

Comments from the Federal Review Team on Marten Falls Community Access Road Project Cultural Heritage Study Plan – November 8, 2021

It is essential that the Impact Statement for the Marten Falls Community Access Road Project (the Project) address all requirements outlined in the Tailored Impact Statement Guidelines (the Guidelines), and that the study plans outline a clear approach to achieving these requirements. The Impact Assessment Agency of Canada (the Agency) has highlighted sections of the Guidelines where requirements for the Impact Statement may not be met, based on content of the draft study plan submitted to the Agency. Note that this table does not provide an exhaustive list of the requirements described in the Guidelines. The Guidelines should be reviewed in their entirety, including the sections identified below.

General Comments from the Impact Assessment Agency of Canada on the Marten Falls Community Access Road Draft Study Plans – July 2, 2020					
#	Tailored Impact Statement Guidelines Section¹	Required Action for Proponent	Proponent Response	Final Study Plan Section Reference	Agency comments
GC-01	Section 5 - Public Participation and views (including 5.1, 5.2)	<p>Provide a clear description in the study plans of how public engagement opportunities have been and/or will be integrated into the impact statement phase. This must include detail on how the public will have opportunities to provide input to contribute to the development of the Impact Statement, as required in Section 5 of the Guidelines.</p> <p>Describe what engagement with the members of the public listed in the Public Participation Plan has been done in the development of the study plans, and/or any planned engagement with members of the public on the proposed study plans.</p>	<p>Section 4: describes how the Proponent will provide Project notices and opportunities with members of the public listed in the Public Partnership Plan. This will also include the opportunity to provide input on the existing environment, VCs, effects assessment methods, effects assessment results, and mitigation and follow-up program measures as applicable. A variety of activities will be offered so that members of the public are informed of the IS / EA Report as it progresses and are aware of the opportunities and means to provide their input.</p> <p>The study plans have recognized public and agency input received on the Project to date.</p>	Section 4.1 “A variety of activities will be offered so that members of the public are informed of the IS / EA Report as it progresses and are aware of the opportunities and means to provide their input.”	<p>Section 4.1 of the study plan mentions that “a variety of activities will be offered”, however, no details on the likely engagement activities are provided.</p> <p>As required by Section 5 of the Guidelines, the Impact Statement must provide a record of engagement that describes all efforts taken to seek the views of local communities and other stakeholders with respect to the Project, including on the study plans. This record of engagement is to include all engagement activities undertaken prior to the submission of the Impact Statement, including prior to and during the planning phase, and in the preparation of the Impact Statement.</p> <p>Provide details on the timeline for public engagement relative to the project work plan, including engagement relative to the schedule for baseline work, and in consideration of the project team’s timeline for the development of the Impact Statement.</p> <p>Demonstrate in the Impact Statement how comments provided by members of the public on cultural heritage were taken into consideration. Comments provided to the Agency are available on the Canadian Impact Assessment Registry Internet site at: https://iaac-aeic.gc.ca/050/evaluations/proj/80184/contributions</p>
GC-02	Section 6 - Description of Engagement with Indigenous Groups (including 6.1, 6.2, 6.3)	<p>Provide a clear description in the study plans of how all Indigenous groups listed in the Indigenous Engagement and Partnership Plan will have opportunities to provide Indigenous knowledge, including the validation of how information they provided was applied. The study plan should include a description of the proposed methods for data collection, management of confidentiality, and information storage. This should also include a methodology for tracking information that has been approved by the group, to demonstrate that the guidance outlined in Section 6.2 of the Guidelines has been incorporated into the study plans.</p> <p>Describe what engagement with all the Indigenous groups listed in the Indigenous Engagement and Partnership Plan has been done in the development of the study plans, and/or any planned engagement with Indigenous groups on the proposed study plans, particularly in relation to collection of Indigenous knowledge (i.e. develop the work plan in collaboration with those Indigenous groups that would need to provide knowledge).</p>	<p>In Section 4.2 it is noted that the Proponent will provide Project notices and opportunities for consultation and engagement with Indigenous communities identified in the Indigenous Partnership and Engagement Plan. A variety of activities will be offered so that Indigenous communities are informed of the IS / EA Report as it progresses and are aware of the opportunities, means and timelines to provide their input.</p> <p>Section 2.1.1 outlines the approach to handling confidential information, by means of permission from Indigenous communities to include Indigenous Knowledge in the IS / EA Report, regardless of the source of the Indigenous Knowledge.</p> <p>The study plans have recognized Indigenous community input received on the Project to date.</p>	<p>Sections 4.2 “...A variety of activities will be offered so that Indigenous communities are informed of the IS / EA Report as it progresses and are aware of the opportunities, means and timelines to provide their input...”</p> <p>“...Indigenous communities will have the opportunity to comment on components of the study plans throughout the IS / EA Report consultation and engagement process...”</p> <p>Section 4.4 A meeting was held with the MFFN Community Based Land Use Planning (CBLUP) team, and the MFFN CAR Project Team on September 16, 2019 in Thunder Bay, Ontario. The purpose of the meeting was to review the Project mapping and Indigenous Knowledge data provided by MFFN, and to discuss</p>	<p>Section 4.2 of the study plan states that “a variety of activities will be offered”, however, no details on the planned engagement activities are provided.</p> <p>Section 4.2 of the study plan also states that “Indigenous communities will have the opportunity to comment on components of the study plans throughout the IS / EA Report consultation and engagement process”, however, it is unclear on which components of the study plan the project team plans to engage. It is also unclear whether Indigenous groups will be provided with a meaningful opportunity to provide input on a preliminary approach/method for baseline data collection, as required in Section 6 of the Guidelines, or if engagement will take place after the baseline data collection is complete.</p> <p>Section 4.4 describes cultural heritage engagement with Marten Falls First Nation. Provide details on the timeline for Indigenous engagement on the cultural heritage study plan with all Indigenous groups listed on the Indigenous Engagement and Partnership Plan, including engagement relative to the schedule for baseline work, and spatial and temporal boundaries determinations, and particularly in relation to collection of Indigenous knowledge, and in consideration of the project team’s timeline for the development of the Impact Statement.</p> <p>Demonstrate in the Impact Statement that comments provided by Indigenous groups on cultural heritage were taken into consideration.</p>

¹ Refer to complete sections of the Guidelines for more context.

