



July 13, 2021

Ms. Debra Sikora  
Panel Chair  
Marathon Palladium Project  
Joint Review Panel

**RE: Invitation to participate in the public comment period on the Environmental Impact Statement Addendum for the Marathon Palladium Project**

Dear Ms. Debra Sikora,

As requested in the letter from the joint review panel dated April 20, 2021, the Parks Canada Agency (Parks Canada) has reviewed the Environmental Impact Statement (EIS) Addendum and additional information for the Marathon Palladium Project to provide input on the sufficiency of information provided to proceed to a public hearing.

Parks Canada's participation in the proposed Marathon Mine Palladium Project focuses on potential impacts on boreal caribou within the Coastal Range (ON6) that encompasses Pukaskwa National Park. The Coastal Range is referred to as the Lake Superior Coast Range (LSCR) within the EIS Addendum.

Parks Canada is the Responsible Authority under the *Species at Risk Act* for species at risk, including boreal caribou, within Pukaskwa National Park. Parks Canada is collaborating with Environment and Climate Change Canada who is the Responsible Authority for boreal caribou within areas of the Coastal Range outside of Pukaskwa National Park. Our specific comments related to the adequacy of the EIS Addendum are included in the attached table in the format requested by the review panel.

Thank you for the opportunity to comment on this project.

Sincerely,

<Original signed by>

Sharon Hayes  
Field Unit Superintendent, Northern Ontario Field Unit  
Parks Canada  
201 May Street North, Suite 201  
Thunder Bay ON P7C 3P4

CC: Christine Drake – Park Superintendent, Pukaskwa National Park  
Daniel Pouliot – Resource Conservation Manager, Pukaskwa National Park



Information Requests

Issue #	Reference to EIS Guidelines or Panel Terms of Reference	Reference to EIS 2012, EIS Addendum 2021 and Original IR	Rationale	Information Request
1 East-West Connectivity	2.6.1.8 (page 37 / PDF 42)	EIS Addendum 2021 • 6.2.8.1.9, Pages 6.351, 6.355	<p>Section 6.2.8.1.9 states: “<i>Gonzalez et al. (2015) concluded that long-term recovery and persistence of woodland caribou in Pukaskwa may be unlikely with or without translocation.</i>” (6.351)</p> <p>Section 6.2.8.1.9 states: “<i>Given the local extirpation of caribou in PNP and reduced numbers in the remainder of the LSCR farther west, it appears unlikely that the Project would be a substantial barrier to caribou dispersal.</i>” (6.355)</p> <p>Section 6.2.8.1.9 states: “<i>Despite the limited anthropogenic disturbance in PNP, woodland caribou have disappeared there while they persist in a much more disturbed landscape west of Marathon, potentially due to the more rugged topography and abundant nearshore islands that potentially serve as refuge. Unless the conditions that drove caribou to extirpation in PNP change, it is unlikely that dispersal from the currently occupied range west of the Project east to PNP would result in a positive population outcome.</i>” (P 3.555).</p> <p>Given the large home range size of caribou relative to the size of Pukaskwa National Park (PNP), the park is likely too small to support caribou populations on its own. Many factors, including predation, habitat loss and fragmentation outside the park and stochastic effects on small caribou populations likely contributed to their extirpation within PNP, and their persistence elsewhere along the North Shore. Maintenance of adequate functional habitat and range connectivity are critical to the survival and recovery of boreal caribou in the Coastal Range and around PNP, as evidenced by the subsequent sentence in the Gonzales et al. (2015) paper to the one</p>	<p>Parks Canada supports the Information Requests submitted by Environment and Climate Change Canada and Natural Resources Canada and requests the following specific details:</p> <p>In regards to range connectivity in the Coastal Range during all phases of the Project (construction, operation, and post-closure):</p> <p>a) Map and describe potential areas of east-west connectivity with PNP within the Coastal Range, and describe any expected changes to caribou habitat or the ability to traverse these regions of connectivity with PNP.</p>

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			<p>quoted by the Proponent, which reads: “<i>Importantly, long-term recovery and survival of caribou may be hampered by the lack of contiguity with more northern populations and habitat conditions beyond the boundaries of Pukaskwa National Park.</i>”</p> <p>The recovery strategy states: “Connectivity of habitat both within a range and between ranges is essential for boreal caribou persistence on the landscape” (Environment Canada 2019). The east-west corridors represent within-range connectivity. The EIS addendum lacks information regarding potential east-west corridors that would maintain caribou habitat connectivity with PNP and support future recovery actions and range occupancy. There is not adequate evidence to suggest that dispersal from west of the mine site east to PNP is unlikely to result in positive population effects.</p>	
2 Site Restoration and Off-Site Mitigation	2.2.3 Closure and Post-closure	EIS Addendum 2021 <ul style="list-style-type: none"> <li>• Section 6.2.8.1.9, 6.350</li> <li>• Section 6.2.6.6.1, Page 6.256</li> <li>• Section 6.2.8.1.2, Page 6.330</li> <li>• Table 8.1, Page 8.19</li> <li>• Response to IR2-1 (CIAR# 757)</li> </ul>	<p>Section 6.2.8.1.9 states: “<i>where practicable, sites will be rehabilitated progressively, rather than waiting until the project is complete.</i>” (P 6.350)</p> <p>Section 6.2.6.6.1 states: “<i>progressive rehabilitation is discussed in the Conceptual Closure Plan (see Section 6.2.1 of this EIS Addendum [Vol 2]) (P 6.256).</i> And Section 6.2.8.1.2 states: “<i>...loss of potential connectivity is reversible at decommissioning; proposed off-site mitigation will create an overall benefit to woodland caribou.</i>” (P 6.330)</p>	Parks Canada supports the Information Requests submitted by Environment and Climate Change Canada and Natural Resources Canada and requests the following specific details: <ol style="list-style-type: none"> <li>a) Discuss how progressive reclamation and site restoration will benefit caribou range connectivity with PNP north-</li> </ol>

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			<p>Table 8.1 states: “<i>Details regarding off-site mitigation for Woodland Caribou will be defined in the Updated Caribou Habitat Off-site Mitigation Report</i>” (P 8.19)</p> <p>As highlighted above in Parks Canada IR #1, within-range and between range habitat connectivity are essential for caribou persistence and recovery of boreal caribou within the Coastal Range. A full understanding of rehabilitation activities and details on the restored landscape are required to evaluate the sufficiency of proposed measures to restore the function of the area and maintain habitat connectivity that allows for future range occupancy. Very few details are provided in the EIS Addendum related to progressive rehabilitation and the proposed site restoration plan. The Updated Caribou Off-Site Mitigation Report, provided in the proponent’s response to IR2-1 (CIAR# 757) focuses on north-south connectivity, and does not sufficiently address east-west connectivity.</p>	<p>south as well as east-west throughout the life of the project.</p> <p>b) Identify how proposed off-site mitigation will support range connectivity and occupancy with PNP, including a map of proposed off-site mitigation sites in relation to preferred and used caribou habitat.</p> <p>c) Provide information on the timing of both on-site and off-site reclamation activities, as well as details on contingency plans and related effects if reclamation activities are stalled due to changes in mining lifespan/schedules.</p>