

Marten Falls First Nation

# **DRAFT Tailored Impact Statement Guidelines: Review Comments**

*Marten Falls All-Season Community Access Road*

**Date:** January 28, 2020

Issue Number	Section Number	Section Title	Page	Request to IAAC for Revision or Clarification
1	1	Introduction	1	<p>Request that text in Section 1 "Introduction" in the 3rd paragraph be revised to exclude the requirement for "...ensuring incorporation of Indigenous Knowledge in each technical section..." because Indigenous communities may choose not to participate in the engagement program for the Project and/or may not provide Indigenous Knowledge for all technical and/or valued components.</p> <p>Request that the word 'ensure' be removed from the throughout the Tailored Impact Statement Guidelines (the Guidelines) because it may not be possible, in all cases, to guarantee (i.e. 'ensure') a 'required' outcome. Considering this is a 'Guidelines' document, prescriptive language (i.e., 'must'; 'ensure') should not be included; therefore, Marten Falls First Nation (MFFN) requests that such language be removed from the Guidelines.</p> <p>MFFN defines the "Project" as the project described in the Detailed Project Description for the Marten Falls All-Season Community Access Road submitted to the Impact Assessment Agency of Canada (IAAC) in November 2019.</p>
2	1.1 m)	Factors to be considered in the Impact Assessment	2	<p>Definition of 'community knowledge' required. It is referenced separately from 'public views' and 'Indigenous Knowledge'. IAAC requested to provide a suggested methodology to gather 'community knowledge'. IAAC needs to clarify who the particular community members/stakeholders/ groups are that would impart 'community knowledge'.</p>
3	1.1 q)	Factors to be considered in the Impact Assessment	2	<p>Request that the Guidelines provide clarification on the timeline period for the submission of other "...assessment[s] of the effects of the designated project that is conducted by or on behalf of an Indigenous governing body and that is provided with respect to the designated project" so that MFFN can have sufficient time to take such an assessment(s) into account within the Project Impact Statement document.</p>
4	1.1 r)	Factors to be considered in the Impact Assessment	2	<p>Request that the Guidelines provide clarification on the timeline period for the submission of other "...assessment[s] of the effects of the designated project that is conducted by or on behalf of an Indigenous governing body and that is provided with respect to the designated project" so that MFFN can have sufficient time to take such an assessment(s) into account within the Project Impact Statement document.</p>

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5	1.1 t)	Factors to be considered in the Impact Assessment	2	Request that the Guidelines provide clarification on the timeline period for the submission of other "...assessment[s] of the effects of the designated project that is conducted by or on behalf of an Indigenous governing body and that is provided with respect to the designated project" so that MFFN can have sufficient time to take such an assessment(s) into account within the Project Impact Statement document.
6	2.3	Project location	2	IAAC to provide clarification regarding how confidential information should be considered in the Impact Statement.
7	2.5	Qualifications of individuals preparing the Impact Statement	3	IAAC to clarify what form of information is required in the Impact Statement to show expertise of individuals.
8	3	Project Description	1	Throughout Section 3 (Project Description), MFFN requests the removal of requirements to provide Project design details that will not be known until the detailed design / micro-sighting stage. Detailed Project design information (e.g. details of required culverts; design details of bridge crossings) are not required in an Impact Statement to determine the mitigation required to sufficiently avoid or minimize adverse effects. Standard mitigation methods and guidelines to avoid or minimize adverse effects (e.g. applying setbacks; adhering to established stream crossing guidelines) and applicable legislation requirements will be implemented which negates the need for excessive project description details in an Impact Statement.
9	3.2.1	Site Preparation and Construction	4	MFFN requests clarification regarding the need to describe the ' <i>use of the Anaconda/Painter Lake forestry road</i> ' in the Project Description section of the Impact Statement. MFFN notes that the existing Anaconda/Painter Lake forestry road is not considered a component of the proposed Project. MFFN notes that the construction and upgrades to the Anaconda/Painter Lake forestry road are included in Section 22 of the draft Tailored Impact Statement Guidelines as one of the projects or activities that should be included in the cumulative effects assessment, which is appropriate for the Impact Statement.