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				any specific areas the CBLUP team or MFFN would like the archaeologists to specifically examine during the Stage 1 and subsequent Stage 2 work. This information was utilized to inform the Cultural Heritage Study Plan and was also incorporated into the Cultural Heritage Study Plan and the Stage 1 Archaeological Assessment (AA) report and Stage 2 AA field work planning...”	Comments provided to the Agency are available on the Canadian Impact Assessment Registry Internet site at: https://iaac-aeic.gc.ca/050/evaluations/proj/80184/contributions
GC-03	Section 6.2 - Analysis and response to questions, comments, and issues raised	Revise the study plans to include an approach to handling confidential information that demonstrates adherence to the guidance provided in Section 6.2 of the Guidelines.	<p>Section 2.1.1: Section has been updated to include information regarding both confidentiality and permission information on all collected Indigenous Knowledge, regardless of the source.</p> <p>This section also includes how information regarding the Indigenous Knowledge Sharing Agreements will be established by the Proponent and Indigenous community participating in the Program.</p>	Section 2.1.1 “...Sensitive and / or confidential information collected through Indigenous Knowledge Sharing Agreements will be protected from public or third-party disclosure and will be established between the Proponent and Indigenous communities participating in the Indigenous Knowledge Program prior to the sharing and use of any sensitive information. Instances where Indigenous Knowledge sharing has taken place during consultation activities (e.g., meetings) will be recorded in the Record of Consultation and Engagement, including where Indigenous Knowledge was incorporated into Project decisions and into the IS / EA Report (i.e., specifics will not be included in the Record of Consultation and Engagement given the potential sensitivity and / or confidentiality of the information shared)...”	<p>As required in Section 6 of the Guidelines, describe the confidential information provided by each Indigenous group. Present the content in sufficient detail to support understanding of the potential effects and impacts on rights, while also protecting confidential/sensitive specifics and respecting stipulations in the confidentiality agreements (e.g, use buffer areas instead of specific locations, etc.).</p> <p>Provide to the Agency, in the form of a letter from the Indigenous group that shared confidential information, a letter confirming that:</p> <ul style="list-style-type: none"> • the Indigenous group that provided confidential information is satisfied with the way the Impact Statement was informed; • the Indigenous group that provided confidential information is satisfied with the way the issue was solved or addressed.
GC-04	Section 7.4 Spatial and temporal boundaries	<p>Describe the approach to be implemented to demonstrate how the definitions of the proposed study area boundaries:</p> <ul style="list-style-type: none"> • encompass the anticipated boundaries of the Project’s effects, including all potentially impacted local communities, municipalities and all Indigenous groups listed in the Indigenous Engagement and Partnership Plan; and • take into account community knowledge and Indigenous knowledge; current or traditional land and resource use by Indigenous groups; exercise of Aboriginal and Treaty rights of Indigenous peoples, including cultural and spiritual practices; physical, ecological, technical, social, health, economic and cultural considerations; and 	<p>Section 6.2: General information on study areas for the Project, including a detailed list of what was considered to develop the discipline-specific local and region study areas, is included in each study plan. Each study area has been proposed taking into consideration community knowledge and Indigenous Knowledge, current or traditional land and resource use by Indigenous communities, and the exercise of Aboriginal and Treaty Rights of Indigenous peoples, including cultural and spiritual practices, physical, ecological, technical, social, health, economic and cultural considerations available at this time.</p> <p>The proposed discipline-specific study areas are preliminary. The proposed study areas will be consulted and engaged on early in the IA / EA</p>	<p>Section 4.1 “[opportunities for consultation and engagement] will include the opportunity to provide input on the existing environment, VCs, effects assessment methods, effects assessment results, and mitigation and follow-up program measures as applicable.”</p> <p>Section 6.2.1 “The specific location of Project components, including the roadway, quarries, pits and temporary infrastructure, are not yet known and will be included in the IS / EA Report.”</p>	<p>It is unclear how a Local Study Area of 2.5 km from the centreline of the Project was determined to be appropriate to assess direct effects on cultural heritage since the locations of several project components, including but not limited to aggregate pits and quarries, laydown areas, and access roads, are still unknown.</p> <p>Section 4.1 of the cultural heritage study plan seems to indicate that opportunities for consultation and engagement would not seek feedback on the temporal and spatial boundaries.</p> <p>For those project components where their locations remain unknown, additional engagement opportunities with all Indigenous groups listed in the Indigenous Engagement and Partnership Plan will be required to understand and assess potential effects on cultural heritage.</p> <p>As required in Section 7.4.1 of the Guidelines, provide information regarding how the following were/will be taken into account in defining</p>

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		the size, nature and location of past, present and foreseeable future projects and activities.	process. In addition, the Indigenous Knowledge Program provides additional opportunities for community knowledge and Indigenous Knowledge, current or traditional land and resource use by Indigenous communities, and the exercise of Aboriginal and Treaty Rights of Indigenous peoples to be shared in greater detail.		<p>the spatial boundaries: community knowledge and Indigenous knowledge; current and traditional land and resource use by Indigenous groups; exercise of Aboriginal and Treaty rights, including cultural and spiritual practices; physical, ecological, technical, social, health, economic and cultural considerations; and the size, nature and location of past, present and reasonably foreseeable future projects and activities.</p> <p>Ensure that the cultural heritage Regional Study Area encompasses the spatial boundary of cumulative effects.</p> <p>Provide the above information in a way that allows those who provided the knowledge to the proponent and the Agency to see their input reflected in the Impact Statement. It is not sufficient to state that “input from participants will be/was taken into account”.</p>
