

**Comments on the Marten Falls Community Access Road (the Project) Draft Ungulates Study Plan – October 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 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.

<b>General Comments from the Impact Assessment Agency of Canada on the Marten Falls Community Access Road Draft Study Plans – July 2, 2020</b>					
<b>#</b>	<b>Tailored Impact Statement Guidelines Section<sup>1</sup></b>	<b>Required Action for Proponent</b>	<b>Proponent Response</b>	<b>Final Study Plan Section Reference</b>	<b>Agency comments</b>
<b>GC-01</b>	<b>Section 5 - Public Participation and views (including 5.1, 5.2)</b>	<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>	<b>Section 4.1</b> “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 workplan, 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 that comments provided by members of the public on ungulates_were taken into consideration. Comments provided to the Agency are available on the Canadian Impact Assessment Registry Internet site at: <a href="https://iaac-aeic.gc.ca/050/evaluations/proj/80184/contributions">https://iaac-aeic.gc.ca/050/evaluations/proj/80184/contributions</a></p>
<b>GC-02</b>	<b>Section 6 - Description of Engagement with Indigenous Groups (including 6.1, 6.2, 6.3)</b>	<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</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>	<b>Section 4.2</b> “...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...”  “...Indigenous communities will have the opportunity to comment on components of the study plans throughout the IS / EA Report consultation and engagement process...”	<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 plans 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. Provide details on the timeline for Indigenous engagement on the ungulates study 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 ungulates_were taken into consideration. Comments provided to the Agency are available on the Canadian Impact Assessment Registry Internet site at: <a href="https://iaac-aeic.gc.ca/050/evaluations/proj/80184/contributions">https://iaac-aeic.gc.ca/050/evaluations/proj/80184/contributions</a></p>

<sup>1</sup> Refer to complete sections of the Guidelines for more context.

**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 Section <sup>1</sup>	Required Action for Proponent	Proponent Response	Final Study Plan Section Reference	Agency comments
		work plan in collaboration with those Indigenous groups that would need to provide knowledge).			
GC-03	<b>Section 6.2 - Analysis and response to questions, comments, and issues raised</b>	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>	<p><b>Section 2.1.1</b>                      "...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>	<p>As required in Section 6 of the Guidelines, incorporate in the Impact Statement content that describes 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"> <li>the Indigenous group that provided confidential information is satisfied with the way the Impact Statement was informed;</li> <li>the Indigenous group that provided confidential information is satisfied with the way the issue was solved or addressed.</li> </ul>
GC-04	<b>Study plans spatial boundaries</b>	<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"> <li>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</li> <li>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 the size, nature and location of past, present and foreseeable future projects and activities.</li> </ul>	<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 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>	<p><b>Table 6-1 Ungulates (moose and caribou) Study Areas</b>  <b>Ungulates Local Study Area</b>                      "The proposed Project route alternatives and 10 km buffer on either side of the centreline of the route alignments and all other proposed Project infrastructure (permanent and temporary)"</p> <p><b>Moose Regional Study Area</b>                      "All Wildlife Management Units (WMU) that intercept the Moose LSA (17, 1D, 18A)."</p> <p><b>Caribou Regional Study Area</b>                      "Caribou Ranges: Missisa Range, Ozhiski Range, Nipigon Range, and Pagwachuan Range"</p> <p><b>Section 6.2.2 Ungulates study area</b>                      "The draft Study Plan for Ungulates proposed a Caribou LSA of a 35 km buffer around the</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 the spatial boundaries:</p> <ul style="list-style-type: none"> <li>community knowledge and Indigenous knowledge;</li> <li>current and traditional land and resource use by Indigenous groups;</li> <li>exercise of Aboriginal and Treaty rights, including cultural and spiritual practices;</li> <li>physical, ecological, technical, social, health, economic and cultural considerations; and</li> <li>size, nature and location of past, present and reasonably foreseeable future projects and activities.</li> </ul> <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>

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				route alignments. This size was consistent with the surveys conducted over the Project route alternatives in 2018 (Zoetica 2018) and aligned with the direction in the TISG for a study area with a 10 km to 40 km buffer around the route.... The revised Ungulate LSA for the Project currently being considered includes the area within 10 km of the centreline of the route alternatives. This study area allows for the characterization of existing conditions and prediction of potential environmental effects for the Project."	
<b>GC-05</b>	<b>Section 7 - Baseline Methodologies (Including 7.1, 7.2, 7.3, 7.4)</b>	<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>	<b>Sections 4.2 and 6</b>	This comment has been partially addressed. Refer to UN-08 in the table below for detail about the outstanding information still required in relation to ungulates study area boundaries.
<b>GC-06</b>		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.	<b>Section 4.3</b>	<p>Describe how GBA+ has been or 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, 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>It is not sufficient to mention that Gender-Based Analysis Plus will be applied to the assessment. Clear descriptions of how GBA+ was integrated (including to which variables, method, and how it influenced results' interpretation) are needed in the Impact Statement.</p>

