## Table 1: Responses to Technical Advisory Committee (TAC) Review Comments

| TAC DEPARTMENT | ISSUE / QUESTION # | ISSUE / QUESTION RAISED* | RESPONSE | PROPOSED MITIGATION SUMMARY |
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| Air Quality Section, Environmental Compliance and Enforcement Branch, Manitoba Sustainable Development (MBSD) – Feb. 13, 2019 | 1 | Suggestion that the proponent provide a more detailed estimation and emission calculation for each production process and other components of the project. | Additional details regarding emission calculations are provided in **Attachment A** to this table 1 of TAC responses which is an updated (revised) version of the 'Air Quality Report' provided as Appendix E in the EAP).<br><br>The design-build contractor, Turnkey Processing Solutions (TPS), provides the Best Available Control Technologies (BACT) for fugitive emissions (e.g. dust) mitigation for its silica sand plant designs. TPS has designed and built over 20 dust control systems for silica sand plants throughout North America. Independent third party testing, mandated by regulatory agencies, has proven over time that TPS dust control technologies out-perform all regulatory requirements. This BACT will be applied in all facets of dust control. | N/A |
| | 2 | Uncertainty regarding if dust emissions from fugitive sources (e.g., aggregate storage piles, roads - paved and unpaved) within Project area and construction activities were considered in the emission estimation process. | Fugitive emissions were taken into account from the overburden berms and the paved roads. The emission sources were listed in Tables 10, 11 and 12 in Appendix E 'Air Quality Report' in the EAP (also in the updated version as **Attachment A** to this Table 1).<br><br>The haul trucks and overburden berms were modelled as six point sources and volume sources, respectively, in the original version of the Air Quality Report (Appendix E of the EAP). In the updated version (**Attachment A** to this Table 1), the access road is modelled using a line volume source along the main access road, consisting of 176 evenly spaced volume sources. This changed the modelling results as the increased number of sources allows for more accurate dispersion modelling estimates of the pollutants. | N/A |
| | 3 | Suggestion that additional mitigation measures to minimize particulate matter and $NO_2$ be considered if proposed measures are inadequate. | The NOx exceedance is localized and within the Project Site Area boundary, and therefore typically isn't a concern to the local public. The main contributor to $NO_x$ in the model is the equipment used to operate the facility. Please note that full conversion of $NO_x$ to $NO_2$ was considered in the modelling as it is the most conservative approach.<br><br>The Air Quality Report (Appendix E of the EAP), which uses updated modeling to estimate the areas of potential Project-related exceedances to air quality guidelines, has been revised and is provided in **Attachment A** of this Table 1. The isopleth maps shown in the revised Air Quality Report (**Attachment A** of this Table 1) show the maximum estimated exceedance extents for various air quality parameters from the sand wash and dry facility under the worst-case scenario condition (extended long, dry, hot weather during non-winter months coupled with high winds).<br><br>Predicted maximum 24-hr average concentrations of $SO_2$ and CO were below the associated Manitoba Ambient Air Quality Criteria (MAAQC) across the modelling domain. Predicted concentrations of $NO_2$ are below MAAQC at sensitive receptors, with possible exceedances estimated to be limited to the immediate vicinity of the emission sources (i.e. internal combustion byproducts of equipment operation).<br><br>Possible predicted 24-hr average concentrations of particulate matter ($PM_{10}$) is below the MAAQC limit of 50 µg/$m^3$ with the possible exception of sites within Seymourville and Wanipigow located 3.2 km and 4 km, respectively, from the facility location where $PM_{10}$ may exceed MAAQC limit guideline by up to 4.6 µg/$m^3$ of $PM_{10}$ under worst-case scenario conditions.<br><br>Smaller particulate matter ($PM_{2.5}$) is of greater concern because these particle sizes are small enough to be inhaled directly into the lungs. The isopleth maps shown in the revised Air Quality Report (**Attachment A** of this Table 1) predict no 24-hr average concentration exceedances beyond MAAQC for $PM_{2.5}$ at sensitive receptors.<br><br>One of contributors to the exceedances are the quarry overburden berms. The proposed mitigation strategy will be for the facility to develop a Dust Management Plan. The Dust Management Plan that is | EAP, Section 8, Air Quality Monitoring<br>EAP, Table 6-5: Air Quality<br><br>**Additional proposed mitigation:**<br>Dust suppression activities, such as the use of approved dust control agents, will be undertaken when and where required to sufficiently mitigate airborne particulate matter.<br><br>CPS is developing an Environmental Management Program, which will be applied during construction and/or operation of the facility, as required. environmental management plans proposed to be included within the Environmental Management Program are as follows:<br><br>• Dust Management Plan<br>• Air Quality Monitoring Plan<br>• Erosion and Sediment Control Plan<br>• Surface Water Management Plan<br>• Heritage Resources Management Plan<br>• Groundwater Monitoring Plan<br>• Revegetation Monitoring Plan<br>• Emergency Response Plan<br><br>The Environmental Management Program and Plans will be reviewed annually as required, and revised as needed. Required reporting will be provided to MBSD as stipulated in the EAL. |

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| | | | developed for the Project will include dust suppression on the two quarry overburden berms, including the addition of water to the berms to increase dust control efficiency, as needed. The addition of water to the berms would cause aggregation and cementation of fines to the surfaces of larges particles, and the potential for dust emissions would be greatly reduced. This is outlined in United States Environmental Protection Agency, *13.2.4 Aggregate Handling and Storage Piles* (AP-42: Compilation of Air Emissions Factors, November 2006), retrieved November 2018 from: https://www3.epa.gov/ttnchie1/ap42/ch13/final/c13s0204.pdf.<br><br>As indicated in Section 8 'Air Quality Monitoring' of the EAP, an Air Quality Monitoring Program will be developed for the Project operation phase and will be submitted to Manitoba Sustainable Development (MBSD), Environmental Assessment Branch for review and comment. If the Air Quality Monitoring Program detects air quality exceedances that require mitigation, an adaptive management approach to address exceedances will be developed and discussed with MBSD. | |
| | 4 | Suggestion that a more detailed particulate matter emission mitigation plan and ambient air quality monitoring plan be submitted. | Refer to response **#3** regarding air quality mitigation and monitoring. | Refer to proposed mitigation for response **#3**. |
| | 5 | Suggestion that a detailed characterization of the particulate matter indicating silica content be submitted. | A mineral constituent analysis, which characterizes the sand resource, is provided in **Attachment B**. Based on this analysis, the silica content ($SiO_2$) averages 95.9%.<br><br>Considering that no crushing or grinding of the excavated silica sand resource will occur, the frequency and magnitude of free liberated particulates, with silica content, to the ambient air environment external to the sand wash and dry facility are considered very low and only under very dry and windy conditions. Under such conditions, dust control measures will be applied to minimize the potential for free liberated silica particulates to the ambient air environment.<br><br>As indicated in Section 6.5.1 'Air Quality' of the EAP, key mitigation measures to control dust include: enclosing the sand wash and dry facility (including all conveyors and transfer points) under negative pressure to allow fines to be collected in a bag house fabric filter dust collection system; and completely enclosing sand truck transport loads with a waterproof sealed load cover to minimize silica dust projection. Therefore, the risk of exposure to respirable silica is anticipated to be negligible from sand extraction activities. | EAP, Section 6.5.1, Air Quality<br>EAP, Table 6-5: Air Quality<br>EAP, Section 8, Air Quality Monitoring<br><br>**Additional proposed mitigation:**<br>Dust suppression activities, such as the use of approved dust control agents, will be undertaken when and where required to sufficiently mitigate airborne particulate matter.<br><br>CPS is developing an Environmental Management Program, which will be applied during construction and/or operation of the facility, as required. environmental management plans proposed to be included within the Environmental Management Program are as follows:<br><br>• Dust Management Plan<br>• Air Quality Monitoring Plan<br>• Erosion and Sediment Control Plan<br>• Surface Water Management Plan<br>• Heritage Resources Management Plan<br>• Groundwater Monitoring Plan<br>• Revegetation Monitoring Plan<br>• Emergency Response Plan<br><br>The Environmental Management Program and Plans will be reviewed annually as required, and revised as needed. Required reporting will be provided to MBSD as stipulated in the EAL. |
| Manitoba Municipal Relations, Community and Regional Planning, Beausejour Regional Office – Feb. 5, 2019 | 6 | Reference to *The Planning Act* regarding conditional use of land within the Incorporated Community of Seymourville. | CPS will apply for a Conditional Use Permit under *The Planning Act* for development of the Project on land within the Incorporated Community of Seymourville. | N/A |

