to provide fire breaks around facilities),	
129	D.F. A/IRM Tech	Surface water		Vol 2 Sec. 9.3.3, page 21-22: discussion of water management pipeline	Stated that WMPipeline able to transfer both fresh water from Pinewood Rive to mine rock pond(pg. 21) and able to transfer excess treated water from water management pond to Pinewood River downstream of McCallum Creek.	Clear description is required for correct understanding of the project	Please confirm how many water management pipelines will be located along water management pipeline route	
130	D.F. A/IRM Tech	Surface water		Vol 2 Sec. 9.3.3, page 21-22: discussion of water management pipeline	There is no information regarding location on Pinewood River where water management pipelines intersect.	Missing information and details.	Please provide details of this site be provided (i.e. sketch and technical details of pipeline/river interface) Please confirm if the transfer site of fresh/excess treated water assumed to be on private land (Lot 36, PautilloTwp)	
131	Marney Brown	Natural Hazards (Fire)		Vol 2 Section 9.4.2.3	Clarify responsibilities / expectations of external fire response agencies.	If firefighting resources from Fort Frances refers to the municipal department, discussion needs to occur in advance with town	Clarify intent of statement and confirm whether separate agreement with FF municipal department is necessary (eg. For access to specific resources not	

						council and fire chief as this would fall outside regular mutual aid process due to geographic proximity to mine site. If reference to Fort Frances refers to MNR firefighting resources, AFFES only responds to forest/grass and brush fires, not structural.	available from other municipal departments).	
132	Marney Brown	Natural Hazards (Fire)		Vol 2 Section 9.4.2.2	Consider implementation of additional design features to minimize risk of fire spreading from facility	Identify additional measures to prevent damage / disruption from fires caused by the project.	Need to consider potential risk of fire spreading to adjacent buildings / lands and develop mitigation strategies to limit spread. Consider additional design safeguards such as establishment of buffers areas around facilities.	
133	John Van den Broeck SAR Biologist	Wildlife (SAR)		Vol 2 13.7.3	Further design work is likely required to assess impacts on Breeding Birds Figure 5-16 illustrates point count location, many of which will be directly impacted. Consequently it is unclear whether or not the remaining stations peripheral to the development are adequate to detect changes in occupancy that may occur as a result of disturbance	Clear, accurate documentation is required for correct understanding of the project	Please provide the adequate information.	
134	Melissa Mosley, Management Biologist	Wildlife		Appendix J-5 2013 Winter Aerial Survey for Mammals Report s. 5. p4	Winter deer concentration areas (yards) are surveyed and identified by the MNR, and sub-categorized/ranked based on usage. This report did not adequately describe the extent of these areas in the project area, nor was it designed to determine preference by deer for these areas. The conclusion that the authors determined no pattern of preference, based on field observations, is not supported	Affects evaluation of alternatives and environmental significance determination.	Please remove conclusion that deer, and other species, showed no pattern of preference for habitat within the study area.	EA

					The statement "...deer and moose typically benefit from some level of disturbance..." should be qualified. While these species do benefit from some level of forest disturbance, it is in conjunction with either natural or artificial regeneration of the forest shrub and tree species, not the absence of such as occurs during mine development and operation when habitat is cleared and removed from the landscape. Transmission corridors are unlikely to produce new browsing opportunities as they must be sprayed with herbicide or mechanically cut to reduce competing vegetation, thus eliminating the target browse species.			
135	Rachel Hill District Planner	Conceptual Closure Plan		Appendix E Section 1.3 Pg 1	Appreciate acknowledgement this needs to support the EA. Decommissioning (closure) should include an objective to address social, recreational and land use.	A clear understanding of the long term plans is important.	A commitment to consult with the public , stakeholders and agencies to identify the preferred land use after closure, should be included in the report	
136	Rachel Hill District Planner	Conceptual Closure Plan		Appendix E Section 2.3 Pg 4	The description of the project components are slightly different than what is described in Section 1 of Vol 2: - the open pit is described as being approx 170ha in area vs 200ha. - the TMA selected is approx 800ha vs 1500ha	Corrections needed.	Please amend.	

137	Rachel Hill District Planner	Conceptual Closure Plan		Appendix E throughout	Re-vegetation of the mine site will need to have a separate plan developed once mine operations are complete. A better understanding of the site conditions will be evident at that time, as well as an understanding of newer technologies and success.	A clear understanding of the long term plans is important	The report should include a commitment to develop a vegetation plan at closure. The plan should include details such as how much area is to be re-vegetated, the objective of the re-vegetation (habitat restoration, aesthetics etc) the type of re-vegetation (seeding vs planting, species etc) the need for addition of treatments such as topsoil/fertilizers etc. The statement on pg 10 that native seed mixes might not be available at a feasible cost should not have an influence	
138	District Planner Rachel Hill	Conceptual Closure Plan		Appendix E Section 4.5.2 Pg 19	With regard to rehabilitation of aggregate pits and quarries, it would be most efficient if there was a commitment to be consistent with the rehabilitation standards under the Aggregate Resources Act. This is mandatory for any permits issued under the ARA and encouraged for those that are not.	A clear understanding of the long term plans is important	Please amend.	
139	Christopher Martin, Biologist	Decommissioning and Reclamation		Volume 2, Appendix E. S4.6.1, pg. 21	Diversion of natural or other fish-bearing watercourses will further disrupt fish and fish habitat.	Minimize negative impacts to the environment.	It is MNR's preference that natural (Pinewood) or other fish-bearing watercourses (West Creek diversion) not be further diverted or manipulated at closure, provided the optimal pit filling rate may be achieved by other means.	
140	Christopher Martin, Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk)		Appendix 0. Table 0-11, Effects on terrestrial species and habitat	Disadvantages of roads to natural environments also include road-related mortality of wildlife, barriers to dispersal and gene flow in populations	Baseline studies need to support alternatives assessment and mitigation measures in draft EA. Ensure	Consider additional disadvantages of road re-alignment to the natural environment.	

					and supporting colonization of invasive species, particularly plants.	conclusions are consistent with data collected and analyses.		
141	Christopher Martin, Biologist	Wildlife (Terrestrial and/or Aquatic, including Species at Risk) Vegetation		Appendix O.	There is no consistent point of reference for advantages and disadvantages – some comparisons are made relative to an undisturbed environment while other comparisons are made relative to other alternatives. This makes interpretation of advantages and disadvantages extremely difficult.	Clear, accurate documentation is required for correct understanding of the project	Use the undisturbed environment as a consistent point of reference for comparing advantages and disadvantages of alternatives. „No effect“, “maintaining protection of aquatic life standards”, etc. should not be considered an advantage or disadvantage to the environment. Minimizing, mitigating or downplaying negative environmental impacts [e.g. “all habitats that would be displaced are extensive and commonplace within the NLSA”, “no (or very minor) displacement of wetlands”, etc.] should not be listed as advantages relative to an undisturbed environment.	
142	Kevin Brown	Hazards– reference to flooding throughout the report			Dams are classified under the Hazard classification system in the CDA and or Ontario Dam Safety Guidelines. This classification would determine which “flood” event” they would be designing to. A little premature at this time to state that they are designing to a 100 yr flood event.	Clear, accurate documentation is required for correct understanding of the project	Design limits/flood limits would be determined in accordance with the hazard classification	
143	P.Cooze:forester	General-Logistics		Wood harvest on Crown Land.	Some overlap with the planned allocation (both harvest and contingency blocks) associated with the 2012-2017 Phase 2 Operational plan for the 2007/2017 FMP for the Crossroute Forest. One planned harvest block overlaps with the preferred transmission line route. Two contingency blocks also overlap: one with	Any harvest of wood on Crown land will require a Licence. Some private parcels may have trees reserved to the Crown. Most likely it is the pine which will be reserved.	Information on forest resource licensing is provided as a separate attachment	.

					and suitable forest types are key to use of winter concentration areas. Suitable forest cover takes decades to develop.			
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MEMORANDUM

September 6, 2013

To: Sasha McLeod, Project Officer
Environmental Assessment Services - Project Coordination Section
Environmental Approvals Branch

From: Dale Gable, P.Eng.
Senior Review Engineer – Team 1
Approval Services Section
Environmental Approvals Branch

Re: Review of the Draft Environmental Assessment Report – Rainy River
Gold Project – Rainy River Resources Ltd.
EA File No. EA 05-09-02

I have reviewed the document entitled "Rainy River Gold Project – Township of Chapple, Ontario – Draft Environmental Assessment Report (Environmental Impact Statement)" prepared for Rainy River Resources Ltd. (RRRL) by AMEC. The report is dated July 2013. Based on my review of the document, I am providing the following summary and comments in response to your request to the Environmental Approval Branch's (EAB) – Approval Services Section to provide comments on the Draft Environmental Assessment (EA) from a waste approval perspective.

Background

RRRL has been exploring the property since 2005. The property consists of approximately 232 land parcels. Based on their investigations, RRRL has decided to proceed with the development of the mining operation at the property.

RRRL entered into a voluntary agreement with the Ministry of the Environment (ministry) to a conduct a Provincial Environmental Assessment that will meet the requirements of the Environmental Assessment Act (EAA). The Terms of Reference (ToR) for the project was approved by the Minister of the Environment (Minister) on May 15, 2013.

Waste Component Overview

RRRL included waste management as a component of the EA. RRRL identified the following options for managing waste generated at the site. RRRL did not consider any waste generated in the decommissioning of the Site for their evaluation:

- i. Develop an on-site waste disposal site; or
- ii. Transport waste to the Township of Chapple landfill.

RRRL preferred waste management option is to transport waste generated from the site's operations to the Township of Chapple's landfill. As indicated in the EA, the Township's landfill currently does not have the capacity to accommodate the waste generated from the Site. RRRL indicated that they intend to financially assist the Township with an Environmental Assessment to expand the landfill site.

Comments on the Draft Environmental Assessment - Evaluation for Environmental Compliance Approval issued the Environmental Protection Act

I have reviewed Volume 2 of the document and I am providing the following comments from an Environmental Compliance Approval – waste component perspective.

1. RRRL has identified the preferred option for managing waste at the Site is to transport waste off-site for final disposal. There are no EA requirements for the transportation of waste. However, the preferred option assumes that the Township will be granted EA approval for an expansion to its landfill. The Township has yet to undertake the EA process for an expansion and there is no guarantee that they will be granted EA approval. Therefore, it is premature to identify this option as the preferred option or a viable option at this time.
2. In the event, the Township is not granted approval for an expansion and RRRL determines that an on-site waste disposal site is required, then RRRL must follow the EA process as required by Ontario Regulation 101/07 (Waste Management Project) made under the Environmental Assessment Act
3. In Section 4.0 of the draft EA, RRRL indicates that demolition waste was not considered in the waste management assessment. It was indicated that the waste will be stored/placed in a dedicated demolition waste landfill on-site. It is unclear why RRRL considers this type of waste and assessment requirements different and why it does not need to fully assess the impacts. Landfill requirements for construction and demolition waste are no different than domestic waste. Therefore, the assessment for waste management for the project is considered incomplete as the proposed on-site landfill is subject to Ontario Regulation 101/07.
4. As the preferred option for waste management at the site was off-site disposal, the information contained in the EA does not adequately address the technical or environmental impact considerations that are needed for a waste disposal site to be located on-site. From this perspective, the assessment is deemed to be incomplete.
5. In the event RRRL re-assesses the need for an on-site waste disposal site for domestic waste or for the proposed on-site waste disposal site for demolition waste then they will need to address the incomplete/absent assessments to be considered

in the waste management project EA. The type of assessment to consider are identified in the document entitled "Landfill Standards: A Guideline to the Regulatory and Approval Requirements for New and Expanding Landfills (MOE June 2010)", specifically Section 6. These assessments include the following:

- i. Hydrogeological Assessment;
 - ii. Leachate Assessment;
 - iii. Landfill Gas Assessment;
 - iv. Landfill Capacity Assessment;
 - v. Geotechnical Assessment;
 - vi. Noise Assessment;
 - vii. Contaminated Life Expectancy; and
 - viii. Contingency Plans
6. For the proposed on-site landfill site(s), RRRL did not provide sufficient detail on the conceptual design or the closure details of the site. RRRL will have to assess the capacity of the site and the site design (design concept, location, base footprint, slopes etc.) This information has not been provided in the EA. For the closure plan, it was indicated that a 1.0 m of cover and vegetation cover would be applied. RRRL should provide details on the regulatory requirements, design considerations (slope, stormwater management and vegetation considerations) and post-closure activities (i.e. environmental monitoring, inspection and maintenance). These items need to be discussed in the EA.
7. The draft EA indicates that RRRL would temporary store hazardous waste generated on the Site until it can be transported to a licensed facility. The storage facilities should meet the requirements of the Ministry's "Guidelines for Environmental Protection Measures at Chemical and Waste Storage Facilities" dated 2007.
8. It was indicated that that petroleum - hydrocarbon contaminated soils would be treated at the Site. The report should clarify where these soils are being generated. This operation is considered waste processing and as a result on-site treatment process required an EPA approval.