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GC-07	<b>Section 13 - Effects Assessment (including 13.1, 13.2)</b>	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.	<b>Throughout the study plan, Section 9</b>	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	<b>Section 13.1</b>	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.	<b>Section 10</b> "Any assumption used in the effects assessment, for example the assumed average daily traffic on the CAR, will be clearly identified and a rationale provided in the IS / EA Report. Specific assumptions are listed in other sections of the Study Plan (e.g., Section 7)."	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	<b>Section 19.2 - Impacts on the Exercise of Aboriginal and Treaty Rights</b>	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.	<b>Section 5, and Section 6.2.2 in the Aboriginal and Treaty Rights and Interests Study Plan</b>	Feedback will be provided in the Federal Review Team's comments package on the Aboriginal and Treaty Rights and Interests Study Plan.
GC-10	<b>Section 20 - Mitigation and enhancement measures</b>	Provide detail on the approach to meeting the requirements of Section 20 of the Guidelines regarding the identification of mitigation and enhancement measures.	Section 9: Approach to mitigation and enhancement measures, specifically noting that once potential effects have been identified, the effects assessment will explore technically and economically feasible mitigation measures to avoid or minimize the identified negative effects and enhancement measures to increase positive effects.	<b>Section 9.5.1</b> "There are a number of generic requirements related to mitigation and enhancement measures listed in the TISG that are applicable to Ungulates. The IA / EA will consider the applicability of these generic measures and those that are specific to Ungulates VC including.." (lists relevant requirements) "...These are standard practice and are in addition to potential site and / or Project-specific measures which may be identified through Indigenous and community consultation, regulatory processes	Section 9.5.1 of the study plan is listing the requirements outlined in Section 20 of the Guidelines.  Ensure that the Impact Statement provides a description of the method or approach followed to meet the requirements of Section 20 of the Guidelines.

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				and agency guidance. These industry-standard practices will be discussed in the IS / EA Report and will be included in construction environmental management plan(s) (CEMP) and contract documents...”  <b>Concordance table</b> “Section 20 of the TISG describes the requirements around mitigation and enhancement measures that must be considered in the Impact Statement”	
GC-11	<b>Section 25 – Description of the Project’s contribution to sustainability</b>	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 TISG.	<b>Section 9.7</b>	Ensure that the Impact Statement provides a description of the method or approach followed to meet the requirements of Section 25 of the Guidelines.
GC-15	<b>Concordance with Federal Guidance</b>	Provide a separate concordance table containing all requirements of the Guidelines. This is required to show how all requirements of the Guidelines, including the interactions of effects and interconnectedness of valued components, would be addressed.	Please refer to Table 11-1, Table 11-3 and the General Comments Table Response.	<b>Section 11</b>	The Agency has identified inconsistencies between the cross-references presented and the information contained in the study plans. For example, rows 30 and 31 in the concordance table indicate that the requirements will be met as described in the Land and Resource Use Plan. However, it is not clear where in the Lands and Resource Use study plan the information is provided as the requirements are not included in the Land and Resource Use concordance table.  Provide a separate concordance table that describes the content of each study plans. This is needed to cross-check all plans against the Guidelines and demonstrate how all requirements of the Guidelines would be met.

Federal Review Team comments on the Marten Falls Community Access Road Project Draft Ungulates Study Plan – June, 2021						
#	Draft Study Plan Section	Tailored Impact Statement Guidelines Section <sup>2</sup>	Required Action for Proponent	Proponent Response	Final Study Plan Section Reference	Federal Review Team comments on Response
Editorial Comment	<b>Section 6.2.1 Moose Habitat Modelling</b> “Provincial forest fire data and fires from the Far North disturbance layer will be combined into a fire layer. The combined fire layer will be intersected with OLCC data to identify areas associated with burns. Areas intersecting with fires less than 10 years or greater 20 years in age will be overwritten and classified as young forest habitat (Error! Reference source not found.)”		Update the study plan with the reference and Figure 6.1 that currently are missing (Figure 6.1 - Suitability Relationships of Moose for Young Forest, Mature Conifer and Mixed Wood Habitat Interpolated from Rempel (2008)).	The figure referenced in this comment has been removed from the Study Plan. Information on moose habitat will be provided at a later date.	No reference	N/A
UN-01	<b>Section 3 Spatial Boundaries: Study Areas, Table 3-1: Ungulates (moose and caribou) Study Areas</b> “Caribou Ranges: Missisa Range, Nipigon Range, and Pagwachuan Range”  <b>Section 7 Concordance with Federal and Provincial Guidance</b> “Assess Project effects in relation to provincial Range-level population state. Population will not be assessed at the federal Range-level because it was not previously assessed at a fine enough or meaningful scale by Environment and Climate Canada in the Amended Recovery Strategy”	<b>Section 7.4.1</b> “In addition to assessing project and cumulative effects at the scale of the three study areas defined above, also assess at the scale of the implicated Ontario caribou ranges (Missisa, Nipigon and Pagwachuan), and the federal Far North caribou range.”  <b>Section 15.4</b> “use population-level modeling to assess the effects of proposed disturbance on caribou at the scale of federal range boundaries and provincial range boundaries. Increases in predation caused mortality rates need to be considered as do the anticipated exacerbating effects of climate change...  provide an assessment of the potential adverse effects of the Project on the population condition of the range (i.e., size and trend) at both the provincial range scale and the federal range scale”	Provide details to demonstrate how project and cumulative effects will be assessed at the scale of the federal Far North range.  Include the Ozhiski range in Table 3-1 as part of the regional study area, and in the analyses discussed in Section 5.2 of the study plan.	As per technical discussion, the Federal Far North range will be considered in the assessment. The RSA will remain the same (Missisa, Nipigon, Ozhiski, Pagwachuan).		This comment has been addressed. See related comment UN-17.
UN-02	<b>Section 4.3.2 Caribou</b>  <b>Section 6.2 Methods for Predicting Future Conditions</b>	<b>Section 8.11</b> “describe the type and spatial extent of biophysical attributes, as defined in Appendix H of the 2019 proposed amended boreal caribou Recovery Strategy <sup>45</sup> present in the study areas”  <b>Section 15.4</b>	Provide details to demonstrate how the requirements in Sections 8.11 and 15.4 related to biophysical attributes will be met.  Provide details about the methods and approaches that will be used.	<ul style="list-style-type: none"> <li>The proposed GPS collaring plan, aerial winter surveys and additional predator monitoring (through remote cameras) will meet the requirements in Section 8.11 and 15.4 of the TISG.</li> <li>Caribou habitat mapping will be carried out as described in Section 7.1 of the Study Plan.</li> <li>In addition, the Vegetation Study Plan includes a plan to delineate and classify</li> </ul>		This comment has been partially addressed.  Ensure that GIS files and other data used to generate the maps and to calculate range condition are included in the Impact Statement to support the review of the type and extent of biophysical attributes.