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| Lands Branch,<br>Eastern Region,<br>MBSD – Feb. 12, 2019 | 7 | *Timber should be disposed of in a commercial manner under the authority of a timber sales agreement, as spelled out in The Forest Act. If there is no uptake in an auction process, the timber can either be direct awarded to the proponent through a timber sale or through a timber damage appraisal. Wasted timber, or unauthorized removal of timber, are dealt with through The Forest Act and The Forest Management.* | Timber will be disposed of in accordance with *The Forest Act* and Forest Use and Management Regulation. | EAP, Section 4.6.4.5, Forestry<br><br>**Additional proposed mitigation:**<br>Timber will be disposed of in accordance with *The Forest Act* and Forest Use and Management Regulation. |
| | 8 | *From a forest renewal perspective, the site should be progressively rehabilitated. This will have the least amount of impact to the long-term sustainability of the forest. This sustainability issue relates to flora and fauna found in the forest, not just the trees associated with a forest and Use Regulation.* | As indicated within the EAP (Section 2.2 Quarrying; Section 6.4.1 Vegetation), The Project will be developed as an open pit quarry operation with progressive annual rehabilitation of depleted quarry cells. CPS anticipates sequentially extracting silica sand from annual quarries that average 5 ha in size and 10 m to 30 m deep. Annual reclamation of each quarry cell will occur as mining is completed in each cell. Therefore, during any given year of operation, there will be only one active quarry cell averaging 5 ha.<br><br>As indicated in Section 8.1 'Success of Revegetation Efforts', a revegetation monitoring plan will be implemented to determine the effectiveness of revegetation techniques used on previously disturbed land as described in Section 6.4.1 and to determine if follow-up reseeding or replanting is required. The monitoring plan will include monitoring vegetation growth during the growing season each year of the Project until the seedlings appear to be established. Seasonally appropriate monitoring will continue for each sequentially closed quarry cell and during the Project closure phase for a minimum of six years as recommended in Manitoba Government's General Closure Plan Guidelines to determine if the revegetated areas are self-sufficient. Successful revegetation will be one of the factors considered by Manitoba Sustainable Development to determine when the Project Site has been sufficiently 'closed' in accordance with a Closure Plan that will be developed for the Project (EAP Section 7; Section 8.4). | EAP, Section 6.4.1, Vegetation<br>EAP, Table 6-5: Vegetation<br>EAP, Section 8.1. Success of Revegetation Efforts<br>EAP, Section 7, Closure Plan<br>EAP, Section 8.4, Closure Plan Review |
| | 9 | *The natural land cover does not appear to be "common" to the regional area as the underlying soils and surficial geology appear to be substantially different in the Local Project Area compared to the Regional Project Area.* | With respect to the natural vegetation land cover, information provided in the EAP (Section 4.3.1 'Vegetation'), as obtained from the Manitoba Forest Resource Inventory, indicates vegetated land cover within the Project Site (within which the Project Footprint is located) consists of cover types and tree species present in the Regional Project Area (up to 10 km beyond the Project Site) and common within the larger Lac Seul Upland Ecoregion within which the Project Site is located. The Lac Seul Upland Ecoregion is part of the national Ecological Land Classification System used for overseeing ecological resources within Canada in a geographical representation. Therefore, comparison of ecological resources impacts (e.g. vegetated land cover) with the Project Site, to the larger Lac Seul Upland Ecoregion, is considered appropriate. | EAP, Section 6.4.1, Vegetation<br>EAP, Table 6-5: Vegetation<br>EAP, Section 8.1. Success of Revegetation Efforts<br>EAP, Section 7, Closure Plan<br>EAP, Section 8.4, Closure Plan Review |
| | 10 | *The Closure Plan has not yet been developed. As rehabilitation is planned to be ongoing through the life of the Project, the Closure Plan should be submitted for review as soon as possible, and annual reviews with field staff should occur to discuss the progress of rehabilitation and proposals for the current year.*<br><br>*We are assuming that details on re-vegetation, including maps, will be in the Closure Plan; however; annual meetings should occur to view rehabilitation progress and proposals for the current year.*<br><br>*Annual meetings with the proponent and departmental staff should occur to discuss reclamation progress and review the annual reclamation plans.* | A Closure Plan is currently being developed in accordance with applicable regulations.<br><br>As indicated in Section 8.4 of the EAP 'Closure Plan Review', the proposed Closure Plan will outline detailed mitigation plans and monitoring activities that will be implemented to rehabilitate the Project Site during the closure phase of the Project. The Closure Plan will describe the plan for annual reclamation, which will include the submission of annual reclamation reporting to MBSD. The reports will include results of the revegetation monitoring program (with photographs and maps).<br><br>As indicated in Section 8.1 of the EAP 'Success of Revegetation Efforts', a revegetation monitoring program will be implemented to determine the effectiveness of revegetation techniques used on previously disturbed land and to determine if follow-up reseeding or replanting is required<br><br>Annual meetings with MBSD and the CPS Community Oversight Committee to review the rehabilitation progress will be proposed within the Closure Plan. | EAP, Section 6.4.1, Vegetation<br>EAP, Table 6-5: Vegetation<br>EAP, Section 8.1. Success of Revegetation Efforts<br>EAP, Section 7, Closure Plan<br>EAP, Section 8.4, Closure Plan Review<br><br>**To be included within the Closure Plan:**<br>• Annual reclamation plan and reporting<br>• Annual meetings with MBSD and the CPS Community Oversight Committee to review the rehabilitation progress<br><br>**To be included in the annual Revegetation Monitoring Plan reporting:**<br>• Progress of revegetation including photographs and maps |

