

Environmental Protection Operations Directorate  
Prairie & Northern Region  
9250 49 Street  
Edmonton, AB T6B1K5

ECCC File: 4194-10-5/3295

CIAR Reference: 80140



June 29, 2022

via email at: <email address removed>

Wajeeha Siddiqui  
Impact Assessment Agency of Canada  
1145-9700 Jasper Avenue  
Edmonton, AB. T5J 4C3

Dear Wajeeha Siddiqui,

**Re: Request for Comments on the Round 2 Information Request Responses and Final Views on the Lynn Lake Gold Project (Technical Review Round 3)**

Environment and Climate Change Canada (ECCC) has reviewed the Round 2 Information Request Responses for the above-noted Project as requested by the Impact Assessment Agency of Canada's June 9, 2022 letter. This is a follow-up to my email of June 24, 2022. Our input attached reflects IRs for which we had recommendations to make, on topics related to caribou that were not sent along on June 24. Over all, our input is based on ECCC's mandate in the context of the *Species at Risk Act* (SARA), the *Migratory Birds Convention Act 1994* (MBCA), the *Canadian Environmental Protection Act 1999* (CEPA) and the pollution prevention provisions s.36(3) the *Fisheries Act* (FA).

The Agency's June 9, 2022 letter also requested Final Views which ECCC is preparing.

Please contact Marcus Edino at <contact information removed> or <email address removed> if you need more information.

Sincerely,

<Original signed by>

Margaret Fairbairn  
A/Regional Director, Environmental Protection and Operations Directorate  
Prairie Northern Region

cc: Gillian Brown, A/Head, EA South, EPOD, ECCC  
Marcus Edino Environmental Assessment Officer, EA South, EPOD, ECCC



Reference IR#	Expert Dept. or group	EIS Guideline Reference	EIS Reference	Context and Rationale	The Proponent is Required to ...
Nation or department name – IR number (Ro e.g. IAAC-01	Nation or department Name e.g. IAAC	Reference the section(s) of the EIS Guidelines that relate to your comment, concern, or information request. e.g. Part 2, Section 7.1.5 Fish and Fish Habitat	Reference the section(s) of the EIS that speak to your comment, concern, or information request.	Identify what the EIS Guidelines require and/or the link to the Canadian Environmental Assessment Act, 2012 (section 5 or section 19). Briefly identify what the EIS presents and the information gap, inconsistency, or challenge. Explain why filling that information gap is necessary to understanding potential significant adverse environmental effects to areas of federal jurisdiction or impacts to rights.	Describe the information required. Focus on the essential information, explanation, or justification required.
IAAC-R2-121	ECCC	1.4 Regulatory framework and the role of government 2.4 Application of the precautionary approach 6.4 Mitigation measures	12.2.2.2 Species at Risk and Species of Conservation Concern 12.4.2.4 Project Residual Effect for Change in Habitat 12.5.2.2 Mitigation for Cumulative Effects	In their response to IAAC-R2-121 the Proponent indicates: <i>“Following the advice of Environment and Change Canada (see IAAC-R2-121 advice), Alamos has engaged the Province of Manitoba to develop a plan that would support woodland caribou conservation within the Kamuchawie Management Unit. As a result, Alamos has committed to supporting a collaring program in partnership with the Province, pending provincial and federal Lynn Lake Gold Project approvals, to help understand the current ranges of woodland caribou within the KMU. Additionally, if woodland caribou ranges are delineated within the LAA following the collaring program, Alamos will provide additional support, to be negotiated with the Province.</i>  <i>i. Evidence to date suggests that woodland caribou are unlikely to</i>	In their response to IAAC-R2-121 the Proponent commits to supporting a caribou collaring program in partnership with the Province, that will support caribou conservation within the Kamuchawie Management Unit while reducing uncertainty relating to potential interaction with the Project, informing proposed mitigation and any additional mitigation requirements needed following implementation of the collaring program and Project-specific monitoring through adaptive management.  ECCC recommends that the Proponent provide additional information on the anticipated activities and the detailed aspects of the program, work and associated outcomes that they intend to support in partnership with the Province. Additionally, ECCC suggests

