



REQUEST TO DESIGNATE MELTECH INNOVATION CANADA PROJECT 81724 UNDER THE IMPACT ASSESSMENT ACT s.9

September 25, 2021

A. Contact Information of the Requester

Technoparc Oiseaux
CP 32527 BP Lucerne
Mont-Royal, QC H3R 2K0
Email: <personal information removed>
Telephone: <personal information removed>

B. Introduction of the Request for Designation

Technoparc Oiseaux, a citizen mobilization group of over 4000 members devoted to protecting the wetlands and natural habitats north of Pierre Elliott Trudeau Airport in Montreal, Quebec, hereby formally requests that the Minister of the Environment and Climate Change designate Meltech Innovation Canada's proposed [Project 81724 "Construction of an industrial building to produce nonwoven fabric for surgical masks"](#) under Section 9 of the Impact Assessment Act [S.C. 2019, c. 28, s. 1] (1). **We evoke the Minister's discretionary authority to designate this project specifically in function of the proposed project's environmentally sensitive location, the sweeping public concerns related to the adverse environmental effects that will arise should the project move forward, and the inadequate recourse to other existing legislative and regulatory mechanisms to manage these potential adverse effects.** We furthermore take issue with the Montreal Airport Authority's categorical rejection of Indigenous stakeholder rights and believe it has overstepped its authority, necessitating a full Designated Project federal review. Our request is based on science, as well as Indigenous and community knowledge.

We stand with thousands of Quebec citizens, over [35 different conservation and scientific groups](#), as well as representatives of the Mohawk Council of Kahnawà:ke, in calling for this space to be protected (2).

C. Description of the Project that is the Subject of the Request

The [proposed project](#) is situated on federally controlled land: "YUL-Montreal Airport Authority: **Construction of an industrial building to produce nonwoven fabric for surgical masks,**" IAAC Reference 81724, to be located on a 15,500 square-meter section on the northern portion of lot 5599104, Chemin de l'Aviation, in Montreal, Quebec (1). The proponent of the project is Meltech Innovation Canada, located at 2555 Chemin de l'Aviation, Pointe Claire, Québec, H9P 2Z2. The two Authorities supporting this project are the Montreal Airport Authority and Innovation, Science, and Economic Development Canada. This project has not previously been the subject of Designated Project status, nor has any written decision on the project been made by the IAAC. No response to a prior request to designate the project has been previously rendered, including under the CEAA 2012.

While the project description suggests that the site is located “at the Airport,” it bears clarifying that the site in question is 1.5 km away from any active runway and is north of an active golf course, which the Airport Authority subleases to the City of Dorval, Quebec.

The project description reads as follows: “Meltech Innovation Canada plans the construction of an industrial building on the north part of lot 5 599 104 located on the Chemin de l'Aviation at YUL Montreal-Trudeau International Airport. The building's ground surface area will be approximately 4,000 square meters, situated on a 15,500 square meter lot. The land is located on the site of an old golf course, now unused. No wetlands, waterways, sensitive species or habitats or protected zones are present on the site. [...] The building will be used to produce nonwoven fabric for surgical mask manufacturing. The production process uses extruders and hot air to produce fine fibers. These fibers are randomly laid on a moving belt to produce the fabric which is then slit to width and wound in rolls suitable for use in mask manufacturing” (1).

A thorough contextualization of the project as well as an ecological overview of the site in question can be found in our comprehensive [brief](#) submitted to the 81724 Project consultation, “Caractérisation écologique du Champ des monarques Mémoire présenté dans le cadre de la consultation publique de l'Agence d'évaluation d'impact du Canada, aux autorités d'Innovation, Sciences et Développement économique Canada et d'Aéroports de Montréal (ADM) par le promoteur Meltech Innovation Pour le projet 81724 « Construction d'un bâtiment industriel pour la production de toiles non tissées pour masques de protection individuelle» Sur le lot 5 599 104 aussi appelé Champ des monarques” (3).

Further description of the site is provided below in our Rationale for Project Designation.

D. Rationale for Project Designation

As stated above, we call upon Minister's discretionary authority to designate this project specifically in function of the proposed project's environmentally sensitive location, the sweeping public concerns related to the adverse environmental effects that will arise should the project move forward, and the inadequate recourse to other existing legislative and regulatory mechanisms to manage these potential adverse effects.