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| | 11 | Concern raised regarding the practicality / feasibility of having gated control access for the two Project access roads, i.e. likelihood of trucks unlocking and relocking the gate, potentially resulting in open access. | In addition to having gates at both access roads, CPS will employ site security to deter unauthorized access to the facility when the gates are not locked. | **Additional Proposed Mitigation:**<br>CPS will employ site security to deter unauthorized access to the facility when the gates are not locked. |
| | 12 | Inquiry regarding the location of Q2, Q3 and Q4 with respect to the Project Schedule (EAP Sec. 2.13). | Q2, Q3 and Q4 refer to a temporal scale references in 2019, not locations of Project activities. i.e. Q2 = April, May, June; Q3 = July, August, September; Q4 = October, November, December. | N/A |
| | 13 | *Please clarify (with maps illustrating QL #s) the sequence of road building (main roads and secondary roads), quarrying and reclamation. It is not clear where quarrying will begin and how it will proceed. Our preference is to build the main access road, and then begin quarrying at the end of road, thereby allowing access to be decommissioned in a progressive (back to front) and orderly manner.* | Mining sequence will begin and proceed based on ongoing geotechnical work and market demands. | N/A |
| | 14 | *For highly mobile mammal and avian species the majority of direct and indirect effects of the Project will likely **not** be restricted to an area 2 km beyond the Project Site.*<br><br>*Furthermore, we do not believe that 10 km reflects the maximum spatial extent of potential effect of the Project. Rather, given the scope and duration of the Project, the Project has the potential to exert affects on a variety of species, possibly beyond 10 km.*<br><br>*The only way to assess effects is through monitoring, and the proponent does not plan on conducting any wildlife monitoring activities.* | An Environmental Monitoring Program will be developed for the Project that will require an Project Environmental Monitor to document wildlife observations (such as moose) in the Project Site Area, and will implement additional wildlife protection mitigation measures beyond those stipulated in the EAP (Table 6-5: Wildlife), as needed. Wildlife monitoring will be conducted in accordance with requirements stipulated within an Environment Act Licence for the Project. | **Additional proposed mitigation:**<br>An Environmental Monitoring Program will be developed for the Project that will include an Environmental Monitor that will document wildlife observations and implement mitigation measures as needed.<br><br>Wildlife monitoring will be conducted in accordance with requirements stipulated within the Environment Act Licence for the Project. |
| | 15 | *Please clarify how the terrestrial (field?) reconnaissance was conducted (e.g. time of year, transects, routes, what was recorded), as well as what would be considered "rare". The information in Table 4-1 suggests that the Project Area appears to be different from what is present in the Regional Area. For example, the Local Project Area appears to be substantially higher, drier and appreciably more deciduous-dominated compared to the Regional Project Area.* | Characterization of the Project Site Area relied on a combination of land cover information obtained from the Manitoba Forest Resource Inventory and on-site general reconnaissance throughout the Project Site Area within representative vegetated communities where the Project Footprint would be located. As indicated in Section 4.3.1 'Vegetation' in the EAP, terrestrial reconnaissance was conducted during October 10 - 12, 2018. Locations and photographs of general reconnaissance areas are provided in Appendix C of the EAP. Respected local community Elders who accompanied the field reconnaissance team on October 12, 2018, and who were also familiar with the Regional Project Area, confirmed that vegetative communities containing medicinal plants were common throughout the Project Site Area and that over 100 plants were used in traditional medicinal medicines which are found in a wide variety of vegetative communities. This information was interpreted to indicate that no vegetation communities that were considered 'rare' (i.e. uncommon) were present in the Project Site Area (EAP Appendix G1 'Hollow Water First Nation Traditional Ecological Knowledge Report).<br><br>Regarding the land cover characteristics within the Project Site Area as compared to the Regional Project Area, and larger Lac Seul Uplands Ecoregion, please see response #**9** above. | N/A |
| | 16 | *Figure 4-4 and 4-5 are not consistent in their depiction of "forested".* | The GIS data used to produce Figures 4-4 and 4-5 in the EAP, which included information on forested and non-forested cover types, was obtained from the Manitoba Land Initiative Manitoba Forest Resource Inventory. | N/A |
| | 17 | *What is meant by "mature" and "over-mature"? "Young" is described in Table 4-3 as greater than 3 m, but there is no description of mature or over-mature.* | As indicated in a footnote at the end of Table 4-3 in the EAP, forest age class information is based on the Manitoba Forest Resource Inventory data for 'Cutting Class' which is based on size, vigour, state of development and maturity of a stand for harvesting purposes. | N/A |
| | 18 | *The Local Project Area is within GHA 26, and portions of the Regional Project Area are within two GHAs - GHA 26 and GHA 17A. Recent aerial surveys in these GHAs indicate that moose densities in the Regional Project Area range from "Low" to "Medium". While moose* | Information regarding the low moose abundance and frequency of moose hunting within the Local and Regional Project Area was obtained from regional and Local Project Area Traditional Ecological Knowledge studies (Appendix G in the EAP) and is considered accurate based on information from members of the local communities who traditionally use the Local and Regional Project Area land and | EAP, Section 6.4.2, Wildlife<br>EAP, Table 6-5: Wildlife |

