

Targeted Questions for Federal Analysis

The review by the Impact Assessment Agency of Canada (IAAC) is focused on the key issues that are relevant for federal impact assessment decision-making, specifically adverse federal effects and public interest factors. Regarding the adverse federal effects, IAAC aims to understand where standard mitigation measures would apply and the Proponent's proposed mitigation seems appropriate, where existing legislative frameworks can be leveraged, and where oversight and protections from federal and provincial laws can build confidence that effects would be managed and potentially impacted Indigenous communities would be consulted or engaged.

To support IAAC's review of the draft Impact Statements and preparation of the draft Impact Assessment Report, please provide responses to the targeted questions in the table. IAAC assigned questions to federal authorities (FAs). (A list of acronyms is included at the end of this document.) The targeted questions are designed to seek specific feedback and input to further IAAC's analysis of the key issues for preparation of the draft Impact Assessment Report.

When responding to these questions, please consider not only Webequie Supply Road Project (the project), but also Northern Road Link Project and Marten Falls Community Access Road Project. As these three proposed projects are within the same geographic region, please advise of possible distinct considerations when responding to the questions. IAAC will consider the responses to the targeted questions and seek patterns in problem solving when conducting its analysis for all three road projects to ensure efficiency of the assessment processes.

When completed, please return this form to the Webequie Supply Road Project inbox, webequie@iaac-aeic.gc.ca.

| Identifier (FA) | Question | FA Response |
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| <h3>Effects to Fish and Fish Habitat</h3> | | |
| <p>Webequie Supply Road (WSR) draft Impact Statement (dIS) shows that the Local Study Area (LSA) includes the project footprint and extends one kilometre from the centreline of the preferred route. It also includes a 500-metre buffer from temporary or permanent support infrastructure. The LSA boundary is intended to capture areas influenced by hydrological connectivity and habitat fragmentation. The Regional Study Area (RSA) includes the LSA and further extends on each side of the LSA boundaries to include the four tertiary watersheds crossed by the recommended preferred route: the Upper Winisk, Middle Winisk, Upper Ekwan and Lower Attawapiskat watersheds.</p> <p>Large waterbodies crossed by the project area include Winisk Lake (the largest crossing), the Winiskisis Channel, Ekwan River, and Muketei River. The proposed 31 permanent crossings would include 5 major crossings that require in-water piers, and 26 crossings with culverts or clear span bridges.</p> <p>Fish:</p> <p>With respect to fish, IAAC is of the view that injury or mortality to fish from construction and maintenance works, as well as impacts from fishing pressures, may be addressed through standard mitigation measures and other federal and provincial oversight. Other oversight includes requirements stipulated by federal mechanisms under the <i>Fisheries Act</i> as well as provincial legislative frameworks such as provincial permitting of in-water works (e.g., approvals under <i>Lakes and Rivers Improvement Act</i> and/or <i>Public Lands Act</i>) and protections through licensing under <i>Fish and Wildlife Conservation Act</i>.</p> <p>Section 10 of the dIS identifies suitable habitat to support 32 fish species in the RSA, 11 of which are noted as fish species of importance to Indigenous communities (burbot, brook trout, lake sturgeon, lake whitefish, northern pike, walleye, yellow perch, cisco, longnose sucker, white sucker, and lake chub). These 11 fish species have been identified in lakes and rivers and may be present at the proposed water crossing locations, for example at the Winisk Lake crossing. Indigenous Knowledge indicates that some of the species have previously been captured in Winisk Lake and the Winiskisis Channel. The dIS also shows that suitable habitat for lake sturgeon, a species of special concern under the <i>Species at Risk Act</i> (SARA) and Ontario's <i>Endangered Species Act, 2007</i>, is present at a minimum of four of the proposed crossings. IAAC has consulted the Canadian Aquatic Species at Risk database and is not aware of any other aquatic species at risk likely to be present in the study areas.</p> <p>According to the proponent, potential effects to fish include injury or mortality from blasting near waterbodies and from in-water work; changes to survival, reproduction and distribution from the placement of waterbody crossing structures affecting access to fish habitats; and reduced population levels due to increased public access to angling areas. IAAC has also received comments from Indigenous communities that they are concerned about increased angling pressure on fisheries.</p> | | |