GC-05	Section 7 - Baseline Methodologies (Including 7.1, 7.2, 7.3, 7.4)	<p>Provide clear descriptions in the study plans of the proposed study areas and the criteria used to define the study areas for each valued component.</p> <p>Provide clear descriptions of the timing of previously collected data (days/month/year) and future approximate (month/year or season/year) for every field work planned and the criteria used to tailor the temporal boundaries to the valued components under consideration.</p> <p>Describe how all Indigenous groups listed in the Indigenous Engagement and Partnership Plan will be, or have been, engaged to provide input on spatial and temporal boundaries.</p> <p>Explain how the Agency will be provided opportunities to validate spatial and temporal boundaries.</p>	<p>Local Study Area (LSA) and Regional Study Area (RSA) for each valued component are described in Table 6-1, including rationale used to define the area.</p> <p>Study plans have been designed considering historical information, where applicable and available. Study plans will be updated with appended Work Plans, to be submitted at a future date, which will detail upcoming planned field activities.</p> <p>As detailed in both Section 4.2 and Section 6.2 the Proponent will continue to provide opportunities for neighbouring Indigenous communities and interested persons to provide input and inform the effects assessment, including the LSAs and RSAs.</p> <p>Government agencies and interested persons will have the opportunity to comment on component of the study plans throughout the IS / EA Report consultation and engagement process</p>	<p>Section 4.3 “...The Socio-economic Data Collection Program is expected to include targeted interviews, focus groups, questionnaires and other niche tools to gather information from diverse populations to resolve gaps in socio-economic secondary data...”</p> <p>Section 7.1 “...A desktop review of existing information sources was completed to identify information gaps that will need to be addressed through further study...”</p>	<p>To ensure that baseline data collection will meet the requirements of the Guidelines, the Agency advises the project team to share a workplan describing how the survey for cultural heritage data collection will be conducted. If it is not possible to provide this information in the study plans or workplans, the Agency requires an opportunity to review the collected baseline data/baseline reports prior to the preparation of the Impact Statement documentation.</p>
GC-06		Provide further details in the study plans on how GBA+ has been integrated into all aspects of data collection methodology, as per Section 7.1 of the Guidelines, and into the assessment of effects and impacts, as mentioned in Sections 13, 20, 21, and others, related to effects assessments of the Guidelines.	Section 4.3 has been updated to include the consideration of Identity and Gender-Based Analysis Plus (GBA+) including both Indigenous communities and their relevant subpopulations and non-Indigenous communities and their subpopulations. During consultation and engagement activities these groups (and any others defined during consultation) will be engaged with on targeted input.	Sections 4.3 and 9.8	<p>Describe how GBA+ has been and will be applied to the consideration of engagement activities. Identify specific methods targeted to specific subgroups.</p> <p>Provide detail on how GBA+ has been integrated into all aspects of data collection methodology, including for the definition of indicators, as per Section 7.1 of the Guidelines, and into the assessment of effects and impacts, as mentioned in Sections 13, 20, 21, and others, related to effects assessments of the Guidelines.</p> <p>Although the cultural heritage study plan states that ecological and socio-economic context will be used to assess residual effects, the effects assessment also should be conducted to determine if the residual effects could disproportionately impact diverse populations (e.g., men, women, youth, Elders).</p> <p>It is not sufficient to mention that Gender-Based Analysis Plus will be applied to the assessment. Clear descriptions of how GBA+ was</p>

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GC-07	Section 13 - Effects Assessment (including 13.1, 13.2)	Provide details to demonstrate how the Project's potential effects will be considered, as per the requirements in Sections 13 to 19 of the Guidelines. Ensure that the effects assessment considers the effects of each of the project components and physical activities, in all phases, and that it is based on a comparison to the proposed baseline work. Provide detail on how engagement with all Indigenous groups listed in the Indigenous Engagement and Partnership Plan and the public will inform the effects assessment and the selection of mitigation measures and follow-up program measures.	Project environmental interaction are separated into Project phases, and Project activities for each environmental discipline in their VC-specific study plan listed as Table 9-1. Information collected through the various activities (e.g., field studies and programs, effects assessments) of each discipline area (e.g., wildlife, vegetation, cultural heritage) will be shared with the Indigenous Knowledge Program leads. This will support the establishment of the existing environment and the effects assessment for the Aboriginal and Treaty Rights and Interests environmental discipline, as well as the identification of potential mitigation measures and monitoring programs.	Throughout the study plan, Sections 6.2 and 9	As required in Sections 7 and 13 of the Guidelines, ensure that the effects assessment considers the effects of each of the project components (including but not limited to all alternative routes brought forward in the Impact Statement, all aggregates sources, access roads, etc.) and physical activities, in all phases, and that the assessment is based on a comparison to the data and information gathered during the proposed baseline work. Clarify the level of information that will be shared with, and explained to, the Indigenous Knowledge Program leads and whether study plans will be made available to all Indigenous groups listed in the Indigenous Engagement and Partnership Plan.
GC-08	Section 13.1	Provide clear descriptions of the rationale behind the assumptions, including but not limited to the assumed average daily traffic and vehicles composition during the construction and operation phases that will be considered for the effects assessment and the cumulative effects assessment.	Section 10: Current assumptions to be used in the effects assessment have been identified. Any additional assumptions will be identified and rationale will be provided in the IS / EA Report.	Section 10	Before conducting the effects assessment analysis, the Agency advises the proponent to seek the Federal Review Team's confirmation of the assumptions that will be used in the analysis or, at a minimum, to discuss the type of assumptions that will be considered. As required by Section 13.1 of the Guidelines, ensure that the Impact Statement clearly outlines the assumptions used for the assessment of effects, including cumulative effects, on each valued component.
GC-09	Section 19.2 - Impacts on the Exercise of Aboriginal and Treaty Rights	Describe an approach for identifying the potentially impacted rights of Indigenous peoples of Canada that are recognized and affirmed by section 35 of the <i>Constitution Act, 1982</i> , and for integrating the potential impacts on those rights into the collection of baseline information and the effects assessment.	All study plans reference how potential effects on Indigenous rights will be assessed in the Aboriginal and Treaty Rights and Interests Study Plan. Impacts on Rights considerations are explained in the rationale for defining a Local Study Area and Regional Study Area for Aboriginal and Treaty Rights and Interests VCs. Further information for this is listed in Section 6.2.2 in the Aboriginal and Treaty Rights and Interests Study Plan.	Section 5, and Section 6.2.2 in the Aboriginal and Treaty Rights and Interests Study Plan	Feedback will be provided in the Federal Review Team's comments package on the Aboriginal and Treaty Rights and Interests Study Plan.