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| | | *observations in the Project Area are less common than in the Regional Project Area, they are still more common here than in other parts of the GHAs.*<br><br>*When considering recent changes associated with the new all-season road (e.g increased access, increased traffic volume, increased hunting pressure), it is inaccurate to assume that moose hunting does not occur within the Local Project Area. In view of the importance of moose to indigenous communities, as well as recent moose declines in these areas (hence the current closure to licenced moose hunting in GHA 26), the potential socioeconomic effects of the Project on moose should have been considered in the both the Regional Project Area and the Local Project Area.* | resources.<br><br>The 'Scope of Effect' regarding residual Project effects to wildlife in Section 6.4.2 of the EAP should read 'Regional Project Area' rather than 'Local Project Area'. Mitigation measures proposed in Section 6.4.2 of the EAP for the protection of wildlife, and the expected on-going moose management efforts of MBSD in the regional Game Hunting Areas, are considered sufficient to mitigate adverse effects to regional moose and other wildlife populations. | |
| | 19 | *While caribou are wary and difficult to see on-foot, data from previously radio-collared caribou in the indicate that caribou have used habitats in the Regional Project Area (no caribou in this area are collared at the present time).*<br><br>*The Project is expected to have effects within the Regional Project Area, accordingly, caribou should not have been removed from consideration for assessment.* | Information regarding the current lack of caribou within the Regional Project Area (i.e. within 10 km of the Project Site Area) was obtained from a Local Project Area Traditional Ecological Knowledge study (Section 4.3.2 'Wildlife'; Section 4.3.3 'Species of Conservation Concern' in the EAP) and is considered accurate based on information from members of the local communities who traditionally and regularly use the Local and Regional Project Area land and resources. | N/A |
| | 20 | *Please clarify how the terrestrial (field?) reconnaissance was conducted (e.g. time of year, transects, routes, what was recorded). If in fact, all the terrestrial reconnaissance was conducted during a 3-day period in October (Oct 10-12), the resulting data should not be used to form conclusions about presence and absence of wildlife species (e.g. caribou).* | Refer to response **#15** above regarding information on Project Site Area reconnaissance efforts. Information regarding the abundance and potential presence of wildlife species, including caribou, was primarily obtained from previously documented references and results of the Traditional Ecological Knowledge studies for the Local and Regional Project Areas. | N/A |
| | 21 | *Wolverine (a SARA species) is not included in the table, but should be.*<br><br>*Wolverine should have been included in the assessment.* | As indicated in Section 4.3.3 'Species of Conservation Concern' in the EAP, 'Species at Risk' are defined for the purpose of the EAP as those species listed in *The Endangered Species and Ecosystems Act* of Manitoba, and/or those listed as 'Endangered' or 'Threatened' in Schedule 1 of the federal *Species at Risk Act*.<br><br>The wolverine is not listed as a 'Threatened' or 'Endangered' species under *The Endangered Species and Ecosystems Act*, the federal *Species at Risk Act*, or by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC). The wolverine is listed as a species of 'Special Concern' by COSEWIC and in Schedule 1 of the *Species at Risk Act*. Species listed as 'Special Concern' under the federal *Species at Risk Act* are not legally protected (i.e. 'general prohibitions' do not apply) under the *Species at Risk Act*, which applies to federal land and not provincial Crown land.<br><br>There is the potential for Wolverine to occur within the Regional Project Area. The measures proposed to protect wildlife in Section 6.4.2 'Wildlife' of the EAP are considered sufficient to mitigate adverse effects to the regional wolverine population. | EAP, Section 6.4.2, Wildlife<br>EAP, Table 6-5: Wildlife |
| | 22 | *Any assessment must also consider the Regional Project Area. Now that there is an all-season road all the way to Berens River, traffic has increased on the road and members of some other First Nations using the road have a tradition of harvesting caribou (opportunistically) in the Regional Project Area. Accordingly, lack of caribou hunting in the Local Project Area should not be used as justification for removing caribou from consideration in the assessment.* | The potential for Project related effects on caribou was not assessed in the EAP due to the lack of caribou in the Regional Project Area (i.e. within 10 km of the Project Site Area), and therefore absence of expected potential Project effects to caribou.<br><br>Refer to response **#19** regarding the source of information for caribou in the Regional Project Area. | N/A |

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| | 23 | Regarding the scope of effect regarding Wildlife (EAP Section 6.4.2:) to be limited to the Local Project Area, and the conclusion statement regarding Project impacts to Regional Project Area wildlife, the above clauses are contradictory (Regional vs Local Project Area). | As indicated in response **#18**: The 'Scope of Effect' regarding residual Project effects to wildlife in Section 6.4.2 of the EAP should read 'Regional Project Area' rather than 'Local Project Area'. | N/A |
| | 24 | *A number of measures are specified to mitigate effects; however, while some effects may be partially reversible, it will not be possible to reverse other effects. It will be difficult to mitigate certain effects; e.g. posting speed signs will not prevent wildlife collisions, gated access roads will not work as envisioned (see previous comments), no-go windows for nesting birds will help protect birds, but may be inadequate to protect denning mammals. Furthermore, annual rehabilitation will require more discussion to ensure that the stated objectives are being addressed.* | The purpose of applying the proposed mitigation measures is to minimize or avoid unacceptable adverse environmental effects, including adverse effects to regional wildlife populations, beyond a regulatory threshold or level considered unacceptable by regulatory authorities.<br><br>Regarding annual rehabilitation of quarries and Project Closure Plan, please refer to response **#10**. | Refer to all mitigation, monitoring and follow-up measures referenced within this table and within the EAP. |
| | 25 | *The Lac Seul Upland Ecoregion should not be the area used to measure effects on wildlife populations. It is more appropriate to measure effects using the Local and Regional Project Areas. This is doable, and the proponent should be required to prepare a proposed wildlife monitoring plan for review.* | Refer to responses **#9** and **#14** above. | **Additional proposed mitigation:**<br>Wildlife monitoring will be conducted in accordance with requirements stipulated within an Environment Act Licence for the Project. |
| | 26 | *The effects of the Project should not be considered in isolation of other developments occurring in the area. Impacts from this project are additive to those already occurring from other factors; as such; the cumulative effects of the Project should have been considered in the assessment.* | A Cumulative Effects Assessment is not required in an Environment Act Proposal under *The Environment Act* as per the 'Information Bulletin – Environment Act Proposal Report Guidelines' (March 2018).<br><br>However, to provide both the Canadian Environmental Assessment Agency and MBSD with information regarding potential cumulative environmental effects of the Project, a Cumulative Effects Assessment has been prepared (see **Attachment C** of this Table 1). | Refer to **Attachment C** of this Table 1 |
| | 27 | Explain how the effects of the Project on hunting and trapping will be 'reversible'. | For clarification: effects on the 'activities' of hunting and trapping in the Project Site Area are reversible because after Project closure, the Project Site Area is proposed to be rehabilitated to return the landscape to pre-Project conditions to the extent feasible making the rehabilitated Project Site Area suitable again for hunting and trapping activities. | EAP, Section 6.6.3.1, Hunting and Trapping<br>EAP, Table 6-5: Hunting and Trapping |
| Environmental Compliance and Enforcement Branch, MBSD – Feb. 12, 2019 | 28 | *Has CPS calculated the amount of hydraulic and organic loading that the Project is expected to generate during the construction and operation phases? If so, is CPS able to confirm that the Seymourville wastewater treatment lagoon has enough remaining hydraulic and organic capacity to receive this additional waste stream without exceeding its treatment capacity?* | Both the Seymourville and Hollow Water First Nation wastewater treatment facilities are available. If the facilities eventually require expansion as a result of the Project, CPS will financially participate in upgrading these facilities. | EAP, Section 6.6.2.2, Community Services<br>EAP, Table 6-5: Community Services |
| | 29 | *If an expansion of the Seymourville lagoon is necessary, where will CPS direct its wastewater in the interim?* | Refer to response **#28**. | N/A |
| | 30 | *Can CPS clarify what is meant by "regular" air quality monitoring i.e. frequency, as well as provide details regarding the location of the data collection points? How will CPS respond should the air quality monitoring data indicate an exposure concern for employees and/or area residents?* | Air quality monitoring stations will be established for the Project operation phase, with details of the monitoring provided in an Air Quality Monitoring Plan (Section 8.3 of the EAP) that will be submitted to MBDS, Environmental Assessment Branch for review and comment. If the Air Quality Monitoring Plan detects air quality exceedances that require mitigation, an adaptive management approach to address exceedances will be developed in conjunction with MBSD.<br><br>As indicated in Section 6.9.1 'Worker Health and Safety' in the EAP, worker protection in Manitoba is regulated through standards, procedures and training under the *Workplace Safety and Health Regulation, M.R. 219/2015*.<br><br>Safety equipment and personal protective equipment will be supplied to employees and workers. All contractors and visitors will be subject to site specific environmental health and safety orientation for all phases of the Project. | EAP, Section 6.5.1, Air Quality<br>EAP, Table 6-5: Air Quality<br>EAP, Section 8, Air Quality Monitoring<br>EAP, Section 6.9.1, Worker Health and Safety<br>EAP, Table 6-6: Worker Health and Safety |