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| | | <p>Mitigation measures for effects to fish that the proponent has proposed (in Section 10 of the dIS) include: minimize the use of explosives and conduct blasting operations outside of sensitive periods; adhere to best practices to salvage and relocate fish away from work areas; follow best practices to avoid sensitive fish habitats as much as possible (e.g. use appropriate timing window for in-water work); and maintain water flows and safe fish passage. Also, the proponent indicated that it is developing a policy for non-Indigenous personnel on shift or at the construction camps in regard to any fishing activities to address potential angling pressure.</p> <p>Fish habitat:</p> <p>With respect to fish habitat, IAAC is of the view that adverse changes to fish habitat from in-water construction and maintenance works at minor water crossings (i.e. culverts), may be addressed through standard mitigation measures and other federal and provincial oversight. Other oversight includes requirements stipulated by federal mechanisms under, and protective provisions of, the <i>Fisheries Act</i>, as well as provincial permitting of construction activities and structures (e.g., approvals under Ontario's <i>Lakes and Rivers Improvement Act</i>, <i>Aggregate Resources Act</i> and <i>Public Lands Act</i>). Adverse changes to fish habitat from in-water construction and maintenance works at major water crossings (i.e. bridges with in-water piers, such as those proposed at Winisk Lane and the Winiskis Channel), where fish habitat is anticipated to be harmfully altered, disrupted or destroyed, as well as works affecting wetlands that support fish habitat, may be addressed through federal and provincial mechanisms. Mechanisms include authorization pursuant to the <i>Fisheries Act</i>, and provincial permitting of construction activities noted above.</p> <p>According to the dIS, habitat overprinting would occur at the proposed water crossings. The five major water crossings, including the Winisk Lake crossing and the Winiskis Channel crossing, would cause approximately 0.069 hectares of aquatic habitat loss, combined. An estimated 2.8 hectares of riparian habitat would be destroyed or permanently altered by the project. For the most part, temporary access roads would coincide with the footprint of the ultimate preferred route for the WSR, or in some cases may be located outside the road footprint but within the 35-metre-wide right-of-way.</p> <p>Potential effects to fish habitat include physical alteration of waterbodies and watercourses; changes to riparian vegetation; changes from the release of sediment at watercourse crossings; changes from the placement of watercourse crossing structures; changes in channel morphology; and changes in hydrology. Comments from Indigenous communities expressed concerns of potential impacts to surface water quality (including from fugitive dust emissions) and groundwater alterations, as well as impacts to fish passage.</p> <p>Mitigation measures for effects to fish habitat that the proponent proposed include timing windows; buffer zones; erosion and sediment controls; and project design to maintain downstream flows and fish passage.</p> <p>Federal and provincial frameworks for fish and fish habitat:</p> <p>IAAC understands that water crossing design, construction, operation and maintenance is managed through provincial frameworks, such as the <i>Lakes and Rivers Improvement Act</i> and <i>Public Lands Act</i>, usually in accordance with standard guidelines available to proponents, and with the option for provincial ministries to place conditions on the proponent where appropriate. One purpose of the <i>Lakes and Rivers Improvement Act</i> is to provide for the management, perpetuation and use of fish. IAAC understands that as lake sturgeon are of special concern, they do not receive special protections under Ontario's <i>Endangered Species Act, 2007</i>, but may be eligible for provisions to help with their protection and recovery. DFO will review water crossings for potential effects to fish and fish habitat and will determine whether a Letter of Advice is sufficient or if an authorization with conditions may be required under the <i>Fisheries Act</i>. IAAC also understands that DFO and MNR sometimes cooperate on the review of water crossings.</p> <p>IAAC also understands that aggregate pits, which require permits issued under the <i>Aggregate Resources Act</i>, and other project activities may require permits and approvals to take water and discharge wastewater (including stormwater) under the <i>Ontario Water Resources Act</i>, a provincial framework that considers water availability, ecosystem needs and impacts on water users and aquatic life in decision-making.</p> |
| FFH-01 (DFO) | <p>Considering the proposed mitigation measures (See Section 10 for all mitigation measures proposed by the proponent), is it reasonable to conclude that:</p> <ul style="list-style-type: none"> • the local fish populations would be self-sustaining, and 2. there would be little to no non-negligible adverse changes to habitat function or productivity in the LSA and RSA from construction and/or maintenance of the proposed water | |

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| | <p>crossings that would affect populations of fish species noted in the context?</p> <p>Please explain your response to each of the two conclusions, describing any distinct considerations/conditions associated with the project-related stressors on the fish populations and the different types of water crossings (e.g. multi-span bridge, culvert, clear span bridge) at their proposed locations and, as necessary, describe any uncertainty.</p> | |
| FFH-02 (DFO) | <p>Please confirm or clarify the context provided above about frameworks and instruments under the <i>Fisheries Act</i> that may provide oversight to construction and maintenance of the different types of water crossings (e.g. multi-span bridge, culvert, clear span bridge) and other project activities and components, as they relate to fish and fish habitat. Have any other relevant frameworks and instruments been missed?</p> <p>Please describe whether and how each of the frameworks may provide a means to address potential project-related effects to fish and fish habitat (such death of fish or the harmful alteration, disruption or destruction of fish habitat). For example, are conditions sometimes placed on approvals to ensure appropriate timing windows are adhered to, adequate flows are maintained for safe fish passage, best practices are implemented for salvage and relocation, erosion and sedimentation are managed effectively, and changes to riparian vegetation are minimized?</p> <p>For your department's management frameworks, is Indigenous consultation incorporated into the decision-making, and if yes, how does your consultation contemplate effects to Indigenous fishing?</p> | |
| FFH-03 (DFO) | <p>As noted above, IAAC understands that in-water construction and maintenance works at permanent and/or temporary major water crossings that include in water piers (such as those proposed at Winisk Lake and Winiskisis Channel) would require a <i>Fisheries Act</i> authorization. Please confirm or clarify this understanding.</p> <p>Would a <i>Fisheries Act</i> authorization also be required at permanent and/or temporary minor water crossings (i.e. single span bridges and culverts)?</p> | |

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| | <p>Should offsetting be needed as part of a <i>Fisheries Act</i> authorization, what is the likelihood that offsetting would be feasible within the same watershed as the loss or alteration (or more specifically, within reach of the local fish populations affected)? Please also describe how Indigenous and provincial input acquired through the impact assessment or permitting engagement may inform preferred offsetting locations.</p> <p>In the event that offsetting may be required, what specific instructions or requirements can you share at this time to help the proponent prepare an offsetting plan?</p> | |
| <h3>Effects to Migratory Birds</h3> | | |
| <p>IAAC is of the view that adverse changes to migratory birds and their nests and eggs from construction and maintenance works may be addressed through standard mitigation measures and other federal and provincial frameworks. Other frameworks include federal guidance to minimize risk of contravening the <i>Migratory Birds Convention Act</i>, and Crown land work permits or other authorities under Ontario's <i>Public Lands Act</i> for land clearing and for use of provincial Crown land, which may offer protections to birds and their habitats.</p> <p>Section 12 of the WSR dIS identifies six bird groups as key species groups. Each group, except raptors, has a species of migratory bird selected as a proxy. The species groups are forest birds (e.g., orange-crowned warbler and Tennessee warbler); wetland songbirds (e.g., palm warbler and alder flycatcher); shorebirds (e.g., greater yellowlegs); waterfowl (e.g., Canada goose and mallard); raptors (e.g., red-tailed hawk and great grey owl); and finally a group of 7 birds that are migratory, species at risk listed under Schedule 1 of <i>Species at Risk Act</i> (SARA), and species at risk listed in Ontario's <i>Endangered Species Act, 2007</i>. (Details are found in Section 12.)</p> <p>Based on the proponent's data, the percentage of suitable habitat for each key species group in the Local Study Area (LSA) and Regional Study Area (RSA) that would be lost due to overprinting by the project, is expected to be small, ranging from 0.1% to 1.2% of suitable habitat lost in the RSA. The proponent defines the LSA as the area that is 1 km on either side of the right-of-way of the route alternatives. The RSA is the area that is 6 km on either side of the right-of-way of the route alternatives.</p> <p>The proponent has noted that neither bank swallows nor barn swallows were known to occur in the project RSA; additionally, habitat for these species was not found in the RSA. IAAC understands that project construction would result in sand and gravel pits that could provide new nesting habitat for bank swallows. Similarly, large culverts installed as part of project design may provide suitable habitat for barn swallows. The proponent indicated that common nighthawk density may be positively correlated with human disturbance, therefore it is expected that project construction may attract more common nighthawks to the area.</p> <p>IAAC notes that bank swallow is listed as a threatened species on the Species at Risk in Ontario List under Ontario's <i>Endangered Species Act, 2007</i>, a legislative framework which protects both the bird and its habitat. Within this framework, IAAC understands that the proponent would be expected to avoid and mitigate impacts to the bank swallow and its habitat by means such as adhering to guidance outlined in Best Management Practices for the Protection, Creation and Maintenance of Bank Swallow Habitat in Ontario¹. IAAC understands that under the <i>Species at Risk Act</i>, barn swallows' residences include both occupied and unoccupied nests.</p> <p>The proponent has identified the pileated woodpecker and great blue heron to be present in the LSA. While not stated in the dIS, IAAC understands that as these species are protected under Schedule 1 of the <i>Migratory Birds Regulations</i>, their nests are protected year-round, until they can be deemed abandoned after a waiting period.</p> <p>In addition, other mitigation measures have been proposed by the proponent to avoid incidental take and minimize habitat loss. Those include following ECCC's <i>Guidelines to avoid harm to migratory birds</i>; avoiding the nesting periods for vegetation clearing and construction activities; implementing non-intrusive pre-clearing nest surveys if vegetation clearing is required during the migratory bird nesting season; conducting wildlife sweeps; posting and</p> | | |