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10	3.2.2	Operation	5	MFFN requests clarification regarding the need to describe the ' <i>anticipated use of the Anaconda/Painter Lake forestry road</i> ' in the Project Description section of the Impact Statement. MFFN notes that the existing Anaconda/Painter Lake forestry road is not considered a component of the proposed Project. MFFN notes that the construction and upgrades to the Anaconda/Painter Lake forestry road are included in Section 22 of the draft Guidelines as one of the projects or activities that should be included in the cumulative effects assessment, which is appropriate for the Impact Statement.
11	3.2.2	Operation	5	MFFN requests the last bullet point in Section 3.2.2 be removed, i.e., " <i>use of winter roads by the proponent during operations</i> ". MFFN has not proposed the use of winter roads as part of Project operations.
12	3.3	Workforce Requirements	2	MFFN requests that the last two bullet points in Section 3.3 be removed and replaced with a requirement to generally describe those workforce related components/programs that will be required to be implemented by MFFN to support benefits statements and impact assessment conclusions within the Impact Statement. Details of those components/programs would be developed should the proposed Project receive regulatory approval.
13	4.4	Alternative means to carrying out the Project	8	MFFN requires confirmation that the only 'alternative means to carrying out the Project' include the two alternative all-season road routes. It has been determined by the provincial government that this Project is a road, and alternatives to a road project have not been evaluated to date.
14	5	Description of Public Participation and Views	10	IAAC to confirm who is required to document the description of Public Participation and Views. Confirm that IAAC will be providing a record of engagement that describes all efforts taken to seek views of those listed in the Public and Indigenous Engagement Plans. As the ' <i>Impact Statement must include issues, questions and comments raised when participating in Agency led engagement activities</i> ' mentioned in section 5.1 of the Guidelines.
15	5	Description of Public Participation and Views	10	Confirm that IAAC will be providing the MFFN with sufficiently detailed IAAC consultation documentation such that the federal government consultation information could be included in the development of the Impact Assessment, and would this information be regularly provided (such as in monthly IAAC consultation reports to the MFFN Project Team).

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16	5	Description of Public Participation and Views	10	IAAC to clarify MFFN's responsibilities with respect to required participation in engagement activities outlined in the Public Participation Plan. It is unclear as to who will be responsible for producing detailed meeting notes, and tracking and responding to inquiries/comments.
17	5.1	Analysis and response to questions, comments, and issues raised	11	IAAC to clarify how information collected from their Agency-led consultation process will be shared to the Project Team. Discussion is needed to avoid confusion with information being collected, possible consultation fatigue and possible overlap of engagement timelines.
18	5.2	Record of Engagement	12	IAAC to explain and define their validation process.
19	5.2	Record of Engagement	12	Confirm if Record of Engagement as described in Section 5.2 includes those IAAC-led consultation activities. IAAC to clarify the timing of when IAAC-led consultation information / input will be provided to MFFN
20	6	Description of Engagement with Indigenous Groups	13	On page 13, the Guidelines states that the proposed technical meetings ' <i>do not reduce the expectations for engagement with Indigenous groups that the Agency has of the proponent as outlined in this document</i> '. MFFN would like to raise the issue of repetitive consultation and possible community fatigue and requests we discuss the possibility of a MOU / sharing agreement between IAAC and the Project team.
21	6.2	Analysis and response to questions, comments, and issues raised	14	Unclear as to definition of ' <i>analysis</i> '. Request that ' <i>analysis</i> ' is replaced with ' <i>consideration</i> '
22	6.3	Record of Engagement	15	MFFN requests confirmation on whether the Project record of engagement will require activities led by IAAC.
23	7.1	Methodology	17	MFFN requests clarification on the term ' <i>endangered ecosystems</i> '. IAAC to provide a definition or replace with ' <i>protected features</i> ' (e.g. ANSIs)
24	7.2	Sources of Baseline Information	21; par. 5	Confirm that if Project is adhering to Ontario sampling protocols, this will suffice for the Impact Statement.