<sup>2</sup> Refer to complete sections of the Guidelines for more context

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		“With respect to effects on biophysical attributes as defined in Appendix H of the boreal caribou Recovery Strategy: determine whether the Project is expected to remove or alter biophysical attributes necessary for boreal caribou recovery or survival and provide a rationale for the conclusion (provide GIS file if available)”		vegetation ecosites, which we would use to describe the spatial extent and type of biophysical attributes.		
UN-03	<p><b>Section 4.3.2.2 Caribou GPS Collaring</b>  “Golder will register the Project under s.23.17 “Species protection, recovery activities” of O.Reg. 242 / 08 of the Ontario Endangered Species Act, 2007 (ESA) through a Notice of Activity (NoA) prior to commencement of collar deployment and prepare a mitigation plan. Safe handling procedures following MNRF protocol for this type of work will be followed”</p>		Indicate in the study plan intent to ensure all required regulatory requirements and approvals are obtained prior to conducting any activities that may affect individuals, residences or critical habitat of species at risk.	If works occurs on any federal lands, an authorization under Section 73 of the Species at Risk Act (SARA) would be required to engage in capturing and deploying radio collars on a species listed on Schedule 1 of SARA. However, the only federal lands in the caribou LSA are within the boundaries of the MFFN community, where collaring will not occur; as such, a SARA permit is not anticipated to be required for this work.		This comment has been addressed.
UN-04	<p><b>Section 4.3.2.2 Caribou GPS Collaring</b>  “Between ten (10) and twenty (20) GPS collars will be deployed on female adult caribou over the course of up to seven days during February or early March 2021. Collars will be distributed throughout the LSA via helicopter by a professional capture crew (Figure 1, Section 3). Based on advice from MECP in the meeting on March 5, 2020, 20 collars were recommended as an appropriate number of collars to deploy in the study area.”</p> <p><b>Section 4.3.2.3 Summer Nursery Surveys</b>  “Surveys will occur at up to 20 pre-determined ground survey locations within the LSA, 10 per year, during each survey year.”</p> <p><b>Section 7 Concordance with Federal and Provincial Guidance</b>  “The information sources listed at left will be used to inform survey design.”</p>	<p><b>Section 7.2</b>  “Baseline data must be collected in a manner that enables reliable analysis, extrapolations and predictions. Resulting data should be suitable for analyses to estimate pre-project baseline conditions, derive predictions of impacts, and evaluate and compare post-project conditions and at scales of within and across the Project, Local and Regional Assessment areas. Modelling methods, error estimates and assumptions should be reported (as per section 7.1). Modelling and simulations should be used early in the planning phase to estimate the necessary sampling intensity and to quantitatively evaluate the effectiveness of design options.”</p> <p><b>Section 8.11</b>  “sample size must be planned to support a robust evaluation of the project study area within the context of the local study area and regional study area...”</p>	<p>Provide detail to demonstrate the rationale for the sample size and sample intensity for each type of survey that is proposed in the study plan.</p> <p>Provide detail about how the requirements in Sections 7.2 and 8.11 of the Guidelines have been integrated into the survey design for all proposed surveys in the study plan.</p>	<p>Rationale to support the proposed sample size and intensity of surveys for each survey type proposed in the study plan and how the requirements in the Guidelines are integrated into our approach have been included in the Study Plan</p>	<p><b>Section 7</b>  “An initial sample size of 30 animals was selected following technical discussions (summarized in <b>Section 3</b>) and will allow for data from 20 animals to be used in the baseline assessment while accounting for mortalities that may occur between 2021 to 2024, including incidental mortalities that may occur as a consequence of the caribou capture and collaring program.”</p>	<p>This comment has been partially addressed. Sample sizes are generally provided (although not for remote camera monitoring program), but rationales that demonstrate those sample sizes are sufficient to meet the objectives are missing.</p> <p>Provide an updated study plan or work plan, to demonstrate that survey designs and sample sizes meet the requirements in Section 7.2 and Section 8.11 of the Guidelines.</p>