GC-11	Section 25 – Description of the Project's contribution to sustainability	Provide detail on the approach to meeting the requirements of Section 25 of the Guidelines regarding the description of the Project's contribution to sustainability.	Section 9: the sustainability assessment for the Project will be undertaken on the preferred alternative and will characterize the Project's contribution to sustainability incorporating the requirements set out in Section 25 of the Guidelines.	Section 9.7	Section 9.7 of the study plan is listing the requirements outlined in Section 25 of the Guidelines. Ensure that the Impact Statement provides a description of the method or approach followed to meet the requirements of Section 25 of the Guidelines.

Response to Preliminary Comments from the Impact Assessment Agency of Canada (the Agency) on the Marten Falls Community Access Road (the Project) Draft Cultural Heritage Study Plan submitted on May 22, 2020:						
#	Draft Study Plan	Guidelines Section	Required Action for Proponent	Proponent Response	June 2021 Study Plan Reference	Agency Response
CH-01	Section 3	Sections 7.1 and 7.4	<p>Required Action # 1: Update the study plan to demonstrate an approach to collect information that meets the requirements of Sections 7.1 and 7.4 of the Guidelines and how Indigenous groups and the public have been, or will be, provided an opportunity to inform the spatial and temporal boundaries.</p> <p>Required Action # 2: Provide further detail in the study plan to clarify if stage 1 of the archaeological assessment, as mentioned in Section 4.1 of the study plan, took into account the aforementioned requirements of Sections 7.1 and 7.4 of the Guidelines.</p>	<p>The spatial boundaries for the Stage 1 AA were developed based on direction provided by the Proponent. The LSA boundaries are to include the spatial boundaries of the Project, including any associated Project components or activities, and the anticipated boundaries of the Project's effects, including all potentially impacted local communities, municipalities and Indigenous groups. The effects assessment can be found in Section 9.</p> <p>The MFFN CAR Project Team will provide opportunities for consultation and engagement with Indigenous communities identified in <i>the Indigenous Partnership and Engagement Plan for the Marten Falls Community Access Road Project Impact Assessment</i> (the Agency 2020a). Indigenous communities will be involved throughout the environmental assessment so that the MFFN CAR Project Team can consider and incorporate, where appropriate, Indigenous Knowledge and Indigenous land and resource use information into the Project as applicable. Specific consultation and engagement activities and schedules are currently in development and will be shared with the MECP once available. A summary of the consultation plan has been provided in the Study Plan; further details can be found in the ToR.</p>	Sections 4, 6 and 9	<p>Required Actions # 1 and # 2 were partially addressed.</p> <p>Section 4.4 of the cultural heritage study plan indicates that the Cultural Heritage Consultation included one meeting with the Marten Falls First Nation Community Based Land Use Planning to inform sensitive locations, project mapping and to gather Indigenous Knowledge.</p> <p>Provide a work plan to the Agency that clearly outlines the approach to engage all Indigenous groups listed in the Indigenous Engagement and Partnership Plan and the members of the public listed on the Public Participation Plan on the cultural heritage study plan, in order to determine the spatial and temporal boundaries for cultural heritage, to share input and Indigenous knowledge for the Stage 1 Archaeological Assessment and to validate the baseline data collected, and to meet the requirements of Sections 6 and 7 of the Guidelines.</p> <p>See also comments GC-01, GC-02, GC-03 and GC-04.</p>
CH-02	General Comment	Sections 6 and 7	<p>Required Action # 3: Provide a clear description in the study plan of the proposed methods for the establishment of temporal boundaries for the baseline and effects assessment of physical and cultural heritage.</p>	<p>In determining the temporal boundaries, in particular the long operations and maintenance phase, consideration was given to the long-term effects on the well-being of present and future generations. The final temporal boundaries to be used in the IS / EA Report will be based on regulatory agency guidance, professional judgement and input received through the Project consultation process. Section 6.2 of the Study Plan describes temporal boundaries in more detail.</p>	Section 6.2	<p>Required Action # 3 was partially addressed.</p> <p>See comments GC-01, GC-02, GC-03, GC-04, and CH-01.</p>
CH-03	Sections 4.1 and 4.2	Section 6	<p>Required Action # 4: Provide a clear description in the study plan of how all Indigenous groups listed in the IEPP will have opportunities to provide Indigenous knowledge, including the validation of the baseline data collected. This should include a description of the proposed methods for data collection, management of confidentiality, and information storage. This should also include a methodology for tracking information that has been approved by the group, to demonstrate that guidance outlined in Section 6.2 of the Guidelines has been incorporated into this study plan.</p>	<p>The MFFN CAR Project Team will provide opportunities for consultation and engagement with Indigenous communities identified in <i>the Indigenous Partnership and Engagement Plan for the Marten Falls Community Access Road Project Impact Assessment</i> (the Agency 2020a). Indigenous communities will be involved throughout the environmental assessment so that the MFFN CAR Project Team can consider and incorporate, where appropriate, Indigenous Knowledge and Indigenous land and resource use information into the Project as applicable. Specific consultation and engagement activities and schedules are currently in development and will be shared with MECP once available. A summary of the <i>Consultation and Engagement Plan to Support the EA / IS</i> (AECOM 2020) has been provided in the Study Plan; further details can be found in the ToR.</p>	Section 4	<p>Required Action # 4 was partially addressed.</p> <p>See comments GC-02, GC-03, GC-04, and CH-01.</p>
CH-04	Sections 4.1 and 4.2	Sections 12.1, 17.6 and 19.1	<p>Required Action # 5: Provide details of how non-material aspects of cultural heritage will be considered during the baseline data collection. The study plan should note or draw linkages to the requirements of section 12.2 and 12.4 of the Guidelines. Findings of the cultural heritage study plan should inform the proponent's characterization of the current use of lands and resources for traditional purposes and the conditions related to the rights of Indigenous peoples in the Impact Statement.</p>	<p>The MFFN CAR Project Team will work with Indigenous communities to ensure that Indigenous Knowledge and any information on Indigenous land and resource use shared is appropriately integrated into the assessment processes. This will include providing Indigenous communities with the opportunity to collaborate with the MFFN CAR Project Team on the effects assessment. The opportunity to complete their own effects assessment will also be provided to communities, and the MFFN CAR Project Team will work with you to incorporate your effects assessment into the assessment processes. The MFFN CAR Project Team will also provide opportunities to review and discuss draft assessment documents to ensure that the information has been</p>	Section 5	<p>With the exception of anticipated effects to language, Required Action # 5 was addressed in the ATRI plan. The ATRI study plan indicates that "<i>The assessment of potential changes to language will be led by the socio-community assessment – refer to the Social Study Plan for more information</i>", however, this information, does not appear in the social study plan.</p> <p>Update the social study plan to include an approach to assessing the potential effects to language or indicate where in another study plan this information is provided.</p>

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				captured and presented appropriately. Study Plan Section 5 describes how Indigenous Knowledge will be incorporated into the effects assessment.		