¹ <https://files.ontario.ca/bansbmpenpdfinalv.1.117mar17.pdf>

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| | | <p>enforcing appropriate speed limit during operation and maintenance; implementing buffer zones for nests and indicated nests, where possible; constructing oversized culverts or bridge designs instead of causeways; avoiding high quality habitats and sensitive areas for migratory bird species at risk; and minimizing direct loss of vegetation communities, specifically rare mature mixed and deciduous forests. .</p> |
| <p>MB-01 (ECCC)</p> | <p>Considering implementation of the mitigation measures proposed by the proponent to avoid harm or incidental take, does ECCC concur that effects to individual migratory birds and their nests and eggs in the LSA and RSA would be low? Please explain your response and describe any uncertainty.</p> <p>If of a different view, please explain ECCC's view on its predictions on the likely residual effect to migratory birds, and their nests and eggs. This should include a prediction for the likely scenario and worst-case scenario based on available information.</p> | <p>Based on information provided by the Proponent in Sections 12 and 13 of the dIS, and provided that the mitigation measures proposed by the Proponent are implemented and effective (however, see caveats below), ECCC concurs that the effects to individual migratory birds and their nests and eggs, in terms of immediate physical harm or mortality, in the LSA and RSA are likely low. ECCC did not consider effects to migratory birds due to habitat loss or displacement as ECCC's views on these topics were not requested.</p> <p>There is a high degree of uncertainty in the ability to avoid harm or incidental take for the mitigation measure proposed by the Proponent in Section 12 of the dIS: <i>"If removal of vegetation, or blasting activity is required inside these windows, and birds in the work area are displaying breeding behaviour, targeted nest sweeps will be conducted by qualified biologists or resource specialists within 48 hours of construction."</i> [PDF page 299]. Further, the Proponent acknowledges this limitation for wetland songbirds later in Section 12: <i>"Mitigation measures including timing windows will preclude the removal of vegetation within the breeding season in most situations; however, when removal occurs within the breeding season mitigation measures such as nest sweeps will not eliminate incidental take. Overall, a net negative effect is probable if vegetation clearing occurs during the breeding season."</i> [PDF page 417].</p> <p>ECCC does not recommend pre-clearing nest sweeps as a mitigation measure to protect migratory bird individuals and their nests and eggs from vegetation clearing, or other construction and maintenance activities that may harm or disturb nesting birds, during the nesting season. As outlined in the Guidelines to avoid harm to migratory birds, nest searches are not recommended as the ability to detect nests is very low while the risk of disturbing or damaging active nests is high. There are specific conditions in which such surveys may be appropriate, such as if there are only a few possible nesting spots to search or if the activities will take place in 'simple' habitats like a lawn with a few isolated trees, or for colonial breeding species that can be located from a distance. As the Project area is large with dense vegetation, the conditions under which nest searches may be appropriate are likely not present for most of the construction area for this Project. If migratory birds are present during activities that are likely to disturb or damage active nests, the Proponent should take measures to decrease the likelihood of harming individuals, nests, and eggs. For example, ECCC recommends consideration of the following as outlined in the Guidelines to avoid harm to migratory birds:</p> <ul style="list-style-type: none"> • Identify bird habitats likely to support nesting birds that may be affected by vegetation clearing or other construction and maintenance activities. • Identify migratory birds likely to be found in these habitats, for example, by conducting point count surveys. • Identify the time periods when these species are likely to be nesting. • If migratory bird nests are likely to be occupied where work is planned, activities that could disturb or destroy nests should be avoided, adapted, rescheduled, or relocated; the best way to avoid disturbing or destroying active nests is to avoid conducting harmful activities during the breeding season. • If a nest containing a migratory bird or egg is disturbed despite the above measures, halt activities in the area, move away and avoid disturbing surrounding vegetation or making a trail to and from the nest, protect the nest with a buffer zone, and avoid the area until the young have naturally left the vicinity of the nest. • It is not recommended to mark nests using flagging tape or similar materials as this may increase the risk of predators finding the nest; if necessary, flagging tape can be placed at the limits of the buffer zone. • The setback distance for the buffer zone will vary based on the degree of tolerance of the species, previous exposure of the birds to disturbance, the level of disturbance, and the landscape context; setback distances should be established based on the distance at which the bird becomes alert to the activity. |

