

Draft Tailored Impact Statement Guidelines Disposition Table – Provincial Review Team

Upper Beaver Gold Project

Deadline: March 7, 2022

All comments should be submitted via the Submit a Comment feature available on the Project’s Canadian Impact Assessment Registry page (Reference #82960 at <https://iaac-aeic.gc.ca/050/evaluations/proj/82960>). Documents can be uploaded using this feature. If you have any difficulties submitting this way, please contact the registry directly at iaac.registry-registre.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.

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

Ministry:	Ministry of Heritage, Sport, Tourism and Culture Industries (MHSTCI)		
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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	Draft TISG Section	Context and Rationale (provide an explanation of your comments)	Recommendation: provide text to be inserted or deleted. Be specific on the location within the draft TISG that the text would be added/deleted.
MHSTCI-01 (HPU)	3.2 (Project Location)	It is not clear whether the last bullet (“culturally important features of the landscape) is applicable to Indigenous and non-Indigenous communities and whether these relate to physical and cultural heritage. MHSTCI recommends revising this bullet.	<p>Please replace the last bullet of section 3.2 Project Location with the following, consistent with the <i>Technical Guidance for Assessing Physical and Cultural Heritage or any Structure, Site or Thing that is of Historical, Archaeological, Paleontological or Architectural Significance under the Canadian Environmental Assessment Act, 2012</i>:</p> <ul style="list-style-type: none"> • physical and cultural heritage or to any structure, site or thing that is of historical, archaeological, paleontological or architectural significance • culturally important features of the landscape to Indigenous communities
MHSTCI-02 (TPU)	7.2 (Selection of valued components)	<p>The potential Valued Components to be considered do not include noise or existing economic conditions.</p> <p>Various other sections include wording re: identifying baseline ambient noise levels at key receptor points (8.4.1), describing project effects on acoustic environment (8.4.2) and preparing a noise management plan (8.4.3)</p>	Given the draft guidelines outline noise-related work to be done, which is positive, consider including noise/acoustic environment as a Valued Component in Section 7.2.
MHSTCI-03 (HPU)	7.6 (Cumulative effects)	The terminology for VCs included in Section	MHSTCI recommends the following edits:

		<p>7.6 Cumulative Effects should align with the <i>Technical Guidance for Assessing Physical and Cultural Heritage or any Structure, Site or Thing that is of Historical, Archaeological, Paleontological or Architectural Significance under the Canadian Environmental Assessment Act, 2012.</i></p>	<p>The Impact Statement must: (...)</p> <ul style="list-style-type: none"> • VCs for which cumulative effects were identified as a concern during the Planning phase, including: (...) • <u>physical and</u> cultural heritage <u>or to any structure, site or thing that is of historical, archaeological, paleontological or architectural significance</u>
MHSTCI-04 (TPU)	9.3.3 (Mitigation and enhancement measures)	<p>Section 9.3 outlines how economic conditions will be addressed.</p> <p>Section 9.3.2.2 indicates the need to describe potential effects of changes to economic conditions for specific sectors including commercial outfitters and commercial recreation and tourism. This is positive from a tourism perspective.</p> <p>However, Section 9.3.3. (Mitigation and Enhancement Measures) doesn't include specific language about mitigating any potential changes to other economic sectors, such as tourism, due to the project.</p>	<p>MHSTCI recommends adding economic conditions as a Valued Component in Section 7.2.</p> <p>Include specific wording in Section 9.3.3. to address mitigation of project-related effects on other economic sectors, including tourism.</p>
MHSTCI-05 (HPU)	10.1.1 (Indigenous physical and cultural heritage, and structures, sites or	The Project may impact on cultural heritage of significance for non-Indigenous peoples.	MHSTCI recommends adding the following bullets to Section 10.1.1 Baseline Conditions to clarify what technical studies/documentation and

