

**Comments on Marten Falls Community Access Road Project (Project) revised Visual Aesthetics Study Plan – January 7, 2022**

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>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 the visual environment 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 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>	<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.</p> <p>Provide details on the timeline for Indigenous engagement on the visual environment, 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>

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

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#	Guidelines Section <sup>1</sup>	Required Action for Proponent	Proponent Response	Final Study Plan Section Reference	Agency comments
					Demonstrate in the Impact Statement that comments provided by Indigenous groups on the visual environment 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>
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, 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"> <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>Section 6.2</b>  “...The PDA encompasses the 100 metre-wide CAR right-of-way (ROW), temporary construction access roads, work areas, worker camps, and pits, quarries and associated access roads. The preliminary LSA currently being considered within the scope of the ongoing provincial regulatory review process generally includes the area within 2.5 km of the centreline of Alternative 1 and Alternative 4. The preliminary study area generally allows for the documentation of existing conditions and prediction of potential environmental effects for the Project. A 5 km wide study area also allows for route refinements during development of Project design (e.g., adjustment of the alignment to avoid sensitive features)...”</p> <p>“...The LSA and RSA boundaries for the Atmospheric Environment are detailed in Table 6-1 and on Figure 6-2...”</p> <p><b>Local Study Area</b>  Geographic Extent:  - 2.5 km from the PDA  Rationale:</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: 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>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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				<ul style="list-style-type: none"> <li>- Provides for a localized Visual Environment Assessment, given the remote wilderness setting of the Project. Viewers potentially observe a distinguishable level of detail and contrast.</li> </ul> <p><u>Regional Study Area</u> Geographic Extent:</p> <ul style="list-style-type: none"> <li>- Up to 8 km from the PDA</li> </ul> <p>Rationale:</p> <ul style="list-style-type: none"> <li>- Visibility beyond 8 km dissipates and is significantly reduced due to flat topography and forested landscape for sections of the route. Viewers potentially observe minimal distinguishable level of detail and contrast</li> </ul>	
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.	<b>Section 4.3</b>	<p>Describe how Gender-based Analysis Plus (GBA Plus) 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 Plus 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 GBA Plus will be applied to the assessment. Clear descriptions of how GBA Plus was integrated (including to which variables, method, and how it influenced results' interpretation) are needed in the Impact Statement.</p>
GC-07	<b>Section 13 - Effects Assessment (including 13.1, 13.2)</b>	<p>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.</p> <p>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.</p>	<p>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.</p> <p>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.</p>	<b>Throughout the study plan, Section 9</b>	<p>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.</p> <p>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.</p>
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	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> "The MFFN CAR Project Team is not aware at this time of key assumptions that will be recognized in the Visual Environment Assessment. These will be determined during the development of	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.

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		for the effects assessment and the cumulative effects assessment.		the IS / EA Report. Key assumptions made and used in the assessment of Visual impacts will be documented in the IS / EA Report.”	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 was provided in the Federal Review Team's comments package on the Aboriginal and Treaty Rights and Interests Study Plan.
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>	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.

