## <u>Tailored Impact Statement Guidelines Disposition Table – Provincial Review Team</u>

## **Marten Falls Community Access Road Project**

All comments should be submitted via the Submit a Comment feature available on the Project's Canadian Impact Assessment Registry page (Reference #80184 at https://iaac-aeic.gc.ca/050/evaluations/proj/80184). Documents can be uploaded using this feature. If you have any difficulties submitting this way, please contact the registry directly at IAAC.CEAR-RCEE.AEIC@canada.ca. Please note that all comments submitted using this table may be posted on the Project's Canadian Impact Assessment Registry Internet site.

Deadline: January 17, 2020

Please note that this will be your final opportunity to provide inputs to the Tailored Impact Statement Guidelines.

Ministry:	Ministry of Energy, Northern Development and Mines		
IA Contact:	Ariane Heisey, Clare Pineau		
Email:	<email removed=""></email>	Telephone:	<phone number="" removed=""></phone>

- 1. Please review the draft Tailored Impact Statement Guidelines (TISG) sections that are applicable to your ministry's mandate.
- 2. Using the table below, please describe any issues and include your recommendation for how the draft TISG should be adapted to address each issue. Please indicate any recommended **additions or deletions** to the text.

MINISTRY – COMMENT ID	TISG Section	Issue (provide an explanation of your comments)	Recommendation: provide text to be inserted or deleted. Be specific on the location within the TISG that the text would be added/deleted.
ENDM-ROF	3.2.2 Pg. 5 See also pg. 106	Use correct name of roads – check throughout document	Page 5, Bullet 5 Revised text to be inserted  • Anticipated use of the Anaconda Road and Painter Lake Road, both forestry access roads.
ENDM-ROF	3.3 Pg 6 4.3 Pg. 7 5.1 Pg. 11 6.2 Pg. 15 24 Pg. 111 25 Pg. 113	Would be helpful to be include specific federal guidance where the are available (see page 24, footnote 6 where the guidance document was included)	Page 6, Footnote     Include the name of the specific guidance document and link for guidance on gender-based analysis Page 7-8, line 8     Include the specific name of appropriate guidance document and link Page11, last sentence     Include the specific name of appropriate guidance document and link Page 15, Par. 2     Include the specific name of appropriate guidance documents and links Page 111, Par.2     Include the specific name of appropriate guidance document and link Page 113, Par. 5     Include the specific name of appropriate guidance document and link Page 113, Par. 5     Include the specific name of appropriate guidance document and link
ENDM-RGP	4.4 Pg. 9	The term "mining" needs to be removed from "aggregate mining activities", and amended to "aggregate extraction activities" as aggregate extraction is not mining as set out under the Ontario Mining Act	Page 9. Revised text to be inserted  • aggregate extraction activities (including extraction method, location and design of any facilities required to produce aggregate, location of aggregate stockpiles and management of waste materials);  Page 63  • provide estimates of the potential for aggregate extraction activities to be sources of acid rock drainage or metal leaching; including estimates of potential time to the onset of acid rock drainage or metal leaching;

ENDM-RGP	4.4 Pg. 9	The statement "management of non-mining solid wastes" needs to be amended to "management of non-aggregate extraction related solid waste". As there no mining operations occurring during road construction as defined by the Ontario Mining Act	Page 9. Revised text to be inserted  Management of non-aggregate extraction related solid waste
ENDM-ROF	6 Pg. 13	in coordination with the proponent If the Agency is going to set up a series of meetings to discuss technical matters, it may be appropriate to include Ontario which may have technical expertise that is different or complementary to federal expertise especially since the intent is to have one set of documentation	Page 6, par.3, line two Revised text to be inserted in coordination with the proponent and Ontario, to discuss technical matters
ENDM-RGP	8.3 Pg.27	Including the description of the structural geology, known mineral occurrences and any data from exploration diamond drilling and any other type of mechanized drilling will provide information for a more detailed geological  Potential mine hazards need to be considered and identified as these may pose a hazard to human health or the environment if disturbed.  Under the geological hazards bullet, karst topography should be considered as a potential hazard	<ul> <li>Page 27. Revised text to be inserted</li> <li>describe the bedrock geology and lithological units, including a summary table of geologic descriptions, structural geology, known mineral occurrences, mineralization styles (if applicable) supported by geological maps, cross-sections at appropriate scale (normally 1:50 000), and diamond and/or other mechanized drilling data (if applicable);</li> <li>identify any historical and/or recent mine related hazards that exist in the areas planned for the project facilities and infrastructure;</li> <li>identify any geological hazards that exist in the areas planned for the project facilities and infrastructure, including:         <ul> <li>history of seismic activity in the area, including induced earthquakes, and secondary effects such as the risk of, landslides and liquefaction;</li> <li>evidence of active faults;</li> <li>karst topography;</li> <li>isostatic rise or subsidence; and</li> <li>history of landslides, slope erosion and the potential for ground and rock</li> </ul> </li> </ul>