We contend that Designated-Project status is required to thoroughly evaluate the potential adverse environmental effects to which this project may give rise. We specifically take issue with the deficiencies and incomplete nature of the document upon which the Airport Authority of Montreal is basing its determination to allow development to move forward on the proposed site, namely “[Ecological Inventory Chemin de l'Aviation Development \(Dorval\) for Divco](#)” (Évolution Environnement, 2021), and with the project description's claim that “no wetlands, waterways, sensitive species or habitats or protected zones are present on the site” (4). We call for exhaustive, independent ecological surveys for wetland-indicator species, amphibians, small mammals, bats, and avifauna to be conducted with appropriate scientific timing and rigour.

Overview of rationale:

- 1) Is the project near a threshold set in the Project List? No.

- 2) Is the project near or in an environmentally or otherwise sensitive location? **Yes.** (See elaboration below.)
- 3) Does the project involve new technology or a new type of activity? **Yes.** (See elaboration below.)
- 4) Does the project have the potential to cause adverse effects that are of concern to you and fall within federal jurisdiction? **Yes.** (See elaboration below.)
- 5) Does the project have the potential to cause adverse effects that are directly related or incidental to a federal authority either (i) making a decision that would permit the carrying out, in whole or in part, of the project or (ii) providing financial assistance for the purpose of enabling the project to be carried out, in whole or in part? **Yes.** (See elaboration below.)
- 6) Does the project have the potential to cause adverse impacts on the section 35 rights of the Indigenous peoples of Canada? **Yes.** (See elaboration below.)

We specifically contend the following, consistent with [IAAC considerations](#) for Designated Project status (5):

- Carrying out the project may cause adverse effects within federal jurisdiction or adverse direct or incidental effects, and we have public concerns related to such effects, as detailed below.
- There are potential impacts of the project on the right of the Indigenous peoples of Canada – including Indigenous women – recognized and affirmed by section 35 of the *Constitution Act* 1982 (section 35 rights) as well as any regional or strategic assessments.
- Standard design features and mitigation of the project will not address the anticipated adverse effects. The promise to tarp over one set of wetlands during construction while destroying another on-site wetland habitat does not constitute mitigation. Diminishment of the tree canopy, likewise, cannot be mitigated by the promise to erect a green roof.
- The potential adverse effects cannot be adequately managed through other existing legislative or regulatory mechanisms. As federal land, the lot in question is not subject to the provincial laws on, for example, wetland compensation, and obtaining Environmental Authorization Certificates from Quebec’s Ministry of the Environment (MELCC) is not required. Permitting is also not required at the municipal level.
- An assessment of environmental effects would not be carried out by another jurisdiction. As indicated above, there is no regulatory mechanism that applies to this federal lot. Furthermore, there is no record of formal, complete environmental scans having ever been uploaded to the CDPNQ (*Centre de Patrimoine Nationale de Québec*) for cadastral lot 5599104.
- The project may cause adverse environmental effects because of its location and environmental setting, or because of a change in use on previously undeveloped lands. (See 4b and 4d below.)
- There are long-term proposals for multiple activities within the same region that may be a source of cumulative effects. The Montreal Airport Authority makes no secret of the fact that it intends to develop the full 140ha of federally leased land at its disposable, as evident in recent comments and in its current Strategic Plan. Meltech’s plant would constitute a first step towards the complete development of the site.

D-1. The project is not near a threshold set.

D-2. The proposed project is both near and in an environmentally sensitive location.
and

D-4. The project has the potential to cause adverse effects that are of concern to us and that fall within federal jurisdiction.

Lot 5599104 is part of a mosaic of wetlands, reverted grasslands, and mixed-woods deciduous forest that make up 155 ha under federal control, leased to the Aéroports de Montréal or Montreal Airport Authority (ADM). Connected to an additional 60 ha of municipal and private land, the site as a whole represents the last unprotected, non-fragmented sweeping natural space on the island of Montreal, commonly referred to as the “Technoparc” wetlands. The vast array of interconnected ecosystems makes the site a propitious one for many species, especially within an urban context, to such an extent that the site’s biodiversity has been the subject of national press coverage (Emilie Dubreuil, [Un deuxième poumon vert à Montréal, Radio-Canada](#), June 2021; Sarah Levitt, CBC, [The National](#) July 2021) (6,7).