General Comments

1. RRRL should be made aware that any final disposal of waste through landfilling at the Site not exempted by Regulation 347 must be placed in the area approved by an Environmental Compliance Approval related to waste management. If the approval does not specifically approve solid non-hazardous waste, then the waste cannot be placed in that area.

Summary

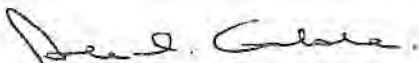
In general, the preferred option for managing the operations waste is premature as it requires a third party to obtain EAA and EPA approval which there is no guarantee of obtaining. It is recommended that alternative sites approved to accept their waste need to be identified. The alternative sites may have impact on the traffic assessment for the Site and may need to be amended.

With regards to on-site waste disposal for both operation waste and demolition waste, RRRL has not provided the information required for an Environment Assessment for a waste

management site. The information provided is grossly incomplete and considered insufficient to assess the environmental impacts for an on-site waste disposal site at the facility. RRRL will have to assess whether or not they need a landfill at the facility. In the event, RRRL determines that they need an on-site waste disposal site then they must follow Ontario Regulation 101/07. Construction and demolition waste will need to be considered in the waste management assessment as is not exempted from the process.

As a result the information provided in the document at this time is considered incomplete and an assessment on the Environmental Protection Act approval related to waste cannot sufficiently be made at this time. As a result, RRRL will need to provide additional information and scope of any investigation(s) for the option of an on-site landfill to be assessed.

Until RRRL has provided information on the landfill to determine the EA implications with regards to the on-site landfill or determination/decision that one is not required, the EA should be considered incomplete.



Dale Gable, P.Eng.
Senior Review Engineer – Team 1
Approval Services Section
Environmental Approvals Branch

Comments on the Air Dispersion Modelling Aspects of the Rainy River Draft Environmental Assessment Report (version 2, dated July 2013)

The dispersion modelling information in the Rainy River Air Quality Modelling Report - Appendix Q Air Quality Modelling Report (Report) which was posted for public comment from July 19, 2013 to August 19, 2013 and the electronic input and output files posted on the proponent's ftp site (<ftp://RRGPFedGov:AMEC12@amftp.amec.com>) on August 12, 2013 were assessed in this review.

The dispersion modelling information in the Report which was considered in this review included:

- 1) Table A3 which included an emission source summary for particulate matter (PM), PM less than 10 microns in diameter (PM10), PM less than 2.5 microns in diameter (PM2.5), oxides of nitrogen (NO_x), carbon monoxide (CO), sulphur dioxide (SO₂), hydrogen cyanide (HCN), copper (II) sulphate (CuSO₄) and calcium oxide (CaO);
- 2) Table A7 which listed the AERMOD dispersion modelling source parameters for the grouped sources included in the model runs;
- 3) Table 13 which included the total facility emissions and the modelled concentrations for PM, PM_{2.5}, NO_x, CO, SO₂, HCN, CaO, CuSO₄, arsenic (As), cadmium (Cd), chromium (Cr), mercury (Hg), magnesium (Mg), manganese (Mn), nickel (Ni), lead (Pb) and zinc (Zn). A footnote in this table described the particulate modelling as "process plant emissions modelled as 1 g/s with all particulate assumed to be compound and scaled by emission rate"; and
- 4) Pages 6 and 16 which included a brief description of the modelling.

The electronic files provided for the modelling assessment included:

- 1) Folders of modelling results for PM, NO_x, CO, SO₂, HCN and the Mill. Note the Mill model files had zero emissions for all sources except for a single source the Mill (PLANT) which was assigned a unitized emission rate of 1 g/s; and
- 2) The other folders included the terrain data and the meteorological input files.

The following are our comments on the above modelling information:

- 1) The model input and out files listed AERMOD version 12345 as the version used in the assessment. Since version 12345 is not the currently approved version of AERMOD in Reg. 419 the proponent will need to submit a section 7 application prior to submitting the application for an Environment Compliance Approval (ECA) and as long as no non-default options were used, the application could be approved;
- 2) The model runs did not use either the LOWWIND1 or the LOWWIND2 beta options in version 12345 however for the PM and Mill model runs particle deposition option was used which turns on plume depletion option since the

- options for no plume depletion (i.e. NODRYDPLT and NOWETDPLT) were not invoked. The use of the plume depletion option results in lower (and non-conservative) predicted air point of impingement concentrations. For an ECA approval, MOE's concurrence would be required to allow the use of the plume depletion option, and without this concurrence the subsequent model runs to obtain an ECA would result in higher concentrations for particulate species;
- 3) Table A3 included source emissions for PM10 and PM2.5 while the model results in Table 13 did not include PM10 and the electronic modelling files were not posted for either PM10 or PM2.5;
 - 4) The source characteristics for point, area and volume sources included in the electronic files matched the data in Table A7, with the exception of the length and width of the pit which has not been included in Table A7;
 - 5) Model files were not provided for any of the metals and it was unclear what the footnote in Table 13 meant e.g. did it mean that the results of the unit emission (1 g/s) model run for the Mill (PLANT) source were multiplied by the facility emission rates to produce modelled concentrations? The Mill model output file gave a 24 hour average emission factor of 8.96 ($\mu\text{g}/\text{m}^3$) per (g/s) which for the CaO and CuSO₄ facility emission rates results in the modelled concentrations in Table 13. However for the metals, multiplying the emission rates by the emission factor of 8.96 resulted in much higher concentrations than those given in Table 13. If a different model file was used to model the metals the file should be provided.
 - 6) The Report did not include any information on the source of data used for the particle size distributions and densities of the particulate species. Furthermore, the size distribution used for the Mill resulted in most of the mass being centred at 30 μm , which must be justified; and
 - 7) When the emissions by source included in Table A3 were compared with the data in the electronic model input files, the following was noted:
 - a. The PM total emissions in the electronic model input files were approximately 10% lower than the information in Table A3, and
 - b. The electronic model input files did not include NO_x, SO₂ and CO emissions for one of the PORT1 or PORT2 emission sources; however Table A3 listed emissions from all of the above contaminants. These sources did not appear to be significant, and thus these omissions would not have significantly affected the overall conclusions.

Dr. Robert Bloxam and Dr. Jinliang (John) Liu
EMRB
September 7, 2013

Reference #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS or ToR	Summary of Comment	Rationale	Proposed Action	EA or Regulatory
MOE-GW-1	MOE Groundwater Specialist	Groundwater		Appendix S— Page 15	<p>The hydrogeological model neglected major surface features that will affect groundwater onsite, including the tailings management area (TMA) and the east mine rock stockpile. Their exclusion in modeling is not considered conservative and has the potential to impact the site water balance.</p> <p>The report states that these features will increase the recharge to the groundwater onsite and not including them in the model is conservative and will tend to slightly overpredict the size of the drawdown cone towards these features. A similar effect is expected due to the increased recharge, explained on Page 17 of Appendix S, caused by the lowering of the water table that will allow recharge where artesian conditions did not allow recharge previously.</p> <p>It is the reviewer's opinion that these operational features may increase the seepage of water into the open pit relative to what has been modeled. The report should evaluate how these features would alter flow rates for the pit de-watering and how these increased rates would affect the zone of influence (ZOI) and the total volume of water discharging from the de-watering wells.</p>	<p>Although it is agreed that these features will act to increase recharge, they also have the potential to increase local water levels and the magnitude of seepage to the pit. The impact of this additional seepage needs to be fully evaluated, particularly since the receiver of the pit dewatering efforts is volume sensitive. This revision to the modeling would enhance the accuracy in seepage rate prediction and the potential for dewatering effects on the Pinewood River.</p> <p>The issue of omitting these features was raised in a memo sent to the MOE Senior Environmental Officer by Alisdair Brown, MOE Regional Hydrogeologist on January 2, 2013, regarding Groundwater Modeling Assumptions. At the time, the Consultant's justification for not including these features in the model was that their final geometries were not known at the time. It is the opinion of the reviewer that estimated geometries and timelines for construction would still provide valuable and necessary information to the model.</p>	These features should be added to the hydrogeological model to ensure accurate model results or the omission of these features needs to be more thoroughly justified from a hydrogeological perspective in the EA.	EA
MOE-GW-2	MOE Groundwater Specialist	Groundwater		Page 4-11 and Appendix S— Page 15	<p>The hydrogeological model does not address the potential to induce consolidation due to dewatering; or settlement in the thick clay layers onsite due to the loading associated with surface features such as the TMA and the east mine rock stockpile. While this subject is mentioned in Section 4, a full description of the expected behavior of the thick clay layers when subject to loading and the potential consequences does not appear to be present.</p> <p>Settlement of the clay layers could result in significant changes to local drainage, which could affect the stability of these features or cause local flooding. Flooding could result in mercury release and methylation.</p>	When exposed to significant loading or de-watering, clay units tend to compress and consolidate. The significant dewatering and surface loadings will likely cause consolidation in the underlying clay layers, affecting the local physiography. Significant subsidence of the ground surface could impact structural stability of surface features and/or induce localized flooding, either of which would have associated environmental impacts.	The potential for such consolidation should be considered, with likely environmental or structural impacts and mitigation and contingency options discussed in the EA.	EA
MOE-GW-3	MOE Groundwater Specialist	Groundwater		Page 5-75	Based on the results of the hydrogeological model, it was stated by the Consultant that a volume of seepage from the TMA and the mine rock	The impacts of the seepage from mine rock stockpiles and the TMA need to be more thoroughly assessed with an	The expected attenuation of contaminants within the subsurface and the loading to the river due to	EA