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| Water Science and Watershed Management Branch, Groundwater Management Section, MBSD – Feb. 11, 2019 | 31 | *No site specific geology or groundwater conditions at the site have been described in the proposal.*<br><br>*No information is available on groundwater quality for this area.* | Preliminary site-specific geologic information has been collected since the 1980s, with the most comprehensive data from drilling programs conducted by Gossan completed in 2006 and 2008 provided in a Preliminary Economic Assessment (EAP reference: P&E Mining Consultants Inc. 2014).<br><br>Hydrogeological investigations are currently underway to characterize the hydrogeology of the Project Site Area. The primary focus of these programs is to characterize subsurface hydrogeological and geotechnical conditions including description of surficial geology, geotechnical properties, water levels, aquifer properties and groundwater quality. | N/A |
| | 32 | *It is recommended that the hydrogeological study should be designed to collect the necessary information to determine whether there is potential for impacts on groundwater users or the ecosystem.* | The planned CPS hydrogeological investigations in March 2019 will collect information to enable development of a hydrogeological conceptual model for the site and surrounding area. Combined with water level and aquifer testing data, the conceptual model will be used to determine the potential for groundwater quantity and quality impacts on groundwater users or the ecosystem based on anticipated groundwater extraction rates.<br><br>As indicted in Section 8.2 'Groundwater Monitoring' in the EAP, CPS will also be monitoring groundwater quality and quantity using on-site groundwater test wells during the Project construction and operation phases. As indicated in Section 6.2.3 'Groundwater' in the EAP, process water will be obtained from an alternative licenced water source if on-going water monitoring studies demonstrate an unacceptable risk to groundwater quantity or quality. | EAP, Section 6.2.3, Groundwater<br>EAP, Table 6-5: Groundwater<br>EAP, Section 8.2, Groundwater Monitoring |
| | 33 | *If monitoring wells are installed during hydrogeological testing the proponent must adhere to applicable provisions of the Groundwater and Water Well Act and Well Standard Regulation.* | Hydrogeological monitoring wells will be installed in accordance with applicable provisions of *The Groundwater and Well Act* and applicable regulations. | **Additional proposed mitigation:**<br>Hydrogeological monitoring wells will be installed in accordance with applicable provisions of *The Groundwater and Well Act* and applicable regulations. |
| | 34 | *It is anticipated that the Winnipeg Formation at the project location will share similar properties to the deposit that was mined at Black Island in Lake Winnipeg. In 1995, Manitoba Energy and Mines, Minerals Division collected samples at the former quarry on Black Island to assess the metal contents of the shales (Fedikow, et al, 1995). The geochemical analysis of these samples showed that the shales are strongly enriched in heavy metals. Therefore, it is a concern that during the mining operation, tailings composed of the shale layer has the potential to leach metals to the environment. To address this concern, the proponent should conduct a risk assessment which should consider but not limited to the following;*<br><br>• *Collection of shale samples during the hydrogeological testing and perform geochemical analysis including the potential to generate acid and leach metals.*<br>• *Evaluate the potential risk of metals leaching to an aquifer or nearby surface waters.*<br>• *Develop a mitigation and monitoring program that takes into account the metals that are present in the shale, potential for impacts to water users and the environment.* | There are presently no plans to produce a separate shale waste stream or tailings from the silica sand washing process. Samples of occurrences of the black shale throughout the Project Site Area were collected during the exploration drilling program in 2018 with the intent of isolating the black shale during the mining process. In the areas where the shale layer is encountered during extraction, the shale will be isolated and extracted separately, placed in a prepared clay lined pit at the floor of the current active extraction area and capped with limestone prior to further containment in the restoration process. This is the environmentally accepted process to both permanently neutralize potential acid forming iron elements in the minerals as well as isolate the material from the environment.<br><br>The geochemical characterization program will be developed according to industry best practice for metal leaching/ acid rock drainage (ML/ARD) characterization and management under the supervision of a hydrogeologist and geochemist. As part of the ongoing work in 2019, the existing core library (obtained during exploration drilling at the site) and sample inventory was reviewed to collect discrete shale samples for geochemical characterization.<br><br>Mitigation proposed in the EAP for the protection of surface water quality (EAP Section 6.3.1) includes use of ditching to contain water runoff from disturbed areas and directing runoff into a sump-pit for the use in the sand wash plant for process water, and is anticipated to mitigate the potential for adverse effects to local surface water quality. | **Additional proposed mitigation:**<br><br>ML/ARD mitigation will include:<br><br>• Isolating the black shale during mining;<br>• Encapsulating the black shale in a clay lined pit within an active quarry cell;<br>• Covering the black shale with a crushed limestone layer for neutralization; and<br>• Proceeding with progressive quarry cell reclamation activities as outlined in the Project Closure Plan.<br><br>CPS is developing an Environmental Management Program, which will be applied during construction and/or operation of the facility, as required. environmental management plans proposed to be included within the Environmental Management Program are as follows:<br><br>• Dust Management Plan<br>• Air Quality Monitoring Plan<br>• Erosion and Sediment Control Plan<br>• Surface Water Management Plan<br>• Heritage Resources Management Plan<br>• Groundwater Monitoring Plan<br>• Revegetation Monitoring Plan<br>• Emergency Response Plan |