Federal Review Team comments on the Marten Falls Community Access Road Project Draft Visual Aesthetics Study Plan submitted in 2020						
#	Study Plan (2020) Reference	Guidelines Section <sup>2</sup>	Required Action for Proponent	Proponent Response	Study Plan (2021) Reference	Response
VE-01	<p><b>Section 4.2: Study Methods</b> “Visual issues that may occur due to the Project include impacts on commercial tourism operations, parks and protected areas and perceptions of harm.”</p> <p><b>Section 6.2: Methods for Predicting Changes in the Physical Environment</b> “This includes a visibility analysis, of the potential effects the CAR will have on the immediate surrounding area, and identification of sensitive receptor locations that are potentially impacted by the proposed CAR.”</p>	<p><b>Section 8.1</b> “The Impact Statement must: ...</p> <ul style="list-style-type: none"> <li>describe existing ambient nighttime light levels at the project site and at any other areas where project activities could have an effect on light levels. The Impact Statement will describe night-time illumination levels during different weather conditions and seasons; and ...”</li> </ul> <p><b>Section 14.1</b> “The Impact Statement must: ...</p> <ul style="list-style-type: none"> <li>identify and justify the approach to determine the extent to which sound effects resulting from the Project are adverse and describe any changes in night-time light levels as a result of the Project; and ...”</li> </ul>	Update the study plan to provide details to demonstrate how the existing ambient nighttime light levels and predicted changes in light levels at relevant locations will be described, as per the requirements in Sections 8.1 and 14.1 of the Guidelines.	No significant permanent lighting is proposed for the CAR. As such a lighting assessment is not warranted.		<p>The required action was addressed.</p> <p>Table 11-3 of the visual aesthetics study plan indicates that “there are no anticipated long-term permanent lighting structures required for the Project”. Include this information in the Impacts Statement to justify why the Proponent is of the view that this requirement is not relevant to this Project.</p>
VE-02	<p><b>Section 4.2: Study Methods</b> “changes to the visual environment may generate perceptions of environmental harm by Indigenous communities related to sensitive cultural features and recreationalists who value the pristine quality of the landscape. Therefore, visible disturbances and perceptions may impact the areas for those users.”</p>	<b>Section 6</b>	<p>Provide details to demonstrate that all Indigenous groups listed in the Indigenous Engagement and Partnership Plan will be engaged with and provided 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>The study plan includes commitments to engage with Indigenous communities including the consideration of Indigenous Knowledge and input on VCs, effects assessment and any recommended mitigation measures.</p>	Sections 2.1, 4.3 and 5	<p>The required action was partially addressed.</p> <p>See comments GC-02, GC-03, GC-04 and GC-06 above.</p>
VE-03	<p><b>Section 6.2: Methods for Predicting Changes in the Physical Environment</b> “It is anticipated that the results of the visual assessment will be considered in the assessment to effects to Indigenous peoples and impact on the exercise of Aboriginal and Treaty Rights.”</p>	<b>Section 19.2</b>	<p>Describe the 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. Include details to demonstrate when Indigenous groups will be engaged in identifying potential impacts on rights.</p> <p>Provide detail on the timeline for engagement relative to the project workplan. Include details about engagement relative to the schedule for baseline work and effects assessment, including the identification of mitigation measures to address impacts, in consideration of the project team’s timeline for the development of the Impact Statement.</p>	<p>For information on how impacts on the rights of Indigenous peoples will be assessed, please see the Aboriginal and Treaty Rights and Interests Study Plan. Information relevant to the Visual Environment Assessment received through the Aboriginal and Treaty Rights and Interests Study Plan will be considered.</p> <p>The timeline for the Visual Environment Assessment is to be confirmed. It is expected that the work will commence in 2021 Q2-Q3 subject to COVID-19 restrictions.</p>	Section 4.2	<p>The required action was partially addressed.</p> <p>Provide a work plan that outlines an updated 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>