Effects within federal jurisdiction: Wildlife: Migratory Bird Convention Act of 1994

The area has consistently been recognized as *the* top site for ornithological observation in Montreal, registering the greatest number of bird species observed on the island of Montreal for the past five years (8). **The broader proximal site contains [confirmed nesting locations](#) (9) for Wood Thrush, Eastern Whip-poor-will, Common Nighthawk, Least Bittern, Canada Warbler, and Eastern Wood-Pewee, with a noted strong nesting potential for Short-Eared Owl and Bobolink.**

Monarch Fields, the northern portion of lot 5599104, is especially rich in biodiversity, given its structure of open grassland and reverted field bordered by crucial wetland complexes (treed swamps and a ponded wetland). The site as a whole is renowned in particular for its avifauna, in addition to its impressive stands of Common Milkweed, a plant vital to the survival of the Monarch Butterfly, a species which COSEWIC has assessed since 2016 as endangered. Sensitive bat species, notably Silver-haired bat, in addition to possible *Myotis* have also been documented on site. A total of 209 bird species have been observed in the broader interconnected area, with **144 bird species documented to date specifically on the proposed construction site of federal lot 5599104.**

It is crucial to note that to date there have been no formal, exhaustive studies of lot 5599104 conducted. Citizen-science GPS observations of status species, entered into iNaturalist and eBird databases and confirmed by documentation retrieved formally from Quebec’s database of total and sensitive bird species (namely, SOS-POP and Regroupement Québec Oiseaux), show that **9 federal-status at-risk bird species have been documented on lot 5599104 alone: namely, Barn Swallow, Chimney Swift, Eastern Meadowlark, Short-eared Owl, Common Nighthawk, Canada Warbler, Wood Thrush, Eastern Wood-Pewee, and Rusty Blackbird.** Two additional federal-status species were recorded in both the iNaturalist and eBird databases in the months of August and September 2021: **Olive-sided Flycatcher** (Aug. 28, 2021) and **Lesser Yellowlegs** (Sept. 11, 2021), raising the total to **11 federal-status at risk species documented on lot 5599104.**

When the remainder of the adjacent federally controlled lands slated for future development are taken into account, we observe a total of 14 federal-status species, of which 9 have been assessed as threatened by COSEWIC, and 5 assessed as being of special concern. (Threatened COSEWIC species include Least Bittern, Barn Swallow, Bank Swallow, Bobolink, Chimney Swift, Eastern Meadowlark, Lesser Yellowlegs, Eastern Whip-poor-will, and Short-Eared Owl; Special-Concern COSEWIC species include Canada Warbler, Common Nighthawk, Eastern Wood-Pewee, Evening Grosbeak, Olive-Sided

Flycatcher, and Rusty Blackbird.) Moreover, a total of 33 RCO-13 priority species, including Purple Martin, American Kestrel and Peregrine Falcon, have been regularly documented on lot 5599104.

In addition to this wealth of avifauna, the northern portion of lot 5599104 is an important corridor for pollinators, including wild Western Honeybee, bumblebees, leaf-cutter bees, wasps, as well as a variety of butterflies and moths. Monarch Fields takes its name from the numbers of monarchs the site generally attracts. Over 125 monarch butterflies have been tagged on the northern portion of lot 5599104 in the past three years under the University of Kansas “Monarch Watch” program, and our citizen-science mobilization group has inventoried over 4000 Common Milkweed plants on site. Currently Monarch Fields is registered in the [iNaturalist](#) and [Montreal Espace pour la Vie](#) project database as having the highest concentration of Common Milkweed on the island of Montreal (2021) (10,11).

As a side-note, in terms of bat species, lot 5599104 has not been adequately inventoried, with only one autumnal study referred to (but not disclosed) by the project proponent, suggesting incorrect timing for inventories according to standard accepted Canadian bat inventory protocols. Our own citizen-science data collection indicates that Monarch Fields is an important feeding ground for several bat species, including Silver-haired bats, with over 90 passages recorded of bats (EPNO, EPFU, and LANO, with additional possible *Myotis*) over two nights, for a total recording time of one hour and twenty minutes, in July and August 2021.