CH-05	Section 4.1	N/A	Required Action # 6: Provide a rationale in the study plan, as to why the minor water crossings were not considered in the Stage 1 archeological assessment.	This is a misreading of the information provided, and the study plan has been updated in Section 7 to provide more clarity. There are two activities occurring simultaneously. During the Stage 1AA, archaeological potential was determined through the criteria outlined in Section 7 of the Study Plan. In addition to completing the Stage 1 property inspection, the Stage 2 field assessment was started. Given direction from the internal team, the Stage 2 began at some of the larger water crossings (the major water crossings were a focus in order to inform ongoing bridge design). This does not mean the minor watercourses will not be assessed if they have been deemed to retain archaeological potential, but given the time of the Stage 2 AA, only specific areas were targeted at that time of the year. Further Stage 2 fieldwork is required.	Section 7	Required Action # 6 was addressed.
CH-06	Section 4.1	Section 7.2	<p>Required Action # 7: In consideration of the ongoing COVID-19 pandemic and that some Indigenous groups are presently in a state of emergency, provide updated information reflecting measures taken in the methodology for the archeological assessment to ensure that the Indigenous groups (at a minimum those listed in the IEPP) and the public are able to inform baseline studies, as is required in Sections 7.2 of the Guidelines.</p> <p>Required Action # 8: Provide further details regarding the schedule for the baseline data collection of the archeological assessment (e.g. number of visits to sampling sites, identification of sample sites and types of analysis). Clarify the qualifications of the experts that conducted or will conduct surveys and analysis for the archeological assessment.</p> <p>Required Action # 9: Inform potentially impacted Indigenous groups (at a minimum the Indigenous groups listed in the IEPP) about the status of the stage 1 archeological assessment, sharing information about baseline data collected, so that the groups have an opportunity to inform the archeological assessment scope and can volunteer information to inform the scope of the stage 2 assessment. The Agency also notes that Neskantaga First Nation has specifically requested that Dr. Hamilton be included in archeological assessments for the Project.</p> <p>Required Action # 10: Provide details of opportunities to be given for Indigenous groups to review baseline data collected during Stage 1 of the archeological assessment and to participate in the Stage 2 of the archeological assessment. Indigenous groups should also be provided with an opportunity to inform thresholds of significance of a heritage resource.</p>	<p>Action 7: All Indigenous communities and organizations listed in the Table 4, including government agencies and interested persons will be informed of baseline studies and will be provided opportunities for input. MFFN is having ongoing discussions with Indigenous communities and continues to request preferences for each community's preferred method(s) of engagement during the EA and in consideration of COVID-19.</p> <p>Action 8: Updated text to include a header for "Schedule" under Section 4. No sampling strategy employed with archaeology. All areas identified as retaining archaeological potential where proposed impacts are to occur, must be subject to Stage 2 AA as per the <i>Ontario Heritage Act</i> and the <i>Standards and Guidelines for Consultant Archaeologists</i>. The qualifications of the person are outlined in Section 4 - all archaeological assessments must be completed by a licensed archaeologists in Ontario, administered by the MHSTCI.</p> <p>Action #9: The Stage 1 AA is in Draft form, submitted to the MHSTCI and under Ministry review. Once the reports are accepted from the MHSTCI, the MFFN CAR Project Team will evaluate sharing the report with Indigenous Communities listed in Table 4-1 and Dr. Hamilton.</p> <p>Action #10: The Stage 1 AA is in Draft form and can be shared once accepted by the Minister of Heritage, Sport, Tourism and Culture Industries.</p>	Action 8-Section 7	<p>Required Action # 7 and # 8 were addressed.</p> <p>Required Action # 9 was not addressed. The Agency requests to be informed when all Indigenous groups listed in the IEPP are provided the Stage 1 Archeological Assessment.</p> <p>Required Action # 10 was partially addressed. The Agency requests an opportunity to review the baseline data report and the Stage 1 Archeological Assessment (once accepted by the Minister of Heritage, Sport, Tourism and Culture Industries).</p> <p>Submit a work plan that clarifies whether Indigenous groups listed in the IEPP will be provided with an opportunity to participate in the Stage 2 Archeological Assessment and to inform thresholds of significance of a heritage resource.</p>
CH-07	Section 4.2	N/A	Required Action # 11: Provide details on what baseline information will be sourced from primary information sources, and what will be sourced from secondary information sources so that it is clear where information is being sourced for the indicators listed in the study plan.	Action # 11: Primary sources include field review and community and public engagement. Secondary sources include current and archival written accounts, maps, drawings, plans and images, scientific or academic publications.	Sections 4 and 9, Table 9-2	<p>Required Action # 11 was addressed.</p> <p>Required Action # 12 was partially addressed. See comments GC-02, GC-03, GC-04, and CH-01, including the requirement to submit a work plan describing engagement activities, invited participants and anticipated timing.</p>

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			<p>Required Action # 12: Regarding primary information collection, including field review and community engagement, the study plan requires additional details on how the collection methodology would meet the expectations of the Guidelines, including:</p> <ul style="list-style-type: none"> - Specify types of engagement activities (surveys, questionnaires, community sessions, chief and council sessions, workshops, etc.). - Describe how Gender-Based Analysis Plus (GBA+) has been applied to the consideration of engagement activities. Identify any specific methods targeted to specific subgroups. - Specify participants in engagement activities (reflecting the Indigenous groups listed in the IEPP and members of the public listed in the Public Participation Plan) including rationale for how the selection of participants meets the objectives of the study and demonstrates accessibility considerations (e.g. language requirements) and GBA+. - Describe the approach the proponent intends to take to encourage or attract participation, including how opportunities to participate will be planned and advertised. - Describe how Indigenous knowledge will be used to inform types of engagement activities and participant selection. - If sample questionnaires, interview questions, or other data collection tools exist, identify them in an appendix to the study plan, and provide clear links to how they relate to physical and cultural heritage. - Identify past public or Indigenous engagement activities that have taken place and are being used to inform this study plan. - Specify the methods used to conduct a field review of identified cultural heritage resources. - Describe identified data limitations and how such data limitations will be addressed. <p>Required Action # 13: For secondary information collection, including background historical research, provide specific information sources to be used, and for which indicators they apply. Provide detail on how the proponent has considered GBA+ requirements in the identification of secondary information sources.