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25	7.2	Sources of baseline information	20	On page 20, MFFN is asked to provide land cover data on solitary trees. MFFN interprets this as being for wildlife habitat (potentially, chimney swift and bats). This may be not technically feasible. IAAC to confirm the use of LiDAR data to assist in identification of solitary trees.
26	7.3	Consideration and methodology in selecting VCs	23	IAAC to justify why each species at risk should be considered as a Valued Component.
27	7.3	Consideration and methodology in selecting VCs	23	Acoustic detector surveys have been proposed to conduct breeding bird surveys, nightjar surveys, and yellow rail surveys. IAAC to confirm if this approach is acceptable.
28	7.4	Spatial and Temporal Boundaries	24	On page 25, studies are requested ' <i>for each alternative route</i> '. The amount of detail outlined in the Project Description, as well as elsewhere in the Guidelines, is not typical (feasible or reasonable) for each route alternative. MFFN requests tailoring further on a per-project phase basis (project-specific): background desktop review; identifying opportunities and constraints may need some high level in-field at strategic assessment locations. MFFN request that detailed field investigations along the preferred route be conducted to support permitting once the preferred route has been identified in support of developing a preferred design.
29	7.4	Spatial and Temporal Boundaries	24	IAAC to confirm that the Local Study Area (LSA) for Caribou will be determined based on the scoping discussions with MECP and will likely follow the existing habitat range boundaries. Confirm that high level presence/absence surveys within the caribou ranges outlined by MECP would also be appropriate in the federal context as well. MFFN prefers that the LSAs are to be coordinated with MECP so that only one streamlined LSA exists for each species.
30	7.4	Spatial and Temporal Boundaries	24	Due to the nature of the geography of the Project study area, in-field investigations for each individual alternative will not be feasible. MFFN recommends conducting this work for the preferred route alternative, within the Project scope, to determine preferred detail design. IAAC to confirm that MFFN's existing approach of supplementing historical information with limited field surveys is appropriate.

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31	8	Baseline Conditions - Biophysical Environment	25	The Guidelines reference to two years of baseline data required to document " <i>natural variability</i> ". This does not seem to be scientifically viable with respect to completing an Impact Assessment. MFFN requires IAAC to provide examples of projects designated for federal environmental review that have statistically (defensibly) demonstrated the natural variability that exists in project areas (through collection of on-site baseline surveys) to a sufficient degree such that construction and operation monitoring studies can determine if project effects are occurring. MFFN requires this information to validate IAAC's request for two years of baseline surveys required for surface water, birds and Species at Risk.
32	8.1	Atmospheric, acoustic, and visual environment	25	MFFN requests that the requirement to describe existing radon gas conditions be removed from the Guidelines. The presence of existing natural background levels of radon gas is a potential human health concern, in certain areas of Canada, within enclosed structures such as permanent buildings. Therefore, we anticipate that radon gas is not human health concern for this Project which does not include permanent buildings. MFFN requests that IAAC review and edit the Guidelines to remove other requirements not specific (i.e. 'tailored') to this proposed Project.
33	8.1	Atmospheric, acoustic, and visual environment	26	On page 26, MFFN is of the opinion that the following requirement is excessive considering the nature of the Project: ' <i>...for the aquatic environment, provide current underwater soundscape and vibration descriptions of the study area and at the project site from various sources based on acoustic measurements. Provide information on vibration and sound sources, geographic extent and spatial and temporal variations within the water column...</i> ' MFFN requests removal for providing underwater soundscape and vibration descriptions be based on measurements as it is not applicable to the nature of the Project.

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34	8.1	Atmospheric, acoustic and visual environment	26	As stated above, page 26 states that the Impact Statement must provide current underwater soundscape and vibration descriptions of the study area and at the Project site from various sources based on acoustic measurements. However, the referenced Federal and current Provincial noise guidelines do not establish thresholds or acceptable levels for underwater noise; and do not require proponents to assess underwater noise and vibration impacts on species. Accordingly, there are no workplans developed in consideration of underwater noise and vibration measurements. Current Provincial and referenced Federal noise guidelines do not provide metrics for benchmarking such measurement data. For these reasons, the requirement for underwater acoustic measurements can be considered not feasible with respect to this Project. MFFN requests removing the requirements for providing underwater soundscape and vibration descriptions based on measurements.
35	8.1	Atmospheric, acoustic, and visual environment	25	Page 25 of the Guidelines states that the background emission sources must be identified and quantified. IAAC to confirm MFFN's methodology, that the baseline air quality will be established (measured at a single point in the community of Marten Falls) through the ambient monitoring program. Potential relevant background emission source types will be identified (but not quantified), as is typical for a project of this nature.
36	8.1	Atmospheric, acoustic, and visual environment	25	On page 25, Total Particulate Matter (TPM) is listed as having to be included in baseline monitoring. The proposed monitoring program does not include TPM. It is not practical to sample for TPM in this geography. All other parameters are being sampled through an automated system. Given the nature of the Project and that future operation primarily includes vehicle traffic, MFFN requests confirmation that PM10 and PM2.5 should be the primary particulate parameters of concern for analysis, and would like to confirm this approach.
37	8.1	Atmospheric, acoustic, and visual environment	25	On page 25, Volatile Organic Compounds (VOCs) are listed as having to be included in baseline monitoring. The proposed monitoring program includes sampling for BTEX, which is intended to represent VOCs. MFFN would like to confirm that our approach is acceptable as it is not feasible to conduct a detailed suite VOC study due to the nature of the geography of the Project area.