					<p>stockpiles will not be captured by the seepage collection ditches surrounding these features. It is expected that this seepage will discharge to the Pinewood River after a period of time. While the water quality of these seepages is estimated in Appendix T, the expected contaminant attenuation within the subsurface and the contaminant loading to the river are not present. This information is required to assess the impact that groundwater discharge will have on the Pinewood River.</p>	<p>estimate of the expected contaminant loadings. Since it is estimated (Appendix T) that the concentrations of almost all contaminants of concern within some seepage water will be in exceedance of PWQO criteria, it is requested that the impact of these high levels of contamination be estimated and discussed within the EA.</p>	<p>groundwater discharge should be quantified with potential impacts discussed in the EA.</p> <p>It would be beneficial to incorporate these contaminant loadings into the hydrogeological model since justification of the results may be required during the permitting stage to better understand the quality and quantity of seepage and potential impact to receptors.</p> <p>Due to the extremely low assimilative capacity of the receiver, it may be necessary to show that discharging water is in compliance with PWQO.</p>	
MOE-GW-4	MOE Groundwater Specialist	Groundwater		Appendix S— Figure 3-2	<p>The hydrogeological model domain needs to be extended to reduce potential boundary effects. Significant changes in head are observed at the bottom boundary of the model domain (Appendix S, Figure 3-2) and it is believed that these changes could introduce inconsistencies in the simulated results. An extension of the model domain, or justification as to why it is not necessary, is needed.</p> <p>The simulated changes in head could be sensitive to the relationship between horizontal and vertical permeability utilized in the model, with sensitivity likely increasing with depth. This ratio was not found in the draft EA. This ratio and the sensitivity of the model to this ratio are important in understanding the interactions and interpreting results and need to be included in the final EA.</p> <p>The elevated errors in predicted head values observed with depth could be attributed to the issues noted above.</p>	<p>It is the reviewer's opinion that the hydrogeological model domain should be of sufficient size as to observe no changes in head at the bottom boundary. Significant changes at this boundary could unrealistically alter the simulated results, introducing errors. The potential effects of these significant changes in head should be discussed and, if increasing the size of the model domain is not required, further justification must be provided.</p> <p>Field measured bulk permeabilities are typically representative of horizontal permeabilities, while vertical permeabilities are generally defined as a ratio between horizontal and vertical permeabilities. This ratio influences the simulated drawdown cone and changes in head with depth. An understanding of this relationship, how this relationship was determined in the EA, and the sensitivity of the model to this relationship are needed to interpret the simulated results. This information is requested for the final EA.</p> <p>Potential evidence of discrepancies in the model with depth is present in the relationship between the computed and observed groundwater levels summarized in Figure 2-3 of Appendix S (both A and B), where the deepest layer analyzed, layer 6, shows the most inconsistent results.</p>	<p>For the final EA, the size of the model domain should be increased to a size which yields no changes in head at the bottom boundary or the size of the model domain must be more thoroughly justified with respect to model accuracy.</p> <p>The relationship between vertical and horizontal permeability and an analysis of the sensitivity of the hydrogeological model to this relationship should be provided and justified in the EA.</p>	EA
MOE-GW-5	MOE Groundwater	Groundwater		Page 6-100	<p>The preferred alternative for closure of the open pit involves flooding of the pit. Since pre-development</p>	<p>Existing ground water levels at the mine site are above the ground surface.</p>	<p>The magnitude and impacts of the contaminant loading expected from</p>	EA


	Specialist				local water levels are above the ground surface, it is expected that the pit will eventually fill completely and a floodway will be constructed to permit discharge directly to the Pinewood River. While the expected water quality of the flooded pit is estimated in Appendix T, the expected contaminant loading to the river does not appear to be estimated. Since some contaminant concentrations within the pit lake are expected to be in exceedance of PWQO criteria, an estimation of the loading is needed to help assess the impact to the receiver.	Therefore, once flooded, the pit lake will be discharged via a floodway to the Pinewood River. The elevated levels of some contaminants expected in this discharging water will impact the river due to the low flow within the river. An estimation of the contaminant loading to the river from the pit lake and a discussion of potential long term impacts to the water body are required.	the pit lake discharge to the Pinewood River should be discussed in the EA. Due to the extremely low assimilative capacity of the receiver, it may be necessary to show that discharging water is in compliance with PWQO.	
MOE-GW-6	MOE Groundwater Specialist	Groundwater		Page 6-100	The post-closure rising of the local water table could result in the partial saturation of mine rock stockpiles. Partial saturation of the stockpiles could result in acid rock drainage (ARD) generation if potentially acid generating (PAG) rocks are subjected to fluctuations in water levels. This concept was not discussed in the draft EA and should be considered in the final EA.	The elevated water level associated with the flooding of the pit will likely act to raise the water table in large surface features such as the mine rock stockpiles. If the water table were to fluctuate within a stockpile containing PAG rocks, the conditions for potential ARD or metal leaching could develop. A discussion of the potential for such an impact and the related consequences is needed.	The environmental impacts of increasing local groundwater levels within large surface features should be discussed in the EA with consideration to the conditions for ARD. It may be beneficial to include these large surface features in the hydrogeological model to assess the profile of the water table within them.	EA
MOE-GW-7	MOE Groundwater Specialist	Groundwater		Page 7-43 and Appendix S— Figure 5-1	A monitoring program for water levels, water quality, flow discharges, and receiving water aquatic life and habitat maintenance is discussed in the draft EA. While the program appears to be sufficient, further consideration of the program will be made during the permitting stage.	A more thorough description of the monitoring program will be required for the permitting stage. For example, trigger criteria will need to be defined for contaminants of concern and an extended (long term) monitoring program should be developed.	No immediate action required for the EA.	
MOE-GW-8	MOE Groundwater Specialist	Groundwater		Page 11-1	While this did not impact my review, just note that Tables 7-39 and 7-40 are referenced at the end of section 11.1 where I believe Tables 7-47 and 7-48 are the tables of interest.		Correct for the final EA.	EA
MOE-GW-9	MOE Groundwater Specialist	Groundwater		Page 6-24	The preferred alternative for the management of non-hazardous solid waste is the use and expansion of the existing Township of Chapple landfill. However, there are 2 active landfills (Shenston and Richardson) in the Township of Chapple and the draft EA does not specify which landfill will be used. While there appears to be no groundwater issues on or offsite related to either of these landfills that the Ministry of the Environment (MOE) is aware of, expansion of a landfill requires an application for a new environmental compliance approval (ECA). The final EA should clarify that the Township is aware of the process and that it can be completed in the time frame required by the RRGP. A contingency plan should be developed in the event that the Township of Chapple landfill cannot be appropriately expanded.	The expansion of a landfill in Ontario requires the approval of an ECA by the MOE. The final EA needs to confirm that non-hazardous waste from the RRGP can be adequately handled within the timeframe necessary. A contingency plan would ensure that this waste could be appropriately handled if expansion of the Township of Chapple landfill is not a viable option.	In the final EA, provide the details of the specific landfill to be used for non-hazardous waste management and confirm that the Township of Chapple is aware of the expansion process. Clarify that approval for expansion can reasonably be attained within the timeframe required by the RRGP. Provide a contingency plan in the final EA for the handling of non-hazardous solid waste. I recommend including an assessment of the potential to utilize other municipal landfill sites, including the Township of Emo and the Township of La Vallee landfills, and a combination of local disposal sites.	EA
MOE-GW-10	MOE Groundwater	Groundwater		Appendix H	The draft EA did not include a thorough baseline study regarding the water quality and	It would be prudent for the proponent to have a record of the pre-	Conduct a baseline study of the water quality and quantity of the	EA

	Specialist				<p>quantity of the domestic use wells within or surrounding the expected ZOI. However, the proponent did mention verbally that such a study would be conducted prior to mine development. This communication took place during a site visit with MOE staff (Alisdair Brown, Drew Stajkowski, and Simon Haslam) and a representative of the proponent (Mark Vancook).</p> <p>This baseline study is necessary to assess the background conditions of the domestic use wells in the project area as a record for comparison in the event of any well issues that may arise during the life of the project.</p>	<p>development conditions of surrounding domestic use wells to assess the validity of potential complaints and to quantify any changes that may be observed. If degraded water quality and/or quantity complaints are issued during the life of the project, it could be difficult to show that the RRGP was not at fault without the information from such a baseline study.</p>	<p>domestic use wells within and surrounding the ZOI to establish pre-development conditions.</p> <p>It will be the responsibility of the proponent to remediate any water quality or quantity issues associated with domestic use wells that can be attributed to the project.</p>	
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MTCS (Northern Policy and Planning Unit - tourism) Comments on Rainy River Gold Project Draft EA Report – September 6, 2013

Reference #	Reviewer Name and Position	Ecosystem Topic	Reference to EIS Guidelines or ToR	Reference to EIS or ToR	Summary of Comment	Rationale	Proposed Action	EA or Regulatory
Assign Comment Reference Number (Department/Ministry and number e.g. CEAA-1 or MNR-1)		Aboriginal (including potential rights impacts, traditional use of lands and resources) Accidents & Malfunctions Acoustic Environment (including Noise and Vibration) Atmospheric Environment (including Air Quality) Cumulative Effects Decommissioning and Reclamation Effects of the Environment on the Project (incl. Climate Change) Fish and Fish Habitat Fishery General - Concern General - EA Type General - Consultation General - Logistics General - Project Risks Geology Groundwater (including water quality and quantity) Human Health Hydrology Monitoring Natural Hazards Navigable Waters Physical and Cultural Heritage (including Archaeology) Socio-Economic Environment Surface Water (including water quality and quantity) Terrain and Soils Transportation Vegetation Visual Impacts Wastewater/Effluent Wildlife (Terrestrial and/or Aquatic, including Species at Risk)	Provide the specific section(s) and page number(s) from the EIS Guidelines or ToR related to the comment	Provide the specific volume(s), section(s) and page number(s) from the EIS of the information being referenced	Provide an explanation of the issue of concern	Describe the rationale for why issue of concern is important for environmental assessment purposes.	Describe any action recommended	Pick EA, Regulatory Instrument or Both. Please state which regulatory instrument you are referring to.
MTCS -1 (Tourism)	Jim Antler	Socio-Economic Environment		Vol. 2, Section 5.12.2.4 (page 5-148)	References that four Bear Management Areas (BMA) overlap the Human Environment Local Study Area (HLSA).	Did not find information about how potential loss of access for hunting area would be addressed for the tourism operators holding the areas.	Further discussions with the Ministry of Natural Resources and the operators in question to address any potential impacts (if not already occurred).	EA
MTCS -2 (Tourism)	Jim Antler	Socio-Economic Environment		Vol. 2, Section 5.13.3.3 (page 5-153) and	Report presents tourism data for 2009 for the Rainy River District	Our Ministry has data available for 2010.	The attached document provides tourism data for the Rainy River District from 2006-2010.	EA

MTCS (Northern Policy and Planning Unit - tourism) Comments on Rainy River Gold Project Draft EA Report – September 6, 2013

				Vol. 3, Appendix L (pages 22-23)			 Click	
MTCS -3 (Tourism)	Jim Antler	Socio-Economic Environment		Vol. 2, Section 7.2.2 (page 7-9) and Section 7.18.5 (pages 7-116 to 7-118)	Selected Valued Socio-economic Components (VSEC) does not include one for tourism.	It is recognized that no tourism facilities are located within the HLSA. Section 7.18.5 relating to the VSEC for “hunting” does not reference the commercial BMA areas that are identified in Section 5.12.2.4 (Outdoor Recreation)	While no specific “tourism” VSEC may be necessary, the section dealing with assessing effects for the hunting VSEC should at least acknowledge the existence of BMAs in the HLSA.	EA
MTCS -4 (Tourism)	Jim Antler	Surface Water		Vol. 2, Section 6.11.1 (page 6-64) and Section 8.2.1 (page 8-3)	Reference to Burditt (Clearwater) and Off Lakes as possible contingency water sources for start-up operations.	We understand that there are tourism facilities on both lakes. The operators of those facilities may have concerns with any draw down of the water levels on these lakes. We acknowledge that at least one operator on Off Lake has been consulted with according to the draft EA report (Gateway North Outfitters). Another (Ross’ Camp) attended a meeting on December 10, 2012 to discuss accommodation of workers. However, other operators on the lake are not referenced.	If not already done, the proponent could provide targeted information to the tourism businesses on Off and Burditt Lakes regarding the use of the two lakes as proposed contingency water sources in order to seek comments. Tourism facilities to be contacted include True North Outposts and Cabins, Hideaway Lodge, Little Moose Lodge, Ross’ Camp and Trails End Lodge.	EA

From: McLeod, Sasha (ENE) [<mailto:Sasha.McLeod@ontario.ca>]
Sent: Tuesday, September 10, 2013 4:26 PM
To: kstanfield@rainyriverresources.com; Daniel, Sheila E
Cc: Davis, Stephanie (CEAA); Liu, Amy (CEAA); Aitken, Jill (CEAA)
Subject: More provincial comments - MOE Aboriginal

Good afternoon,

Please see comments from MOE's Aboriginal Affairs Branch on the draft EA. I've updated the tracking list below.