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| | | <p>For further information, see Table 2 Examples of lower and higher risk levels for the factor associated with protection of nests, in ECCC's <i>Guidelines to avoid harm to migratory birds</i>. Activities associated with higher risk levels, such as clearing vegetation in migratory bird nesting habitat during the nesting season, may lead to residual effects to migratory birds, and their nests and eggs, as well as contravention of the <i>Migratory Birds Convention Act</i> (MBCA) and the <i>Migratory Birds Regulations</i> (MBR).</p> <p>One exception to this is nest searches for Schedule 1 migratory birds, specifically Pileated Woodpecker and Great Blue Heron. Nests of these species are protected year-round under the MBR, and cannot be damaged, destroyed or removed unless the Proponent has provided a notice through the Abandoned Nest Registry that the nest is not in use and the nest has remained unoccupied by a migratory bird from the time the notice is received by ECCC for the duration of time indicated in the Schedule 1 for that species (24 months for Great Blue Heron, 36 months for Pileated Woodpecker). ECCC recommends that the Proponent include mitigation measures specific to the potential to encounter nests of these species.</p> <p>See more info on Schedule 1 Migratory Birds here: Fact sheet: Nest Protection under the Migratory Birds Regulations, 2022 - Canada.ca.</p> <p>This conclusion is similar to that for the Marten Falls Community Access Road; ECCC is unable to advise whether this information would be similar for the Northern Road Link Project until the Impact Statement and mitigation measures for that Project have been reviewed.</p> |
| MB-02 (ECCC) | <p>Considering that the project could create new nesting habitat for certain migratory bird species, such as the barn swallow, bank swallow and common nighthawk, could the mitigation measures proposed by the proponent be protective of these migratory birds and their nests and eggs during the life of the project?</p> <p>If not, please provide other best practices or mitigation measures that could be considered for the project and have proven to be protective of these migratory birds known to occur in areas with human disturbances. Please confirm the standard practices that the proponent may implement to prevent new establishment in unsafe areas with human disturbances and to protect the migratory birds.</p> | <p>Common Nighthawk (listed as "Special Concern" under SARA)</p> <p>It is possible the general mitigation measures proposed by the Proponent to protect migratory birds and their nests and eggs would not be protective of Common Nighthawk and their nests and eggs if the Project creates new nesting or roosting habitat that is hazardous due to construction activities or operation of the road. As mitigation specific to the potential creation of new nesting or roosting habitat for species like Common Nighthawk has not been considered in the draft IS, ECCC recommends the Proponent monitor potential nesting and roosting areas in proximity to the road, and other areas of active development, for Common Nighthawk activity. Note that, as outlined in ECCC's response to MB-01, nest searches are not recommended. If monitoring indicates Common Nighthawk presence or use of areas on or near the road, or in areas of active development, the Proponent should take measures to decrease the likelihood of harming individuals, nests, and eggs. For example, ECCC recommends consideration of the following:</p> <ul style="list-style-type: none"> • Erect road signs or speed bumps to lower vehicle speeds during the active season. • Use deterrents such as noise makers or visual deterrents such as reflective or holographic tape or streamers, or predator decoys. • If nesting is observed or suspected, avoid construction and maintenance activities during the active season in that area. <p>To increase the likelihood of preventing Common Nighthawk from nesting or roosting in development and roadside areas, ECCC recommends consideration of the following measures:</p> <ul style="list-style-type: none"> • Landscape along roads and other development areas using taller trees and bushes to make these areas less suitable to Common Nighthawk for nesting, and to cause birds to fly higher. • Maintain undisturbed areas of high-quality natural nesting habitat within the PSA, such as sandy areas (e.g., dunes, eskers, and beaches), open forests (e.g., mixed-wood and coniferous stands, burns, and clearcuts), wetlands (e.g., bogs, marshes, lakeshores, and riverbanks), gravelly or rocky areas (e.g., outcrops, barrens). |

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| | | <p>ECCC notes that the last bullet may be particularly important given that the Proponent concludes in the Executive Summary: <i>“The net adverse cumulative effects were considered significant for Common Nighthawk due to loss of habitat from vegetation clearing activities.”</i> [PDF page 77].</p> <p>Barn Swallow and Bank Swallow (both listed as “Threatened” under SARA)</p> <p>The Proponent did not include either Barn Swallow or Bank Swallow in their assessment. However, should either species be found to occur in the Project area, and if the mitigation measures proposed by the Proponent and the guidance outlined in Ontario’s Best Management Practices for the Protection, Creation and Maintenance of Bank Swallow Habitat in Ontario, are implemented and effective, ECCC concurs that these measures would likely be protective of Barn Swallows and Bank Swallows and their nests and eggs.</p> <p>The Proponent states that Barn Swallow and Bank Swallow were not detected in any surveys and no suitable habitat was identified within the RSA, however climate change may move the distribution of these species further north. With this context, ECCC recommends the Proponent monitor potential nesting areas for these species and implement the above measures and best practices if nesting activity is observed or suspected.</p> <p>This conclusion is similar to that for the Marten Falls Community Access Road; ECCC is unable to advise whether this information would be similar for the Northern Road Link Project until the Impact Statement and mitigation measures for that Project have been reviewed.</p> |
| <p>Effects to Current Use of Lands and Resources for Traditional Purposes - Changes to Game Birds That Support Indigenous Hunting</p> | | |
| <p>Based on the information provided by the WSR proponent in the dIS, IAAC understands that the populations of bird species of importance to Indigenous communities are expected to remain self-sustaining and ecologically effective in the Regional Study Area. (The Regional Study Area is defined as the area that is 6 km on either side of the right-of-way.) However, the proponent has noted that a large amount of rock barren (38%), which may be used by Canada Geese for nesting, will be lost in the LSA. Of note, IAAC is aware that Indigenous communities potentially impacted by the project have indicated that they hunt ducks, geese and grouse.</p> | | |
| <p>CU-01 (ECCC)</p> | <p>Considering the approximate amount of rock barren potentially lost due to the project and the proponent’s proposed mitigation measures, how does ECCC expect the loss of rock barren to alter the abundance of Canada Geese in the LSA?</p> | <p>ECCC does not expect the loss of rock barren to alter the abundance of Canada Goose in the LSA. The Proponent does not provide any information on the association or reliance of geese on this habitat type in the Project area, stating only: <i>“Rock Barren, which is often used by Canada Goose, is rare in the LSA, comprising just 9.07 ha, with 3.34 ha projected for removal.”</i> [Section 12 PDF page 532]. However, rock barren is not considered prime nesting habitat for Canada Goose and the species is known to be adaptable and use a variety of habitats, so the loss of 3 ha of rock barren habitat is unlikely to alter their abundance in the LSA.</p> |
| <p>Effects to Current Use of Lands and Resources for Traditional Purposes - Changes to Caribou That Support Indigenous Hunting</p> | | |
| <p>IAAC expects non-negligible adverse changes to caribou and their habitat.</p> <p>Caribou:</p> <p>IAAC understands that Indigenous communities hunt boreal caribou for consumption and subsistence, along Attawapiskat River, around McFaulds Lake, along Muketei River, and within the Asheweig River, Ekwan, Winisk and Attawapiskat watersheds.</p> | | |