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38	8.1	Atmospheric, acoustic, and visual environment	25	IAAC to confirm MFFN's methodology for baseline air quality measurements, to be collected at a single location, which is representative of the Project area given the remote nature, repetitive landscape, and lack of substantive emissions sources. Seasonal variability can be addressed; however, a detailed spatial analysis is not practical.
39	8.1	Atmospheric, acoustic, and visual environment	26	<p>There is a requirement to 'Provide dispersion modelling of a base case to account for existing pollutant sources and to determine the spatial distribution of pollutants within the study area'.</p> <p>Given the remote nature of the Project site and the majority of the footprint not having notable activity / sources of emissions, the requested modelling of a base case, with vehicle traffic on temporary roads, etc. would be difficult to characterize and likely a substantial effort that would not produce meaningful results. IAAC to confirm that the Project can be assessed using modelling and baseline ambient monitoring results will be added to predict future ground-level concentrations.</p>
40	8.8	Vegetation	33	<p>The Guidelines indicate that the Impact Statement must provide a description of "<i>the amount, merchantability and location of any merchantable timber to be removed during project construction</i>" within the local study area. This timber cutting inventory is not appropriate detail/scope for an Impact Assessment, but is appropriate information for an application for a Forest Resource License (cutting permit) from the Ministry of Natural Resources and Forestry should the project receive approval from the provincial and federal government to proceed with construction. Micrositing of Project components following federal and provincial approvals will likely be required prior to application for a cutting permit as part of the Project construction phase. Therefore, it is not reasonable to require a detailed forest inventory of any merchantable timber to be removed during project construction for inclusion in the Impact Statement. Broader-scale estimates of forest cover species composition and maturity using provincial forest resource inventory data are appropriate for an Impact Statement document. Therefore, MFFN requests that the last sub-bullet under the first bullet point in Section 8.8. be removed, or revised to state that an estimate of the forested area to be cleared for project construction, and likely providing merchantable timber, will be provided in the Impact Statement.</p>

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41	8.9	Fish and Fish Habitat	33	MFFN requests that fish and fish habitat baseline information be limited to the amount of information needed to adequately predict potential effects of the proposed Project and determine mitigation measures required. MFFN reiterates this request for all other environmental and valued components that will be assessed in the Impact Statement. For example, the request for information on predator-prey interactions at multiple spatial and temporal scales is information that is extremely extensive, highly detailed, and is not required to sufficiently assess potential Project effects and most importantly, to determine required mitigation.
42	8.10	Birds, migratory birds and their habitat	35	The scope of required baseline bird survey data is considered unreasonably excessive for the purpose of adequately assessing the potential impacts of an all-season road project on birds, including migratory birds and bird species at risk which are federal jurisdiction. The scope of bird surveys required in the current Guidelines is more relevant for a wind energy project and MFFN asks if the text in the Guidelines may have been inadvertently copied from federal guidelines for a wind energy project on federal land. We expect that baseline data should focus on the most sensitive season (i.e. nesting season) when this Project would have the most potential to result in a measurable effect on bird populations (i.e. during the breeding bird season). There is no precedence to expect that an all-season road project would measurably affect over-wintering bird populations or bird populations during migration. Also, decades of bird surveys would be required to determine significant differences in individual bird species populations; and any significant differences would be unlikely to be shown to be attributed to the proposed Project. Therefore, MFFN requests that the second bullet point in Section 8.1 be revised to read: collect baseline bird data to adequately describe the breeding bird populations within representative landcover types such that potential Project effects and appropriate mitigation measures can be determined.
43	8.10a	Birds, migratory birds and their habitat	40	On page 40, the Guidelines state that, " <i>A spatially dispersed stratified random sampling approach should be used. Sample sites should be selected with a randomization procedure that accounts for the project design footprint.</i> " Our current approach to the requested sampling involves natural cleared areas for landing a helicopter in the identification of sampling locations. IAAC to confirm this approach is acceptable.
44	8.10a	Birds, migratory birds and their habitat	40	On page 40, it is stated, " <i>Describe food webs and trophic linkages to summarize biotic interactions.</i> " It is unclear how this would be quantified. Agency to provide further clarification and supportive documentation.