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		<p>consult with experts of the relevant jurisdiction on appropriate survey methodologies for caribou. Provide a justification for the selected methodologies...</p> <p>survey protocols should provide a rationale for the scope of and the methodology used for surveys including design, sampling protocols and data manipulation and where using recognized standards, provide details of any modifications to the recommended methods and rationale for these modifications and indicate who was consulted in the development of the baseline surveys (e.g., federal/ provincial wildlife experts, specialists and local Indigenous groups)</p> <p>In designing surveys for caribou, the following information sources should be consulted ....”</p>				
UN-05	<b>Section 5 Data Management and Analysis</b>	<p><b>Section 8.10 and Section 8.11</b>  “Submit complete data sets from all survey sites. These should be in the form of complete and quality assured relational databases, with precisely georeferenced site information, precise observation/visit information and with observations and measurements in un-summarized form. Databases and GIS files should be accompanied by detailed metadata that meets ISO 19115 standards.  Provide documentation and digital files for all results of analyses that allow for a clear understanding of the methods and a replication of the results (raw scripts or workflows are preferred in place of descriptive documentation).”</p>	Provide detail to demonstrate that data sets, documentation and digital files will be submitted, in the form that is required in Section 8.10 and 8.11 of the Guidelines	Complete data sets from all survey sites will be provided. They will be in the form of complete and quality assured relational databases, with precisely georeferenced site information, precise observation / visit information and with observations and measurements in un-summarized form. Databases and GIS files will be accompanied by detailed metadata that meets ISO 19115 standards (or equivalent). Documentation and digital files will be provided for all results of analyses that allow for a clear understanding of the methods and a replication of the results.		This comment has been addressed.
UN-06	<b>Section 5.1.1 Field Data</b> “Field data collected for the baseline program will be supplemented by existing moose	<b>Section 7.2</b> “The Impact Statement must provide detailed descriptions of specific data sources, data collection, sampling, survey and	Provide detailed descriptions of specific data sources that will be used to identify baseline moose conditions proposed in Section 5.1.1 of the study plan. Sources should be	Appendix A of the Study Plan was revised to include specific sources. The results of the desktop studies will be provided at a later date.	<b>7.1 Desktop Assessment States:</b>  <b>Appendix A</b>	This comment has been partially addressed.  The response indicates that these details will be provided at a later date. In general, the correlation



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	data gathered from historic studies, agencies and online resources.”	research protocols and methods followed for each baseline environmental, health, social and economic condition that is described, in order to corroborate the validity and accuracy of the baseline information collected... If using existing data sources, the Impact Statement must provide justification to show that the data sources are relevant in spatial and temporal coverage to the Project. Some data sources may have good coverage in Southern Ontario or existing road networks but be unsuitable as a baseline for these northern areas where there are not roads.”	listed and preferably correlated to the criteria and indicators that they will inform.  Provide justifications to demonstrate that each data source is relevant in spatial and temporal coverage to the project.			between baseline data collection, indicators, and effects assessment is not always clear.  Provide an updated study plan that demonstrates that a clear correlation between the desktop studies and the criteria and indicators they informed.
UN-07	<b>Section 5.1.2 Indigenous Knowledge</b> “Indigenous knowledge collected through engagement with Marten Falls First Nation community members as well as other First Nation communities with traditional territories in the vicinity of the Project will be considered with the background data and field data collected for the project. These data will be used to further inform where key habitats for moose occur.”	<b>Section 6</b> “The proponent must engage with all Indigenous groups that may be impacted by the Project. The Indigenous Engagement and Partnership Plan, issued by the Agency, is available to assist the proponent in further developing or refining their engagement strategy and supporting ongoing trust and relationship-building. In addition to the requirements set out in section 6.1, 6.2 and 6.3, the proponent must provide Indigenous groups with an opportunity to: provide Indigenous knowledge during baseline data collection; comment on the list of valued components and indicators...”	Provide details to demonstrate that all of the Indigenous groups listed in the Indigenous Engagement and Partnership Plan will be engaged with, including to inform where key habitats for moose, as well as other ungulates of importance to the groups, occur.	As identified in Section 4.2 of the Study Plan, the Proponent will provide 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).  Further information on how Indigenous Knowledge will be considered in the IS / EA Report has been included in Section 5 of the Study Plan.  Section 5 of the Study Plan provides further details on the two concurrent and complementary avenues for Indigenous communities and groups to be engaged with and provide input on the Project: the Indigenous Knowledge Program and the Consultation and Engagement Program.	<b>Table 4-1: Identified Neighbouring Indigenous Communities, including their Provincial Territorial Organizations and / or Tribal Council Affiliations</b>  “Long Lake #58 First Nation**  Animbiigoo Zaagi’igan Anishinaabek First Nation*  * Indigenous communities or organizations identified by the MECP who should be consulted on the basis that they may be interested in the Community Access Road.  **The MECP indicated in a letter to MFFN that Long Lake #58 First Nation was moved from interest-based to rights-based.”  <b>Section 5</b>	This comment has been addressed.  Please note that for the federal impact assessment, Animbiigoo Zaagi’igan Anishinaabek First Nation and Long Lake #58 First Nation must be equitably engaged as per the requirements of Section 6 of the Guidelines.
UN-08	<b>Section 5.2 Caribou</b>  <b>Section 7 Concordance with Federal and Provincial Guidance</b> “Caribou: Indigenous Knowledge of caribou related to current and	<b>Section 6</b> “The proponent must engage with all Indigenous groups that may be impacted by the Project. The Indigenous Engagement and Partnership Plan, issued by the	Provide details to demonstrate that all of the Indigenous groups listed in the Indigenous Engagement and Partnership Plan will be engaged and provided opportunities to provide input on caribou use of the study areas and cultural importance. This	As identified in Section 4.2 of the Study Plan, the Proponent will provide 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	<b>Sections 4.2 and 5</b>	This comment has been partially addressed  Provide a workplan that clearly outlines the approach and timing of engagement, with Indigenous groups listed in the Indigenous Engagement and Partnership Plan, on the Ungulates valued component, including the