In short, **the value of the site as a feeding and migratory stopover for hundreds of species cannot be overstated.** It bears repeating that in winter, lot 5599104 is a province-wide renowned site for owls, with 6 different species of owls observed regularly on site, namely Snowy Owl, Barred Owl, Great-Horned Owl, Short-Eared Owl, Long-Eared Owl, and Northern Saw-whet Owl (in addition to Great Gray Owls during irruption years).

Unfortunately, we do not have confidence in the Montreal Airport Authority to uphold the Migratory Birds Convention Act of 1994 for the expanse of natural habitats which it subleases from the federal government. In June of 2021, we observed anti-nesting nets placed around five trees on the proposed Meltech construction site, over 1.5 kilometres from the airport fields (12). We have video footage of birds trapped within the [nets](#) (13). When we complained directly to the Montreal Airport Authority, the nets were promptly removed. Interfering with nesting during nesting season is a clear violation of the Migratory Birds Convention Act of 1994.

Effects within federal jurisdiction: Changes to the environment on federal lands Wetland Corridor

In terms of vegetation, the mosaic attributes of lot 5599104 are especially important to sustain biodiversity. Monarch Fields has treed swamps and wetland corridors bordering open grassland. In addition to the high counts of Common Milkweed (4000-5000 estimated on Monarch Fields alone, the highest concentration of Common Milkweed recorded in iNaturalist on the island of Montreal), to date 27 species of facultative and obligative wetland-indicator species have been documented with GPS on the proposed construction site alone, with a significant stand of cattails and a corridor of wetland-indicator species running directly through the northern portion of the building lot (14). The proponent’s inventories of wetland species are scant, with several species under-documented or overlooked altogether. Given the fact that Montreal has lost hundreds of hectares of wetlands over the

past decade, and that 85% of southern Quebec's wetlands have already permanently disappeared, the presence of even the smallest wetlands must be taken seriously, especially when these occur on federal lands.

Tree Canopy and Heat-Island Mitigation

It is important to note that the site is a cooling area in an area of heightened heat-islands. Importantly, the site offers a significant tree canopy when compared with the canopies of surrounding municipalities (19.52% for Monarch Fields, in comparison to the respective tree canopies of the borough of Ville Saint-Laurent (10.8%) and City of Dorval (9.95%)) (15). Diminishment of the natural habitat and current green space may likewise result in a diminishing of the cooling-island effect offered by the site as a whole. The City of Dorval and the borough of Saint-Laurent have among the highest concentration of heat islands in Montreal, which correlates directly to the strikingly low ratio of greenspace surface area to borough surface area. In 2018, the borough of Saint-Laurent had only 3.6% of its surface area comprised of parks and greenspace, well below the City of Montreal average of 11.4% (16). Furthermore, the City of Montreal ranks well below the national average of greenspace for major cities, falling short by more than half the Canadian-city median of 473 ha of greenspace per 100,000 citizens, with only 230 ha of greenspace per 100,000 citizens per the latest 2018 figures (17). In this respect, to diminish the site's tree canopy and greenspace is to potentially incur financial costs measurable in terms of diminished health-care and wellness of citizens.

Diminishment of Land Use

The specific use of the space should also be evoked here; the proposed Meltech Innovation project offers to employ 21 people. By our tallies, at least 10,000 people visit the site annually to pursue ornithological observation, photography, or nature walks, without mentioning those who frequent the area for outdoor activities such as running.

D-3. The project is a new technology, but does not necessitate the selected location to be implemented.

Meltech Innovation's project involves domestic manufacturing of non-surgical masks, a first in Canada. Technoparc Oiseaux is not opposed to the purpose of Medicom's proposed plant. We are, however, opposed to the choice of location for the site. With over 2 million square feet of vacant brown-lots and empty buildings in the immediate neighbourhood of the proposed project, in addition to 2 million square feet of heat-island-producing parking lots, we push back against the contention that destroying biodiversity and precious greenspace at *this specific location* is required. Furthermore, it should be noted that Meltech Innovation's project lies outside the scope of the aeronautical industry, contradicting general criteria given by the Montreal Airport Authority for on-site development in its [Strategic Plan](#) (18).

D-4. The project has the potential to cause adverse effects that are of concern to us and that fall within federal jurisdiction.

Please see elaboration provided above under D-2/D-4.

