

LYNN LAKE GOLD PROJECT: ECCC input into the Draft EA Report

| Chapter /Section Title, Section #, Page # | Original text from the Agency | ECCC's input/comments | Rationale |
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| <p>2.2.2 MacLellan Site</p> <p>Tailings Management Facility</p> <p>p.28</p> | <p>“The use of a full liner beneath the Tailings Management Facility was not proposed as the current design was considered more economically feasible and would allow tailings consolidation over time.”</p> | <p>ECCC recommends that the Agency consider expanding the Agency’s text to reflect the following additional rationale provided by the Proponent, in their response to Information Request IAAC-R2-75:</p> <p>In response to IAAC-R2-75 the Proponent noted: With a fully lined TMF, the lack of foundation drainage would prolong the tailings consolidation process, reducing long-term stability and increasing the risk of embankment failure.</p> | <p>To include additional relevant information and rationale provided by the Proponent.</p> |
| <p>3.2.1 Proponent’s Alternatives Assessment</p> <p>Mine Waste Disposal</p> <p>p.39</p> | <p>“Use of a full liner beneath the Tailings Management Facility was not selected as this option was not considered economically feasible.”</p> | <p>As in the previous recommendation (for 2.2.2), ECCC recommends that the Agency consider expanding the Agency’s text to reflect additional rationale provided by the Proponent.</p> | <p>To include additional relevant information and rationale provided by the proponent</p> |
| <p>6.2 Groundwater Decommissioning/Closure</p> <p>p.62</p> | <p>“Seepage collection systems around the mine rock storage areas, and ore and overburden stockpiles at the Gordon and MacLellan sites, and around the Tailings Management Facility at the MacLellan site would remain in place during decommissioning/ closure until surface water quality meets applicable</p> | <p>ECCC recommends that the Agency consider revising text as follows:</p> <p>“Seepage collection systems ... until surface water quality meets applicable regulatory discharge requirements for a sufficient duration to demonstrate that removal of seepage collection systems would not cause adverse effects on fish and fish habitat.”</p> | <p>To confirm that removal of seepage collection systems will not adversely affect fish and fish habitat.</p> |

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| | regulatory discharge requirements.” | | |
| 6.2.1 Proponent’s Assessment of Environmental Effects Operation p.64 | “The Proponent predicted that concentrations of contaminants in groundwater would not exceed thresholds for the discharge of groundwater to surface water at the point of discharge, despite the predicted exceedances of federal and provincial water quality guidelines, due to dilution along the groundwater flow path.” | ECCC recommends that the Agency consider reordering this text for clarity: “Despite the predicted exceedances of federal and provincial water quality guidelines, due to dilution along the groundwater flow path, the Proponent predicted that concentrations of contaminants in groundwater would not exceed thresholds for the discharge of groundwater to surface water at the point of discharge.” | Rephrasing is recommended for clarity, as it is currently not clear in the paragraph who predicted what. |
| 6.2.3 Agency Analysis and Conclusions p.67 | “The Agency also acknowledges that uncertainty remains as to the effectiveness of the interceptor well system at mitigating project-related changes to lake levels in Gordon and Farley Lakes as a result of groundwater drawdown.” | ECCC notes the following for the Agency’s information: Uncertainty also remains for dilution along the flow path and that monitoring at all stages of the Project will be essential in verifying the Proponent’s predictions. | To highlight for the Agency that there are other sources of uncertainty. ECCC notes that the effectiveness of the interceptor well system is not the only source of uncertainty brought forward by the Proponent. Many assumptions are made by the Proponent in stating that there will be dilution of contaminants along the flow path, as stated in the Operation (p.64) and Decommissioning/Closure (p.65) sections. However, the mitigation measures and Follow up monitoring sections generally address concerns for these assumptions (p 68-69) by requiring monitoring at sites of concern. |