				<p><i>interact with the Project; however, the plan describe above in a. will provide precise delineation of the herd range throughout the year (e.g., informing calving range). This information will drastically reduce uncertainty relating to potential interaction with the Project and will inform proposed mitigation and any additional mitigation requirements needed following implementation of the collaring program and Project-specific monitoring through adaptive management.</i></p> <p><i>ii. Following implementation of the plan described above in a., it is assumed there will remain minimal uncertainty regarding the range of woodland caribou in the KMU. However, recognizing that range use may change over time, Alamos has committed to monitoring for woodland caribou during the construction and post-construction phases of the Project which will help address future uncertainty while informing mitigation measures and adaptive management, as necessary.”</i></p> <p>Section 6.4 of the EIS Guidelines outlines requirements for Mitigation measures: <i>“Every EA conducted under CEAA 2012 will consider measures that are technically and economically feasible and that would mitigate any significant adverse environmental effects of the project. Under CEAA 2012, mitigation measures includes measures to eliminate, reduce or control the adverse</i></p>	<p>that the Proponent provide information on any additional mitigations or adaptive management that will be undertaken to reduce the effects of the Project using the results of the collaring program. ECCC advises that this information will support the understanding of whether the monitoring activities and subsequent mitigation or adaptive management will be sufficient to reduce the effects of the project or to offset the 205ha of critical habitat lost (including time lag considerations) as a result of the project, whether it is consistent with the goals of the Federal Recovery Strategy, and whether there is potential for a residual effect.</p> <p>ECCC is of the view that a ratio of 5:1 to 10:1 (habitat restored : habitat disturbed) could be required to balance the potential project residual adverse effects.</p>
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				<p><i>Manitoba's Boreal Woodland Caribou Recovery Strategy (2015) has:</i></p> <ol style="list-style-type: none"><li>1. a recovery goal to manage and protect caribou habitat to sustain boreal caribou populations; and</li><li>2. recovery objectives to:<ul style="list-style-type: none"><li>• <i>“conserve large intact boreal caribou habitat at a coarse scale and increase boreal caribou habitat to ensure that sufficient habitat quality and quantity (in appropriate spatial and temporal distributions) exists across all management units to support self-sustaining local populations and habitat connectivity within and between local ranges and management units;”</i> and</li><li>• <i>“where required, reduce or mitigate direct threats that have an impact on the survival and recovery of boreal caribou populations.”</i></li></ul></li></ol> <p>Additionally, the Federal Recovery Strategy (lists the MB9 range as 67% undisturbed. Critical habitat for the MB9 range is identified in the Federal Recovery Strategy as all existing habitat in the range that would contribute to at least 65% undisturbed habitat (and the biophysical attributes required by boreal caribou to carry out life processes).</p> <p>Based on habitat condition of the MB9 range, the critical habitat must increase over time to reach a minimum of 65% undisturbed habitat. The</p>	
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				<p>Federal Recovery Strategy identifies a minimum 65% undisturbed habitat in a range as the disturbance management threshold, which provides a measurable probability (60%) for a local population to be self-sustaining. This threshold is considered a minimum threshold because at 65% undisturbed habitat there remains a significant risk (40%) that local populations will not be self-sustaining.</p> <ul style="list-style-type: none"><li>• For boreal caribou ranges with undisturbed habitat below the threshold: restoration of disturbed habitat to a minimum of 65% undisturbed habitat will be necessary in all ranges except SK1, where the threshold is set at 40% undisturbed habitat</li><li>• For boreal caribou ranges with undisturbed habitat equal to or above the threshold: maintenance of a minimum of 65% undisturbed habitat will be necessary in all ranges except SK1, where maintenance of a minimum of 40% undisturbed habitat will be necessary.</li></ul>	
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