ENDM-RGP	10	Land tenure under the	instability/landslides, and subsidence during and following project activities; and  • provide a characterization of the geochemical composition of expected construction materials, in order to predict metal leaching and acid rock drainage including oxidation of primary sulphides and secondary soluble sulphate minerals.  Page 51
	Pg. 51	Ontario Mining Act, should be considered as a separate item as land tenure may only look at Crown Land vs. Private Land.	access, ownership and use of resources (e.g., land tenure, land tenure under the Ontario Mining Act, minerals, aggregate, food, water, social infrastructure), including ownership of land surrounding water crossings.
ENDM-RGP	11 Pg. 53	Under the "Business Environment" bullet section, land tenure under the Ontario Mining Act, should be considered as a separate item as land tenure may only look at Crown Land vs. Private Land.	Page 53 Revised text to be inserted  • Business Environment  • access, ownership and use of resources (e.g., land tenure, land tenure under the Ontario Mining Act, minerals, aggregate, food, water, social infrastructure), including ownership of land surrounding water crossings.
ENDM-RGP	17.2 Pg.81	Mineral exploration and mining operations need to be specifically listed	Page 81 Revised text to be inserted  • describe the potential interactions of the designated project with local and regional land use and resource activities, including adverse and positive effects to:  • transportation and utilities corridors (including community airports and winter roads);  • residential land use;  • forestry and logging operations;  • mining operations;  • mineral exploration activities;  • commercial outfitters; and  • other land uses.
ENDM-ROF	17.4 Pg 82 See also 10.	Concern about using the term Community Cohesion to describe local demographics and changes to the demographics. Community	Page 82  Revised Text to be inserted

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	p. 51	cohesion has a distinct meaning in social impact assessment and is one component of a community profile. Our research has shown that Community cohesion can be defined as "a shared sense of belonging based on common goals and social values, respect for differences and acceptance of the rights and obligations of community members working towards a common goal and healthy community".¹ Cohesion can be affected both positively or negatively by a proposed project. It is great that community cohesion is being considered, but it should be one component of a community profile.  It may also be beneficial to define what community cohesion is as this term will not be familiar to many participants in the IA process.	Suggest changing heading of section from Community Cohesion to Community Profile and include community cohesion at the end of the paragraph as another aspect of the community for the proponent to consider.  Suggest moving bullets 2 and 3 from list in 17.5 to section 17.4 as these bullets can help describe community cohesion  • describe in-and-out migration effects, including changes in social and cultural make-up of affected communities and changes in populations • identify whether social divisions might be intensified as a result of a project and evaluate effects to social cohesion
ENDM-ROF	17.5 Pg. 83	Duplication of sub-bullets 1 and 5 "trafficking illegal or counterfeit goods"	Pg. 83  Remove one of the sub-bullets to eliminate duplication
ENDM-RGP	18.6 Pg. 86	Mineral exploration and mining operations need to be specifically listed	Page 86. Revised text to be inserted  The Impact Statement must:  • describe the project's impact and consistency with any existing local or regional plans for  • transportation and utilities corridors (including community airports and winter roads);  • residential land use;  • forestry and logging operations;  • mining operations;  • mineral exploration activities;  • commercial outfitters; and

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<sup>&</sup>lt;sup>1</sup> Ensign, P.C. et al (2014) "Natural Resource Exploration and Extraction in Northern Canada: Intersections of Community Cohesion and Social Welfare", Journal of Rural and Community Development 9(1) 112-133

			other land uses.
ENDM-RGP	18.6 Pg. 87	Mining projects should be amended to "mineral exploration and/or development projects" as there are no operating mines in the area as defined by the Ontario Mining Act.	Page 86. Revised text to be inserted  • provide a description of the extent to which the project will facilitate developments, including mineral exploration and/or development projects, in the area;  • provide an estimate and description of the mineral exploration and/or development project's direct, indirect, and induced economic impact, such as  • any measurable impact on provincial/territorial GDP; and  • increased consumer spending.
ENDM-RGP	22 Pg.105	The term "Greenstone mineral belt" should be replace with "geologic greenstone belt(s)" as this could cause confusion differentiating between the areas that make up the Municipality of Greenstone and the geologic term greenstone belt.	Page 105. Revised text to be inserted  The cumulative effects assessment must include consideration of cumulative effects to rights of Indigenous peoples and cultures, for all potentially impacted groups including those located in the geologic greenstone belt(s) which will be impacted by increased access to the region by exploration and mineral development projects.
ENDM-RGP	22 Pg.106	In the list of projects or activities that should be included in the cumulative effects assessment, the bullet point "the Eagle's Nest Mine" should be removed as a stand alone item and relabelled as "Eagle's Nest" as it is not an operating mine.  The replacement text "Eagle's Nest" needs to be inserted within the bullet point discussing mining activities associated with the other mineral deposits.	Page 106. Revised text to be inserted  • potential mining activities associated with the following deposits: Eagle's Nest, Black Thor, BlackBird, Big Daddy, Black Label;
ENDM-RGP	23.2 Pg. 110	Under what must be included The Impact Statement, the wording needs to be more inclusive of possible geologic hazards	Page 110. Revised text to be inserted  • identify any areas of potential wind or water erosion, slumps and slope instability, geologic hazards;

			including, but not limited to those caused by geologic movements
ENDM-ILB		For preferred 5km corridor. Conflicting land use. Involves 3,303 active mining claim, affecting 5 claim holders. Also, overlaps in part, 6 existing lands withdrawal orders for mineral and surface rights.	Potentially, consent to dispose of surface rights may be required from claim holders for each active claim Lands alienated could potentially be for indigenous lands concerns, otherwise, there may be land use conflicts to mitigate.
		Alternate3: 5km corridor. Conflicting land use. Involves 1,357 active mining claim, affecting 3 claim holders Also, overlaps in part, 6 existing lands withdrawal orders for mineral and surface rights.	
		Alternateve4: 5km corridor. Conflicting land use. Involves 259 active mining claim, affecting 2 claim holders Also, overlaps in part, 4 existing lands withdrawal orders for mineral and surface rights	
ENDM-ROF	25 Pg. 112	Use of the word practitioner in Par 2, line 4 and 6. Not used anywhere else in	Page 112, Par 2, line 4 and 6  Delete 'practitioner' and replace with
		document. Consider using the word proponent.	'proponent'

Insert as many rows as applicable