Sasha

Comments already provided (as of Sept 10/13):

- MEDTE
- MNDM closure plan, land tenure and Aboriginal
- MNDM mine rehabilitation
- MNDM socio-economic
- MOE air quality
- MOE air quality
- MOE surface water
- MOE wastewater
- MTCS cultural heritage
- MTO
- OMAFRA
- MOE noise
- MOE groundwater
- MOE waste
- MOE air modelling
- MOE EAS
- Ministry of Energy
- MNR
- MTCS tourism
- [MOE Aboriginal](#)

In future I expect to provide you with comments from:

- [MOE air quality](#)

From: Tyance, Joseph (ENE)
Sent: September 10, 2013 3:41 PM
To: McLeod, Sasha (ENE)
Subject: RRR

Hi Sasha,

Let me first state that the Aboriginal Consultation Record (repetitive notations) is so disjointed and very challenging to find actual issues raised by the Aboriginal groups. I am impressed that RRGP logged meetings, emails, and some information in the appendices (D1-1400). Those records on a global basis do reference relevant meetings, public advertisements, presentations, emails etc. but nothing in away of identifying whether or not actual issues were raised by First Nations or Metis groups. I am assuming that the advanced copy (Draft EA May, 17, 2013) that was provided to the 14 Aboriginal groups was meant to facilitate whether or not any of these Aboriginal groups had concerns and issues (maybe that is why I didn't see any issues and concerns). Throughout this EA process, it is assumed that certain presentations were offered as to solicit feed back from various Aboriginal groups but what is lacking (the appendices) is whether or not actual issues were raised by them, and for that matter, recorded or foot-noted. Further, we have been alerted that the Independent Technical Review was funded by RRGP and is therefore forthcoming at the end of this EA process. I am also assuming once submitted, the MOE will be made aware of any discrepancies or issues at that time. An ideal world, it would have more convenient/appropriate to be aware of those actual issues or concerns before, instead after.

Similarly, I also understand that some First Nations were granted funds to undertake Aboriginal Traditional Knowledge gathering, and I am not entirely confident that this was referentially incorporated to any of the baseline studies. In regards to this specific undertaking, I would love to have seen reference note somewhere in the appendices or in the main body to demonstrate that RRGP did hire several EA monitors during their field study exercises. This would have demonstrated that issues/concerns were potentially addressed through a phased approach. In other cases, while RRGP undertook initiatives to interview Aboriginal groups on the matter related to socio-economic analysis, it becomes challenging to determine whether or not this material made its way through the report or whether or not issues were raised by various Aboriginal groups.

In sum, I guess most of the current issues and concerns were actually related to perceived benefits like employment and training and not to mention the signed IBA. Other concerns were referenced like fish and wildlife, environment management, water resources, and traditional culture and land use. Again, it was challenging to cross reference from the appendices, or whether or not these were addressed in the main report.

My major concern is related to the organization of the Aboriginal Consultation Record (disjointed). I will have a more fulsome comment once the outstanding issues and concerns have been addressed in the final EA report.

Joe Tyance
Senior Advisor, Aboriginal Affairs Branch
Ministry of Environment, Northern Region
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Email: Joseph.Tyance@ontario.ca

Stakeholder: Fisheries and Oceans Canada
Point of Contact: Sara Eddy c/o Julie Dahl, Manager, Regulatory Review
Comments received: July 31, 2013
Comments regarding: Fish Habitat Offset Strategy and Fish Habitat No Net Loss Plan MMER Schedule 2 Waterbodies

#	COMMENT (abbreviated)	RRR RESPONSE
General Comments		
1	<p>The discussion and figures in both documents identify Clark Creek as being overprinted by mine infrastructure and requiring scheduling under the Metal Mining Effluent Regulations (MMER). Please be advised that the proposed on-line dam/pond construction and subsequent relocation/diversion of Clark Creek to a nearby tributary of the Gallinger Creek system will be subject to authorization under subsection 35(2) of the <i>Fisheries Act</i>. The proposed dewatering of Marr Creek downstream the Tailings Impoundment Area will also be subject to authorization under subsection 35(2) of the <i>Fisheries Act</i>. Both the Offsetting Strategy and No Net Loss Plan reports will need to be adjusted accordingly.</p>	<p>The proponent appreciates the Fisheries and Oceans Canada (DFO) clarification that the proposed online dam construction and subsequent relocation/diversion of Clark Creek to a nearby tributary (Gallinger Creek) as well as the proposed dewatering of Marr Creek downstream of the Tailings Management Area (TMA) will be subject to authorization under subsection 35(2) of the <i>Fisheries Act</i>. Our understanding of this clarification, as expressed in email correspondence (Ruthven : Eddy August 23, 2013) and telephone conversations (Simms : Eddy August 28, 2013) is that the abandoned remnant sections of Clark Creek that will ultimately be overprinted by the West Mine Rock and East Mine Rock stockpiles respectively, would no longer be considered natural waters frequented by fish and as such would not require listing on Schedule 2 of the Metal Mining Effluent Regulation (MMER) prior to use as mine rock stockpiles. We further understand that a channel abandonment plan to salvage remaining fish to the extent possible from the remnant channel sections may be required as a condition of the Section 35 Authorization.</p> <p>Also clarified in our correspondence, is that Marr Creek is being overprinted by tailings / mine rock, without being diverted, and would therefore require Schedule 2 listing.</p> <p>Mapping and habitat accounting will be adjusted within the Offset Strategy document as well as in No Net Loss Plan (NNLP) reports (both MMER Schedule 2 waterbodies and Section 35 NNLP reports) to reflect this clarification</p>

#	COMMENT (abbreviated)	RRR RESPONSE
Draft Fish Habitat Offset Strategy		
2	4.0 Offset Strategy- note that the serious harm provisions of the amended <i>Fisheries Act</i> have not yet come into force	Comment is acknowledged and the Offset Strategy document will be revised to reflect the provision's status (as in force or not) at the time of next revision.
3	4.0 Offset Strategy- note that offset requirements for the infill in fish habitat from the construction of containment dams/berms for mine infrastructure components are subject to subsection 35(2) of the <i>Fisheries Act</i> ; the Authorization for these impacts related to the Tailings Impoundment Area (TIA) containment berm(s) will only be issued following listing of the associated waterbodies under Schedule 2 of the MMER.	Agreed. The Section 35 NNLP will clearly specify that the authorization for the construction of the portions of the containment berms that overlay natural waters frequented by fish, and are related to the TMA, will not be received until after the listing of the associated waterbodies under Schedule 2. It would be proposed that any other Section 35 Authorizations not associated with containment of mine waste (i.e. West Creek, Clark Creek) could be Authorized immediately after completion of the environmental assessment.
4	4.0 Offset Strategy- regarding the alternative approach to offsetting, DFO will need to see a scientifically defensible approach and quantifiable link to compensating for impacts to the fish communities affected by this project. More detail and discussion is required.	As part of the <i>Rainy River Gold Project Fish Habitat No Net Loss Plan Fisheries Act Section 35 Authorizations</i> report (currently under preparation) quantification of habitat loss using the same methodology, as presented and generally accepted by DFO, in the <i>Rainy River Gold Project Fish Habitat No Net Loss Plan MMER Schedule 2 Amendment Waterbodies</i> will be included. Through further discussion with DFO a defensible approach to offsetting using alternative approaches will be further developed for acceptance.
Fish Habitat No Net Loss Plan MMER Schedule 2 Amendment Waterbodies -Draft		
5	1.0 Introduction- note that the new serious harm provisions of the <i>Fisheries Act</i> have not yet come into force.	Comment is acknowledged and the Offset Strategy document will be revised to reflect the provision's status (as in force or not) at the time of next revision.
6	2.0 Overview of Approach to No Net Loss Planning- it is stated that not all losses will be immediate and that offset works are likely to be completed throughout the life of the mine and possibly through closure. Given that an approved habitat compensation plan must be in place prior to initiating deposits to a tailings impoundment area, please describe the timing of construction for the proposed off-setting measures in relation to project phasing.	We agree that in the case of the Schedule 2 NNLP that the compensation plan must be in place prior to the depositing of tailings in waters frequented by fish. A Project schedule and timing of compensation works will be provided in a subsequent draft of the Schedule 2 Waterbodies NNLP.

#	COMMENT (abbreviated)	RRR RESPONSE
7	3.4 Habitat Suitability- please provide a clear rationale for why Lake Sturgeon has not been considered further.	<p>Traditional, historical and recent information was unable to substantiate modern occurrence of Lake Sturgeon within the Pinewood River and its tributaries. Fish community presence / absence records therefore did not include this species and as such it was not included within modelling exercises. Although Lake Sturgeon are opportunistic as a species with respect to habitat to fulfill life history criteria, the Pinewood River was still considered as having a very low value with respect to Lake Sturgeon habitat (i.e. low gradient, generally shallow depth, lack of optimal spawning substrates etc.).</p> <p>Records of capture were obtained during spring of 2013 by both AMEC and the Ministry of Natural Resources (MNR). One specimen was captured by AMEC in the downstream section of the Pinewood River close to its confluence with the Rainy River. Records regarding the capture of Lake Sturgeon by the MNR have not been received in detail, but two specimens were captured during the spring somewhat upstream of the location of the AMEC capture. As such the Project team will continue to work with MNR to better define the upstream extent of sturgeon but based on the Catch per Unit Effort (CPUE) abundance of the species is considered quite low and their presence is not expected to extend to the immediate Project site.</p> <p>Overprinting of watercourses by Project components will only include a limited number of upper tributaries of the Pinewood River (not the Pinewood river itself) as presented in the NNLP document. As such impacts to Lake Sturgeon at the far downstream sections of the Pinewood River are expected to be minimal and restricted to a minor decrease in flow (less than 5% at Water Survey of Canada Station 05PC023) based on subwatershed diversion/impoundment and supplementation scenarios</p> <p>In light of the new records of capture (spring of 2013) and as suggested by the MNR, Lake Sturgeon has been added to fish community species lists in subsequent documentation.</p>

#	COMMENT (abbreviated)	RRR RESPONSE
8	6.0 Measures to Mitigate Impacts to Fish Habitat during Implementation of the Plan- mitigation measures regarding intakes/outfalls, fish screens and fish salvage should be included.	Further mitigation measures specific to intakes / outfalls, fish screens and fish salvage will be included in the next revision of this document.
9	7.0 Measures Taken to Monitor the Implementation of the Plan - last paragraph should note that the monitoring will be to ensure constructed habitat is consistent with the proposed plan and scheduling under MMER; please note that for waterbodies subject to MMER, subsection 35(2) Fisheries Act authorizations are not required.	Measures taken to monitor the implementation of the plan will be described specific to constructed habitats consistent with the proposed plan and scheduling under MMER.