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| <p>6.2.3 Agency Analysis and Conclusions</p> <p>Mitigation Measures</p> <p>p.68</p> | <p>“Contact water will be treated to meet the GCDWQ and the MWQSOG requirements prior to discharge, as necessary.”</p> | <p>ECCC recommends the Agency consider adding the following guideline to the sentence: “Contact water will be treated to meet the GCDWQ, CWQG-FAL and the MWQSOG requirements prior to discharge, as necessary.”</p> <p>CWQG-FAL: Canadian Water Quality Guidelines – Freshwater Aquatic Life</p> | <p>To include additional relevant standards ECCC recommends also including the CWQG-FAL in the Agency’s text, for any discharges to surface waters.</p> |
| <p>6.2.3 Agency Analysis and Conclusions</p> <p>Follow-up and Monitoring</p> <p>p.69</p> | <p>“o monitoring of groundwater quality near the open pits, Gordon Lake, Farley Lake, Susan Lake, Minton Lake, the unnamed lakes northeast of Minton Lake (i.e. Lake 2 and Lake 3), Payne Lake, the Keewatin River, and the unnamed tributary of the Keewatin River, and up- and down-gradient from the Tailings Management Facility, mine rock storage areas, ore and overburden stockpiles, ...”</p> | <p>ECCC recommends that the Agency consider adding Pump Lake as a monitoring location: “monitoring of groundwater quality near the open pits, Gordon Lake, Farley Lake, Susan Lake, Pump Lake, Minton Lake, the unnamed lakes northeast of Minton Lake (i.e. Lake 2 and Lake 3), Payne Lake, the Keewatin River, and the unnamed tributary of the Keewatin River, and up- and down-gradient from the Tailings Management Facility, mine rock storage areas, ore and overburden stockpiles, ...”</p> | <p>Pump Lake is downgradient from Project operations and closer than Susan Lake.</p> |
| <p>6.3 Surface Water</p> <p>Gordon Site</p> <p>Changes to Surface Water Quality</p> <p>p.73</p> | <p>“The Project may affect the pH and turbidity of lakes and streams within the Gordon site LAA through increased erosion and sedimentation in all project phases; the release of contact and non-contact water with high concentrations of suspended solids during construction and operation; and the release of effluents</p> | <p>ECCC recommends that the Agency consider revising text as follows: “The Project may affect the pH and turbidity of lakes and streams... seepage with high amounts of suspended solids. or The pH may be affected by seepage or runoff that has come into contact with mine rock or tailings during operation or later.”</p> | <p>This sentence implies that project-related discharges will contain high concentrations of suspended solids. ECCC notes that discharges are required to meet the <i>Metal and Diamond Mining Effluent Regulations</i> (MDMER) discharge limits, including suspended sediment limits, and recommends including a</p> |

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| | and groundwater seepage with high amounts of suspended solids or that has come into contact with mine rock or tailings during operation.” | | clarification to that effect. Since pH is not affected by suspended sediments it would be more accurate to discuss pH separately. |
| 6.3.3 Agency Analysis and Conclusions Key Mitigation Measures and Monitoring to Avoid Significant Effects and FollowUp Program Requirements Mitigation Measures p.81 | “• During all project phases, the Proponent will implement mitigation measures, including collection and treatment of contact water and seepage before discharge to the receiving environment, to prevent project-related exceedances of the CWQG-FAL in all surface waterbodies within the Gordon and MacLellan site PDAs, LAAs, and RAA, including for fluoride, iron, hexavalent chromium, phosphorus, aluminum, arsenic, copper, cyanide, antimony, and total and dissolved cadmium.” | ECCC recommends that the Agency consider revising text as follows: “• During all Project phases, ... and total and dissolved cadmium, and any additional contaminants of concern.” | To address additional contaminants of concern. If monitoring demonstrates differences from what was predicted in the EIS additional parameters may require monitoring. |
| 6.3.3 Agency Analysis and Conclusions Key Mitigation Measures and Monitoring to Avoid Significant Effects and Follow-Up Program Requirements | “•Prior to release to the receiving environment, water in the pit lakes will be treated in accordance with the CWQG-FAL. If pit lake water quality is not suitable for release to the surrounding environment, additional treatment options will be implemented to improve water quality | ECCC recommends that the Agency consider revising text as follows: “•Prior to release... If pit lake water quality is not suitable for release to the surrounding environment, additional treatment options will be implemented to improve water quality to prevent project-related exceedances of the CWQG-FAL in the aquatic receiving environment and to comply with federal | Additional text is recommended to describe treatment goals. |