D-5. The project has the potential to cause adverse effects that are directly related or incidental to a federal authority either (i) making a decision that would permit the carrying out, in whole or in part, of the project or (ii) providing financial assistance for the purpose of enabling the project to be carried out, in whole or in part.

One of the two listed authorities for the Meltech project is Innovation, Science, and Economic Development, a federal body. On June 17, 2021, it was announced that the Canadian government, in offering subsidization through ISED, had granted Medicom/Meltech \$29 million dollars to establish a mask-material-making factory in Montreal.

To date, the federal government, while retaining ownership of the land in question, seems to have ceded all decision-making on land-use to the Airport Authority of Montreal. In January 2021, TRAN (the Federal Standing Committee on Transport, Infrastructure, and Communities) released [suggested talking points](#) for Transport Canada officials and federal representatives facing concerned citizens and environmental groups on the “hot issue” of a Federal Wildlife Refuge at Montreal Airport (19). Among these talking points included the reminder that the ADM holds a lease with the federal government that expires in 2072 and that “Under the terms of this ground lease, Aéroports de Montréal is an independent entity that operates at arm’s length from Transport Canada.” Furthermore, the Transport Canada document contains an “If Pressed” section, intended to help officials rebut citizens or groups who “press” the issue: “Transport Canada respects the autonomy of Aéroports de Montréal and encourages concerned parties to engage directly with Aéroports de Montréal regarding lands under their administration” (20).

The *carte-blanche* approach that the federal government has offered the Aéroports de Montréal may explain ADM’s disregard when it comes to completing thorough ecological surveys of the area. It also seems to have informed our next point of concern: a clear overstepping of authority related to Indigenous rights regarding custodianship of the land in question.

D-6. The project has the potential to cause adverse impacts on the section 35 rights of the Indigenous peoples of Canada.

On August 2, 2021, the Aéroports of Montréal sent a letter to the Mohawk Council of Kahnawà:ke, indicating the following: “We are of the view that the Project does not give rise to a duty to consult the Mohawks of Kahnawà:ke because it does not have any adverse impact on the ability of the Mohawks of Kahnawà:ke to exercise the Aboriginal rights that they assert. Indeed, the Mohawks of Kahnawà:ke do not exercise any such right on the land where the Project is located. In any case, whether or not the Project has triggered a duty to consult the Mohawks of Kahnawà:ke, in our view, the latter have been duly informed of the Project and have had ample opportunity to express their concerns regarding the impact of the Project on the exercise of their asserted Aboriginal rights. In this latter regard, we note that the only such concern expressed in your letter of July 22, 2021 is the one related to the waterfowl hunting rights asserted by the Mohawks of Kahnawà:ke. After consideration, we believe that the Project has no adverse impact on the waterfowl hunting rights asserted by the Mohawks of Kahnawà:ke since the latter do not exercise any such right on the land where the Project is located or close to this area. In addition, as you will note from the Ecological study to which ADM has requested, the Project has no adverse effects on waterfowl!” (quoted in Mohawk Council of Kahnawà:ke’s submission to ADM Public Consultation entitled “[MCK review of ecological study posted by the](#)

[Aéroports de Montréal \(ADM\)](#) in support of the proposal to construct an industrial building to produce nonwoven fabric for surgical masks on ADM controlled lands and the email response received from Martin Massé to MCK's letter of July 22, 2021, IAAC Reference Number 81724") (21).

In his public-record submission to the ADM consultation dated August 23, 2021, Chief Kakwirakeron Ross Montour, signatory of the submission by the Mohawk Council of Kahnawà:ke, thoroughly rebuts these claims made by ADM. According to the MCK submission, the summary of potential adverse impacts to Section 35 Rights include but are not necessarily limited to: 1) ADM's failure to fulfil the duty to consult and accommodate; 2) ADM's failure to meet the duty to inform; 3) ADM's failure to acknowledge "asserted Aboriginal title rights and stewardship rights, and responsibilities to the project lands"; 4) ADM's failure to assess potential project impacts to rights. One line in particular stands out in ADM's response to MCK: "[ADM is] of the view that the Project does not give rise to a duty to consult the Mohawks of Kahnawà:ke because it does not have any adverse impact on the ability of the Mohawks of Kahnawà:ke to exercise the Aboriginal rights that they assert. Indeed, the Mohawks of Kahnawà:ke do not exercise any such right on the land where the Project is located" (quoted by R. Montour, idem). ADM's dismissiveness and presumption of authority to judge Indigenous land rights is striking. Such dismissiveness may indeed be a corollary effect of the Federal Government and Transport Canada's stated strategy of allowing ADM to operate with "autonomy" and "at arm's length." Such claims, however, on the part of the project Authority stand in stark contrast to tenets of Section 35 Indigenous land rights and the Canadian Constitution, setting a dangerous precedent. We reiterate and amplify the position of Chief Kakwirakeron Ross Montour: "Given the nature of [ADM's] response – which was based on the refusal to recognize rights assertions and a denial of any potential impacts to these rights – [MCK's] position remains that the federal authorities are not currently able to assess potential project impacts to rights as required by the *Impact Assessment Act*" (22).