Stakeholder: Ministry of Natural Resources
Point of Contact: Matthew Myers, Planning and Information Management Supervisor
 Christopher Martin, Management Biologist
Comments received: July 16, 2013
Comments regarding: Review of Draft Fish Habitat Offset Strategy (Revision A) and draft Fish Habitat No Net Loss Plan: MMER Schedule 2 Amendment Waterbodies

Draft Fish Habitat Offset Strategy

#	COMMENT (abbreviated)	RRR RESPONSE
1	Consistent with RRR’s response to MNR comments on the Rainy River Gold Project 2012 Aquatic Resources Baseline Report, the following statement in Section 1.0 Purpose – “The creeks and streams that are present in the local area do not support a commercial or recreational fishery” should be replaced with “while limited bait fishing does occur with certain project area streams, the area does not support a significant commercial or recreational fishery”	Text will be replaced in the Fish Habitat Offset Strategy to read: “while limited bait fishing does occur with certain project area streams, the area does not support a significant commercial or recreational fishery”
2	Section 3.0 Environmental Effects: It is our preference that the term ‘loss’ be used over ‘displacement’ as it is a clearer and more transparent description of impacts to fish habitat.	The term loss will be used as applicable.
3	Section 3.0 Environmental Effects – Flow Reduction (Pinewood River): First paragraph of this section discusses Pinewood River flow downstream of McCallum Creek while the second discusses flows at the junction of Loslo Creek and the Pinewood River. Two reviewers found this organization of flow predictions confusing. In the third paragraph, it is unclear whether the effluent discharge immediately downstream of McCallum Creek is accounted for the flow reduction prediction at this location.	Flow reductions have been presented to describe potential flow loss at the immediate Project site (at Loslo Creek) and at the junction of McCallum Creek, which has a considerable contribution to the Pinewood watershed area. Given the large contribution of McCallum Creek to the system, the intent is to discharge the mine effluent downstream of the McCallum Creek inflow. The flow discussion in the next revision of this document will be restructured to clearly describe the flow reductions at each location and how the effluent discharge has been included in the prediction.

#	COMMENT (abbreviated)	RRR RESPONSE
4	Section 3.0 Environmental Effects – Flow Reductions (Pinewood River): It should be clarified whether all flow reduction predictions provided apply at any particular point in time of year or are yearly averages. If yearly averages, these flow reduction predictions should be broken down by month in a tabular or graphic format.	The flow reduction predictions presented are based on an annual accounting of mean flow years as well as low flow and high flow years. Recent analysis has further confirmed the flow reductions will be less than previously stated. A detailed description of monthly flow reductions based on a mean flow year, a low flow year, and a high flow year will be provided in the next revision of this document.
5	Given recent confirmation that mature lake sturgeon use the Pinewood River, the MNR requires predicted flow reductions in the lower reaches of the watershed (e.g. at the junction of the Kishkakoosis River and Pinewood River) be identified in this report.	Additional estimates of flow reductions at major tributary inflows such as the Kishkakoosis River will be provided in the next revision of this report.
6	Lake Sturgeon should be added to Table 2: Fish Species Present in Affected Waterbodies	Lake Sturgeon will be added to Table 2, along with a clarifying footnote, drafted in consultation with Ministry of Natural Resources (MNR) that provides context as to the extent of Sturgeon within the Pinewood River.
7	Figure 3: The reason for including '(Clark and West Creeks)' within the contents of the box titled 'Offset Impacts with 'Like for Like' Compensatory Offsets' should be clarified.	Although the impacts to Clark Creek and West Creek are generally associated with Section 35 of the Fisheries Act (habitat provisions), the realigned and impounded sections of these creeks will be directed as compensation for the losses associated with the Schedule 2 waterbodies. The reason for this, as discussed with Fisheries and Oceans Canada (DFO), is that the realigned and impounded habitats fit well with the Metal Mining Effluent Regulation (MMER), No Net Loss Plan (NNLP) habitat compensation requirements in terms of the amount and type of habitat created. Figure 3 will be revised in the next version to clearly differentiate between habitats that are affected and the habitats used as compensation.
8	MNR understands and accepts the reasons for pursuing both 'like for like' habitat compensation and alternative offset strategies. We continue to support plans to rehabilitate degraded stream habitats in the Pinewood River watershed.	The Project team is continuing to have discussions with DFO to confirm that the alternative offset strategies are acceptable and consistent with developing DFO offset policy.

#	COMMENT (abbreviated)	RRR RESPONSE
9	Subsection 3.3.2 Fishery Weight: The description of how fishery weights are assigned stated baitfish are ranked as 2 needs to be explained as the ranking is not consistent with Table 3-5 where some baitfish species have a ranking of 1. Clarification is needed.	The author has reviewed the document and specifically Table 3-5 and agrees that Brassy Minnow and Mimic Shiner may be included as baitfish within the context of the weighting of fish species from a Fisheries perspective. However, Sticklebacks, Darters, Log Perch and Shorthead Redhorse Sucker although permitted for use as live bait within Ontario are not considered primary species of baitfish harvest or target and therefore should remain within the framework of the NNL technical calculation with a ranking of 1 for "other species".
10	The planned average and maximum depths of West Creek Pond and Clark Creek Pond should be identified in the report.	Further design details including mean and maximum depths will be provided in drawings in a subsequent version of this document.
11	It would be helpful if total area of habitat types 3, 4 and 5 overprinted are identified in the report.	A summary table indicating the Weighted Usable Area of habitat types 3, 4 and 5 that are proposed to be overprinted will be included in future versions of this report.
12	We note habitat Types 3, 4 and 5 are overprinted by mine components and the offset habitat consists of a relatively larger proportion of habitat Type 5. Further rationale for considering large impoundments greater than 11 ha in area as Type 5 habitat, described as ponds 10-50 m wide, would be of value.	The larger impoundments will provide greater surface areas with ample in-water cover opportunities and greater depths. As such it is expected that the majority of species would be provided with an increase in habitat suitability by such features, most especially with respect to overwintering opportunities. The assumption of these features providing a habitat suitability value similar to that of type 5 habitat was made in a conservative fashion so as not to overestimate the potential WUA that may be constructed.
13	Recognizing the expected changes in habitat types as described in the bullet above, the report could elaborate on the predicted changes to fish community composition and population sizes within the local study area.	A discussion of potential changes to fish community and/or population sizes (survival) will be included in subsequent versions of this document.
14	Section 6.0 Measures to Mitigate Impacts to Fish Habitat during Implementation of the Plan: We expect a stronger commitment to avoid direct impacts to fish during the mine construction phase. A description of fish-out protocols and a fish relocation strategy should be included. We also suggest that minimum vegetation buffers (no clear zones) along water bodies be specified and details of when and where specific erosion control measures will be applied.	Further detail with respect to mitigation during implementation of the plan will be provided in subsequent version of the document.

#	COMMENT (abbreviated)	RRR RESPONSE
15	A description of measures to be taken, if any, to prevent blockage (beaver damming) of fish migration and dispersal routes throughout West Creek and Clark Creek diversion channels should be provided.	We see beaver as an integral component of the flow regimes in small local tributaries and do not propose any long term beaver management along the reconstructed channels. However, there may be a need to manage beaver activity in areas such as the constructed outlets from the impoundments, or in the channels to promote stabilization and maintain channel capacity during life of the mine. In the case of both West Creek and Clark Creek, we anticipate that small bodied fish colonization opportunities will exist from the upstream reaches of the watercourse, and that despite beaver activity, fish will be able to migrate upstream from the lower tributaries and the Pinewood River.
16	While not specifically a requirement of the Fisheries Act, the MNR suggests that Rainy River Resources consider access to and use of offset habitats by local baitfish harvesters.	To ensure the safety of the public and its workers, RRR would take a consistent approach to all lands within the Project work area.

From: Ruthven, Mark C

Sent: Tuesday, September 10, 2013 12:06 PM

To: Eddy, Sara; Martin, Christopher (MNR); Dahl, Julie; rachel.hill@ontario.ca

Cc: Dan.McDonnell@ec.gc.ca; Kyle Stanfield; Bobrowicz, Steve (MNR); Daniel, Sheila E; TC111504; Sasha.McLeod@ontario.ca; Stephanie.Davis@ceaa-acee.gc.ca; Amy.Liu@ceaa-acee.gc.ca; Jill.Aitken@ceaa-acee.gc.ca; Russell, Dan

Subject: Responses to DFO and MNR Comments - Fisheries No Net Loss Plan Documents - Rainy River Project

Please find attached the RRP responses to comments received on the Draft Fisheries No Net Loss Plan Documents (Strategy document and MMER NNLP Document) received from DFO and MNR. Specifically the responses address comments received from DFO (Julie Dahl C/o Sara Eddy dated July 31, 2013) and from MNR (Matthew Myers C/o Rachel Hill dated July 16, 2013).

Please do not hesitate to contact us if you have any questions regarding the responses provided.

Sincerely,
Mark

Mark C. Ruthven
Associate Biologist;
Asst. Head Environmental Assessment
AMEC

Environment & Infrastructure
160 Traders Blvd. East, Suite 110, Mississauga ON Canada L4Z 3K7
Tel: 905-568-2929 x 4110
Direct: 905-568-1917 x 4110, Mobile: 416-805-0576

From: Stacey Jack
Sent: September-25-13 1:49 PM
To: 'Cyrus.Elmpak-Mackie@HydroOne.com'
Cc: 'ierullo@HydroOne.com'; 'Roman.Dorfman@HydroOne.com'; 'w.d.kloostra@HydroOne.com'; Kyle Stanfield
Subject: Rainy River Gold Project Response to comments

Dear Mr. Elmpak-Mackie;

Thank-you for providing comments on the Rainy River Gold Project Draft Environmental Assessment.

Please find attached a table which includes our responses to the comments you have provided.

Sincerely,

Stacey Jack
Community Coordinator

New Gold Inc.
Rainy River Project
P.O. Box 5, 5967 Highway 11/71
Emo, Ontario, Canada, POW 1E0
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From: Kyle Stanfield [<mailto:kstanfield@rainyriverresources.com>]

Sent: Friday, September 20, 2013 2:21 PM

To: McLeod, Sasha (ENE); Stephanie [CEAA] Davis (stephanie.davis@ceaa-acee.gc.ca); Liu, Amy [CEAA]; Aitken, Jill [CEAA]; Bennett, Neal (MNDM)

Cc: Stacey Jack; Daniel, Sheila E

Subject: RRGP Draft EA Comments Tables Responses Set 2

Hello - Second set of comments responses attached.

Cheers,



Kyle L. Stanfield P.Eng.

Vice President, Environment & Sustainability

T 807 623 1540 | C 807 621 6152 | F 807 623 0974 | kstanfield@rainyriverresources.com

Rainy River Resources Ltd., 1111 Victoria Avenue East, Thunder Bay, Ontario, Canada P7C 1B7

From: Stacey Jack
Sent: September-25-13 3:33 PM
To: 'Peggy Johnson'
Cc: Kyle Stanfield
Subject: Responses to RRGP Comments

Good Afternoon Peggy;

Thank-you for providing comments on the Rainy River Gold Project Draft Environmental Assessment.

Please find attached a table which includes our responses to the comments provided by the Township of Chapple.

Sincerely,

Stacey

Stacey Jack
Community Coordinator

New Gold Inc.
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From: Daniel, Sheila E

Sent: September-26-13 12:52 PM

To: 'Eddy, Sara'

Cc: TC111504; Liu, Amy [CEAA]; Aitken, Jill [CEAA]; Davis, Stephanie [CEAA]; Kyle Stanfield (KStanfield@rainyriverresources.com); Ruthven, Mark C; McLeod, Sasha (ENE)

Subject: Rainy River Project - additional information in follow up to your comments on the Draft EA Report - Part 1

Please find attached a copy of Appendix D (Part 1) of the Approved Amended Terms of Reference for Rainy River Project. It is being sent in two e-mails, as otherwise it may be too large for your e-mail limits.