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| <p>Mitigation Measures</p> <p>p.82</p> | <p>to comply with MDMER limits.”</p> | <p>discharge requirements (i.e., MDMER and subsection 36(3) of the Fisheries Act, as applicable).”</p> | |
| <p>6.3.3 Agency Analysis and Conclusions</p> <p>Key Mitigation Measures and Monitoring to Avoid Significant Effects and Follow-Up Program Requirements</p> <p>Follow-up and Monitoring</p> <p>p.82</p> | <p>“•Prior to construction, a follow-up program ... This follow-up program will be used to monitor the following parameters, at a minimum: instantaneous flows; total suspended solids and turbidity; lake levels; pH levels; and concentrations of contaminants identified in the MDMER, including fluoride, iron, hexavalent chromium, phosphorus, aluminum, arsenic, copper, cyanide, antimony, and total and dissolved cadmium, calcium, and magnesium.”</p> | <p>ECCC recommends that the Agency consider revising text as follows:</p> <p>“•Prior to construction, a follow-up program ... calcium, and magnesium; and any additional parameters determined in consultation with relevant authorities.”</p> | <p>To address additional contaminants of concern. If monitoring demonstrates differences from what was predicted in the EIS additional parameters may require monitoring.</p> |
| <p>6.3.3 Agency Analysis and Conclusions</p> <p>Key Mitigation Measures and Monitoring to Avoid Significant Effects and Follow-Up Program Requirements</p> <p>Follow-up and Monitoring</p> <p>p.82</p> | <p>“•Prior to construction, a follow-up program ... The follow-up program will include a description of:</p> <ul style="list-style-type: none"> ○ monitoring locations for Gordon Lake, Farley Lake, Minton Lake, Cockeram Lake, Swede Lake, Ellystan Lake, Arbor Lake, Burger Lake, the Keewatin River, the unnamed tributary of the Keewatin River, the Hughes River, the pit lakes, and the Tailings Management Facility;” | <p>ECCC recommends that the Agency consider revising text as follows:</p> <p>“•Prior to construction, a follow-up program ... The follow-up program will include a description of:</p> <ul style="list-style-type: none"> ○ monitoring locations for Gordon Lake... the Hughes River, Payne Lake, Susan Lake, fish-bearing wetlands, the pit lakes, and the Tailings Management Facility, Mine Rock Storage Areas, collection ponds, all discharges and seepage, and any additional locations determined in consultation with | <p>To include more near-field and on-site locations, and potentially additional monitoring locations. If monitoring demonstrates differences from what was predicted in the EIS additional locations may require monitoring.</p> |

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| | | relevant authorities during review of final monitoring plans;” | |
| <p>6.3.3 Agency Analysis and Conclusions</p> <p>Key Mitigation Measures and Monitoring to Avoid Significant Effects and Follow-Up Program Requirements</p> <p>Follow-up and Monitoring</p> <p>p.82</p> | <p>“• Prior to construction, a follow-up program will be developed...</p> <ul style="list-style-type: none"> ○ monitoring locations... ○ analytical parameters to be monitored and monitoring frequency; and ○ contingency measures that will be implemented to address potential project effects to surface water quality and quantity.” | <p>ECCC recommends the Agency consider adding the following bullet into this section between the bullets on analytical parameters and contingency measures:</p> <p>“○ triggers and corresponding response actions; and”</p> | <p>Monitoring should be accompanied by triggers and response measures to enable proactive detection and response for protection of the aquatic environment.</p> |
| <p>6.3.3 Agency Analysis and Conclusions</p> <p>Key Mitigation Measures and Monitoring to Avoid Significant Effects and Follow-Up Program Requirements</p> <p>Follow-up and Monitoring</p> <p>p.82</p> | <p>“• Prior to construction, a follow-up program will be developed...</p> <p>If monitoring indicates that project-related discharges are resulting in exceedances of the CWQG-FAL limits for fluoride, iron, hexavalent chromium, phosphorus, aluminum, arsenic, copper, cyanide, antimony, or total and dissolved cadmium at or downstream of the edge of mixing zones, additional mitigation measures will be developed and implemented...”</p> | <p>ECCC recommends that the Agency consider revising text as follows:</p> <p>“• Prior to construction, a follow-up program will be developed... If monitoring indicates that project-related discharges are resulting in exceedances of the CWQG-FAL limits for fluoride, iron, hexavalent chromium, phosphorus, aluminum, arsenic, copper, cyanide, antimony, or total and dissolved cadmium, or any additional contaminants of concern at or downstream of the edge of mixing zones, additional mitigation measures will be developed and implemented...”</p> | <p>To address any additional contaminants of concern. If monitoring demonstrates differences from what was predicted in the EIS additional parameters may require monitoring.</p> |