We share Chief Ross Montour's call for "ADM to commit to a comprehensive Impact Assessment, following that of a 'designated project' under the Impact Assessment Act, 2019 that would address the impacts of ADM's ultimate development plans on the Technoparc. This investigation should consider the wildlife within Technoparc and how they use different areas within this area for feeding and rearing young; the hydrology and hydrogeology of the area and the impact that development would have on existing features on the landscape; impacts of noise and air pollution associated with industrial manufacturing; impacts on the Rights and Interests of Indigenous communities; and social and cultural impacts to the public at large" (21).

Only a fully transparent Designated Project will remedy the oversights that have currently marked ADM and ISED's project consultation, and bring the project into line with the original [purposes](#) of the Impact Assessment Act, 2019, namely "to ensure that scientific information, Indigenous knowledge and community knowledge [...] are taken into account (6.1j); " to ensure that projects, as defined in section 81, that are to be carried out on federal lands [...], are considered in a careful and precautionary manner to avoid significant adverse environmental effects" (6.1i); in addition to "promot[ing] communication and cooperation with Indigenous peoples of Canada with respect to impact assessments" (6.1f); and ensuring "respect for the rights of the Indigenous peoples of Canada recognized and affirmed by section 35 of the Constitution Act 1982 in the course of impact assessments and decision-making under this Act" (6.1g) (23).



E. Technoparc Oiseaux's discovery of the project.

To close, we learned of this project through several sources in June 2021: confirmation with Members of Parliament, news reports, and direct communication with the proponent Medicom/Meltech. Technoparc Oiseaux invited the proponent to visit the site to see the ecological richness for themselves, and was initially informed that such a visit could not take place, given that consultation for the project was ongoing. Medicom executives nonetheless subsequently visited the site with us during the ongoing consultation, in the presence of ADM representatives. A record of that visit is available upon request.

Thank you for your prompt consideration and response.

Sincerely,

Katherine Collin Co-Organizer
Technoparc Oiseaux

REFERENCES:

1. YUL-Montreal-Trudeau Airport. (2021, June 23). *Project 81724: Construction of an industrial building to produce nonwoven fabric for surgical masks*. Impact Assessment Registry of Canada. <https://iaac-aeic.gc.ca/050/evaluations/proj/81724?culture=en-CA>.
2. Technoparc Oiseaux (2021, July 9). "Lettre d'appui: Sauvons Champ des monarques." <https://bit.ly/3AL7Pzj>
3. Technoparc Oiseaux, Collin, K., Riou, F. & Rocheleau, S. (2021, August 20). *Caractérisation écologique du Champ des monarques*. <https://technoparcoiseaux.org/documentation> [<https://bit.ly/3lZQddt>].
4. Évolution Environnement. (2021, June 28). *Ecological Inventory Chemin de l'Aviation Development (Dorval) for Divco*. Impact Assessment Registry, Project 81724 iaac-aeic.gc.ca/050/documents/p81724/140895E.pdf
5. Impact Assessment Agency of Canada. (2020, June 17). *Operational Guide: Designating a Project under the Impact Assessment Act*. <https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/designating-project-impact-assessment-act.html>
6. Dubreuil, Emilie (2021, June 18). *Un deuxième poumon vert à Montréal*. Radio Canada. <https://ici.radio-canada.ca/info/videos/media-8463342/deuxieme-poumon-vert-montreal>
7. Levitt, Sarah. (2021, July 24). *Montreal's conservationists work to save vanishing Monarchs from extinction*. CBC, The National. <https://www.cbc.ca/news/canada/montreal/monarch-butterflies-migration-conservation-species-caterpillar-1.6113665>
8. eBird. 2021. *eBird: An online database of bird distribution and abundance [web application]*. eBird, Cornell Lab of Ornithology. <http://www.ebird.org>.
9. SOS-POP. 2021. *Banque de données sur les populations d'oiseaux en situation précaire au Québec*. Données issues du programme de Suivi des sites importants pour la conservation des populations d'oiseaux en péril du Québec. QuébecOiseaux, Montréal, Québec. [version du 7