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	historical use as well as cultural importance”	<p>Agency, is available to assist the proponent in further developing or refining their engagement strategy and supporting ongoing trust and relationship-building. In addition to the requirements set out in section 6.1, 6.2 and 6.3, the proponent must provide Indigenous groups with an opportunity to: provide Indigenous knowledge during baseline data collection; comment on the list of valued components and indicators...”</p> <p><b>Section 8.10</b> “describe the historic and current use of terrestrial wildlife as a source of country foods (traditional foods) or where use has Indigenous cultural importance (e.g., black bear, caribou, deer, moose, beaver, arctic fox, fisher, wolverine, rabbits, marten, muskrat, and otter);”</p> <p><b>Section 8.11</b> “describe boreal caribou use of the study areas (e.g., distribution, movement) over time using surveys to complement existing data if data within the project study areas are insufficient or unavailable to be able to understand how caribou use the habitat. Involve province of Ontario for data and survey requirements. Consider Indigenous knowledge and community knowledge”</p>	<p>includes incorporating into the plan where Indigenous groups will be provided with opportunities to:</p> <ul style="list-style-type: none"> <li>• provide Indigenous knowledge during baseline data collection;</li> <li>• comment on the list of valued components and indicators;</li> <li>• inform the effects assessment and review its conclusions; and</li> <li>• inform the development of mitigation measures and follow-up programs.</li> </ul>	<p>Plan for the Marten Falls Community Access Road Project Impact Assessment (the Agency 2020a). Further information on how Indigenous Knowledge will be considered in the IS / EA Report has been included in Section 5 of the Study Plan. Section 5 of the Study Plan provides further details on the two concurrent and complementary avenues for Indigenous communities and groups to be engaged with and provide input on the Project: the Indigenous Knowledge Program and the Consultation and Engagement Program.</p>		determination of the spatial and temporal boundaries related to Ungulates.
UN-09	<p><b>Section 3 Spatial Boundaries: Study Areas</b> <b>Table 3-1</b> “The proposed project routes and 35 km buffer on either side of the route alignments”</p> <p><b>Section 5.2.7 Collaring Data</b> “GPS collaring data was acquired from the MECP (2019) for the Nipigon, Missisa, and Pagwachuan Ranges and will be spatially analyzed in relation to the EA route alternatives to determine number of collaring points in the vicinity of the</p>	<p><b>Section 7.4.1</b> “For caribou, the local study area should be at a minimum: project study area plus a 10-40-kilometre buffer. Simulation modeling may indicate a larger buffer. In addition to assessing project and cumulative effects at the scale of the three study areas defined above, also assess at the scale of the implicated Ontario caribou ranges (Missisa, Nipigon and Pagwachuan), and the federal Far North caribou range.”</p>	<p>Discuss why the data analysis of caribou collar data is scaled back to 10 km from the previously defined LSA spatial boundary of 35 km buffer on either side of the proposed project route and how consistency with previous ungulate surveys will be achieved.</p>	<p>The 10 km buffer was proposed because MNRF uses a 10 km buffer around nursery and winter ranges as standard practice in BMPs for mineral exploration and states that the ZOI is 10 km. Following discussions with regulators in September - November 2020, we have revised the size of the LSA to a 10 km buffer but will extend some of our aerial survey program to the larger 35 km extent for consistency with study coverage from the Zoetica report.</p>		This comment has been addressed.