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| <p>6.3.3 Agency Analysis and Conclusions</p> <p>Key Mitigation Measures and Monitoring to Avoid Significant Effects and Follow-Up Program Requirements</p> <p>Follow-up and Monitoring</p> <p>p.83</p> | <p>“●Monitoring of pit lake water quality will continue throughout the decommissioning /closure and post-closure phases of the Project until water quality in the pit lakes meets CWQG-FAL limits, to allow unabated discharge to the surrounding environment. After that time, monitoring and maintenance will cease.”</p> | <p>ECCC recommends that the Agency consider revising text as follows:</p> <p>“●Monitoring of pit lake water quality will continue throughout the decommissioning /closure and post-closure phases of the Project until it has been demonstrated that water quality in the pit lakes has stabilized and consistently meets CWQG-FAL limits...”</p> | <p>To provide clarity and add important detail to ensure protection of fish.</p> |
| <p>7.1.3 Agency Analysis and Conclusions</p> <p>Key Mitigation Measures and Monitoring to Avoid Significant Effects and Follow-Up Program Requirements</p> <p>Mitigation Measures</p> <p>p.105</p> | <p>“●Prior to construction, the Proponent will develop, in consultation with Indigenous nations and relevant federal and provincial authorities, mitigation measures to reduce the potential for project-related erosion and sedimentation, including the following:</p> <ul style="list-style-type: none"> ○ intake and effluent discharge pipes will be screened...; and ○ effluent discharge pipes will be equipped with diffusers...” | <p>ECCC recommends that the Agency consider revising text as follows:</p> <p>“●Prior to construction, the Proponent will develop... including the following:</p> <ul style="list-style-type: none"> ○ intake and effluent discharge pipes... ○ effluent discharge pipes... <p>o all other mitigation measures described in the final erosion and sedimentation control plan which should be developed and implemented prior to construction.”</p> | <p>In order to incorporate all relevant mitigation measures, the condition should also include the erosion and sedimentation control (ESC) plan/measures, which is an essential element in ESC. A comprehensive erosion and sediment control plan will include a number of essential mitigations not related to the two bullets identified in the current condition.</p> |
| <p>7.1.3 Agency Analysis and Conclusions,</p> <p>Key Mitigation Measures and</p> | <p>“●Prior to discharge of water from the Wendy and East pit lakes to Farley Lake during construction,</p> | <p>ECCC recommends that the Agency consider including the following additional text:</p> <p>“●Prior to discharge of water from the Wendy and East pit lakes ... to</p> | <p>To include discharge requirements. For clarity, it is important to include language to ensure that that water will be tested, and</p> |

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| <p>Monitoring to Avoid Significant Effects and Follow-Up Program Requirements</p> <p>Mitigation Measures</p> <p>p.105</p> | <p>contact water collection ditches to Farley Lake during construction, operation, and decommissioning/closure, and groundwater interceptor wells to Farley Lake and Gordon Lake during operation, water will be heated or cooled, when required, to maintain the temperature regime in both lakes (i.e. water will only be discharged when it is within 2°C of background water temperatures). To the extent possible, collected water will be discharged outside of burbot winter spawning periods, as determined by Fisheries and Oceans Canada, to limit effects to egg incubation and juvenile recruitment.”</p> | <p>limit effects to egg incubation and juvenile recruitment. Contact water will be tested prior to release or discharge. If water quality is not suitable for release to the surrounding environment, mitigations (e.g., treatment) will be implemented to improve water quality to prevent project-related exceedances of the CWQG-FAL in the aquatic receiving environment and to comply with federal discharge requirements.”</p> | <p>treated as needed, prior to discharge. The current text does not mention testing, preventing exceedances, or compliance with federal discharge requirements.</p> |
| <p>7.1.3 Agency Analysis and Conclusions</p> <p>Key Mitigation Measures and Monitoring to Avoid Significant Effects and Follow-Up Program Requirements</p> <p>Mitigation Measures</p> <p>p.105</p> | <p>“•Groundwater collected by interceptor wells and water from the existing Wendy and East pit lakes, prior to dewatering, will be aerated to encourage precipitation of oxide-forming elements, break down thermal and chemical stratification, and increase dissolved oxygen concentrations prior to release of</p> | <p>ECCC recommends that the Agency consider revising text similar to ECCC’s recommendation regarding contact water (provided in 7.1.3 above).</p> | <p>To include discharge requirements. For clarity, it is important to include language to ensure that that water will be tested, and treated as needed, prior to discharge. The current text does not mention testing, preventing exceedances, or compliance with federal discharge requirements.</p> |