	<p>things of significance – Baseline conditions)</p>	<p>Different types of heritage, structure, site or thing can fall under the authorities of municipal, provincial/territorial or federal governments and sometimes under several of these authorities. Although the effects within federal jurisdiction are related to Indigenous peoples, baseline conditions should also include non-indigenous communities that may identify areas of cultural heritage value (significance) within the project’s location.</p> <p>It is not clear how this section is aligned with the <i>Technical Guidance for Assessing Physical and Cultural Heritage or any Structure, Site or Thing that is of Historical, Archaeological, Paleontological or Architectural Significance under the Canadian Environmental Assessment Act, 2012</i></p> <p>Technical cultural heritage studies (e.g. cultural heritage assessment reports, archaeological assessments) undertaken for the federal EA process could also be used for</p>	<p>aligned with the <i>Technical Guidance</i> will be completed:</p> <ul style="list-style-type: none"> • identify VCs which will include an inventory of potential lands and resources and establishing their importance as heritage or as a structure, site or thing. This may be assessed through a combination of consultation, desk-based research and a site survey or inspection. This will be document in an archaeological assessment and Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment. • An archaeological assessment(s) should be undertaken by an archaeologist licenced under the <i>Ontario Heritage Act (OHA)</i> • A Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment should be undertaken for the entire study area during the planning phase. This study will: <ul style="list-style-type: none"> i. Describe the existing baseline cultural heritage conditions within the study area by identifying all known or potential built heritage resources and cultural heritage landscapes, including a historical summary of the study area. ii. Identify preliminary potential project-specific impacts on the known and potential built heritage resources and cultural heritage landscapes that have been identified. The
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		the provincial EA process.	<p>report should include a description of the anticipated impact to each known or potential built heritage resource or cultural heritage landscape that has been identified.</p> <p>iii. Recommend measures to avoid or mitigate potential negative impacts to known or potential built heritage resources and cultural heritage landscapes. The proposed mitigation measures are to inform the next steps of project planning and design.</p>
MHSTCI-06 (HPU)	10.1.2 (Indigenous physical and cultural heritage, and structures, sites or things of significance – Effects Indigenous physical and cultural heritage)	The Project may impact on cultural heritage of significance for non-Indigenous peoples. Different types of heritage, structure, site or thing can fall under the authorities of municipal, provincial/territorial or federal governments and sometimes under several of these authorities. Effects of any changes to the environment on heritage or any structure, site or thing (other than those with respect to Indigenous peoples) that are directly linked or necessarily incidental to a federal decision (e.g., disturbance to a designated heritage lighthouse) shall be assessed. Therefore,	<p>MHSTCI recommends the following edits:</p> <ul style="list-style-type: none"> • <u>Include a description of the nature and current condition of the heritage or any structure, site or thing</u> • assess potential effects to physical and cultural heritage, and structures, sites or things of historical, archaeological, paleontological or architectural significance to <u>Indigenous peoples groups and non-Indigenous peoples</u>, including, but not limited to: (...) • <u>consider the potential cumulative effects</u> • (...) describe the outcomes of engagement and consultation activities with <u>the public and Indigenous communities with concerns about heritage resources in the project area</u> and indicate the participation of the members of these communities in the related

		<p>the Impact Statement will assess effects of changes to all cultural heritage resources, associated with Indigenous and non-Indigenous communities.</p> <p>The TSIG should align with the <i>Technical Guidance for Assessing Physical and Cultural Heritage or any Structure, Site or Thing that is of Historical, Archaeological, Paleontological or Architectural Significance under the Canadian Environmental Assessment Act, 2012.</i></p>	<p>studies, if applicable</p>
MHSTCI-07 (HPU)	<p>10.2.2 (Current use of lands and resources for traditional purposes - Effects to current use of lands and resources for traditional purposes)</p>	<p>If the project involves lands that are owned or controlled by an Ontario Ministry or Prescribed Public Body (PPB) on behalf of the Crown (O. Reg. 157/10 includes the list of PPBs), a Ministry or PPB may have responsibilities under the Standards and Guidelines for Conservation of Provincial Heritage Properties</p> <p>This section should be expanded to indicate compliance with the <i>Ontario Heritage Act</i> for provincial heritage properties and for archaeological matters.</p>	<p>MHSTCI recommends the following edits for consistency:</p> <ul style="list-style-type: none"> • evaluate the potential effects of changes to physical and cultural heritage and to structures, sites, or things of historical, archaeological, paleontological or architectural significance to communities, including: (...) • provide copies of correspondence with provincial or territorial authorities responsible for heritage resources containing their comments on the heritage resource assessment and proposed mitigation measures; • describe the results of consultation and engagement activities with the public and Indigenous and non-Indigenous communities having heritage resource concerns in the project area and indicate the participation of the members of these