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45	8.10a	Birds, migratory birds and their habitat	40	On page 40, the Guidelines that, " <i>Existing data must be supplemented by surveys, if required to produce a representative sample of the avifauna and habitats of the study area</i> ". IAAC to confirm MFFN's approach using existing historical data as the far northern conditions of the Project study area lend to difficulty in conducting on site surveys and scoping of preferred habitat/hot spots for these SAR.
46	8.12	Species at Risk	44	On page 44, regarding methodology for bat surveys, MFFN requests this to struck from the Guidelines as this level of survey is not appropriate or typical for this stage of the Project.
47	8.12	Species at Risk	45	On page 45, regarding caribou survey methodology, IAAC to confirm that MFFN's approach to caribou survey sampling methods will be developed in coordination with the MECP. MFFN is scoping additional studies, the timing is yet to be determined, and the MECP will not officially review or sanction any survey work plans until the provincial terms of reference are finalized.
48	8.2	Meteorological Environment	27	IAAC to confirm that use of existing data to generate Project-specific meteorology for the modelling is acceptable thus no additional MET data is proposed to be collected.
49	8.2	Meteorological Environment	27	On page 27, the Guidelines state ' <i>Provide pan evaporation measurements or estimates of monthly (or daily) evapotranspiration</i> '. Existing meteorological data already collected in the region will be included in the existing conditions description, and for modelling purposes. Additional data collection is not proposed nor is it clear why this specific data is being requested as it will not be used in the modelling. This is not typically a requirement for an air quality program and MFFN requests this ask to be struck from the Guidelines.
50	8.5	Riparian and Wetland Environments	29	On page 29, it is requested to perform a ' <i>Wetlands Function Assessment</i> '. Typically, this level of assessment is completed on the preferred alternative at the permitting stage of a project, and not at the preliminary design stage of an Impact Assessment. MFFN requests this to be struck from the Guidelines.
51	8.5	Riparian and Wetland Environments	29	On page 29, it is requested to perform ' <i>Surveys for presence, abundance, density, distribution of MBCA and federal SAR in wetlands</i> '. Typically, this level of assessment is completed on the preferred alternative at the permitting stage of a project, and not at the preliminary design stage of an Impact Assessment. MFFN requests this to be struck from the Guidelines.

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52	8.6	Groundwater and Surface Water	31	On page 31, the Guidelines require MFFN to provide surface water quality data (physicochemical and chemical) for a minimum of 2 years to illustrate seasonal and inter-annual variability. IAAC to confirm that use of published/previously samples information is acceptable. Detailed sampling of this nature is not typically completed at the preliminary design stage of an Impact Assessment.
53	8.6	Groundwater and Surface Water	31	On page 31, the Guidelines require MFFN to provide baseline sediment quality and characteristic data for key surface water sites likely to be impacted by the road (i.e., from runoff, spills, erosion and sedimentation, etc.). IAAC to confirm use of published/previously collected samples for this information is acceptable. Detailed sampling of this nature is not typically completed at the preliminary design stage of an Impact Assessment.
54	8.6	Groundwater and surface water	31	On page 31, the Guidelines state ' <i>provide for each water body potentially affected by the project, the total surface area, bathymetry, bank and bottom features, biological components, flows, maximum and mean depths and type of substrates (Sediments)</i> '. This level of survey is not appropriate for a preliminary design. The current approach looked at representative locations with specific streamflow characteristics and major crossings to get a generalized picture of hydrologic conditions in the Project area for design and mitigation development. IAAC to confirm that MFFN's existing approach is appropriate based on this level of scope, as a detailed survey is not feasible.
55	8.6	Groundwater and surface water	31	On page 31, the Guidelines state ' <i>provide a delineation and characterization of groundwater-surface water interactions, including an identification of groundwater-dependent ecosystems, wetlands, discharge and recharge areas.</i> ' It is not possible to conduct a study of this detail, and IAAC to confirm that MFFN's desktop approach to characterize the general flow regime in the study area is acceptable, as it is not feasible to conduct a detailed survey of these items for each waterbody at this stage of Project studies.
56	8.6	Groundwater and surface water	31	On Page 31 of the Guidelines states ' <i>describe the surface water quality baseline characterization program, including sampling site selection, monitoring duration and frequency...</i> '. The conduct of the baseline surface water quality characterization is not feasible for every water body in the Project study area. IAAC to confirm MFFN's collection of water chemistry data on representative survey locations is acceptable.