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| | | | | The Environmental Management Program and Plans will be reviewed annually as required, and revised as needed. Required reporting will be provided to MBSD as stipulated in the EAL. |
| | 35 | A groundwater monitoring plan is expected to be submitted to MBSD for review with respect to the proposed groundwater monitoring program (Section 8.2 of the EAP).<br><br>*It is recommended that a sufficient baseline information on groundwater levels and quality should be collected prior to the commencement of mining for comparison when assessing possible impacts of mining on the groundwater resources.* | Refer to responses **#31** and **#32** for groundwater investigations and monitoring. | EAP, Section 8.2, Groundwater Monitoring |
| | 36 | *In addition to the nearby wells noted in the proposal, other wells may also be present. An assessment should be undertaken in an effort to locate all wells on the site or areas that could potentially be impacted by the operation.* | An updated groundwater wells map, using the most recent information available from Manitoba Sustainable Development (MBSD), has been provided in Appendix C of a Cumulative Effects Assessment report included as **Attachment C** of this Table 1. The MBSD groundwater well database does not have a record of all active groundwater wells in Manitoba. The proposed Groundwater Monitoring Program will confirm the locations of local groundwater wells in the Project Site Area. | N/A |
| | 37 | *Develop a contingency plan should the quarry operation have any negative water quality or quantity impacts on any groundwater users.* | If the Groundwater Monitoring Plan studies (EAP Section 8.2) indicate that use of groundwater for sand wash plant operations is likely to be unsustainable, CPS will obtain water for facility operations from sustainable alternative water sources including water from seepage within the annual open quarry pit, and water that will be trucked to the Project site from a licensed source (EAP Section 2.9 'Water Use'). | N/A |
| Interlake-Eastern Regional Health Authority, Stonewall Community Health Office – Jan. 31, 2019 | 38 | *The proponent should survey and map human populations in the affected area. It is not clear how many people live in the vicinity of this quarry, processing plant and trucking routes, and where their residences are. A survey should be included which shows the population and the distance to the quarry, processing plant and trucking routes.* | The potential for adverse effects to human health and safety relating to Project truck traffic is discussed in a Traffic Memorandum provided in **Attachment D** of this Table 1. | N/A |
| | 39 | *It is not clear what kind of monitoring program will be in place, what are maximum acceptable concentrations of particulate matter and silica dust for the general public in Manitoba, and what will happen if air pollutants exceed acceptable concentrations. If silica levels are very high, will the company be planning to evacuate nearby communities? Also, how stringent are provincial air quality standards, and how do they compare to other jurisdictions? Do provincial air quality standards reflect current evidence on effects of air pollutants on human health. I would expect that results of air quality monitoring would be forwarded to the regional medical officer of health.* | The original Air Quality Report (Appendix E of the EAP) and the revised Air Quality Report (**Attachment A** of this table 1), provide Manitoba Ambient Air Quality Criteria (MAAQC) limits for potential pollutants associated with the proposed Project.<br><br>Refer to response **#3** for Air Quality Monitoring and proposed mitigation. | Refer to proposed mitigation for response **#3**. |
| | 40 | Request for the Project effects on groundwater to be clarified. | Refer to responses **#31** and **#32** regarding potential effects to groundwater. | EAP, Section 6.2.3, Groundwater<br>EAP, Table 6-5: Groundwater<br>EAP, Section 8.2, Groundwater Monitoring |
| | 41 | Inquiry regarding if water waste will be generated and if so, how will water waste be disposed. | Information regarding wastewater was provided in the EAP, Section 2.5.1 'Wastewater'. There will be no discharge of wastewater during processing as all process water will be recycled back into the wet plant and not discharged to the environment. Wastewater from washroom and shower facilities along with the cafeteria will be directed to a septic holding tank. The septic holding tank will be pumped out by a licenced local contractor on an as-needed basis and will be disposed at a licenced local wastewater treatment facility.<br>As indicated in the EAP, Section 6.6.2.3 'Community Services', CPS has committed to upgrading the Seymourville wastewater treatment facility/lagoon to accommodate Project wastewater treatment needs, including increased wastewater treatment demand from employees housed in the community, if necessary. | EAP, Section 6.6.2.3, Community Services<br>EAP, Table 6-5:Community Services<br>EAP, Section 6.3.1, Surface Water Quality<br>EAP, Table 6-5:Surface Water Quality |

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| | 42 | *Noise levels should be monitored, and they should not exceed acceptable levels. What is the acceptable level of noise for the general public? The noise levels should be monitored in the communities in the vicinity of the quarry. The project will be operating 24 hours per day, 7 days per week (see executive summary). Will night-time operations be expected to operate within lower noise levels?* | Noise complaints will be tracked and investigated and any corrective action will be applied as required.<br><br>CPS will engage with the local community to determine feasible solutions to adaptively manage noise levels resulting from Project activities should complaints be brought to the attention of CPS. | EAP, Section 6.5.2, Noise<br>EAP, Table 6-5: Noise |
| Water Stewardship and Biodiversity Division, Lands Branch, MBSD – Feb. 11, 2019 | 43 | *Any further activities outside of the quarry lease that are on Crown land will require Crown land permits.* | CPS will apply for Crown land permits under *The Crown Lands Act,* and applicable regulations, as required for Project activities. | N/A |
| | 44 | *The Project Site is situated in part within the Incorporated Community of Seymourville (Director of Survey Plan 19311) and immediately adjacent to Hollow Water First Nation, existing cottage developments and Crown lands with potential for future cottage development. The Incorporated Community of Seymourville Zoning By-Law Map 1 - Natural and Seasonal Recreation Areas, identifies lands adjacent to the Project Site as zoned Seasonal Recreational and within Seymourville as Residential. As such, there are incompatible land uses between the Project Site and adjacent lands, communities and developments. Health, safety and nuisances (such as noise) associated with the Project Site must be considered and prevented to ensure that the Wanipigow Sand Extraction Project does not negatively affect existing developments or designated land uses.* | CPS will apply for a Conditional Use Permit under *The Planning Act* for development of the Project on land within the Incorporated Community of Seymourville. The Project will be developed in accordance with conditions of the Conditional Use Permit to mitigate health, safety and nuisances and potential adverse effects to existing adjacent developments or designated land uses. | **Additional proposed mitigation:**<br>The Project will be developed in accordance with conditions of a Conditional Use Permit under *The Planning Act* for development of the Project on land within the Incorporated Community of Seymourville to mitigate health, safety and nuisances and potential adverse effects to existing adjacent developments or designated land uses. |
| | 45 | Regarding returning the topography to preconstruction condition to the extent feasible: *… cross sectional or volumetric information is not provided to facilitate assessment of projected topography beyond the anticipated life of the Wanipogow Sand Extraction Project. Lands Branch recommends Canadian Premium Sand Inc. (CPS) submit the Closure Plan in order to review post Project longterm effects to the landscape.* | Refer to response **#10** regarding the Project Closure Plan. | EAP, Section 6.4.1, Vegetation<br>EAP, Table 6-5: Vegetation<br>EAP, Section 8.1. Success of Revegetation Efforts<br>EAP, Section 7, Closure Plan<br>EAP, Section 8.4, Closure Plan Review<br><br>**To be included within the Closure Plan:**<br>• Annual reclamation plan and reporting<br>• Annual meetings with MBSD and CPS Community Oversight Committee to review the rehabilitation progress |
| | 46 | *Surface water within the Project Site is addressed through ditching which will be constructed to direct drainage to an active quarry cell. However, existing communities, cottages developments and Crown lands are located immediately adjacent to the project area (4.6.5.3 Cottages). The report does not address impacts to adjacent communities, developments and Crown lands from the residual effects of clearing, construction and culvert installation beyond the Project Site.* | Surface water runoff associated with Project components and activities is planned to be fully contained within the Project Site Area and is not expected to impact adjacent existing communities, cottage developments and Crown lands.<br><br>The residual effects of clearing and construction activities, including culvert installation, are expected to be sufficiently mitigated by environmental monitoring and protection measures proposed with the EAP and within an Environmental Management Program that will be prepared for review and approval by MBSD prior to the initiation of Project construction. | EAP, Section 6.3.1, Surface Water Quality<br>EAP, Table 6-5: Surface Water Quality<br>EAP, Table 6-6: Summary of Potential Accidents and Malfunctions and Measures to Mitigate Risk of Occurrence<br><br>**Additional proposed mitigation:**<br>CPS is developing an Environmental Management Program, which will be applied during construction and/or operation of the facility, as required. environmental management plans proposed to be included within the Environmental Management Program are as follows:<br><br>• Dust Management Plan<br>• Air Quality Monitoring Plan<br>• Erosion and Sediment Control Plan |