			<p>communities in the related studies, if applicable;</p> <ul style="list-style-type: none"> • in the event that project activities may disturb the soil, on the surface or underground, is carried out on Crown lands, conduct an archaeological potential study for the Crown territory affected. Archaeological resources should be screened using the MHSTCI <i>Criteria for Evaluating Archaeological Potential</i> and <i>Criteria for Evaluating Marine Archaeological Potential</i> to determine if an archaeological assessment is needed. MHSTCI archaeological sites data are available at archaeology@ontario.ca. If the project area exhibits archaeological potential, then an archaeological assessment should be undertaken by an archaeologist licenced under the Ontario Heritage Act (OHA), who is responsible for submitting the report directly to MHSTCI for review. Based on the recommendations of this study, field work (visual inspection without snow cover, archaeological inventory, or other) could be necessary. Depending on the findings, this expertise could lead to mitigation measures related to the findings obtained, which can take the form, for example, of intensive digs at a given site or a proposal for modification of the anticipated route. Technically and economically feasible measures must be identified that would mitigate any significant adverse environmental effects; • on lands under provincial jurisdiction, work that could disturb the soil on the surface or
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			underground should comply with the <i>Ontario Heritage Act</i> , including the <i>Standards and Guidelines for Conservation of Provincial Heritage Properties</i>
MHSTCI-08 (HPU)	10.4 (Mitigation and enhancements measures)	<p>Jurisdiction over heritage is shared among levels of government. Heritage sites may be specifically designated as protected sites or may be subject to a blanket system of protection either by legislation or by policy at the federal, provincial, territorial or municipal level. Information under section 10.4 should also be consistent with the Technical Guidance. Mitigation measures for physical and cultural Heritage or any structure, site or thing that is of Historical, archaeological, paleontological or architectural significance can only be identified by qualified persons and documented in technical cultural heritage studies (e.g., archaeological assessment, cultural heritage report).</p> <p>MHSTCI recommends some edits to the bullet around archaeological assessments on Crown lands to align with the current legislative framework in Ontario.</p>	<p>MHSTC recommends the following edits to clarify what mitigation measures should be undertaken for potential or known cultural heritage resources:</p> <ul style="list-style-type: none"> • describe the measures that would mitigate any significant adverse environmental effects on physical and cultural Heritage or any structure, site or thing that is of Historical, archaeological, paleontological or architectural significance related to Indigenous peoples and non-Indigenous and supported by technical cultural heritage studies; • provide any intervention and communication plans, as applicable, pertaining to heritage resources and structures, sites, and things of cultural, historical, archaeological, paleontological, or architectural significance, if there is a possibility of discovery during construction or development activities. This plan must include, at a minimum, the person to be contacted, intervention measures and the conditions that would lead to a shutdown and resumption of work; • provide copies of correspondence from the provincial authorities responsible for the conservation of cultural heritage authorities. Correspondence should

			<p>include comments from provincial authorities on the the due diligence under <u>legislative and regulatory framework, including comments on technical cultural heritage studies.</u></p> <ul style="list-style-type: none"> • In the event that project activities may disturb the soil, on the surface or underground, on federal Crown lands, an archaeological assessment(s) by an archaeologist licensed under the Ontario Heritage Act shall be conducted for the affected lands. Archaeological assessment(s) shall be undertaken during the impact assessment process and prior to any ground disturbing activities. Recommendations from the archaeological assessment(s) will be followed by the proponent
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Insert as many rows as applicable