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57	8.6	Groundwater and surface water	31	On Page 31, the Guidelines state ' <i>provide baseline surface water quality data, for a minimum of two years...</i> '. The conduct of the baseline surface water quality data is not feasible for every water body in the Project study area. IAAC to confirm the use of historical information and site-specific collection of the preferred alternative at the water crossing locations during the Project permitting stages only will be acceptable.
58	8.9	Fish and Fish Habitat	33-34	On Pages 33-34, Bullets 1, 2, and 5. MFFN understand that, typically, at this stage of a project, the fish and fish habitat are characterized. The amount of detail described in the Guidelines is irrelevant and generalized, consisting of an over-arching list of factors related to aquatic environment, but does not seem to be tailored for this Project. This is also not typical for a linear infrastructure project. Detailed field investigations are typically conducted following detailed design, during the permitting phase. IAAC to confirm that conducting studies on fish and fish habitat in representative habitats and significant water crossings throughout the study area is acceptable.
59	9	Baseline Conditions - Human Health	50	If previous studies on human health baseline conditions are unavailable and/or have not yet been conducted, IAAC to confirm recommended approach. Given the nature of the Project (a road), MFFN does not believe a sampling program or studies are likely not applicable.
60	9	Baseline Conditions - Human Health	50	Information on baseline contaminant concentrations should only be collected if a Human Health Risk Assessment (HHRA) is required under the Impact Assessment. If the problem formulation does not suggest an HHRA needs to be conducted, this should not be required as the project would not be expected to impact these concentrations. We request the bullet pertaining to this on page 50 is prefaced with, " <i>if an HHRA is conducted</i> ".
61	12	Baseline Conditions - Indigenous Peoples	54	IAAC to confirm whether or not a draft Impact Statement will be required for submission to IAAC for review prior to submission of the Final Impact Statement.
62	12	Baseline Conditions - Indigenous Peoples	54	IAAC to clarify approach if Indigenous communities do not want to share this level of specific information. MFFN requests that the Agency add the phrase, ' <i>where available</i> ' to the data collection requirements.

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63	12	Baseline Conditions - Indigenous Peoples	54	On page 54, ' <i>Where possible, the Impact Statement should include contextual information, both historic and current, regarding an Indigenous group's history and cultural practices, land use, as well as the manner in which rights of Indigenous peoples are, or may be, exercised and impacted by the project, as identified by the Indigenous groups.</i> ' IAAC to clarify if this also includes asserted rights.
64	12	Baseline Conditions - Indigenous Peoples	55	Since there are many information gaps in the federal and provincial census data pertaining to health, social, and economic conditions of Indigenous peoples, baseline data collection is sparse and difficult to obtain. Therefore, all data related to health and socio-economic information will be extracted from secondary sources, where available. IAAC to confirm approach.
65	12.1	Physical and Heritage Culture	55	Information on the ability of Indigenous community to transmit culture (e.g. through teaching of sacred laws, traditional laws, etc.) will be difficult to obtain. IAAC to clarify as to expectations for information collection.
66	12.1	Physical and Heritage Culture	55	MFFN requests this section reference that archaeological assessment will be completed under the <i>Ontario Heritage Act</i> and its associated Standards and Guidelines for Consultant Archaeologists. The Draft Permitting Plan and Cooperation Plan appears to relate strictly to federal requirements.
67	12.2	Current Use of Lands and Resources for Traditional Purposes	55	Request edit ' <i>as identified by the Agency</i> ' to be included.
68	12.4	Conditions Related to the Rights of Indigenous Peoples	57	The information requirements for the 'Conditions Related to the Rights of Indigenous Peoples' requires documentation (e.g. maps) of information that is culturally sensitive and may not be appropriate to include in a public document. MFFN requests that the Guidelines clarify how information that should not be released publicly should be communicated to IAAC.
69	12.4	Conditions Related to the Rights of Indigenous Peoples	57	MFFN requests to know how pre-existing impacts and cumulative effects that are already interfering with the ability to exercise rights to pass along Indigenous cultures and practices in the Impact Statement are to be incorporated into the Impact Statement? Given the impacts of colonization, we request that IAAC clarify the purpose and proposed results of such information in the Impact Statement.