It is being provided in follow up to our responses to your comments on the Rainy River Project, Draft Environmental Assessment Report. RRR has indicated in their response which the Canadian Environmental Assessment Agency received this morning, that you would receive this document in expectation that you may not have received it from your predecessor.

Best regards,

Sheila Daniel, M.Sc., P.Geo.
Senior Associate Geoscientist;
Head Environmental Management
AMEC

Environment & Infrastructure

160 Traders Blvd. East, Suite 110, Mississauga ON Canada L4Z 3K7

Tel: 905-568-2929 x 4123

Direct: 905-568-1917 x 4123, Mobile: 416-524-5928

sheila.daniel@amec.com

amec.com

Business sustainability starts here... AMEC supports SOS Children

From: Daniel, Sheila E
Sent: September-26-13 11:42 AM
To: McLeod, Sasha (ENE)
Cc: TC111504; Kyle Stanfield; Liu,Amy [CEAA]; Davis,Stephanie [CEAA]; Aitken,Jill [CEAA]
Subject: RE: attachments for MOE air responses? - RE: RRGP Draft EA Comments Tables Responses Set 3

Sasha: you are correct. With apologies, it was inadvertently not attached in the responses.

For completeness, I have also copied the CEA Agency on this additional attachment.

Best regards,

Sheila Daniel

Tel: 905-568-2929 x 4123

Direct: 905-568-1917 x 4123, Mobile: 416-524-5928

sheila.daniel@amec.com

From: Kyle Stanfield [<mailto:Kyle.Stanfield@newgold.com>]
Sent: Thursday, September 26, 2013 11:26 AM
To: McLeod, Sasha (ENE); Daniel, Sheila E
Subject: RE: attachments for MOE air responses? - RE: RRGP Draft EA Comments Tables Responses Set 1

Thanks Sasha.

Sheila – Can you follow-up?

Kyle

From: McLeod, Sasha (ENE) [<mailto:Sasha.McLeod@ontario.ca>]
Sent: Thursday, September 26, 2013 11:25 AM
To: Kyle Stanfield
Subject: attachments for MOE air responses? - RE: RRGP Draft EA Comments Tables Responses Set 1

Hi Kyle. In your responses to MOE Air – Sushant Agarwal, it looks like there are references to separate attachments, e.g. in comments 2 and 4. I didn't see these attachments in your original email. Could you please provide them (or clarify what the attachment references are)?

Thank you.
Sasha

From: Kyle Stanfield [<mailto:kstanfield@rainyriverresources.com>]
Sent: September 18, 2013 4:59 PM
To: McLeod, Sasha (ENE); Bennett, Neal (MNMD); 'stephanie.davis@ceaa-acee.gc.ca'
Cc: Stacey Jack; Daniel, Sheila E
Subject: RRGP Draft EA Comments Tables Responses Set 1

Good afternoon – Please find attached for your distribution and review, the initial set of responses to comments received from Provincial agencies. More responses are being completed and will be sent soon (we have over 800 comments being responded to).

We are still on track to deliver the Final EA in October as we had planned. As agreed with Sasha during our call this week, should there be additional follow-up to our responses with any of the agencies we would be happy to arrange for either a meeting or conference call with the technical experts to answer questions further. In this way, we can avoid excessive back and forth with tables of more responses that would otherwise delay Environmental Assessment process.

Cheers, Kyle



Kyle L. Stanfield P.Eng.

Vice President, Environment & Sustainability

T 807 623 1540 | C 807 621 6152 | F 807 623 0974 | kstanfield@rainyriverresources.com

Rainy River Resources Ltd., 1111 Victoria Avenue East, Thunder Bay, Ontario, Canada P7C 1B7

The information in this email is privileged or confidential or both. If you are not the intended recipient, you are prohibited from using, distributing or copying this information.

From: [Daniel, Sheila E](#)
To: [McLeod, Sasha \(ENE\)](#)
Cc: [TC111504](#); [Kyle Stanfield](#); [Davis, Stephanie \[CEAA\]](#); [Liu, Amy \[CEAA\]](#); [Aitken, Jill \[CEAA\]](#); [Bennett, Neal \(MNDM\)](#)
Subject: RE: RRR response to noise comments - missing attachments
Date: October-02-13 2:58:43 PM
Attachments: [R20_Attach1_Chapple_OPlan.pdf](#)
[R20_Attach2_Sample Calc.pdf](#)

Our apologies. They were inadvertently missed when sent and are attached.

Best regards,

Sheila Daniel

Tel: 905-568-2929 x 4123
Direct: 905-568-1917 x 4123, Mobile: 416-524-5928
sheila.daniel@amec.com

From: McLeod, Sasha (ENE) [<mailto:Sasha.McLeod@ontario.ca>]
Sent: Wednesday, October 02, 2013 2:45 PM
To: kstanfield@rainyriverresources.com; Daniel, Sheila E
Subject: RRR response to noise comments - missing attachments

Hi Kyle. The RRR responses to MOE's noise reviewer comments refer to two attachments that I didn't see in your email to me. Specifically they are attachments 1 and 2 referred to in your responses 5 and 8. The only attachment I saw that accompanied the noise responses is the PDF attached here. Please provide attachments 1 and 2.

Thank you,
Sasha

From: Kyle Stanfield [<mailto:Kyle.Stanfield@newgold.com>]
Sent: September 26, 2013 10:57 AM
To: McLeod, Sasha (ENE); Stephanie [CEAA] Davis (stephanie.davis@ceaa-acee.gc.ca); Liu, Amy [CEAA]; Bennett, Neal (MNDM)
Cc: Stacey Jack; Daniel, Sheila E
Subject: FW: RRP Draft EA Tables of Comments and Responses Set 3

Please find latest responses attached.

Regards, Kyle

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From: Kyle Stanfield [<mailto:Kyle.Stanfield@newgold.com>]

Sent: Friday, October 04, 2013 9:11 AM

To: Sasha (ENE) McLeod (Sasha.McLeod@ontario.ca); Liu, Amy [CEAA]; Aitken, Jill [CEAA]; Stephanie [CEAA] Davis (stephanie.davis@ceaa-acee.gc.ca); Bennett, Neal (MNDM)

Cc: Daniel, Sheila E

Subject: RRP Detailed Groundwater Responses - E-mail 2 of 2

Kyle Stanfield

Director, Environment & Sustainability

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From: Didrikson, Amy (MTCS) [<mailto:Amy.Didrikson@ontario.ca>]
Sent: October-04-13 2:04 PM
To: Stacey Jack
Cc: McLeod, Sasha (ENE)
Subject: RE: Rainy River Project CHAR Report & Recommendations

Stacey,

Please see the attached comments from MTCS on the CHAR report and associated memo containing mitigation recommendations, sent below, and please let me know if you have any questions.

Regards,
Amy

Amy Didrikson, MCIP, RPP
Heritage Planner
Ministry of Tourism, Culture and Sport
Culture Division | Programs and Services Branch | Culture Services Unit
T. 416.212.7420 | Email: amy.didrikson@ontario.ca

From: Stacey Jack [<mailto:Stacey.Jack@newgold.com>]
Sent: September 25, 2013 9:32 AM
To: Didrikson, Amy (MTCS)
Cc: Kyle Stanfield; 'Daniel, Sheila E'; 'TC111504@amec.com'
Subject: Rainy River Project CHAR Report & Recommendations

Good Morning Amy;
As requested during your review of the Rainy River Gold Project Draft Environmental Assessment, please find attached the CHAR report and recommendations which were prepared by Unterman McPhail Associates.
If you would like to discuss the report or recommendations, please do not hesitate to contact me.

Sincerely,
Stacey

Stacey Jack
Community Coordinator

New Gold Inc.
Rainy River Project
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From: Kyle Stanfield [<mailto:Kyle.Stanfield@newgold.com>]

Sent: Friday, October 04, 2013 10:01 AM

To: Sasha (ENE) McLeod (Sasha.McLeod@ontario.ca); Liu, Amy [CEAA]; Aitken, Jill [CEAA]; Stephanie [CEAA] Davis (stephanie.davis@ceaa-acee.gc.ca); Bennett, Neal (MNDM)

Cc: Daniel, Sheila E

Subject: Response to MNR Draft EA Comments

Please find attached responses to the MNR comments on the Draft Environmental Assessment report.

Thanks

Kyle Stanfield

Director, Environment & Sustainability

New Gold Inc.

Rainy River Project

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From: Kyle Stanfield [<mailto:Kyle.Stanfield@newgold.com>]
Sent: Friday, October 04, 2013 9:10 AM
To: Sasha (ENE) McLeod (Sasha.McLeod@ontario.ca); Stephanie [CEAA] Davis (stephanie.davis@ceaa-acee.gc.ca); Liu,Amy [CEAA]; Bennett, Neal (MNDM); Aitken,Jill [CEAA]
Cc: Daniel, Sheila E
Subject: Rainy River Project Detailed Groundwater Responses E-mail 1 of 2

Please find attached responses to the questions related to groundwater from both the Ministry of Environment as well as Natural Resources Canada.

Regards

Kyle Stanfield
Director, Environment & Sustainability

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**Ministry of Tourism,
Culture and Sport**

Culture Services Unit
Programs and Services Branch
401 Bay Street, Suite 1700
Toronto ON M7A 0A7
Tel: 416 314 7265
Fax: 416 314 7175

**Ministère du Tourisme,
de la Culture et du Sport**

Unité des services culturels
Direction des programmes et des services
401, rue Bay, Bureau 1700
Toronto ON M7A 0A7
Tél: 416 314 7265
Télé: 416 314 7175



October 4, 2013

VIA E-MAIL ONLY

Stacey Jack
Community Co-ordinator
New Gold Inc.
Rainy River Project
P.O. Box 5, 5967 Highway 11/71
Emo, Ontario, Canada, P0W 1E0

Dear Ms. Jack,

Our File No. : 59EA011
Proponent : Rainy River Resources Limited
Subject : Rainy River Gold Project
Location : Township of Chapple, District of Rainy River

We acknowledge receipt of the Cultural Heritage Assessment Report (CHAR) for the Rainy River Gold Project (RRGP), which you provided to us via e-mail on September 25, 2013. We are also in receipt of the memorandum entitled "Mitigation Recommendations for Cultural Heritage Assessment Report", dated September 11, 2013 (the Mitigation Memo) which contains mitigation recommendations for a number of built heritage resource sites and cultural heritage landscapes identified in relation to the above-noted project.

We have reviewed the CHAR and Mitigation Memo and have the following comments.

Please clarify whether any of the potential built heritage resources or cultural heritage landscapes identified in the CHAR are located on Crown Land.

Please provide further description on the nature of the potential impacts. For example, please clarify, as appropriate, whether the impacts will be: of short or long duration; site-specific or widespread; high or low physical impact; and, reversible or irreversible. In particular, please indicate the extent to which the RRGp will remove portions of the agricultural landscape. The current description is vague ("The introduction of the open pit and underground mine will result in alterations to the existing rural landscape").

Please clarify how it was determined that Site #15, the "Richardson Trail", has "minimal" cultural heritage value as a cultural heritage landscape. How has the trail been evaluated and who has been consulted regarding the local significance?