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	Project (within 10 km) and the time of year the points occurred.”					
UN-10	<p><b>Section 6 Indicators and Expression of Change</b></p> <p><b>Table 6-1</b></p> <p>“Indicators:</p> <ul style="list-style-type: none"> <li>• Relative significance of sub-range habitat features</li> <li>•Relative tolerance of the range to alteration / risk”</li> </ul>	<p><b>Section 15.4</b></p> <p>[content regarding effects on caribou]</p>	Provide details about how these two indicators (relative significance of sub-range habitat features, relative tolerance of the range to alteration/ risk) will be assessed.	Relative significance of sub-range habitat features and relative tolerance of the range to alteration/ risk will be assessed through analysis and interpretation of provincial integrated range assessment reports and review of landscape changes in LSA and RSA at the Project and cumulative effects scales.		<p>This comment has been partially addressed.</p> <p>Appendix B ‘Draft Study Plan Comments – Federal’ indicates that Section 9 of the study plan includes information about howthe relative tolerance of the range to alteration/risk will be assessed. However, Section 9 does not provide any detail or mention this topic. More detail is required on how this will be done and how it relates to the indicators in Table 9.2, as well as other parts within Section 9, such as the assessment of potential effects, the methods for predicting future conditions, and mitigation and enhancement measures.</p> <p>In an updated study plan, provide the additional detail on how the relative tolerance of the range to alteration/risk will be assessed.</p>
UN-11	<p><b>6.1.2 indicators</b></p> <p>“Ideally, effect threshold values for adaptability and resilience limits of a VC are known, and changes in indicators can be quantified accurately with a high degree of confidence to evaluate whether a threshold has been exceeded. However, critical thresholds such as amount or distribution of habitat required to maintain a self-sustaining population, or the specific number of individuals required to maintain an ecologically effective population size, are rarely available for wildlife VCs....</p> <p>.... Consequently, a detailed and transparent account of predicted effects associated with estimated cumulative changes to each measurement indicator will be provided for each VC using available scientific literature, publicly available data, data collected during the baseline program, and logical reasoning (i.e., a weight of evidence, or reasoned narrative approach).”</p>		Provide details to demonstrate if the approach to the effects assessment will differ for caribou since threshold values are known and used to define critical habitat and self-sustainability of local populations.	The thresholds from the federal recovery strategy for caribou will be used for the effects assessment (65% undisturbed habitat within the range)		This comment has been addressed.
UN-12	<p><b>Section 6.2 Methods for Predicting Future Conditions</b></p>	<p><b>Section 15.4</b></p> <p>“assess the effects of all linear disturbances (e.g., new road access or rights of way) on caribou, including movements between</p>	Provide further detail to demonstrate how the requirements in Section 15.4 of the Guidelines specific to caribou will be met.	The information requested is provided in the updated Study Plan.		This comment has been addressed.

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		<p>seasonal habitats to account for functional habitat loss and effects of increased predation.<sup>59</sup>;</p> <ul style="list-style-type: none"> <li>• use population-level modeling to assess the effects of proposed disturbance on caribou at the scale of federal range boundaries and provincial range boundaries. Increases in predation caused mortality rates need to be considered as do the anticipated exacerbating effects of climate change;</li> <li>• with respect to effects on undisturbed habitat at the scale of the range:</li> <li>• provide an account (and GIS file if available) of added project disturbance using a 500-metre buffer, using the following formula: (Project footprint + 500metre buffer) - overlapping area(s) already considered disturbed habitat (see glossary in the federal recovery strategy); and</li> <li>• determine whether the Project is expected to compromise the ability of ranges to be maintained at the disturbance management threshold and provide a rationale for the conclusion.</li> <li>• With respect to effects on biophysical attributes as defined in Appendix H of the boreal caribou Recovery Strategy: determine whether the Project is expected to remove or alter biophysical attributes necessary for boreal caribou recovery or survival and provide a rationale for the conclusion (provide GIS file if available);</li> <li>• With respect to effects on connectivity:</li> <li>• determine whether the Project is expected to result in a reduction of connectivity within or between the ranges and provide a rationale for the conclusion;</li> <li>• evaluate habitat and range connectivity at the local, regional and range scales using</li> </ul>				