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| | | <p>IAAC notes that boreal caribou are protected on private and provincial Crown land in Ontario under the <i>Endangered Species Act, 2007</i> (ESA). IAAC understands that this framework aims to achieve an overall benefit to the species through implementation of permit conditions that would allow an adverse change to caribou or its habitat. IAAC also understands from the <i>Endangered Species Act Submission Standards</i>² that overall benefit actions that focus on the local population or habitat adversely affected by an activity are preferred in decision-making. Further, IAAC notes that the province would consult Indigenous communities prior to making decisions under the ESA, including consultation undertaken as part of the environmental assessment.</p> <p>The WSR proponent indicated that linear infrastructure would increase the presence of caribou predators. The proponent has identified the following mitigation measures to address increased predation from the presence of linear features: areas no longer used will be blocked until they are progressively restored or reclaimed; clear vegetation along the ROW to reduce attractant habitat; minimizing width of linear features; including switchbacks and bends in temporary roads; wildlife crossing and passages will be incorporated in the road design; and prompt removal of roadkill.</p> <p>Sensory disturbance to caribou is anticipated over the life of the project. The WSR proponent suggested that sensory disturbances during the construction phase may impact caribou behaviour, including that pregnant cows may stay 10 to 15 km away from the disturbance. Expected traffic on the road during operation will mostly comprise light and medium personal and commercial vehicles, with industrial trucks occasionally using the road. The proponent has identified the predicted sound level of operational use to be 44dBA, which IAAC assumes could trigger changes in wildlife behaviour. The proponent has identified the following mitigation measures for sensory disturbance during the construction and operation phases of the project: noise abatement equipment on machinery; avoiding disruptive construction activities during sensitive windows; and enforcement of speed limits to reduce noise from traffic.</p> <p>Caribou habitat:</p> <p>Information from the WSR dIS identified boreal caribou movement which overlaps with the project footprint (the project footprint is the area of direct disturbance, including roadway and ancillary features). The habitat extends up to the James Bay and Hudson's Bay coasts (Appendix F, Figure 11.17). The proponent has also identified areas of suitable habitat which overlap with the project footprint (Section 13, Figure 13-3, 13-4 and 13-5).</p> <p>The WSR proponent indicated that project construction would result in moderate loss of boreal caribou habitat in the caribou LSA and minimal loss in the RSA. (The proponent defines the caribou LSA as the area that is 11 km on either side of the right-of-way of the route alternatives, and the caribou RSA includes the provincial Missisa and Ozhiski ranges.) The proponent has indicated that 30.6% and 0.1% of category 1 habitat would be removed from the LSA and RSA, respectively, and has identified mitigation measures to further minimize effects of habitat loss. Measures include, minimizing vegetation clearing; avoiding habitat important to caribou life processes; revegetating cleared areas; and implementing methods to speed up vegetation regrowth. In addition, off-site restoration opportunities would be considered to offset project effects, if on-site restoration activities are not available.</p> |
| CU-03 (ECCC) | How does ECCC work with MECP to manage caribou not on federal lands that are important to Indigenous Peoples? | <p>From a regulatory perspective, caribou management and protection within the WSR Project area is primarily the responsibility of Ontario.</p> <p>Responsibility for wildlife conservation in Canada is shared between the federal, provincial, and territorial governments. The SARA was designed to work collaboratively with provincial and territorial legislation to protect species at risk. Under SARA, the federal government is responsible for migratory birds and aquatic species at risk wherever they occur, as well as terrestrial species at risk found on federal lands. Under these conditions, certain SARA prohibitions protecting individuals and residences (e.g., nests or dens) of endangered, threatened and extirpated species apply automatically. ECCC is committed to working collaboratively with the provinces and territories on the recovery and conservation of boreal caribou. ECCC regularly meets with Ontario's Ministry of the Environment, Conservation, and Parks to discuss and collaborate on shared interests including the protection and recovery of species at risk and their habitat in Ontario as it relates to federally listed terrestrial species at risk.</p> <p>In particular, the governments of Ontario and Canada are currently implementing an agreement for the conservation of caribou, boreal population in Ontario (Agreement for the Conservation of Caribou, Boreal Population in Ontario), signed in April 2022 under sections 10 and 11 of the SARA. The agreement provides a framework for both governments to work collaboratively, and with Indigenous and non-Indigenous partners, to sustain or improve the environmental conditions necessary to maintain and recover self-sustaining local populations of boreal caribou in Ontario. The agreement includes several key commitments to support boreal caribou conservation and is</p> |

