## Enclosure 2: Comment Table for the for Northern Road Link Project - Initial Project Description (IPD) IPD submitted February 2, 2023 by Webequie First Nation and Marten Falls First Nation (the proponent)

Please use this document to provide comments on the Northern Road Link Project (the Project). The document consists of two tables.

Table 1 will enable you to describe potential project effects.<sup>1</sup> The Impact Assessment Agency of Canada (the Agency) requires detailed advice to inform the Summary of Issues provided to the proponent pursuant to subsection 14(1) of the *Impact Assessment Act* (IAA). Please refer to prompts in the table to guide your responses.

Table 2 will facilitate the collection of general or editorial comments.

## Table 1: Description of the potential effects of the Project

Comment ID	Document Reference	Valued Component	Project Component	Description of the Potential Effect (Context and Rationale)	Powers, Duties and Functions	Risk Characterization Rating	Instructions to the Proponent	Summary of the Issue
Please identify comments by organization and comment number.	If the comment is related to a specific section of the documentation, please provide a reference (e.g. title, section, subheading, page number). You may also choose to copy the relevant text here.	Identify the valued component(s)— within the mandate of your department, ministry or agency— to which the effect applies. This may include components of the environment, health, social or economic conditions.	If applicable, please indicate the project component that could cause the described effect. If the effect is linked to a power, duty or function, please identify the project component that would be regulated, monitored, or enabled by the power duty or function.	<ul> <li>For each effect within your mandate (one effect per row), please provide the context and rationale. In your response, please respond to following points:</li> <li>Describe whether the proponent has adequately articulated the effect. Provide rationale. If an effect that could affect a valued component is not described adequately, explain what is lacking or unclear and describe any possible link between the effect and a project activity or component.</li> <li>Describe whether the proponent has identified and adequately articulated mitigation and/or monitoring measures to address the potential effect. Provide rationale. <ul> <li>a. If the proponent has identified mitigation measures, provide your expert opinion of the proposed measures; indicate whether these mitigation and of proven effectiveness.</li> <li>b. If not, provide advice on how the effect could be managed through well-understood mitigation measures, and identify such measures.</li> </ul> </li> <li>Describe whether the proponent has adequately articulated the potential for residual effects after mitigation has been applied. Provide a value defices after mitigation has been applied. Provide advice on the potential for residual effects.</li> </ul>	Does your department, ministry or agency have powers, duties or functions associated with this effect? If yes: • Identify the act and associated power, duty or function. • Indicate whether the exercise of the associated power, duty or function would <u>mitigate, manage or set</u> <u>conditions</u> that would address the effect	Based on the information that you have provided, please characterize the risk by selecting a rating (from [1] to [6]) for the effect (See <b>Enclosure 3</b> for definitions)	Provide a specific, actionable request for the proponent Where applicable, provide instructions for how the proponent would build confidence in the Detailed Project Description and Response to the Summary of Issues to support or confirm the risk rating selected at left.	Where potential effects have been overlooked or are missing or could be better described and presented by the proponent, provide a concise synopsis for the Summary of Issues. Please, where possible, use simple (lay) language in your summary.
MTCS-01	Section 15.1.3.2 – Noise: Proposed Baseline Studies		Road construction primarily although operations phase could also have noise impacts	This section (page 73) outlines that potential Noise Sensitive Receptors (NSRs) within 1.5 kilometres of the preferred corridor will be identified. It also notes that NSRs may include hunting/fishing/trapping cabins	No	Unable to categorize risk as may be site specific and based on the concern of individual tourism business owners	Please confirm if hunting/fishing/trapping cabins is intended to capture commercial tourism accommodation facilities.	Given that minimizing noise may be important for remote tourism businesses, capturing key tourism-related NSRs (i.e. facilities)

<sup>&</sup>lt;sup>1</sup> effects in this context means changes to the environment or to health, social or economic conditions and the positive and negative consequences of these changes.

					Some additional rationale for why a 1.5 kilometre area was chosen would be helpful.	should be considered, in consultation with relevant businesses, even if their facilities may be located beyond 1.5 kilometres from the preferred corridor
MTCS-02	Section 15.2.2.2 – Wildlife and Wildlife Habitat: Proposed Baseline Studies	Table 15-3 on page 87 outlines data collection methods and data applicability for a variety of wildlife species including moose and black bear, which are important species for the tourism sector.	No	1 (No effect anticipated)	It is recommended that tourism operators be considered as a potential source for data collection.	Tourism operators have insight from their experiences (and those of their clients) on moose and bear populations in the area of their businesses.
MTCS-03	Section 23.2.1 - Socio- Economic Environment: Potential Effects	Page 142 lists a number of potential project-related effects         on the local and regional economy, during the road         construction and operation phases, including changes in         labour force participation and unemployment and changes in         income levels.	No	Unable to categorize risk. Potential to be a 3 (Anticipated residual effect may be detectable, but is negligible, after application of well- understood mitigation measures) but would depend on any potential mitigation that might be applied	Consideration should be given to how the project may affect other sectors in the local and regional economy, including tourism. The area is currently remote so potential impacts to the remote tourism sector from developing a road should be monitored.	We note in Section 23.2.2 – Socio- Economic Environment: Preliminary Proposed Mitigation, the intent to work with government authorities, local communities and business owners to develop a local and regional strategy that addresses changes to outdoor recreation use. If this covers commercial tourism uses, that is positive and could be an avenue by which potential impacts to tourism could be considered and addressed.

Comment ID	Document Reference	Context and Background	Instru
<b>Example</b> : TC-01	<b>Example:</b> Initial Project Description Part D, section 17 Pg. 11	<b>Example:</b> The proponent has identified the Navigation Protection Act under the list of federal powers, duties, or function; however, the section appears to be consistent with changes to the legislation introduced in 2019.	<b>Example:</b> In 2019, the Navigation Protection Act was amended and rend is used.
MTCS-01		The Initial Project Description makes several references to tourism and tourism-related activities. It recognizes the interests of outfitters and fishing and hunting camps, among others. We appreciate the acknowledgment of their interests as important stakeholders.	
		Appendix B contains lists about a dozen commercial tourism businesses that were provided a Notice of Commencement for the project Terms of Reference (ToR). Appendix C (Table C-2) outlines that each of these, along with an additional outfitter, were sent additional pieces of project-related correspondence including:	
		<ul> <li>ToR Notice of Commencement follow up letter (July 2021)</li> <li>Notice of first public open house (August 2021)</li> <li>Notice of draft ToR (November 2021)</li> <li>Notice of second open house (February 2022)</li> </ul>	
		While only one of the outfitters appeared to respond to any of these, the notification is important for keeping them aware of any project updates. Individual tourism businesses are in the best position to outline any specific concerns or considerations they may have related to the project and we encourage the proponents to continue send them project-related information.	None – general comment
		At a more strategic level, many of the businesses listed in Appendices B and C are remote in nature (i.e. fly-in). Ontario is home to a large, remote fly-in tourism sector and it is an important component of the tourism industry in the north. As such, the maintenance of remoteness in the area of the road project will be important.	
		There is reference to controlling access beyond the main road in the IPD. However, remoteness involves more than just a mode of access. Limited noise and maintenance of scenic viewscapes add to the value of remoteness among users and may also be important to tourism businesses in the area. More specific comments on these, and other IPD components, are outlined in the table above.	

# Table 2: General and editorial comments - include comments such as formatting, layout or grammar

Please insert additional rows as necessary.

## ructions to Proponent

enamed the Canadian Navigable Waters Act please ensure that the correct title