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		<p>quantitative methods (e.g., habitat suitability analysis etc.); and</p> <ul style="list-style-type: none"> <li>in addition, where telemetry data is available, evaluate movements of collared individuals using quantitative methods (e.g., step analysis), to determine existing movement corridors, and how these may be affected by project development.</li> </ul> <p>with respect to the effects of predation: determine whether the Project is expected to result in an increase of predator and/or alternate prey access to undisturbed areas and provide a rationale for the conclusion”</p>				
UN-13	<p><b>Section 6.2.2 Caribou Habitat Modeling</b>                      “The spatial file of the caribou GHD provided by the MECP includes nursery and winter use areas (Category 1 habitats), seasonal ranges (Category 2 habitat), and remaining areas in the range (Category 3 habitat). GHD categorization was not mutually exclusive meaning that multiple habitat types sometimes overlapped. For ease of presentation and reporting, a conservative approach was applied by assigning the most sensitive category to areas of overlapping habitat types”</p>	<p><b>Section 15.4</b>                      [See specific items related to Caribou (Habitat Protection) – Categorized Habitat at the Sub-range Level]</p>	<p>Provide further detail to demonstrate how the information required for each categorized habitat will be evaluated, as per the requirements in Section 15.4 of the Guidelines.</p>	<p>The information requested is provided in the updated Study Plan.</p>		<p>This comment has been partially addressed.</p> <p>These items are generally addressed, but it is not clear whether habitat types will be assessed individually or only by category. For example the effects assessment speaks to category 1 habitat, but it is unclear whether nursery, over winter, calving, and travel areas be considered individually.</p> <p>Clarify whether category 1 habitats will be addressed individually and justify the approach.</p>
UN-14	<p><b>Section 7 Concordance with Federal and Provincial Guidance</b>                      “Moose:                      Spatial data and quantitative data will be used to describe the following for moose in the LSA:</p> <ul style="list-style-type: none"> <li>biodiversity, distribution and location.</li> <li>abundance and population status.</li> <li>life cycle.</li> <li>seasonal ranges, migration and movements.</li> <li>habitat requirements; and</li> <li>sensitive periods (e.g., seasonal, diurnal and nocturnal).</li> </ul>	<p><b>Section 8.10</b>                      “Identify wildlife species, other than avian species, of ecological, economic or human importance (particularly to Indigenous peoples), within the study area (including moose, rabbit, beavers, otters, muskrat, and frogs), that are likely to be directly or indirectly effected and describe each species:</p> <ul style="list-style-type: none"> <li>biodiversity, distribution and location;</li> <li>abundance and population status;</li> <li>life cycle;</li> <li>seasonal ranges, migration and</li> </ul>	<p>Provide detail to demonstrate how all aspects of Section 8.10 of the Guidelines will be described for moose, including the methodology and data used to describe the life cycle, seasonal ranges, migration, movements and sensitive periods.</p> <p>Provide detail to demonstrate how habitat type including its: function; location; suitability; structure; diversity; relative use, natural inter-annual and seasonal variability, and; abundance as it existed before project construction will be included in the Impact Statement. Specify</p>	<p>Observations of moose and moose habitat will be recorded during field programs (including aerial transect surveys, remote camera deployment, vegetation surveys). Additional information on observations collected during field work is provided in the updated Vegetation Study Plan.</p>	<p>Section 7.3.1                      Vegetation Study Plan</p>	<p>This comment has been addressed.</p>

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	<ul style="list-style-type: none"> <li>• qualitative and quantitative aspects of habitat described at left...”</li> </ul>	<p>movements;</p> <ul style="list-style-type: none"> <li>o habitat requirements; and</li> <li>o sensitive periods (e.g., seasonal, diurnal and nocturnal).</li> </ul> <p>For the species identified above, describe and quantify the habitat type, including its: function; location; suitability; structure; diversity; relative use, natural inter-annual and seasonal variability, and; abundance as it existed before project construction”</p>	which aspects will be studied using qualitative or quantitative methods.			
UN-15	<p><b>Section 7 Concordance with Federal and Provincial Guidance</b>  “...Examine changes to predator-prey dynamics between wolves and caribou associated with the Project“</p>	<p><b>Section 15.4</b>  “assess the effects of all linear disturbances (e.g., new road access or rights of way) on caribou, including movements between seasonal habitats to account for functional habitat loss and effects of increased predation...  ...Increases in predation caused mortality rates need to be considered...  ...with respect to the effects of predation: determine whether the Project is expected to result in an increase of predator and/or alternate prey access to undisturbed areas and provide a rationale for the conclusion”</p>	Provide further detail to demonstrate how information on increased predation will be collected. Provide details about the methods and approaches that will be used.	We propose the addition of a remote camera monitoring program in the caribou LSA, which will monitor predators as well as other wildlife species year-round. A summary of the program was added to the study plan.	<p><b>Section 7.3.2.3 Remote Camera Monitoring Program States:</b>  Given our understanding of wolf predation as a limiting factor and the potential for linear features to alter caribou predation risk, a remote camera monitoring program focused on detecting wolves and moose (i.e., the target species) will establish baseline levels of wolves, moose, and other wildlife species in the LSA.</p>	<p>This comment has been partially addressed.</p> <p>Not enough detail is provided in the study plan on the remote camera program to determine if it will meet the requirements in Section 15.4 of the Guidelines. The Agency notes that information regarding the remote camera program was provided in the Ungulates work plan. Feedback will be provided in the Federal Review Team’s comments package on the Ungulates work plan.</p>
UN-16	<p><b>Section 7 Concordance with Federal and Provincial Guidance</b>  “Assess other effects on caribou as a result of the Project including sensory disturbance, mortality (directly related to the Project including collisions with vehicles) and change in harvest by Indigenous groups.”</p>	<p><b>Section 15.4</b>  “provide an assessment of the potential adverse effects on boreal caribou individuals (e.g., sensory disturbance, mortality, pollution) including legal harvest from indigenous groups...  ...caribou (Species Protection) – Incidental mortality due to anthropogenic effects (e.g., vehicular collisions, increased hunting pressure)    caribou (Species Protection) – Indirect mortality due to increase in alternate prey sources (moose and</p>	Provide details, including methods and approaches, to demonstrate how the requirements of Section 15.4 will be integrated into the study plan.	The proposed approach to assess effects of the Project are outlined in Section 9.0 of the Study Plan.	<p><b>Section 9.4 Methods for Predicting Future Conditions States:</b>  Predicted changes from baseline conditions for both route alternatives for ungulates will be estimated to describe and characterize potential adverse and positive effects, as follows:  <input type="checkbox"/> Changes in habitat availability and animal use will be estimated quantitatively by calculating differences in the amount of</p>	<p>This comment has been partially addressed.</p> <p>Update the study plan to provide further details regarding the methods and approach, including what data will be used for the effects assessment for each of the requirements in Section 15.4 of the Guidelines.</p>