- juillet]. Referred to in redacted form in Technoparc Oiseaux (2021, August 20), *Caractérisation écologique du Champs des monarques*. <https://technoparcoiseaux.org/documentation>
10. iNaturalist. (2021). *Défi biodiversité Montréal: Espace pour la Vie*. <https://www.inaturalist.org/projects/defi-biodiversite-espace-pour-la-vie-montreal-space-for-life-biodiversity-challenge>
 11. iNaturalist. (2021). *Collection Project: Technoparc Oiseaux - Champ des monarques*. <https://inaturalist.ca/projects/technoparc-oiseaux-champ-des-monarques-adm>
 12. See Technoparc Oiseaux, Collin, K., Riou, F. & Rocheleau, S. (2021, August 20). *Caractérisation écologique du Champ des monarques*, Section 1.2, p. 9, Fig.7. <https://technoparcoiseaux.org/documentation>
 13. Technoparc Oiseaux. (2021, 22 June). Daniel Zuckerkandel, *Facebook* [Group Page]. Retrieved from <https://www.facebook.com/groups/TechnoparcOiseaux/posts/1439114073111588/>
 14. See Technoparc Oiseaux, Collin, K., Riou, F. & Rocheleau, S. (2021, August 20). *Caractérisation écologique du Champ des monarques*, Section 4, pp. 16-24. <https://technoparcoiseaux.org/documentation> [<https://bit.ly/3lZQddt>]
 15. See Technoparc Oiseaux, Collin, K., Riou, F. & Rocheleau, S. (2021, August 20). *Caractérisation écologique du Champ des monarques*, Section 4.5, pp.22-24. <https://technoparcoiseaux.org/documentation>
 16. City of Montreal. (2018). *Superficie de parcs et d'espaces verts par rapport à la superficie du territoire et des arrondissements*. Plan directeur du sport et du plein air urbains 2018, Figure 8, p.36. <https://bit.ly/3uckNnR>
 17. City of Montreal. (2020, Nov. 12). *Montréal : Programme décennal d'immobilisations (PDI) 2021-2030*, p.75. https://portail-m4s.s3.montreal.ca/pdf/pdi_2021-2030_fiches_web.pdf
 18. Aéroports de Montréal. (2013). *Plan directeur: Aéroport Pierre-Elliott-Trudeau de Montréal 2013-2033*. See in particular, Section 8, pp. 55-60. https://www.admtl.com/sites/default/files/FINAL-AdM-PlanDorval_12-2013.pdf
 19. Transport Canada, Standing Committee on Transport, Infrastructure, and Communities (TRAN). (2021, Jan. 27). *Hot Issues: Wildlife Reserve at Montreal YUL, Suggested Responses*. <https://tc.canada.ca/en/binder/proposed-wildlife-reserve-yul>
 20. TRAN, *Op. cit.*
 21. Mohawk Council of Kahnawà:ke, Chief Kakwirakeron Ross Montour. (2021, Aug. 23). *MCK review of ecological study posted by the Aéroports de Montréal (ADM) in support of the proposal to construct an industrial building to produce nonwoven fabric for surgical masks on ADM controlled lands and the email response received from Martin Massé to MCK's letter of July 22, 2021, IAAC Reference Number 81724*. In Technoparc Oiseaux, Documentation. <https://www.technoparcoiseaux.org/documentation> [<https://bit.ly/3ug8UNO>]
 22. M. Massé, cited in MCK & Montour, 2021. *Idem*.
 23. *Impact Assessment Act* (S.C. 2019, c. 28, s. 1). <https://laws.justice.gc.ca/eng/acts/l-2.75/FullText.html>