</p>	<p>Action # 12: The Indigenous Knowledge and Consultation Programs for the Project both serve to support the collection of Indigenous perspectives, values, and input on the Project, including in terms of physical and cultural heritage. The Guidance Document developed for the Project and provided to all Indigenous communities and groups identified in Table 4-1 in November 2020 includes questions related to historical baseline conditions associated with Indigenous cultures (refer to Sections 6.3 and Appendix D in the Guidance Document). The Guidance Document also includes considerations for burial sites, oral histories, cultural values and experiences of being on the land, Indigenous laws and governance systems, and culturally important sites and resources (refer to Sections 6.6 and 6.7 and Appendices D and E in the Guidance Document). These considerations have also been factored into the identification of preliminary indicators for the assessment.</p> <p>Action # 13: Primary sources include field review and community and public engagement. Secondary sources include current and archival written accounts, maps, drawings, plans and images, scientific or academic publications.</p>		Required Action # 13 was not addressed. See comment GC-06.
CH-08	Sections 4.1, 4.2 and 5	Sections 6.1,6.2 and 7.2	Required Action # 14: Provide details to demonstrate how the requirements of Sections 6.1, 6.2 and 7.2 of the Guidelines will be met.	Primary sources include field review and community and public engagement. Secondary sources include current and archival written accounts, maps, drawings, plans and images, scientific or academic publications. Any Indigenous Knowledge data shared as part of the Stage 1 AA will not be made public, as outlined in Section 8 . The Stage 1 AA is with the MHSTCI for review, it can be provided it Indigenous communities once returned. The Proponent will provide opportunities for consultation and engagement with Indigenous communities identified in <i>the Indigenous Partnership and Engagement Plan for the Marten Falls Community Access Road Project Impact Assessment</i> (the Agency 2020a). Indigenous communities will be involved throughout the environmental assessment so that the Proponent can consider and incorporate,	Sections 2, 4 and 8	Required Action # 14 was partially addressed. The Agency supports the proponent's efforts in establishing Indigenous knowledge data sharing agreements. However, as required in Section 6 of the Guidelines, confidential information provided by each Indigenous group must be presented in the Impact Statement in sufficient detail to support understanding of the potential effects and impacts on rights, while also protecting confidential/sensitive specifics and respecting stipulations in the confidentiality agreements (e.g. use buffer areas instead of specific locations, etc.). See also comment GC-03.

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				where appropriate, Indigenous Knowledge and Indigenous land and resource use information into the Project as applicable. Specific consultation and engagement activities and schedules are currently in development and will be shared with the MECP once available. A summary of the consultation plan has been provided in the Study Plan; further details can be found in the ToR.		
CH-09	Section 6.1	Section 6	<p>Required Action # 15: Include detailed and measurable indicators related to physical and cultural heritage features, as outlined in Sections 12.1, 17.6, and 19.1 of the Guidelines.</p> <p>Required Action # 16: Identify how and when Indigenous groups will be provided opportunities to validate the list of valued components and indicators related to physical and cultural heritage features, as required by section 6 of the Guidelines.</p>	<p>Detailed and Measurable indicators related to physical and cultural heritage features will be determined once the temporal and spatial boundaries of construction impacts are known. This information will be included in the IS / EA Report.</p> <p>The Proponent will provide opportunities for consultation and engagement with Indigenous communities identified in the <i>Indigenous Partnership and Engagement Plan for the Marten Falls Community Access Road Project Impact Assessment</i> (the Agency 2020a). Indigenous communities will be involved throughout the environmental assessment so that the Proponent can consider and incorporate, where appropriate, Indigenous Knowledge and Indigenous land and resource use information into the Project as applicable. Specific consultation and engagement activities and schedules are currently in development and will be shared with MECP once available. A summary of the consultation plan has been provided in the Study Plan; further details can be found in the ToR.</p>	Sections 4 and 9	<p>Required Action # 15 was not addressed. The Agency understands that indicators may be developed later in the process and therefore would like an opportunity to review the baseline data report. Note that indicators must provide data (either quantitative or qualitative) that can be measured and used to identify changes stemming from the Project.</p> <p>Required Action # 16 was partially addressed. See comments GC-02, GC-03, GC-04, and CH-01, including the requirement to submit a work plan describing engagement activities, invited participants and anticipated timing.</p>
CH-10	Sections 4.1, 4.2, and 6.2	Sections 7.1 and 13.1	Required Action # 17: Identify when and how the public will be provided with opportunities to provide input and share their views during baseline data collection and effects assessment.	The Proponent will provide Project notices and advise of opportunities for consultation and engagement with members of the public outlined in the <i>Public Participation Plan for the Marten Falls Community Access Road Project Impact Assessment</i> (the Agency 2020) (referred to as the Public Participation Plan). This will include the opportunity to provide input on the existing environment, VCs, effects assessment methods, effects assessment results, and mitigation and follow-up program measures as applicable. A variety of activities will be offered so that members of the public are informed of the IS / EA Report as it progresses and are aware of the opportunities and means to provide their input. The study plans have recognized public and agency input received on the Project to date.	Section 4	Required Action # 17 was partially addressed. See comments GC-01 and CH-01, including the requirement to submit a work plan describing engagement activities, invited participants and anticipated timing.