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70	14.1	Changes to the atmospheric, acoustic, and visual environment	59	On page 59 of the document, the Guidelines state, ' <i>Provide an assessment of project emissions potentially contributing or adding to existing ground ozone levels</i> '. As construction emissions are short term and emissions during operation are associated with relatively low volumes of vehicle traffic, overall contribution to ozone is anticipated to not be a significant issue and therefore it is felt that this analysis is not warranted. MFFN requests this study <u>should be conducted only if needed but not a mandatory item</u> .
71	14.1	Changes to the atmospheric, acoustic, and visual environment	59	Given the Project footprint consists of long stretches of possible similar landscape, MFFN's proposed approach is to model selected areas, including a section of the roadway, which will be considered representative of the estimated emissions along the majority of the roadway. IAAC to confirm this is acceptable.
72	14.1	Changes to the atmospheric, acoustic, and visual environment	60	IAAC to confirm that only quantifying Project emission sources will be used for modelling. Regional sources will be captured in the baseline air quality monitoring program.
73	14.1	Changes to the atmospheric, acoustic, and visual environment	60	On page 60, the Guidelines state ' <i>assess the potential for emissions from the project to contribute to acid deposition and exceedances of critical loads for terrestrial and aquatic ecosystems</i> '. This is not applicable for the nature of the Project. Emissions associated with the construction phase would be short term. During operation, emissions from vehicles would not be anticipated to be of a significant volume such that it would result in observable exceedances of critical loads. This appears to be a significant additional piece of work which would not provide value. MFFN requests this to be struck from the Guidelines.
74	14.1	Changes to the atmospheric, acoustic, and visual environment	60	On page 60, the Guidelines state ' <i>describe participation in national or regional air emission tracking and reporting programs or provide rationale why participation is not required</i> '. This is not applicable for the nature of the Project and is an aspect that should be addressed at the permitting stage. MFFN requests this is struck from the Guidelines.
75	14.2	Changes to groundwater and surface water	61	On page 61, the Guidelines state ' <i>provide a project-specific water use assessment identifying and describing the quantity and quality of water resources potentially affected by the project</i> '. As many of these sources will not be known at this stage of the Project design, IAAC to confirm that MFFN's methodology of assessment conducted using preliminary design level of detail is appropriate.

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76	14, 15, 16, 17	Predicted Changes to the Physical Environment / Effects to Valued Components - Environment / " " - Human Health / " " - Social	59 +	Request the possibility of streamlining the provincial and federal processes to avoid conflicts pertaining to Valued Components.
77	16	Effects to valued Components - Human health	77	Additional requirements for data reporting to include baseline Indigenous Knowledge data disaggregated by GBA+ components (age, gender, etc.) may decrease the response rate and participation limiting the available data due to distrust within communities and confidentiality concerns within small communities, particularly regarding health data. We request the removal of this language from the guide in favour of language only regarding disaggregation of publicly available data only.
78	16	Effects to valued Components - Human health	78	There is a request to assess differential effects between communities on and off the road. Differential effects should be removed as an Impact Assessment considers effects to potential communities, not a comparative analysis of communities. MFFN requests the use of <i>differential effect</i> language be removed.
79	16	Effects to valued Components - Human health	77	The Guidelines reference the use of disaggregated data for the GBA+ component of the Impact Assessment. We request that disaggregated data be revised to " <i>publicly available disaggregated data</i> " as it is inappropriate to require disaggregation of data in a public document beyond what is currently publicly available, or in some cases may already be suppressed by the Federal Government, for confidentiality reasons, particularly health data.
80	16.1	Human Health Risk Assessment	78	Exposure pathways of mercury are not anticipated due to the Project. MFFN requests the reference to mercury be struck from the Guidelines.
81	16.2	Social determinants of Health	79	The quantification to changes in mental health should not be included as part of the Impact Assessment. Changes to mental health cannot be quantified reliably based on a road project. MFFN requests removing <i>quantification</i> .



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82	18	Effects to Valued Components - Economic	84 (and 89)	The Impact Assessment should not be expected to comment on the business cycle (boom-or-bust cycles), which is influenced and primarily determined by many non-project factors including global economic trends. The Impact Assessment should only comment on the impact of the Project (and when applicable, reasonably foreseeable developments) to the overall economy. We request the removal of language referencing boom-or-bust cycles as the intention of the assessment should be to focus on the longevity of economic opportunities related to the Project (direct, indirect and induced) relative to Project stages and how the Project is likely to influence the stability of the economy through economic diversity, as is already indicated in the Guidelines.
83	18.6	Overall Economic Impact	87	Considering the likely structural economic changes associated with a road access project as indicated by the requirement to assess price changes, it is not relevant to conduct input-output modelling, particularly localized input-output modelling. Input-output modelling is linear with a simplified macro-economic structure which removes key variables such as price-level, interest rates and unemployment rates (Statistics Canada, 2009). Due to the reliance on existing economic relationships, price volatility can corrupt the linear relationships contained within these models making them less reliable, particularly over time (Statistics Canada 2009).
84	20	Mitigation and Enhancement Measures	96	The Project design, as stated within the Detailed Project Description, has not proposed the inclusion of underpasses or wildlife bridges. Therefore, we request that IAAC remove the following text in Section 20 (page 96) which states: <i>Underpasses and wildlife bridges: - Incorporate wildlife-friendly road design principles and features. - Include bat monitoring at these sites to estimate mortality.</i>
85	20	Mitigation and Enhancement Measures	93	Page 93, Bullet #6 indicates the requirement to include a mitigation/decommissioning plan for the existing winter road (if it will no longer be used). Since decommissioning of the winter road is outside of the scope of the Project, MFFN requests to be struck from the Guidelines.
86	20	Mitigation and Enhancement Measures	100	MFFN requests to include ' <i>if applicable</i> ' to the end of bullet #3 on Page 100.