In general, the recommendations in the Mitigation Memo appear to be premature, given that additional evaluation is recommended in the CHAR. For example, the Mitigation Memo should acknowledge that the additional research recommended for the farm complexes (sites 11 and

13), through separate CHER reports, may lead to additional mitigation measures, sympathetic with the value of the cultural heritage resource, such as alternative development approaches or salvaging materials. As such, the recommendations in the Mitigation Memo should be treated as *preliminary*.

Finally, it is unclear how documentation (i.e. an illustrated history of the area) was selected as the principle mitigation measure in the Mitigation Memo. The CHAR describes the existing agricultural landscape as a “cultural heritage landscape of potential heritage value”, which “convey[s] the settlement history of the area and commemorates the lives of early settlers”. The Mitigation Memo is unclear as to what conservation options were explored before concluding that documentation is the most appropriate mitigation measure. Please provide clarification on the decision-making process in this case.

Please do not hesitate to contact the undersigned if you have any questions.

Best regards,
Amy Didrikson, MCIP, RPP
Heritage Planner
416-212-7420
Amy.Didrikson@ontario.ca

cc: Sasha McLeod, Project Officer, MOE

From: Darcy Cowan [<mailto:dcowan@slrconsulting.com>]

Sent: Saturday, October 05, 2013 12:11 PM

To: James.McKever@ontario.ca

Cc: 'Garett Macdonald'; 'Paolo Toscano'; Kyle Stanfield; 'Rob Frenette'; Daniel, Sheila E; Kenneth Rosin

Subject: Hwy 600- Draft Final RRGP TIS

Good Morning Mr. McKever

Attached is the updated Traffic Impact Study for the Rainy River Gold Project. The study addresses the comments previously provided as well as comments that were received by RR through Draft EA Process review currently underway.

The RRGP has undertaken the process of creating a design report for the associated relocations and improvements related to MTo facilities and will be providing further information in the form of a report in the next few weeks.

Should you wish to discuss the attached or have any questions, please feel free to contact me to discuss. In the meantime we look forward to any feedback on the attached at the earliest opportunity.

My Regards,

Darcy

Darcy Cowan
Principal Consultant, Senior Project Manager
SLR Consulting (Canada) Ltd.

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Stakeholder: Environment Canada

Point of Contact: Dan McDonell

Comments received: October 7, 2013

Comments regarding: Rainy River Project, Draft Assessment of Alternatives for Mine Waste Disposal

#	COMMENT	RESPONSE	STATUS
1	<p>The Proponent has provided two figures showing the locations of the tailings management area location alternatives (Fig. 3-1; pg. 20) and mine rock stockpile location alternatives (Fig. 7-1; pg. 44). However, a figure(s) with a greater level of detail for the preferred alternative choice(s) is/are also requested.</p> <p>A figure(s) is needed which shows the locations of the Proponent's preferred alternatives for tailings and mine rock disposal. This figure(s) should also provide more detail on the features/components of the TMA and mine rock stockpiles so that EC has a better understanding of the proposed water management for the site(s).</p> <p>The Proponent is requested to provide two separate (or a combined figure) showing the location and layout of the preferred choice of location of tailings management area (TMA) and the mine rock stockpiles. This figure(s) should clearly show the different features/ components of the TMA and the mine rock stockpiles (these include any dams/embankments, seepage collection and management systems, upstream and downstream watercourses and other water treatment and management features).</p>	<p>The requested figures will be provided in the final document.</p>	<p>On-going</p>
2	<p>The Proponent has characterized about 50% of mine rock and most of the tailings as potentially acid generating (PAG). The Proponent has not indicated if co-disposal of all PAG tailings and waste rock at one location was also considered as an alternative.</p> <p>Co-disposal of all PAG tailings and waste rock should be considered as an alternative as it may result in a smaller environmental impact than separate disposal locations.</p> <p>EC requests clarification from the Proponent on whether co-disposal of all PAG tailings and waste rock at one location was considered as an alternative. If co-disposal was not considered as an alternative, please provide the rationale.</p>	<p>A discussion of co-disposal of mine rock and tailings will be included in the final document.</p>	<p>On-going</p>

#	COMMENT	RESPONSE	STATUS
3	<p>The Proponent has considered relevant sub-accounts and indicators in the alternatives characterization for tailings management area (Table 4-1; pg. 23) and mine rock storage area (Table 8-1; pg. 47). However, there is no description of the sub-accounts and indicators provided in the text.</p> <p>The rationale for the selection of the sub-accounts and indicators is an important component in demonstrating that the Proponent has assessed the proposed options by considering the environmental, socio-economic, technical and economic factors relevant to each option. Without this information it is difficult for reviewers to assess the work completed by the Proponent in developing the multiple accounts analysis (MAA).</p> <p>The Proponent is requested to provide in the main text a description of the sub-accounts and indicators for used for the Tailings and Mine Rock/Overburden multiple accounts analyses.</p>	<p>A description of the sub-accounts and indicators used in the multiple accounts analyses will be included in the final document.</p>	On-going
4	<p>The MAA undertaken by the Proponent for the mine rock storage alternatives assessment has resulted in two locations (Alternative C and E) being selected as the preferred locations for the mine rock stockpiles. There is little detail provided on the two mine rock storage piles.</p> <p>The two preferred locations for mine rock storage piles and their intended uses should be fully described so that the rationale for their selection may be understood by third party reviewers.</p> <p>EC requests that the Proponent provide more detailed description of the preferred alternatives, indicating that :</p> <p>1) Alternative C is being proposed for the storage/disposal of PAG mine rock and ore; and 2) Alternative E is proposed for storage/disposal of Non-PAG mine rock and overburden.</p>	<p>The discussion of the two preferred locations for mine rock disposal will be amended in the final document to provide additional information, such as that presented in the draft Environmental Assessment (EA) Report.</p>	On-going

#	COMMENT	RESPONSE	STATUS
5	<p>EC understands that the Proponent has undertaken consultations with Aboriginal groups and that they have not identified any traditional land uses within or adjacent to the project site. There is very little discussion provided on the consultations undertaken by the Proponent.</p> <p>Consideration of Aboriginal concerns with respect to the proposed mine waste disposal options, including the identification of relevant Traditional Knowledge should be incorporated into the alternatives assessment. Details on the Proponent's consultations with affected stakeholders and Aboriginal groups are necessary to demonstrate that the Proponent has undertaken a thorough assessment of mine waste disposal options.</p> <p>EC requests that the Proponent provide more discussion on Aboriginal consultation activities, including any comments or perceptions on the project and in particular, any comments related to the alternatives for mine waste disposal.</p>	<p>A detailed record of consultation, discussions and meetings with Aboriginal groups and the general public related to the Rainy River Project (RRP) is included as Appendix D in the Final EA Report.</p> <p>The Draft EA Report (Ver. 1) was issued to Aboriginal groups in May 2013 in order to allow sufficient time for comment. A subsequent independent technical review has not indicated problems with the storage locations. While a copy of the Assessment of Alternatives for Mine Waste Disposal was not available at that time, the Draft EA Report did include a comprehensive discussion of mineral waste alternatives in Section 4 of the report.</p> <p>RRR and our consultant will provide a copy of the extracted comments received related to mineral waste management and alternatives on behalf of the Aboriginal groups on the draft EA Report along with the Rainy River Resources (RRR) response. A summary will also be provided of all comments received prior to the Draft EA Report issuance from Aboriginal groups on these aspects.</p> <p>The intent is that the final document will be appended to the Final Environmental Assessment Report in October as a supporting document to the overall report.</p> <p>Further detail will be provided in the Final Report.</p>	On-going
6	<p>EC requests that the environmental sub-accounts be expanded to enhance the MAA and improve the Alternatives Assessment document.</p> <p>Enhancing the MAA and the Alternatives Assessment document through the expansion of environmental sub-accounts will help fulfill the purpose of this assessment of alternatives, which is to objectively and rigorously assess all feasible options for mine waste disposal.</p> <p>EC requests that the environmental sub-accounts be expanded to enhance the MAA and improve the Alternatives Assessment document. The Proponent should consider proposing additional indicators such as impacts to water quality, impacts to terrestrial species, and number of fish bearing water bodies impacted.</p>	<p>Thank you for your comment. The tables will be reviewed and expanded / amended as appropriate.</p>	On-going

#	COMMENT	RESPONSE	STATUS
7	<p>The Proponent has stated that “Covers are more expensive and are less effective for controlling oxygen exposure”. The rationale for this statement is unclear.</p> <p>The Proponent is requested to identify which type of covers (water cover or soil/dry cover) they are referring to and the rationale for the statement in Section 1.3.</p>	<p>The statement refers to engineered low permeability covers, and will be corrected in the final text.</p>	On-going
8	<p>1. EC requests the Proponent to explain in more detail how the four screened out alternatives met the elimination criteria described in Section 3.1 (i.e., based on overlap of two disposal locations, with one alternative being preferable over the other).</p> <p>2. Alternative E appears to be smaller in area than alternative H (Figure 3-1, pg. 20). Yet, the alternative H has been screened out due to lack of sufficient space to contain a significant percentage of the entire volume of tailings requiring storage, whereas alternative E has not been screened out by applying the same rationale. EC asks the Proponent to clarify this ambiguity.</p> <p>3. The Proponent is requested to clarify if they consider the combination of in-pit and underground tailings disposal with the disposal of tailings in the TMA, when they screened out alternative H based on lack of adequate storage capacity to hold the tailings</p>	<p>1. Additional detail will be provided in the final document.</p> <p>2. Alternative E is larger than Alternative H, having areas of 492 ha and 357 ha, respectively. Alternative E was screened out on the basis that there is a more suitable alternative in the immediate area (Alternative B) that has greater capacity, and does not overlap with the preferred area for the explosives facilities.</p> <p>3. In-pit and/or underground tailings disposal were not considered as viable standalone options for tailings disposal as these alternatives are not available for storage until late in the mine life. For the same reason, they are not considered as a significant source of supplementary storage to conventional tailings deposition during the operations phase, as deposition into an active pit is not practical, and the underground storage capacity is less than 3% of the total (Section 3.4). Should there be available storage capacity at a later, as yet undefined, point in the operations phase, consideration will be given to the viability of either in-pit or underground storage of tailings.</p>	<p>On-going</p> <p>Complete</p> <p>Complete</p>

#	COMMENT	RESPONSE	STATUS
9	<p>Eight alternative tailings storage locations were identified for initial screening, with four options being screened out and four carried forward for MAA. While the locations of all the alternatives are provided in Figure 3-1 (pg. 20), no description has been given for the four alternatives that were screened out.</p> <p>It is important to fully characterize all alternatives equally so that the reader can clearly understand the assessments of all feasible options for the mine waste disposal. It is also important to include detailed rationale to support any decisions which result in the elimination of alternatives.</p> <p>EC requests that the Proponent provide details on the key characteristics and features of these four eliminated alternatives, similar to the level of information provided for the screened in alternatives (Alternatives A, B, C and D). EC also requests a detailed rationale supporting the decision to eliminate four alternatives from further consideration.</p>	<p>A discussion of the four eliminated alternatives will be provided in the final document.</p>	On-going
10	<p>A greater level of detail is needed for the proposed alternatives for consideration for tailings storage.</p> <p>It is important to fully characterize all alternatives equally with sufficient detail so that the reader can clearly understand the assessments of all feasible options for the mine waste disposal.</p> <p>The Proponent is requested to provide more details for each of the proposed alternatives for consideration for tailings storage (such as the number of dams required to contain tailings in the alternatives, total length of the dams, individual dam heights, number of seepage collection and water management ponds associated with the alternatives etc.).</p>	<p>Additional information on the proposed alternatives will be included in the final document.</p>	On-going
11	<p>The Proponent states that Aboriginal groups have expressed “a desire to protect the local and regional environments”. Concerns raised by Aboriginal groups do not appear to be reflected in the MAA.</p> <p>Consultation with Aboriginal groups is an important part of the alternatives assessment process. Any concerns raised by Aboriginal groups should be reflected in the sub-accounts and indicators for the MAA.</p> <p>EC suggests that the Proponent add ‘Aboriginal and Public Perception/ Opinion’ as a sub-account under the ‘Socio-economic Account’, with additional indicators to rank the opinions of the Aboriginal groups and the public.</p>	<p>Further detail will be provided regarding consultation activities to date related to mineral waste management in the final document.</p> <p>No specific comments on mine waste alternatives have been received to date which would justify inclusion of a subaccount of ‘Aboriginal and Public Perception/ Opinion’; i.e. there is nothing to differentiate the various alternatives, as per section 2.5.1 of the EC <i>Guidelines for the Assessment of Alternatives for Mine Waste Disposal</i>, and the inclusion of this sub-account would have no impact on the final assessment.</p>	On-going