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| | <p>this water to Gordon and Farley Lakes.”</p> | | |
| <p>7.2.2 Views Expressed</p> <p>Federal Authorities</p> <p>p.111</p> | <p>“Environment and Climate Change Canada agreed with the Proponent that the Project would cause temporary residual effects on migratory bird and bird species at risk habitat and that these effects would likely be reversible following reclamation and re-vegetation of the project sites. Environment and Climate Change Canada was of the view that residual adverse effects of the Project to migratory birds and bird species at risk would be adequately addressed, in consideration of the low predicted effects to habitat adjacent to the PDAs, the proposed reclamation of the Gordon and MacLellan sites following operation, including the legacy mine footprints, and the mitigation measures identified.”</p> | <p>ECCC recommends that the Agency consider revising text as follows:</p> <p>“Environment and Climate Change Canada agreed with the Proponent that the Project would cause temporary residual effects on migratory bird and bird species at risk habitat and that these effects would likely be reversible following reclamation and re-vegetation of the project sites. Environment and Climate Change Canada was of the view that residual adverse effects of the Project to migratory birds and bird species at risk would be adequately addressed, in consideration of the low predicted effects to habitat adjacent to the PDAs, in consideration of, the recovery of groundwater levels to near baseline conditions, the proposed reclamation of the Gordon and MacLellan sites following operation, including the legacy mine footprints, and the mitigation measures identified.”</p> | <p>ECCC rather stated that there is low cumulative effects in the region.</p> <p>However, there will be water table drawdown of 1 meter or more that will extend 800m and 1200m respectively around the Gordon and MacLellan Sites during the various Project phases (see Volume 1 and 2 excerpts below). This will affect adjacent habitat for many years.</p> <p>ECCC anticipates that the residual effects of water table drawdowns will be restored over time after closure (e.g. 10 years). This is more likely to affect fens rather than bogs.</p> <p>ECCC recognizes that wetlands are not limiting in the region.</p> <p>EIS Volume 2 Vegetation Wildlife 11.4.4.3 Project Residual Effect</p> <p>Gordon Site: Dewatering is needed to empty the open pit during construction for mine operation and is expected to lower water levels by 1 m within 800 m of the open pit (Chapter 8, Section 8.4.2.3). Shrubby willow was observed in a fen community and requires</p> |