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		<p>deer) leading to increased predation (wolves, bears, etc.) and increased potential for spread of disease (e.g., brainworm)</p> <p>caribou (Species Protection) – Indirect effects due to sensory disturbance (e.g., light, sound, vibration, olfactory) within 10 kilometres of the Project;”</p>			<p>Category 1, 2, and 3 habitat and biophysical attributes, and qualitatively considering potential changes in habitat use (e.g., avoidance due to sensory disturbance). ...</p> <p>Changes in species population state (changes to abundance from altering survival and reproduction) will be estimated quantitatively using the results from changes in habitat, recruitment rates, and predation risk in addition to a qualitative estimate of potential changes in abundance from other Project components and activities (e.g., animal-vehicle collisions). Population indicators will be evaluated at the WMU level of moose and the Range level for caribou.</p>	

New comments based on the Ungulates Study Plan submitted on June 11, 2021.				
#	Study Plan Section	Tailored Impact Statement Guidelines Section	Context	Required Action for the Proponent
UN-17	<p><b>Section 9.3 Potential Effects, Table 9-3</b>            "...Table 9-3 provides a preliminary identification of how changes to Ungulates may result in indirect effects to other environmental disciplines..."</p>	<p><b>Section 15.3</b>            "...The Impact Statement must:            - describe the potential direct, incidental and cumulative adverse effects to other wildlife and wildlife habitat, including population level effects that could be caused by all project activities, including but not limited to: project noise and sensory disturbances, habitat alteration, air emissions and dust, increased predation, increased potential for spread of disease, invasive species introductions, poaching opportunities, any linear access corridors (roads, rights of way) particularly in the vicinity of wetland (including peatlands), lake and riparian habitats and on migratory corridors..."</p>	<p>Section 9.3 of the study plan indicates that Table 9-3 provides a preliminary identification of <i>how</i> changes to ungulates may cause indirect effects to other disciplines. However, it appears that Table 9.3 does not indicate <i>how</i> changes to ungulates may result in indirect effects to other environmental disciplines, but rather <i>whether</i> those interactions may occur.</p> <p>The more relevant consideration for this study plan is whether changes to other environmental disciplines/VCs may result in indirect effects to ungulates.</p>	<p>Ensure that potential interactions that may result in indirect effects to ungulates are identified.</p> <p>Clarify that Table 9-3 indicates not how but whether indirect effects may occur.</p>
UN-18	<p><b>Section 9.6 Residual Effects, Table 9-5</b>            Definitions of 'negligible', 'low', 'medium', and 'high'</p>	<p><b>Section 13.1</b>            "...The effects to each valued component outlined in sub-sections 14.3, 15.2, 15.3, 15.4 must be described using the following criteria..."</p>	<p>The criteria described in Section 13.1 of the Guidelines should be used to describe effects to valued components outlined in the Guidelines, Section 15.3 Terrestrial wildlife and their habitat and 15.4 Species at risk and their habitat.</p>	<p>Use the criteria outlined in Section 13.1 of the Guidelines to describe the degree of effect to ungulates, including the scope, severity, irreversibility and magnitude.</p>
UN-19	<p><b>Editorial - Footnote 7, Section 9.2</b>            "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."</p>		<p>The statement in footnote 7 in Section 9.2 "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." is inaccurate. At this time the Regional Assessment in the Ring of Fire area has not yet begun.</p>	<p>Replace the text in footnote 7 with "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."</p>
UN-20	<p><b>8.10 Terrestrial wildlife and their habitat</b>            - describe the historic and current use of terrestrial wildlife as a source of country foods (traditional foods) or where use has Indigenous cultural importance (e.g., black bear, caribou, deer, moose, beaver, arctic fox, fisher, wolverine, rabbits, marten, muskrat, and otter);</p> <p><b>12.2 Current Use of Lands and Resources for Traditional Purposes</b></p> <ul style="list-style-type: none"> <li>• traditional activities presently or historically practiced (e.g., hunting, fishing, trapping, gathering of plants or medicines, ceremonial or spiritual practices, passing on of Indigenous knowledge and/or language);</li> <li>• location of traditional uses, including hunting, trapping, and fishing camps, cabins, and gathering or teaching grounds;</li> <li>• types of traditional resources such as fish, wildlife, birds, plants, or other natural resources and their habitats of importance for supporting traditional use;</li> <li>• places where culturally important fish, wildlife, birds, plants, or other natural resources are harvested;</li> <li>• description of country foods (traditional foods);</li> <li>• the quality and quantity of resources (e.g., preferred species and perception of quality);</li> </ul>			<p>The project team has indicated that potential impacts from the Project on Eastern Migratory Caribou will be assessed using a qualitative approach.</p> <p>Update the study plan to describe the proposed qualitative approach to assessing the importance of Eastern Migratory Caribou for the Indigenous groups listed in the IEPP as source of country food and for their exercise of their traditional practices.</p>