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| | | | | • Surface Water Management Plan<br>• Heritage Resources Management Plan<br>• Groundwater Monitoring Plan<br>• Revegetation Monitoring Plan<br>• Emergency Response Plan<br><br>The Environmental Management Program and Plans will be reviewed annually as required, and revised as needed. Required reporting will be provided to MBSD as stipulated in the EAL. |
| | 47 | *Recommend CPS review housing needs and work with community and the Department of Indigenous and Northern Relations to address wastewater capacity.* | CPS is assessing the housing needs of the potential workforce to appropriately accommodate the needs for housing and other services in discussion with Seymourville and Manitoba Housing.<br><br>Refer to response **#28** regarding wastewater. | CPS is assessing the housing needs of the potential workforce to appropriately accommodate the needs for housing and other services in discussion with Seymourville and Manitoba Housing. |
| | 48 | *Figure B-1* [Appendix I of the EAP], *proposed project area showing quarry leases, identifies QL-2988, however as noted in an October 4, 2018 correspondence by the Department of Growth Enterprise and Trade states that QL 2988 will not be processed. Lands Branch advises to remove the reference to QL-2988 from this map.* | Figure B-1 within the Heritage Resources Impact Assessment report (Appendix I of the EAP) was produced and submitted to Historic Resources Branch prior to the EAP being submitted to MBSD. An updated map showing the Project Site Area quarry leases is provided in Figure 1-1 of the EAP. | N/A |
| Manitoba Infrastructure, Highways Planning and Design Branch, Environmental Services Section – Feb. 12, 2019 | 49 | *The proposed truck haul route will be crossing the Pine Falls Generating Station. Manitoba Infrastructure and Manitoba Hydro have a shared agreement for the deck over the generating station. More discussions with Manitoba Hydro are needed to address the additional traffic and safety concerns along this portion of the route.*<br><br>*For questions regarding this comment, please contact Russ Andrushuk, P. Eng, Acting Executive Director of Structures, at (204) 945-5058 or at Russ.Andrushuk@gov.mb.ca.* | CPS will continue on-going discussions in March 2019 with Manitoba Hydro and Manitoba Infrastructure to confirm the need and scheduling for road upgrades on the proposed route to Winnipeg. | CPS will continue on-going discussions in March 2019 with Manitoba Hydro and Manitoba Infrastructure to confirm the need and scheduling for road upgrades on the proposed route to Winnipeg. |
| | 50 | *The proposed project may have negative impacts to the provincial highway network and a Traffic Impact Study is needed to determine if any on-highway improvements are required on the provincial highway network.* | A Traffic Impact Study was provided as Appendix N of the EAP submission. The scope of that study included using projected traffic volumes resulting from Project operations to determine potential traffic impacts on the adjacent highway system. The project study limits included the proposed intersection of the new Project Main Access Road at the Hollow Water Road to the intersection of the Hollow Water Road and PR 304 near Manigotagan. The study determined that the Level of Service for each of these intersections is LOS A. The proposed intersection geometry at the Project Main Access Road and the Hollow Water Road will follow the geometry of MI's typical industrial / Commercial / Multi-Lot Residential Access Treatment as recommended in the Traffic Impact Study (Appendix N of the EAP).<br><br>Refer to a Traffic Memorandum provided as **Attachment D** of this table 1 for information regarding the provincial highway network.<br><br>CPS is in ongoing discussions with Manitoba Infrastructure to determine requirements for upgrading provincial infrastructure to accommodate Project traffic and maintain public safety. | EAP, Section 6.7, Traffic<br>EAP, Table 6-5: Transportation<br><br>**Additional mitigation:**<br>CPS is in ongoing discussions with Manitoba Infrastructure to determine requirements for upgrading provincial infrastructure to accommodate Project traffic and maintain public safety. |
| | 51 | *The department has been in negotiations with Hollow Water First Nation to Declare the Hollow Water Access as a Provincial Road. If Declared the proposed access connection from Hollow Water Access to the proposed development site may need an access permit from the department.*<br><br>*For questions regarding this comment, please contact Karen Toews Therrien, Manager of Roadside Development, at (204) 945-0324 or at Karen.ToewsTherrien@gov.rnb.ca.* | CPS will work with Manitoba Infrastructure to obtain access permits to Provincial Roads, as required. | N/A |