² <https://www.ontario.ca/page/endangered-species-act-submission-standards>

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| | | <p>backed by investments from both Canada and Ontario. Implementation of the agreement has been informed by ongoing engagement with Indigenous Peoples and stakeholders. The conservation agreement does not directly address collaboration on federal or provincial impact/environmental assessment processes or permitting and does not currently provide a forum for collaboration on these matters.</p> <p>While collaboration through the agreement on caribou conservation and recovery in Ontario is different from Project-specific collaboration, ECCC welcomes the opportunity to work with MECP on this Project and other development projects that may impact caribou to support meeting federal recovery objectives as well as effective analysis and mitigation of potential effects.</p> |
| <p>Effects to Current Use of Lands and Resources for Traditional Purposes - Changes to Other Terrestrial Wildlife That Support Indigenous Hunting and Trapping</p> | | |
| <p>The proponent has identified 13 furbearer and 3 ungulate species of traditional importance that may be present in the project area. Further, the dIS indicates that a small percentage of furbearer and ungulate habitats, which include upland and wetland habitats, would be lost within the project footprint. Based on the proponent's data, furbearer and ungulate habitats appear sporadically throughout the LSA and RSA. (The proponent defines the LSA for non-ungulates and furbearers other than the wolverine as the area that is 1 km on either side of the right-of-way and the RSA is the area 6 km on either side of the right-of-way. The proponent defines the LSA for the gray wolf and ungulates as the area that is 11 km on either side of the right-of-way, and the RSA as the Missisa and Ozhiski Caribou Ranges. The proponent defines the LSA for the Wolverine as the area that is 11 km on either side of the right-of-way, and the RSA as the area that is 75 km on either side of the right-of-way.) (Section 11, Figure 11-4).</p> <p>As such, the WSR proponent expects residual effects to furbearer and ungulate populations to be low with the application of mitigation measures. The proposed mitigation measures include avoiding sensitive sites, to the extent feasible; reclaiming temporarily cleared areas at the end of the construction phase; doing vegetation clearing and grubbing outside of sensitive periods; limiting the project footprint size (e.g., use existing access roads where possible); implementing buffer zones around waterbodies and riparian habitats; and posting signs in areas where wildlife is regularly observed.</p> <p>These findings from the dIS suggest to IAAC that there would be limited impacts to the abundance and availability of furbearers and ungulates used for Indigenous trapping and hunting.</p> | | |
| <p>CU-08 (ECCC)</p> | <p>How does ECCC work with MECP to manage wildlife (other than caribou) not on federal lands that are important to Indigenous Peoples?</p> | <p>It is ECCC's understanding that, aside from caribou, none of the other furbearers or ungulates identified in the dIS as being important to Indigenous Peoples for hunting and trapping are listed under SARA. ECCC has no mechanism for involvement in the management of these species. Management of these non-SARA listed wildlife species is the sole responsibility of Ontario.</p> <p>There may be some wildlife that are important to Indigenous Peoples more broadly than hunting and trapping that are listed under SARA. With regards to these species, SARA was designed to work collaboratively with provincial and territorial legislation to protect species at risk. Under SARA, the federal government is responsible for migratory birds and aquatic species at risk wherever they occur, as well as terrestrial species at risk found on federal lands. Under these conditions, certain SARA prohibitions protecting individuals and residences (e.g., nests or dens) of endangered, threatened and extirpated species apply automatically. ECCC is committed to working collaboratively with the provinces and territories on the recovery and conservation of species at risk. ECCC regularly meets with Ontario's Ministry of the Environment, Conservation, and Parks to discuss and collaborate on shared interests including the protection and recovery of species at risk and their habitat in Ontario as it relates to federally listed terrestrial species at risk.</p> <p>This conclusion is similar to that for the Marten Falls Community Access Road; ECCC is unable to advise whether this information would be similar for the Northern Road Link Project until the Impact Statement and mitigation measures for that project have been reviewed.</p> |
| <p>Considerations for analyzing public interest factors</p> | | |

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| | | <p>IAAC is of the view that the project, in conjunction with other reasonably foreseeable projects, could benefit certain Indigenous communities. There are Indigenous communities whose members view the project and future development in the Ring of Fire area as a means of creating opportunities for their isolated communities.</p> <p>As part of the impact assessment, IAAC must provide information to decision-makers about the extent to which project effects contribute to Canada's ability to meet its environmental obligations and commitments in respect of climate change. IAAC's current view is that project effects would not contribute to the Government of Canada's ability to meet its environmental obligations. IAAC acknowledges that infrastructure that supports creation of a critical mineral supply chain for advancing the green and digital economy could contribute indirectly to Canada's ability to meet its climate change commitments in the long term.</p> <p>IAAC also must provide information about the extent to which the project would contribute to sustainability. Sustainability is the ability to protect the environment, contribute to the social and economic well-being of the people of Canada and preserve their health in a manner that benefits present and future generations. The sustainability analysis will provide a clear weighing of the balance of positive effects and adverse federal effects. For the analysis, IAAC is considering various factors such as adverse changes to abundance and distribution of wildlife that support traditional activities of the Indigenous communities, adverse effects to Indigenous way of life (including culture, traditions, community health, cost of living and employability), as well as any positive economic and employment opportunities for Indigenous communities and economic benefits to the province of Ontario.</p> <p>IAAC understands that peatlands are of cultural importance to Indigenous communities. Section 4 of the dIS describes how the eastern half (about 56 km) of the project will traverse predominantly peatland areas of the James Bay Lowlands. The proponent indicated that the construction of WSR through peatlands would use a "floating road" construction methodology, placing geotextile or geogrid layers over peat and equalization culverts at intervals of about 100 - 250 metres. This would allow groundwater movement below and through the road embankment and minimize the need for large scale peat excavation and the associated release of stored carbon. Other mitigation measures include limiting vegetation clearing to the permanent project footprint; conducting manual vegetation removal within 10 metres of waterbodies; avoiding peatland ecosystems for temporary features where possible; locating stockpiles at least 50 metres from waterbodies; contouring disturbed areas to minimize soil and water erosion, promoting natural revegetation, and implementing erosion and sediment control measures.</p> <p>In addition, the proponent plans to prepare and implement environmental management plans as part of the Construction Environmental Management Plan and Operation Environmental Management Plan frameworks. These include a Vegetation and Invasive Species Management Plan, a Site Restoration and Monitoring Plan, an Erosion and Sediment Control Plan, and a Soil Management Plan. Together, these plans will guide post-construction vegetation restoration and rehabilitation, management of disturbed soils and stockpiles, and the application of erosion and sediment control measures in accordance with the Ontario Provincial Standard Specifications.</p> |
| <p>PIF-01 (ECCC)</p> | <p>From the perspective of environmental sustainability and considering the final route selection and proposed design for WSR, as well as implementation of the mitigation measures proposed by the proponent, describe your department's views and any uncertainty regarding how much noticeable loss in key functions of wetland ecosystems in the LSA and RSA over the long-term could occur. Please include in your response peatland functions, such as:</p> <ul style="list-style-type: none"> - Carbon storage - Wildlife, biodiversity habitat, and - Hydrology. <p>Please explain your response and describe any uncertainty. With available information, what are ECCC's predictions for likely and worst-case scenario for maintaining wetland function?</p> | <p>Carbon Storage</p> <p>The Proponent discusses the Project's impact on peatland ecosystems and carbon storage in Appendix H Section 5.1.</p> <p>The Proponent states that tree and vegetation clearing during the construction phase will result in the removal of a carbon sink (or the addition of a GHG emissions source associated to the project). In addition, the construction of the road will have an impact on peatlands, though it is assumed that the floating road design will slow or stop the decomposition which may result in GHG emission reductions, however it will also result in a removal of a carbon sink. The Proponent outlines the methodology and all assumptions and data used in the carbon sinks assessment.</p> <p>The Proponent considered the SACC technical guidance in the consideration of land use change emissions and carbon sink impacts, and addressed comments made by ECCC on these topics during the Impact Statement phase. ECCC considers the methodologies used in assessing impacts to be reasonable, as well as the assumptions and data used.</p> <p>Wildlife, Biodiversity Habitat</p> <p>Based on information provided by the Proponent in Section 11 of the dIS, and provided that the mitigation measures proposed by the Proponent are implemented and effective, the likelihood of a noticeable loss in species at risk (other than caribou) and migratory bird habitat functions of peatland ecosystems in the LSA and RSA over the long-term is likely low. ECCC has not factored into this advice effects to caribou as this advice, upon consultation with IAAC, has not been requested.</p> |