CH-11	Section 6.2 and 6.3	Section 13.1	Required Action # 18: Provide details on how the effects assessment methodology would meet the requirements of Sections 13.1 and 13.2 of the Guidelines. Ensure that the effects assessment considers the effects of each of the project components and physical activities, in all phases, and that it is based on a comparison to the proposed baseline work. While the cultural heritage study plan focuses on the archeological resources present in the project area, the study plan should also include baseline information on the access and experience of heritage sites in relation to Indigenous group's exercise of rights as they relate to the physical and cultural heritage in or around the Project.	The indicators and rationale for selection and measurement of potential effects to be used to assess and evaluate the alternative routes is provided in the Study Plan Section 9 . Previous studies providing baseline data were completed prior to the release of the TISG. These studies were developed in consultation with provincial and federal regulators. Baseline Reports including results from these studies will be amended to the Study Plan, when they are available. effects assessment methodology The MFFN CAR Project Team will work with Indigenous communities to ensure that Indigenous Knowledge and any information on Indigenous land and resource use shared is appropriately integrated into the assessment processes. This will	Sections 4 and 9.	<p>Required Action # 18 was partially addressed. The effects assessment described in Section 9 of the cultural heritage study plan is centered on provincial definitions and requirements, and does not meet the additional requirements of Sections 13.1 and 13.2 of the Guidelines.</p> <p>While the cultural heritage study plan focuses on the archeological resources present in the project area, the study plan should also include baseline information on the access and experience of heritage sites in relation to Indigenous groups' exercise of their rights as they relate to the physical and cultural heritage in or around the Project. Note that if proponents conduct baseline</p>

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			<p>Required Action # 19: Provide details of how non-material aspects of cultural heritage described in sections 12.1, 17.6, and 19.1 of the Guidelines will be considered during the effects assessment. The study plan should note or draw linkages to the requirements of section 12.2 and 12.4 of the Guidelines. Findings of the cultural heritage study plan should inform the proponent's characterization of the current use of lands and resources for traditional purposes and the conditions related to the rights of Indigenous peoples in the Impact Statement.</p>	<p>include providing Indigenous communities with the opportunity to collaborate with the MFFN CAR Project Team on the effects assessment. The opportunity to complete their own effects assessment will also be provided to communities, and the MFFN CAR Project Team will work with you to incorporate your effects assessment into the assessment processes. The MFFN CAR Project Team will also provide opportunities to review and discuss draft assessment documents to ensure that the information has been captured and presented appropriately. Study plan Section 5 describes how Indigenous Knowledge will be incorporated into the effects assessment.</p>		<p>studies prior to the release of the Guidelines and the collected baseline data does not meet the requirements of the Guidelines, additional data collection may be required to complete the impact assessment.</p> <p>Update the study plan to provide details on how the effects assessment methodology would meet the requirements of Sections 13.1 and 13.2 of the Guidelines. Ensure that the effects assessment will consider the effects of all project components and physical activities, in all phases, and that it is based on a comparison to the proposed baseline work.</p> <p>Required Action # 19 was partially addressed. While the cultural heritage study plan now includes details on how data related to non-material aspects of cultural heritage will be collected and considered in the effects assessment, there is no mention of the potential linkages of cultural heritage to current use of lands and resources for traditional purposes (requirement found in Sections 12.2 and 12.4 of the Guidelines).</p> <p>Describe in the Impact Statement the potential linkages of cultural heritage to current use of lands and resources for traditional purposes.</p>
CH-12	Section 7.1	N/A	<p>Required Action # 20: Clarify the plans for engaging Indigenous groups and demonstrate how the requirements of Sections 6 of the Guidelines will be met.</p>	<p>The Proponent will provide opportunities for consultation and engagement with Indigenous communities identified in <i>the Indigenous Partnership and Engagement Plan for the Marten Falls Community Access Road Project Impact Assessment</i> (the Agency 2020a). Indigenous communities will be involved throughout the environmental assessment so that the Proponent can consider and incorporate, where appropriate, Indigenous Knowledge and Indigenous land and resource use information into the Project as applicable. Specific consultation and engagement activities and schedules are currently in development and will be shared with the MECP once available. A summary of <i>the Consultation and Engagement Plan to Support the EA / IS</i> has been provided in the study plan; further details can be found in the ToR.</p>	Section 4	<p>Required Action # 20 was partially addressed. See comments GC-02, GC-03, GC-04 and CH-01, including the requirement to submit a work plan describing engagement activities, invited participants and anticipated timing.</p>

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CH-13	<p>4.2 Indigenous Communities <i>"The Proponent will provide Project notices and opportunities for consultation and engagement with Indigenous communities identified in Table 4-1, which is inclusive of all Indigenous communities identified in the Indigenous Partnership and Engagement Plan for the Marten Falls Community Access Road Project Impact Assessment (the Agency 2020a) (referred to as the Indigenous Engagement and Partnership Plan)."</i></p> <p><i>"Indigenous communities will be provided the opportunity to be involved at critical decision-making points throughout the IS / EA Report so that the Proponent can consider and incorporate, where appropriate Indigenous Knowledge and Indigenous land and resource use information into the Project as it pertains to the existing environment, VCs, effects assessment methods, effects assessment results, and mitigation and follow-up program measures. A variety of activities will be offered so that Indigenous communities are informed of the IS / EA Report as it progresses and are aware of the opportunities, means and timelines to provide their input. The study plans have recognized Indigenous community input received on the Project to date. Indigenous communities will have the opportunity to comment on components of the study plans throughout the IS / EA Report consultation and engagement process."