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| Forestry and Peatlands Branch, Water Stewardship and Biodiversity Division, MBSD – Feb. 7, 2019 | 52 | *At this time, any further development requiring timber removal (beyond the exploration that has occurred) should be put on hold until an Environment Act License and Indigenous Consultation are approved/completed. All of the preliminary work can be completed but no actual activity on the land should occur until approvals are in place.* | CPS will conduct Project-related activities in accordance with applicable legislation and regulations, including licences, permits and approvals required and issued to CPS. | N/A |
| | 53 | *Timber should be disposed of in a commercial manner under the authority of a timber sales agreement, as spelled out in The Forest Act. If there is no uptake in an auction process, the timber can either be direct awarded to the proponent through a timber sale or through a timber damage appraisal. Wasted timber, or unauthorized removal of timber, are dealt with through The Forest Act and The Forest Management and Use Regulation.*<br>*The auction process can be prepared ahead of time but not advertised, or implemented, until such a time that the EAL is approved. The time required for an auction is a minimum of 14 days for the volume of timber that needs to be cleared.* | Refer to response **#7** regarding timber disposal. | EAP, Section 4.6.4.5, Forestry<br><br>**Additional proposed mitigation:**<br>Timber will be disposed of in accordance with *The Forest Act* and Forest Use and Management Regulation. |
| | 54 | *From a forest renewal perspective, the site should be progressively rehabilitated. This will have the least amount of impact to the long-term sustainability of the forest. This sustainability issue relates to flora and fauna found in the forest, not just the trees associated with a forest.* | Refer to response **#8** regarding progressive annual rehabilitation. | EAP, Section 6.4.1, Vegetation<br>EAP, Table 6-5: Vegetation<br>EAP, Section 7, Closure Plan<br>EAP, Section 8.4, Closure Plan Review<br>EAP, Section 8.1, Success of Revegetation Efforts |
| | 55 | *As long as the Company follows the strategies and mitigation in the EAP, and the to be developed Closure Plan: harvesting of timber (making it available to community and through auction), dust control, limiting the development of roads, and progressive revegetation, Forestry issues and concerns will be minimized.* | CPS will follow the proposed mitigation, monitoring and follow-up strategies as proposed in the EAP. | EAP, Section 6.4.1, Vegetation<br>EAP, Table 6-5: Vegetation<br>EAP, Section 7, Closure Plan<br>EAP, Section 8.4, Closure Plan Review<br>EAP, Section 8.1, Success of Revegetation Efforts |
| Water Use Licensing Section, MBSD – Jan. 24, 2019 | 56 | *This proponent is required to submit an Application for Licence to Construct a Well and Divert Groundwater. This application is required in order to issue a Groundwater Exploration Permit which must occur PRIOR to groundwater exploration and to well construction. In addition, the proponent will need to hire the services of a hydrogeologist registered with Engineers Geoscientists Manitoba as a condition of the Permit.* | CPS has obtained a licence to construct a well and divert groundwater prior to conducting groundwater exploration and groundwater well installation. CPS is in the process of conducting these activities in accordance with their Groundwater Exploration Permit. | N/A |
| Mines Branch Regulatory Services, Resource Development Division, Manitoba Growth, Enterprise and Trade – Feb. 12, 2019 | 57 | Regarding EAP Section 1.7.1 (pg. 7): *Seems like, they proponent is already in 'advanced exploration' phase without giving 60 days notice to and without filing a mine closure plan with the Mines Branch*. | CPS has chosen to have the proposed Project reviewed under *The Environment Act*, which is considered a Class 2 development under that Act and requires an Environment Act Licence prior to constructing and operating the Project. This regulatory review process is a more rigorous environmental review process than would be required for this Project if CPS had chosen to apply for approval of an Advanced Exploration Project under *The Mines and Minerals Act*.<br><br>Pre-Project activities including geotechnical and hydrogeological investigations required to confirm the proposed locations of Project components and activities, and address information requests prior to the issuance of an Environment Act Licence, have been and are being conducted under Work Permits and other approvals that have been granted by the applicable regulatory department for the purpose of these preliminary exploration activities. | N/A |
| | 58 | Regarding EAP Section 1.7.2 (pg. 7): *The proponent must be aware that the Class 2 development designation is also triggered by the fact that it is a major mining project with an annual production of 1 million tonne of silica sand (nonaggregate material) and just not a tiny quarry operation.* | As indicated in response **#57**, the proposed Project is being reviewed as a Class 2 development under *The Environment Act*. | N/A |

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| | 59 | Regarding EAP Section 2.2.1 (pg. 12): *Fig 2-4 does not indicate the depth or thickness of topsoil/overburden/silica sand above the granite bedrock. It also does not indicate the location or depth of water table or aquifer(s). Borehole sections will be required showing the above information.* | As indicated in response **#31**, CPS is currently conducting geotechnical and hydrogeological investigations required to confirm the proposed locations of Project components and activities. This information will be provided in support of the Environment Act Licence. | N/A |
| | 60 | Regarding EAP Section 2.3 (pg. 13-14): *The activities seem to raise excessive concentration of dust in air. A detailed mitigation plan for dust containment may be required.* | A mitigation plan for dust management will be included within an Environmental Management Program that will be prepared for review and approval by MBSD.<br><br>Also refer to response **#3** regarding potential for excessive Project-related dust and reference to an updated Air Quality Report provided as **Attachment A** of this table 1 for estimated concentrations of particulate matter related to Project operations. | EAP, Section 6.5.1: Air Quality<br>EAP, Table 6-4: Air Quality<br>EAP, Section 8.3, Air Quality Monitoring<br><br>**Additional proposed mitigation:**<br>CPS is developing an Environmental Management Program, which will be applied during construction and/or operation of the facility, as required. environmental management plans proposed to be included within the Environmental Management Program are as follows:<br><br>• Dust Management Plan<br>• Air Quality Monitoring Plan<br>• Erosion and Sediment Control Plan<br>• Surface Water Management Plan<br>• Heritage Resources Management Plan<br>• Groundwater Monitoring Plan<br>• Revegetation Monitoring Plan<br>• Emergency Response Plan<br><br>The Environmental Management Program and Plans will be reviewed annually as required, and revised as needed. Required reporting will be provided to MBSD as stipulated in the EAL. |
| | 61 | Regarding EAP Section 7 (pg. 97): *Mine closure plan will be submitted to Mines Branch. Mining operation can not be commenced until the filed closure plan is approved by the Mines Branch.* | As indicated in Section 7 of the EAP, a Closure Plan will be developed and submitted to MBSD for this Project accordance with the Manitoba Mine Closure Regulation 67/99 General Closure Plan Guidelines. | EAP, Section 7, Closure Plan<br>EAP, Section 8.4, Closure Plan Review |
| | 62 | Regarding EAP Section 7.1 (pg. 97): *Mine Closure plan requires a rehabilitation plan for all the facilities connected with the quarrying and processing of the silica sand on the site.* | As indicated in response **#61**, the Closure Plan will be developed in accordance with the the Manitoba Mine Closure Regulation 67/99 General Closure Plan Guidelines. | EAP, Section 7, Closure Plan<br>EAP, Section 8.4, Closure Plan Review |
| | 63 | Regarding EAP Section 8, 8.4 (pg. 98): *Monitoring and follow up, air quality, water quality and revegetation also to be part of Mine closure plan.* | As indicated in Section 8.4 of the EAP, the proposed Closure Plan will outline mitigation and monitoring activities that will be implemented to reclaim the Project Site during the closure phase of the Project. Pending MBSD review (and as expected, Mines Branch review) of a proposed Closure Plan, the Closure Plan may be revised to reflect changes or additional requirements that may be needed. | EAP, Section 7, Closure Plan<br>EAP, Section 8.4, Closure Plan Review |

* Text in *italics* indicate direct quotes from submitted comments; otherwise issues / questions raised have been summarized for brevity or clarification.
N/A = Not applicable.

## Attachments:

**Attachment A:** Revised Air Quality Report, March 2019
**Attachment B:** Sand Resource Mineral Constituent Analysis
**Attachment C:** Wanipigow Sand Extraction Project – Cumulative Effects Assessment Report
**Attachment D:** Traffic Memorandum