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| | | <p>The main pathway of effect for change to peatland habitat functions for species at risk (other than caribou) and migratory birds is through changes to hydrology, resulting in either (or both) wetter or drier conditions, which could change vegetation communities and other aspects that make current conditions suitable for the species that use peatland habitats. Provided that the Proponent is correct that after proposed mitigation measures the effects to wetlands are negligible (Section 11, PDF page 144) and that the current hydrological regime and flow of water (both surface and groundwater) can be maintained with the presence of the road, the likelihood of this pathway of effect altering peatland habitat functions would likely be low. However, ECCC's views on the hydrological assessment with respect to maintaining peatland functions is described in detail in the following section.</p> <p>This conclusion is similar to that for the Marten Falls Community Access Road; ECCC is unable to advise whether this information would be similar for the Northern Road Link Project until the Impact Statement and mitigation measures for that Project have been reviewed.</p> <p>Hydrology</p> <p>Access road construction over peatlands disrupts surface and subsurface water flows due to vegetation removal, peat compression, and the addition of mineral and/or geotextile layers, which disrupt existing surface drainage paths. This could create flooded conditions on the upstream side of the road and dry conditions on the downstream side of the road. Conditions that are too wet inhibit wetland function (reduced flood storage), but conditions that are too dry can also inhibit wetland function (loss of biodiversity habitat and wetland vegetation).</p> <p>To minimize hydrological disruption and maintain hydrological connectivity, culverts and bridges are a commonly employed mitigation measure. Floating roads have also been employed, but the effectiveness of floating roads can diminish with subsidence and compaction over time. Similarly, culvert effectiveness depends on local topography, proper installation, accurate sizing and hydrological inputs, road orientation, slope, and climate. Ongoing monitoring and maintenance are also required to ensure culvert functionality is maintained. Poor implementation may significantly disrupt peatland hydrology, depth to water tables, flood storage, plant communities, and carbon cycling.</p> <p>The Proponent considers wetland function loss to be Moderate (12) during the Construction Phase and Negligible (3) during the Operations Phase (Table 11-53 Loss of Alteration of Wetland Function of Section 11 Assessment of Effects on Vegetation and Wetlands).</p> <p>To understand the uncertainty regarding noticeable loss in key functions of peatland ecosystems in the LSA and RSA over the long-term, the review completed by ECCC was based on information provided by the Proponent in <i>Section 4: Project Description, Section 7: Assessment of Effects of Surface Water Resources, Section 8: Assessment of Effects on Groundwater Resources, Section 11: Assessment of Effects on Vegetation and Wetlands, Appendix E: Mitigation Measures, Appendix F: Natural Environment Existing Conditions Report, and Appendix K-4: Webequie Supply Road Wetlands Function Monitoring Program</i> of the Draft Impact Statement. From a hydrology perspective, ECCC recognizes that the proposed mitigation measures may reduce the potential for significant long-term loss of key peatland functions; however, uncertainties remain.</p> <p>ECCC notes uncertainty regarding the following:</p> <ul style="list-style-type: none"> • Baseline hydrology of individual peatlands: At this stage, the Proponent has not performed a detailed (Level 3) wetland assessment due to the mosaic nature of the wetlands in the area (Appendix F Section 9.2.6). Based on the information provided in the Draft Impact Statement, it is recognized that mitigation measures have been proposed to reduce and mitigate effects on hydrologic connectivity and loss on peatland function; however, much of the information required to adequately characterize baseline conditions and potential effects from the Project has yet to be collected or produced. Therefore, there is a high level of |

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| | | <p>uncertainty regarding the success of the proposed mitigation measures with regards to effects related to hydrology and peatland function. While ECCC acknowledges the difficulty in accessing the individual wetlands and in characterizing the complex baseline hydrology of these affected peatlands, this nevertheless creates uncertainty in the data used to assess the hydrological impacts to these wetlands. The Proponent plans to perform detailed Level 3 Wetland Functions Assessment during the Monitoring Program stage.</p> <ul style="list-style-type: none"> <p>Floating Road: A floating road was proposed (Section 4: Project Description, subsection 4.3.1.3.1) as a mitigation measure to reduce impacts on subsurface and surface flow, where conditions for building a road have been characterized as “poor to very poor”. Much of their peatland effects assessment assumes that this approach will maintain existing drainage patterns and groundwater conditions. At this stage, it has been identified that equalization culverts at intervals of 100 to 250 m (distance to be confirmed during detailed design) will be installed, and preliminary estimates of peatland compression will target a maximum of +/- 40% of peat thickness when using a geosynthetic layer directly over the peat before placing fill and granular material for the road. The Proponent has identified that further assessments are required to finetune the location and installation depth of the equalization culverts, as well as information required to more thoroughly assess peatland compression. Until these assessments are completed and initial estimates are confirmed or adjusted, uncertainty remains about the success of the floating road construction method to mitigate loss on peatland function. While the Proponent has stated that it will develop a monitoring program to verify that consolidation is occurring as predicted (Section 4: Project Description, subsection 4.3.1.2), this program is not mentioned in Section 22: Follow-up and Monitoring Programs.</p> <p>Baseline hydrology of watercourses: Culvert design is highly dependent on accurate input hydrology (peak, normal and low flows), yet few hydrometric gauges exist along the watercourses crossed by the Project. Therefore, proxy methods have been used to estimate peak flows at watercourse crossings, which, while are common industry practices, nevertheless increase the uncertainty. High water levels at watercourse crossings are estimated using Manning’s equations (Appendix 5-A Section 4 of Appendix F), which may not be a valid assumption if there is a significant backwater. This could lead to an excess of conveyance and a loss of wetland function. Normal and low flows or water levels have not been presented in the Draft Impact Statement – data which will provide an understanding of the long-term effects on the existing wetland function of the peatlands adjacent to affected watercourse crossings.</p> <p>Effects to hydrology: The Proponent states (Section 11: Assessment of Effects on Vegetation and Wetlands, subsection 11.3.2.2) there is no definitive estimate to the extent to which extended indirect effects (like changes to hydrologic flows) may occur. In other words, the Proponent acknowledges uncertainties in Project effects on the wetland hydrology, and therefore peatland function. The Proponent has therefore assumed that high impact effects may occur within 20 m, moderate impact effects up to 60 m and minimal effects up to 250 m from the Project. Culverts designed using inaccurate hydrology estimates may result in too much water upstream of the crossing or too little water upstream of the crossing, both of which can result in wetland function loss. These effects can also occur downstream of the crossing. The Proponents states (Section 4: Project Description, subsection 4.3.2.2.2) that culverts will exceed the sizing standards for hydraulic structures to mitigate this uncertainty, but this may also result in an alteration in hydroperiod and subsequent wetland function loss, because sizing standards are intended to accommodate extreme peak flows, whereas the sustainability of a wetland over the long-term is influenced by average water levels over the year.</p> <p>Residual Effects: The Proponent notes (Table 11-53 of Section 11: Assessment of Effects on Vegetation and Wetlands, subsection 11.9.2) ‘moderate’ effects to wetland function during the Construction Phase (with a ‘certain’ likelihood of occurrence and a ‘long term’ duration), and ‘negligible’ effects to wetland function during the Operation Phase. The Proponent predicts (Section 11: Assessment of Effects on Vegetation and Wetlands, subsection 11.9.2.2) that residual effects will be ‘negligible’. Without further</p> |