#	COMMENT	RESPONSE	STATUS
12	<p>Five alternative mine rock storage locations were identified for initial screening with one option, Alternative B, eliminated from further consideration due to regulatory criteria. No detailed description of Alternative B is provided.</p> <p>It is important to fully characterize all alternatives equally so that the reader can clearly understand the assessments of all feasible options for the mine rock storage locations. It is also important to include detailed rationale to support any decisions which result in the elimination of alternatives.</p> <p>EC requests that the Proponent provide a description of Alternative B similar to the level of information provided for the screened in alternatives (Alternatives A, C, D, and E) in Section 8.0.</p> <p>Editorial correction: The last sentence of this section incorrectly identifies the Alternatives that were carried forward for MAA – A, B, C and D rather than A, C, D and E.</p>	<p>A description of Alternative B will be included in the final document.</p> <p>RRR appreciates the editorial correction; this oversight will be corrected in the final document.</p>	On-going
13	<p>The Proponent has eliminated Alternative B, located south of the open pit, from further consideration using pre-screening criterion “is this the most suitable alternative in the vicinity of the impoundment location?” A brief explanation is provided as a footnote to Table 7-1, which states that “Alternative B cannot meet Ministry of the Environment sound quality guidelines, and therefore cannot be approved under any possible scenario.”</p> <p>The pre-screening criterion that was applied to Alternative B and the explanation provided for its elimination from further consideration is not clear.</p> <p>The Proponent is requested to clarify the supporting rationale for the elimination of Alternative B.</p>	<p>Alternative B is located adjacent to the neighbours located in Black Hawk. Sound modelling indicates that under any usage scenario, sound levels from regular ongoing operations will exceed Ministry of the Environment Sound Quality Guidelines. As a result, this alternative would be unable to receive provincial approval for operation, considered to be a fatal flaw, regardless of its performance in a multiple accounts analysis. For this reason, it was eliminated from any further consideration.</p>	Complete

From: Daniel, Sheila E
Sent: Thursday, October 10, 2013 2:39 PM
To: 'McDonell,Dan [Burlington]'
Cc: Dobos,Rob [Burlington]; Amy.Liu@ceaa-acee.gc.ca; Aitken,Jill [CEAA]; Broadhurst,Dave [Ontario]; Fooks,Jeanette [Burlington]; TC111504; Kyle Stanfield; Simms, David
Subject: RE: Question which was raised from the RRGP Draft EIS relating to WSC station 05PC023

On behalf of Kyle Stanfield, please find attached responses for your consideration.

Questions for Rainy River Resources

Environment Canada also has a couple of questions about the anticipated use of the hydrometric station data.

1. What aspects of RRGP operation and site management depend upon data from the Pinewood River hydrometric station?

Response: Pipeline flow discharge from the water management pond to the Pinewood River would require daily flow values during the spring and fall open water periods to determine allowable discharge volumes based on daily loading calculations for critical parameters.

2. Does RRR anticipate that daily water level data and flow estimates will be used to govern effluent discharge rates for the RRGP in near-real time?

Response: Yes. Preferably we would use flow data from the day before (or two days before) to calculate allowable loadings on any given day.

Environment Canada suggests that NewGold and Environment Canada meet in person or by teleconference to discuss a potential agreement for the long-term operation of a hydrometric station along the Pinewood River. Very good idea. I was having similar thoughts as this will be a critical item for us.

Response: This is a very good idea and we would appreciate the opportunity to discuss at your convenience, as this will be a critical item for the RRP.

Best regards,

Sheila Daniel

Tel: 905-568-2929 x 4123

Direct: 905-568-1917 x 4123, Mobile: 416-524-5928

sheila.daniel@amec.com

From: McDonell,Dan [Burlington] [<mailto:Dan.McDonell@ec.gc.ca>]
Sent: Monday, October 07, 2013 3:41 PM
To: Kyle.Stanfield@newgold.com
Cc: Daniel, Sheila E; Dobos,Rob [Burlington]; Amy.Liu@ceaa-acee.gc.ca; Aitken,Jill [CEAA]; Broadhurst,Dave [Ontario]; Fooks,Jeanette [Burlington]
Subject: Question which was raised from the RRGP Draft EIS relating to WSC station 05PC023

Hello Kyle,

During the course of a secondary review of the draft EIS for the Rainy River Gold project by Environment Canada, we noted some information about the availability and use of hydrometric station data. We felt

that this information warrants further discussion between Environment Canada and NewGold and felt it important to raise now instead of holding off until the next round of comments on the EIS.

In section 13 of the draft EIS, reference was made to the operation of the Water Survey of Canada (a component of Environment Canada) station for the Pinewood River.

“Flows are already being measured for the Pinewood River at WSC Station 05PC023. Note that given the importance of the WSC station to overall site water management as per Section 4.12, RRR will need to enter into an agreement with WSC to ensure that the station will be maintained throughout the RRGP mine life, and that data will be made available to RRR on a daily basis, and that RRR would be immediately informed of any maintenance activities which could influence its operations.” (Rainy River Gold Mine Draft EIS, Section 13 – Follow Up Monitoring; Pg.12)

This description includes several assumptions about the operation of the Pinewood River station. The Water Survey of Canada has prepared some information to respond to those assumptions. Environment Canada also has a couple of questions about the anticipated use of the hydrometric data from this station.

Pinewood River hydrometric station - operating assumptions

The Pinewood River hydrometric station is operated by the Water Survey of Canada but is funded by the Ontario Ministry of Natural Resources. The WSC cannot guarantee the ongoing operation of the station for the duration of RRGP mine operations since MNR's hydrometric monitoring priorities and funding may change

Daily water level data should be available for the Pinewood River station as long as the station is in operation. Interim discharge data will also be available on the real-time web site

Data transmission may be disrupted on occasion due to monitoring equipment damage or failure, power failure or communications failure.

Water Survey of Canada could certainly inform RRR of maintenance activities that could influence operations. Any such arrangement would need to be part of a station operation agreement between RRR and WSC.

The Water Survey of Canada agrees that NewGold and WSC should explore the development of an MOU/agreement pertaining to the long-term operation of the WSC station if data is important to the operation/management of the RRGP.

If NewGold wishes to use daily water level data to govern effluent discharge rates, WSC could assist with the evaluation of the stability and suitability of the present observing location and whether a more suitable gauging location along the Pinewood River might be warranted.

Questions for Rainy River Resources

Environment Canada also has a couple of questions about the anticipated use of the hydrometric station data.

1. What aspects of RRGP operation and site management depend upon data from the Pinewood River hydrometric station?

2. Does RRR anticipate that daily water level data and flow estimates will be used to govern effluent discharge rates for the RRGP in near-real time?

Environment Canada suggests that NewGold and Environment Canada meet in person or by teleconference to discuss a potential agreement for the long-term operation of a hydrometric station along the Pinewood River.

Thanks
Dan

Dan McDonell

Environmental Assessment Officer
Environmental Assessment Section
Environment Canada
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From: Kyle Stanfield [<mailto:Kyle.Stanfield@newgold.com>]

Sent: Friday, October 11, 2013 10:21 AM

To: Liu,Amy [CEAA]; Aitken,Jill [CEAA]; Dan [Burlington] McDonell (Dan.McDonell@ec.gc.ca); Sasha (ENE) McLeod (Sasha.McLeod@ontario.ca)

Cc: Russell, Dan; Daniel, Sheila E

Subject: Comment/Response table for EC comments on MMER

Amy and Dan – Please find attached our responses to Environment Canada’s comments on the Draft Alternatives for Mine Waste Disposal. I want to thank the Environment Canada team once again for these comments and helping us to ensure the project is properly designed and consulted on with the general public including our Aboriginal partners. Our goal remains Responsible Resource Development that respects the requirement to eliminate environmental effects to the extent practical both in the short and long term.

Amec is coordinating ensuring the changes are made to the report that will be included within the Final EA report.

Please let us know if there are any further comments.

Sincerely,

Kyle Stanfield

Director, Environment & Sustainability

New Gold Inc.

Rainy River Project

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From: Kyle Stanfield [<mailto:Kyle.Stanfield@newgold.com>]
Sent: Friday, October 11, 2013 12:43 PM
To: Sasha (ENE) McLeod (Sasha.McLeod@ontario.ca); Liu,Amy [CEAA]; Aitken,Jill [CEAA]; Bennett, Neal (MNDM); Hill, Rachel (MNR); 'melissa.mosley@ontario.ca'; 'Christopher.Martin@ontario.ca'
Cc: Daniel, Sheila E; Simms, David
Subject: FW: R27_RRP_Response to MNR_Draft EA Comments_FINAL to Gov_REV.docx

Please find attached the completed responses to the MNR comments. There were 10 comment responses missing out of the 52 page document that are now included.

Thanks, Kyle

From: Daniel, Sheila E [<mailto:sheila.daniel@amec.com>]
Sent: Wednesday, October 09, 2013 11:56 AM
To: 'rachel.hill@ontario.ca'; 'Sasha.McLeod@ontario.ca'; Kyle Stanfield
Cc: 'melissa.mosley@ontario.ca'; 'Christopher.Martin@ontario.ca'; Russell, Dan; Simms, David
Subject: Re: Missing responses on some MNR comments

We completed a preliminary review last night and yes, it appears that these comments somehow disappeared when we reformatted the original table received. We will prepare responses. Our apologies that we did not catch that before it was issued.

Sheila E. Daniel, M.Sc., P.Geo.

AMEC

Cell: 416-524-5928

From: Hill, Rachel (MNR) [<mailto:rachel.hill@ontario.ca>]
Sent: Wednesday, October 09, 2013 09:31 AM
To: McLeod, Sasha (ENE) <Sasha.McLeod@ontario.ca>; kstanfield@rainyriverresources.com <kstanfield@rainyriverresources.com>; Daniel, Sheila E
Cc: Mosley, Melissa (MNR) <melissa.mosley@ontario.ca>; Martin, Christopher (MNR) <Christopher.Martin@ontario.ca>
Subject: RE: Missing responses on some MNR comments

Thanks Sasha.

It would appear there was no response provided from comments numbered 139 through to 146.

Rachel

From: McLeod, Sasha (ENE)
Sent: Tuesday, October 08, 2013 2:25 PM
To: kstanfield@rainyriverresources.com; sheila.daniel@amec.com
Cc: Hill, Rachel (MNR); Mosley, Melissa (MNR)
Subject: Missing responses on some MNR comments

Hi Kyle,

MNR has pointed out that the RRR responses table you provided on the MNR comments appears to be missing several comments at the end. MNR had 146 comments while the RRR response table only has

136 comments. Can you please clarify or send any missing responses? The RRR response table I received is attached along with the original MNR comment table.

Thank you,
Sasha

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