Issue Number	Section Number	Section Title	Page	Request to IAAC for Revision or Clarification
87	21	Residual Effects	104	MFFN does not believe the matrix figures at the end of Section 21 describing ' <i>Impact</i> ' and ' <i>Magnitude</i> ' are a correct interpretation of the NatureServe risk assessment related document referenced in the footnote on page 102 of the Guidelines. For example, note that ' <i>Magnitude</i> ' is defined as " <i>scope x severity</i> ", but the matrix for ' <i>Magnitude</i> ' includes ' <i>severity x irreversibility</i> '; and ' <i>Impact</i> ' is defined as " <i>magnitude x irreversibility</i> ", but the matrix for ' <i>Impact</i> ' includes ' <i>severity x scope</i> '. MFFN requests that IAAC review and revise Section 21 to provide defensible guidance for the assessment of residual effects.
88	22	Cumulative Effects Assessment	104	MFFN requests that the Agency provide a criteria for, or define, ' <i>reasonably foreseeable future physical activities</i> ' in the Guidelines to justify the list of required physical activities to be considered in the cumulative effects assessment (minimum list is provided in the draft Guidelines), and provide the Proponent with sufficient guidance to include other future physical activities in the assessment, as needed. The Proponent must have access to sufficient information about ' <i>reasonably foreseeable future physical activities</i> ' to consider these activities in a cumulative effects assessment. Also, we consider future physical activities to be ' <i>reasonably foreseeable</i> ' if the proponents of those projects have secured sufficient funding to initiate any required regulatory review and approval processes which demonstrates reasonable advancement of a proposed project design/concept. This is why we have proposed that only those potential future projects that have initiated the required formal regulatory review and approval processes be considered in a cumulative effects assessment. For example, ideas regarding potential future physical activities/projects may be discussed in any number of public or non-public forums, but should not be considered ' <i>reasonably foreseeable</i> ' simply because the idea has been discussed. We are open to discussing with IAAC the need to include potential future physical activities that have been documented and adequately described with sufficient detail in publicly available community / regional planning documents.
89	25	DESCRIPTION OF THE PROJECT'S CONTRIBUTIONS TO SUSTAINABILITY	112	Clarification needed from IAAC as guidance documents do not discuss how to mitigate potential conflicting views on sustainability. Sustainability can be viewed from various lenses and perspectives.

Issue Number	Section Number	Section Title	Page	Request to IAAC for Revision or Clarification
90	26.2	Follow-up Program Monitoring	116	<p>Bullet point #6 (sub-bullet #1) on page 116 requires that post-construction monitoring should be conducted to specifically include "<i>Ongoing monitoring of project and control sites to evaluate whether there are changes in the bat community following project construction</i>". We believe that this requirement is applicable for a wind energy project and has been erroneously included in the draft Guidelines document for this all-season road project. MFFN requests that the entire bullet point #6, including the two sub-bullets be deleted from the Guidelines for the reason stated above, and because sub-bullet #2 regarding monitoring the effectiveness of mitigation measures is already specified in bullet point #7 (i.e. requiring "<i>description of the methodology and mechanism for monitoring the effectiveness of mitigation and reclamation</i>").</p>
91	26.2	Follow-up Program monitoring	116-117	<p>Bullet point #8 (sub-bullet #1) on page 116 requires that all reclamation plantings be monitored biannually (i.e., late spring and fall) during consecutive years. We believe that it is difficult at this stage of project studies to define a frequency of specific monitoring time frames, as the effects of the project have not yet been predicted via the impact assessment. We would like to ask that the sub-bullet be replaced with a requirement for reclamation planting monitoring program, only 'if required', on the basis of the determined project effects.</p>