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| | | <p>information on the existing characteristics of each wetland affected and culvert design details, there remains uncertainty whether the residual effects will, in fact, be negligible, particularly with respect to the aforementioned indirect effects to hydrology.</p> <ul style="list-style-type: none"> Regional Study Area: The Proponent assumes (Section 11: Assessment of Effects on Vegetation and Wetlands, subsection 11.7.2.2) that net effects to peatland hydrology will be limited to the local geographic context. Peatlands can often have complex hydrologic connectivity over vast distances. Over the long term, as the floating road compresses and water movement upstream and downstream on the road changes, it is possible that changes to this complex connectivity can result in Project effects on water levels in wetlands extending beyond the local geographic context. At this stage, the Proponent has not performed a detailed (Level 3) wetland assessment, but it is ECCC's understanding that the assessment will be done as part of the wetlands function monitoring program as indicated on Appendix K-4. Characterization and monitoring of the local existing hydrological connectivity within the wetland is required to adequately assess the geographical extent of the project's net effects to peatland hydrology. Therefore, until the monitoring program is in place and initial assumptions on the success of mitigation measures and estimated peat compression under the road can be confirmed, there remains uncertainty on the possibility of effects extending outside the local geographic context. <p>Overall, the level of uncertainty related to construction methodology, culvert placement, characterization of residual effects, and the long-term viability of specific mitigation measures (floating road and equalization culverts), as provided within the Draft Impact Statement, remain high. Therefore, ECCC cannot confidently assess likely or worst-case scenarios for maintaining long-term peatlands function with respect to hydrology within the LSA or RSA.</p> <p>It is recommended that the effectiveness of proposed mitigation measures and their potential impacts on all valued components be further discussed. ECCC acknowledges the Proponent's commitment to monitoring within the LSA and RSA throughout all Project phases. ECCC emphasizes the importance of developing and implementing robust monitoring programs during construction and operations to minimize noticeable loss in key hydrologic functions of peatland ecosystems in the LSA and RSA over the long-term.</p> |
| PIF-02 (ECCC) | <p>Is it reasonable to conclude that direct loss of wetland habitat, as well as changes to the wetland functions caused by the project, would not reduce the abundance or availability of the following over the long-term:</p> <ul style="list-style-type: none"> - habitats suitable for the identified traditional plants in the LSA; - furbearers and ungulates used for traditional purposes (trapping and hunting) by Indigenous communities in the LSA; and, - bird species used for traditional purposes (hunting) by the Indigenous communities in the LSA? <p>Please explain your response and describe any uncertainty. With available information, what are ECCC's predictions for likely and worst-case scenario for maintaining wetland function?</p> | <p>Habitats suitable for traditional plants, and furbearers and ungulates used for traditional purposes</p> <p>It is ECCC's understanding that none of the traditional plants, or furbearers or ungulates (except for caribou) identified in the dIS as being important to Indigenous Peoples for trapping, hunting, or gathering are listed under SARA. As such, ECCC has no mechanism for involvement in their management nor expertise in their ecology. These species fall under the responsibility of Ontario. ECCC has not factored into this advice effects to caribou as this advice, in consultation with IAAC, was not requested.</p> <p>Bird species used for traditional purposes</p> <p>ECCC notes that the following bird species have been identified in the dIS as used for traditional purposes (hunting) within the LSA by the Indigenous communities:</p> <ul style="list-style-type: none"> • Ducks • Geese (Canada, Snow, and Blue) • Swan • Partridge • Ptarmigan • Grouse |

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| | | <p>Note that partridge, ptarmigan, and grouse are not migratory bird species listed under the MBCA.</p> <p>The Proponent has not provided any information on potential effects related to the direct loss of peatland habitat, or changes to peatland function, specifically for these species. Canada Goose and Mallard were selected by the Proponent as representative of waterfowl.</p> <p>Based on the information provided for Canada Goose and Mallard, and provided the identified mitigation measures are implemented and effective, effects related to the direct loss of peatland habitat, or changes to peatland function, are unlikely to reduce the abundance and availability of these species over the long-term.</p> <p>This conclusion is similar to that for the Marten Falls Community Access Road; ECCC is unable to advise whether this information would be similar for the Northern Road Link Project until the Impact Statement and mitigation measures for that Project have been reviewed.</p> |

List of Acronyms for Members of the GRT

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| ECCC | Environment and Climate Change Canada |
| DFO | Fisheries and Oceans Canada |