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

Federal Review Team comments on the Marten Falls Community Access Road Project Draft Visual Aesthetics Study Plan submitted in 2020						
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VE-04	<b>Section 3: Spatial Boundaries: Study Areas</b> “The team will define the visual study area based on the visibility of the Project and the assessment for changes to visual environment that is most impactful. The visual study areas are expected to consider the visual detail that can be perceived for route Alternative 1 and route Alternative 4 including appropriate consideration of foreground, middle-ground and background viewing (BC MoF, 1997). The Visual Environment Study will identify the immediate baseline environment within the foreground (100 m from PSA) and the mid-ground (2.5 km from PSA) where viewers potentially observe a distinguishable level of detail and contrast and background (up to 8 km from the PSA).”	<b>Section 7.4.1</b> “...Spatial boundaries are defined taking into account the appropriate scale and spatial extent of potential effects and impacts of the Project; 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; and physical, ecological, technical, social, health, economic and cultural considerations...”	Provide details to demonstrate how and when Indigenous groups and the public have been or will be engaged in defining the spatial boundaries for the Project.  Provide details on the timeline for 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.	As noted in Section 6.2.2, the Visual study area will be defined based on the visibility of the Project and the assessment of changes to the Visual Environment that are the most impactful. Interested Indigenous communities will be engaged regarding the assessment of Visual impacts including the identification of locations that are considered to be visually sensitive.	Section 6.2.2	The required action was not addressed.  See GC-01, GC-02 and GC-04 above.
VE-05	<b>Section 6.2: Methods for Predicting Changes in the Physical Environment</b> “This includes a visibility analysis, of the potential effects the CAR will have on the immediate surrounding area, and identification of sensitive receptor locations that are potentially impacted by the proposed CAR.”	<b>Section 14.1</b> “The Impact Statement must: ... • describe the locations and characteristics of the most sensitive receptors including species at risk and differential effects for sensitive receptors;...”	Provide detail to demonstrate that the locations and characteristics of the most sensitive receptors including species at risk and differential effects for sensitive receptors will be described, as required by Section 14.1 of the Guidelines.	Species at Risk are not a receptor for the Visual Environment Assessment. The process for determining sensitive human Visual receptor locations is described in Section 9.2 of the Study Plan.	Section 9.2	The required action was addressed.
VE-06	<b>Section 6.2: Methods for Predicting Changes in the Physical Environment</b> “The results of the visual assessment will also be submitted to the social, economic, human health and community safety, and land and resource use assessment teams for consideration in their impact assessments.”  <b>Section 7 Concordance with Federal and Provincial Guidance</b> “Will be addressed in Health, Social, Economic and Land Use Conditions”	<b>Section 12.2</b> “...In general, the Impact Statement should consider: ... • the experience of the practice (e.g., connection to the landscape without artificial noise and sensory disturbances, air quality, visual landscape, perceived or real contamination, etc.); and ...”  <b>Section 12.4</b> “The Impact Statement should document the nature and extent of the exercise of rights of Indigenous peoples, potentially impacted by the Project, as identified by the Indigenous group(s). Indigenous groups may also provide their perspective through consultations with the Agency. This information related to rights may include, but is not limited to: ... • the experience associated with the exercise of rights (e.g., noise and sensory disturbances, air quality, visual landscape);...”	Update the study plan to provide further detail on the specific visual environment criteria and indicators that will be collected and assessed through other study plans. At a minimum, provide a cross reference as to where the specific visual environment criteria and indicators can be found in the other plans.	See Section 9.2 of the Visual Study Plan for a description of the visual indicators to be considered in the assessment. The results from the Visual Environment Assessment will be incorporated into the assessment of other VCs, such as Land and Resource Use, Social Environment, and Aboriginal and Treaty Rights and Interests.	Section 9.2  Land and Resource Use Study Plan  Social Environment Study Plan  Aboriginal and Treaty Rights and Interests Study Plan	The required action was addressed.

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		<p><b>Section 13.2</b>            ...the Impact Statement must consider and describe the interactions between the environmental, health, social and economic effects as well as the interaction and interconnectedness of selected valued components taking into account values of local communities, including municipalities and Indigenous groups...</p> <p><b>Section 14.1</b>            "The Impact Statement must: ... describe consultation with regulators, stakeholders, community groups, landowners and Indigenous groups about potential effects to the atmospheric, acoustic, and visual environment;..."</p>				

New comments from the Federal Review Team on the revised Visual Aesthetics Environment Study Plan submitted in 2021.				
#	Study Plan Section	Guidelines Section <sup>3</sup>	Context	Required Action for the Proponent
VE-07	<b>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."	<b>Editorial comment</b>	The statement in the footnote 7 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.	Replace the text in footnote 7 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> "
VE-08		<b>Section 7.3</b> "...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."	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.	Provide an updated work plan that outlines how the visual aesthetics environment study plan will be executed in the field, including when baseline data will be collected. The work plan should include 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.
VE-09	<b>Table 11-3: Study Plan Federal and Provincial Concordance – Requirement Deviations</b>		Proposed amendments and/or deviations from the Guidelines will not be reviewed or approved during the study plans review process.  The Agency will provide guidance on the process to propose amendments and/or deviations to the Guidelines to the project team.	

<sup>3</sup> Refer to complete sections of the Guidelines for more context