</i></p>	<p>Section 6.2 "...The Impact Statement must also document how the proponent responded to questions, comments and issues raised by Indigenous groups, and how unresolved matters have been addressed. Any proposed mitigation measures are to be clearly linked, to the extent possible, to valued components in the Impact Statement as well as to specific project components or activities. The analysis and responses are to include:</p> <ul style="list-style-type: none"> • a comprehensive list of all issues, questions and comments raised during the engagement activities by each Indigenous group and the proponent's responses, including how matters have been addressed in the Impact Statement or will be addressed through the impact assessment (including but not limited to avoidance, mitigation or other measures to address potential effects or impacts on the exercise of rights of Indigenous peoples);... • if engagement with certain Indigenous groups is not possible, rationale must be provided, including, as applicable, an outline of efforts made; • where and how Indigenous groups' knowledge, perspectives and input were integrated into or contributed to decisions regarding the Project (e.g., project design), including: <ul style="list-style-type: none"> ○ scoping, development and collection of baseline information; ○ plans for construction, operation, decommissioning, abandonment, and maintenance; and ○ follow-up and monitoring. • where and how Indigenous groups' knowledge, perspectives and input were integrated in the characterization of the nature of environmental, health, social and economic effects and impacts expected from the Project for each Indigenous group; ..." <p>Section 12 "...If an Indigenous group has chosen not to participate, the proponent should identify the community and provide evidence of efforts to engage...</p> <p>...Where Indigenous groups do not wish to participate, the proponent is encouraged to continue sharing information and analysis with the Indigenous groups of the potential effects of the Project, and to use available public sources of information to support the assessment..."</p>	<p>The study plan does not describe how information will be shared with participants that may face barriers to participate rather than be 'disinterested' as required by Section 12 of the Guidelines.</p> <p>A description of efforts to engage with individuals or groups that may face barriers to participate should be provided. Certain populations may be less likely to express their views voluntarily, and steps should be taken to remove barriers to ensure their participation.</p>	<p>Describe in the study plan actions taken and to be taken to raise interest in the Project from Indigenous groups who may face barriers to participate in engagement activities.</p> <p>Clarify how information will continue to be shared with participants and Indigenous groups who may face barriers to participate in engagement activities.</p> <p>For the Indigenous groups that do not wish to participate, provide the rationale in an updated study plan and describe the barriers and the efforts made to overcome them, as per Sections 6.2 and 12 of the Guidelines.</p> <p>Include in the Impact Statement detailed descriptions of the Indigenous groups that are being engaged and of those that do not wish to participate.</p>
CH-14	<p>Editorial - Footnote 6, Section 9.2 <i>"In February 2020 a regional assessment of the Ring of Fire region commenced; however, it is not sufficiently advanced at this time to inform the Project VCs. The VCs will be consulted and engaged on early in the IA/EA process and finalized taking into consideration the input received. Therefore, only information relevant to the Project that arises from the regional assessment of the Ring of Fire within an appropriate timeline will inform the VCs for the Project."</i></p>		<p>The statement in the footnote 6 in Section 9.2 <i>"In February 2020 a regional assessment of the Ring of Fire region commenced; however, it is not sufficiently advanced at this time to inform the Project VCs."</i> is inaccurate, as the Regional Assessment in the Ring of Fire area has not yet begun.</p>	<p>Replace the text in footnote 6 with <i>"In February 2020, the Minister of Environment and Climate Change determined that a regional assessment will be conducted in an area centred on the Ring of Fire mineral deposits in northern Ontario. Relevant information available in relation to the Regional Assessment in the Ring of Fire area would be considered in the impact assessment of the Project."</i></p>

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CH-15		<p>Section 7.3 "...For each of the valued components that will be assessed in the Impact Statement, the proponent must create a study plan and a work plan to be validated by the Agency. Upon receipt of a study plan, the Agency may request that the proponent present and discuss the study plan at technical meetings, which will be scheduled during the impact statement phase..."</p>	<p>In order to meet the requirements of Section 7.3 of the Guidelines, a work plan or work plans for the valued components to be assessed in the Impact Statement must be submitted to the Agency for validation.</p> <p>Since this cultural heritage study plan does not include content for a work plan, notably this plan does not outline when engagement activities will be undertaken with each Indigenous group listed in the Indigenous Engagement and Partnership Plan or with members of the public listed in the Public Participation Plan (i.e., scheduling, sequencing), the submission of a work plan is an outstanding requirement of the Guidelines.</p>	<p>Provide a work plan that outlines the scheduling and sequencing of engagement activities relative to proposed baseline work, engagement on the study plan, spatial and temporal boundaries determinations, and particularly in relation to collection of Indigenous knowledge.</p>
CH-16	<p>Section 9.2 Valued Components and Indicators</p> <p>Table 9-2: Cultural Heritage Indicators</p> <p>Section 11.2 Cultural (Built) Heritage "A number of definitions that have specific meanings for use in a policy context accompany the <i>Provincial Policy Statement</i> (Ontario Government 2020). For the purposes of the study plan in reference to Cultural Heritage, the term 'cultural heritage resources' was used to describe both cultural heritage landscapes and built heritage resources."</p>	<p>Section 7.3 "The list of valued components must be informed, validated and finalized through engagement with the public, Indigenous groups, lifecycle regulators, jurisdictions, federal authorities, and other interested parties. The Impact Statement must describe valued components, processes, and interactions that are identified to be of concern or that the Agency considers likely to be impacted by the Project and are included in the Guidelines..."</p> <p>Section 12.1 "...Indigenous physical and cultural heritage is considered to include, but is not limited to, any site, structure or thing of archaeological, paleontological, historical or architectural significance..."</p>	<p>Section 11.2 of this cultural heritage study plan defines "cultural heritage resources" as including both "cultural heritage landscapes" and "built heritage resources". For clarity, definitions and terminologies should be provided at the beginning of the study plan and the terms should then be used consistently throughout the document.</p>	<p>Update the study plan to provide relevant definitions and terminologies at the beginning of the document.</p> <p>In order to be consistent with terms used in the study plan and to ensure that effects or the Project to any built heritage resource are considered, update Table 9-2 to change the name of the second valued component from "Cultural Heritage" to "Cultural Heritage Resources" and ensure that "Built Heritage Resources" identifies appropriate indicators.</p>