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SUBJECT: APPLICATION FOR A CERTIFICATE OF NON-SUBJECTION FOR THE GD-17 SAND PIT

**Responses to COMEV's Questions and Comments - Nemaska Cree First -Nation GD17 Borrow
Pit Expansion Project
(File 3214-03-046)**

Hello,

In response to your questions and comments in the letter sent to Mr. Jean H. Paradis on August 11, 2021, we are sending you our responses and supporting documents. This letter is reproduced in full in Appendix 1 of this document.

The COMEV/MELCC questions and answers are provided below:

QC-1¹. *Considering the current existence of the borrow pit, the proponent must detail the restoration work currently underway or planned for the portion already in operation. The proponent must also consider the possibility of a progressive restoration and specify the nature of the restoration work planned after the operation of the expansion. In particular, the proponent must identify the responsible for the restoration work and provide a schedule or timetable for the restoration work.*

RESPONSE TO QC-1

The operation of the GD-17 borrow pit (3 ha already permitted), shown on Map 2 of Appendix 2 of the preliminary information form (*formulaire de renseignements préliminaires*, MELCC), is expected to be completed in the fall of 2022. Upon completion of the operation, in the fall of 2022 or spring of 2023,

¹ **Note:** *the COMEV questions were originally written in French. They have been translated by Poly-Géo, but the French version prevails.*

the slopes of the north and east mining fronts will be smoothed with a mechanical shovel and/or bulldozer so that they do not exceed a 30° slope, as stipulated in the *Regulation respecting sand pits and quarries*. At the same time, the overburden disposed on the periphery of these mining faces will be spread at the bottom of the mining area. The organic matter and woody debris incorporated in the topsoil will accelerate the re-vegetation of the disturbed site. In addition, alders will be planted at a density of 1800 plants per hectare during the summer of 2023. The western and southern portions of the existing mining area will not be restored until 2025 or 2026 because they will be used as an access road to the new mining areas and may be used for the installation of the screening/crushing machine and for temporary storage of produced aggregate.

Site remediation may be phased as the operation proceeds. The operator will ensure that the site is operated in a rational and orderly manner to minimize visual and environmental impacts and facilitate site restoration. However, the operation of the gravel pit will be dependent on the need for aggregate types. Some portions of the site will be sandier, while others will be primarily gravel.

The site operator, Nemaska Eanou, will be responsible for the operation of the site and its remediation in compliance with the *Regulation respecting sand pits and quarries*.

The duration of the operation of the additional area (7 ha) of the GD-17 gravel pit is estimated at about ten years. However, it is possible that the granular materials present will be exhausted before the end of this period. In such a case, the restoration and closure work will be undertaken as soon as the operation is completed. As with the previously mined portion, this will involve reducing the slopes of the mining faces to less than 30°, spreading the overburden around the periphery of the site, and planting shrubs (alders) throughout the disturbed areas to encourage the recovery of tree vegetation and the natural reintroduction of small wildlife within a reasonable time frame. Portions of the borrow pit that are fully mined prior to the end of the 10-year period and not required for temporary aggregate storage will be subject to early restoration.

QC-2. *The proponent must report on the meetings held with land users, including the tallyman of R-16 and the owners of cabins in the area of the borrow pit, and detail their concerns regarding the expansion of the borrow pit. It should also indicate whether mitigation measures are planned to address the concerns.*

RESPONSE TO QC-2

Consultations were conducted by the proponent in December 2021 with the tallyman of R-16 and cabins located in the vicinity of the GD-17 borrow pit. The results of these consultations are provided in Appendix 2. All the people concerned were contacted and none of them expressed any objections to the expansion of the sand pit. However, this acceptance is subject to the operation and restoration of the sand pit in compliance with the standards of the *Regulation respecting quarries and sand pits*.

QC-3. *The proponent must detail how it plans to comply with the requirements of the section 122 of the Règlement sur l'aménagement durable des forêts (Regulation respecting sustainable forest management), particularly the maintenance of a protective strip of 100 meters between the watercourses and the limits of the borrow pit to ensure the protection of lake sturgeon.*

RESPONSE TO QC-3

In order to meet the requirements of Section 122 of the *Règlement sur l'aménagement durable des forêts* (RADF), a 100 m wide protection strip between the high water mark (HWM) of Champion Lake and the limits of the borrow pit will be respected to ensure the protection of lake sturgeon and its habitats. This protection strip was already applied in the document initially submitted for the non-subjection request (Map 2 of Appendix 2 of the Preliminary Information Form submitted on May 3, 2021 to COMEV). To be safe, this strip will be measured on foot, directly in the field, using a hip chain and delineated by close, visible and distinctive marking of trees around the perimeter of the area being logged. Personnel will be notified of these boundaries and required to respect them or face penalties.

The coarse texture of the materials targeted by the operation and the absence of fine particles (clays and silts) in the latter exclude any risk of erosion around the operation area and of transport by runoff of fine particles towards Champion Lake. Finally, the surface stripping and site operation methods will respect the standards of the laws and regulations in force.

The map in Appendix 3 shows that a minimum width of 100 m will be maintained between the limits of the GD-17 borrow pit and the high water mark (HWM).

COMPLEMENTARY DOCUMENT

A complementary study (in French) to characterize the natural environment at the GD-17 borrow pit site was conducted by the DDM Group in the fall of 2021. It is presented in full in Appendix 4 of this document. This study does not reveal any particular operating constraints related to fauna or flora.

We remain at your disposal to provide you with further details and information. Please accept our best regards.



Richard Lévesque
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APPENDIX 1

LETTER FROM THE MINISTRY OF THE ENVIRONMENT AND CLIMATE CHANGE (AUGUST 11, 2021)

- QUESTIONS AND COMMENTS ON THE
APPLICATION FOR A CERTIFICATE OF
NON-SUBJECTION FOR THE GD-17
BORROW PIT EXPANSION

APPENDIX 2

CONSULTATION WITH THE R-16 TALLYMAN AND CABIN OWNERS

APPENDIX 3

MAP SHOWING THE PROPOSED
DEVELOPMENT AREA FOR GD-17
AND THE 100 M WIDE PROTECTION
STRIP TO BE MAINTAINED BETWEEN
THE HIGH WATER MARK OF
CHAMPION LAKE AND THE
DEVELOPMENT AREA

APPENDIX 4

DDM GROUP REPORT

- CHARACTERIZATION OF NATURAL ENVIRONMENTS OF THE GD-17 GRAVEL PIT, NEMASKA