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| | | | <p>subgygric to subhydic soil moisture conditions for seed production and germination (Flora of North America 2020). Drier conditions during construction/operation and post-closure due to ground water drawdown will likely lead to the loss of this occurrence. Indirect effects of dewatering may last approximately 10 years post-reclamation due to natural refilling of the open pit (Chapter 8, Section 8.1.4.2).</p> <p>MacLellan Site: Dewatering is needed to empty the open pit during construction for mine operation and is expected to lower water levels by 1 m within 1,200 m of the open pit (Chapter 8, Section 8.4.2.3) Therefore, both of these occurrences may be indirectly affected by drawdown from dewatering of the open pit, and will likely last through post-closure until the open pit fills (Chapter 8, Section 8.1.4.2).</p> <p>11.4.6 Project Residual Effects. Gordon Site. Swamps and marshes have fluctuating water tables and may be connected to ground water tables (Halsey et al. 1997). However, bog</p> |
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| | | | <p>wetlands are not anticipated to be indirectly affected by groundwater drawdown because bogs typically receive water only from precipitation and have low water flow (Halsey et al. 1997).</p> <p>EIS Volume 1. Map 8-17 to Map 8-23. Maps of drawdown at MacLellan and Gordon Sites.</p> |
| <p>7.2.3 Agency Analysis and Conclusions</p> <p>p.112</p> | <p>“However, the Agency is of the view that these measures should be implemented at all times and throughout all project phases to mitigate effects to migratory birds and bird species at risk, until surface water quality at the project sites meets applicable federal and provincial regulatory requirements...”</p> | <p>ECCC recommends that the Agency consider revising text:</p> <p>“However, the Agency is of the view that these measures should be implemented and monitored at all times and throughout all project phases to mitigate effects to migratory birds and bird species at risk, until surface water quality at the project sites meets applicable federal and provincial regulatory requirements...”</p> | <p>Ongoing monitoring of bird deterrents is necessary to measure their efficacy and to prevent/reduce mortality and contraventions of the MBCA.</p> <p>Monitoring is an important component of implementing bird deterrents.</p> |
| <p>7.2.3 Agency Analysis and Conclusions</p> <p>Key Mitigation Measures and Monitoring to Avoid Significant Effects and Follow-Up Program Requirements</p> <p>Mitigation Measures</p> <p>p.113</p> | <p>“•If vegetation clearing and/or construction activities cannot occur outside of migratory bird breeding periods, as described in Environment and Climate Change Canada’s General Nesting Periods for Migratory Birds, additional mitigation measures will be implemented to protect migratory birds, their</p> | <p>ECCC recommends that the Agency consider revising text as presented below:</p> <p>“•If vegetation clearing and/or construction activities cannot occur outside of migratory bird breeding periods, as described in Environment and Climate Change Canada’s <i>General Nesting Periods for Migratory Birds</i>, additional mitigation measures will be implemented to protect migratory birds, their eggs, and their nests, including non-intrusive bird surveys, by a qualified professional, which will be</p> | <p>Surveys should be conducted by a qualified professional to ensure appropriate methods are used, and birds and nests are not disturbed or damaged. This addition is consistent with the language used in the next bullet on page 113.</p> |

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| | <p>eggs, and their nests, including non-intrusive bird surveys, which will be conducted within the Gordon and MacLellan site PDAs prior to construction to identify nests of migratory bird and bird species at risk, including common nighthawk, olive-side flycatcher, barn swallow, bank swallow, short-eared owl, horned grebe, yellow rail, evening grosbeak, and rusty blackbird. Based on the results of surveys, buffer zones and setback distances around nests will be established prior to construction and in consultation with Indigenous nations and other relevant federal and provincial authorities, taking into account the Manitoba Conservation Data Centre's Recommended Development Setback Distances and Restricted Activity Periods for Birds by Wildlife Feature Type (2021), to protect nests and prevent mortality. Buffer zones and setbacks will be maintained during vegetation clearing and site preparation activities."</p> | <p>conducted within the Gordon and MacLellan site PDAs prior to construction to identify nests of migratory bird and bird species at risk, including common nighthawk, olive-side flycatcher, barn swallow, bank swallow, short-eared owl, horned grebe, yellow rail, evening grosbeak, and rusty blackbird. Based on the results of surveys, buffer zones and setback distances around nests will be established prior to construction and in consultation with Indigenous nations and other relevant federal and provincial authorities, taking into account the Manitoba Conservation Data Centre's <i>Recommended Development Setback Distances and Restricted Activity Periods for Birds by Wildlife Feature Type</i> (2021), to protect nests and prevent mortality. Buffer zones and setbacks will be maintained during vegetation clearing and site preparation activities."</p> | |
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| <p>7.2.3 Agency Analysis and Conclusions.</p> <p>Key Mitigation Measures and Monitoring to Avoid Significant Effects and Follow-Up Program Requirements</p> <p>Mitigation Measures</p> <p>p.114</p> | <p>“●Lights used at nighttime will be aimed downwards (i.e. down-lighting) to limit effects on migratory bird and bird species at risk habitat adjacent to the Gordon and MacLellan site PDAs.”</p> | <p>ECCC recommends that the Agency consider adding the following text:</p> <p>“●Lights used at nighttime will be aimed downwards ... Navigation lighting should be of minimum intensity and duration, that meets navigation regulations, to minimize attraction to migratory birds. Lighting that does not attract insects will also be considered.”</p> | <p>In addition to the stated mitigation, tall structures that require navigation lighting also need to employ measures to avoid harm to birds. These structures have been known to cause large migratory bird mortality events during migration.</p> <p>Consider using lighting throughout the Project that does not attract insects that migratory birds and bats feed on.</p> |
| <p>7.2.3 Agency Analysis and Conclusions</p> <p>Key Mitigation Measures and Monitoring to Avoid Significant Effects and Follow-Up Program Requirements</p> <p>Follow-up and Monitoring</p> <p>p.114</p> | <p>“●Prior to construction, a follow-up program will be developed, in consultation with Environment and Climate Change Canada , other relevant federal and provincial authorities, and Indigenous nations, to verify the accuracy of the environmental assessment and to determine the effectiveness of mitigation measures related to avoiding harm to migratory birds, including migratory birds that are listed species at risk, their eggs and nests. The follow-up program will be implemented during all phases of the Project.”</p> | <p>ECCC recommends that the Agency consider removing the specific reference to ECCC.</p> <p>“●Prior to construction, a follow-up program will be developed, in consultation with Environment and Climate Change Canada, other relevant federal and provincial authorities, and Indigenous nations, to verify the accuracy of the environmental assessment and to determine the effectiveness of mitigation measures related to avoiding harm to migratory birds, including migratory birds that are listed species at risk, their eggs and nests. The follow-up program will be implemented during all phases of the Project.”</p> | <p>Follow up measures are readily available in the public domain from other Projects. ECCC is available to review the plan developed by the Proponent.</p> |
| <p>7.3.3 Agency Analysis and Conclusions</p> | <p>“The Agency recommends that the Proponent work with Environment and</p> | <p>ECCC recommends that the Agency consider revising the text as follows:</p> | <p>ECCC is available to review the follow-up program developed by the Proponent but</p> |

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| <p>p.123</p> | <p>Climate Change Canada and Indigenous nations to develop a follow-up program to monitor for any unique species-specific effects, including potential effects to habitat within the PDAs and LAAs, mortality risk, and species at risk health, and develop species-specific mitigation measures to limit or prevent these project effects.”</p> | <p>“The Agency recommends that the Proponent work with Environment and Climate Change Canada and Indigenous nations to develop a follow-up program, in consultation with federal authorities and Indigenous Nations to monitor for any unique species-specific effects, including potential effects to habitat within the PDAs and LAAs, mortality risk, and species at risk health, and develop species-specific mitigation measures to limit or prevent these project effects.”</p> | <p>would not participate in the development of the program.</p> |
| <p>7.3.3 Agency Analysis and Conclusions</p> <p>Key Mitigation Measures and Monitoring to Avoid Significant Effects and Follow-Up Program Requirements</p> <p>Mitigation Measures</p> <p>p.124</p> | <p>“•During all project phases and in consultation with Environment and Climate Change Canada, Indigenous nations, and other relevant federal and provincial authorities, the Proponent will mitigate adverse project effects on boreal caribou and its habitat in a manner consistent with the federal Recovery Strategy for Woodland Caribou (Rangifer tarandus caribou), Boreal Population (2020).”</p> | <p>ECCC recommends that the Agency consider revising text as follows:</p> <p>“•During all project phases and in consultation with Environment and Climate Change Canada, Indigenous nations, and other relevant federal and provincial authorities, The Proponent will develop a mitigation plan to address, through all Project phases, adverse Project effects on boreal caribou and its habitat, will mitigate adverse project effects on boreal caribou and its habitat in a manner consistent with the federal Recovery Strategy for Woodland Caribou (Rangifer tarandus caribou), Boreal Population (2020). The Proponent will consult with relevant federal and provincial authorities and Indigenous nations on the mitigation plan.”</p> | <p>ECCC is available to review the Proponent’s plan to mitigate adverse Project effects on boreal caribou and their habitat through all phases of the Project.</p> |