

ATTACHMENT: May 8, 2023
Federal Authority Advice Record

Response due by June 7, 2023

De Havilland Field Project, 2150038 Alberta Inc.

Agency File: 84552

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1. Is it probable that your department or agency may be required to exercise a power or perform a duty or function related to the Project to enable it to proceed?

If yes, specify the Act of Parliament and that power, duty or function.

ECCC does not expect that it will be required to exercise a power or perform a duty or function related to the Project to enable it to proceed. Once the scope of the project and of the assessment are established by the Agency, this may change as additional activities or Project components could come into scope. Please note the following requirements that may apply to this Project:

Species at Risk Act permits

For species listed in Schedule 1 of the *Species at Risk Act (SARA)* as Extirpated, Endangered or Threatened, a permit may be required from ECCC (section 73 of SARA) for activities that affect a listed terrestrial wildlife species, the residences of its individuals or any part of its critical habitat, where those prohibitions are in place. Such permits may only be issued: if all reasonable alternatives to the activity that would reduce the impact on the species have been considered and the best solution has been adopted; all feasible measures will be taken to minimize the impact of the activity on the species, the residences of its individuals, or its critical habitat; and if the activity will not jeopardize the survival or recovery of the species

Prohibitions are in place for individuals and residences on federal lands in a province, reserve or any other lands under the *Indian Act*, or lands under the authority of the Minister of the Environment, and for birds listed under the *Migratory Birds Convention Act, 1994* wherever they occur regardless of land tenure.

Furthermore, prohibitions may be in force on land other than federal land pursuant to other orders or regulations under SARA. It is possible that additional prohibitions may come into

force in the future through orders in Council for individuals, residences and critical habitat on non-federal lands and / or through a ministerial order for critical habitat on federal lands. It is also possible that, over the course of the assessment or after the assessment, additional species could be listed under SARA; permits may be required for Project activities that affect these additional species. Proponents are advised to monitor for such developments on the SARA Registry <https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry.html>.

ECCC will require detailed information on the potential effects of the Project, including locations and/or occurrences of species at risk, their use of habitat and critical habitat within the Project area, and specific effects on federal land, before ECCC can determine whether a SARA permit is required.

Migratory Birds Convention Act permits

The *Migratory Birds Regulations, 2022* (MBR 2022) protect migratory birds, their eggs and their nests, by prohibiting activities that may harm them. Unless a person has a permit or the regulations authorize it, it is prohibited to engage in the following activities:

- Capturing, killing, taking, injuring or harassing a migratory bird or attempting to do so;
- Destroying, taking or disturbing an egg; and
- Damaging, destroying, removing or disturbing a nest, nest shelter, eider duck shelter or duck nesting box, unless the following exceptions apply:
 - The nest does not contain a live migratory bird or a viable egg; and,
 - The nest was not built by a species listed in Schedule 1.

Modernization of the MBCA in 2022 has additionally identified 18 species of birds whose nests are protected year round (Schedule 1 of MBR 2022). The nests of species listed in Schedule 1 are protected at all times, unless the following conditions are met:

- Notification of the unoccupied nest has been submitted/received through the Registry for Abandoned Nests; and,
- The waiting time designated in the regulations has passed, during which time the nest has not been occupied by a migratory bird.

In some situations, it may be possible to obtain a permit to move or destroy an unoccupied nest of a Schedule 1 species. For more information, please visit:

<https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds.html>

1b. Please describe any Indigenous or public consultation that will be undertaken in relation to the exercise of that power, duty or function, including when it would take place.

ECCC does not expect to exercise any powers or perform a duty or function under any Act of Parliament in relation to the Project that will involve public and Indigenous consultation. If SARA or Migratory Birds permits are required public and Indigenous Consultations would be part of the process.

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2. Is your department or agency in possession of specialist or expert information or knowledge that may be relevant to the conduct of an impact assessment of the Project?

Specify the specialist or expert information or knowledge.

ECCC has specialist or expert information that may be relevant to the impact assessment in the areas listed below; in each of these subject areas we have expertise related to establishing an adequate baseline, assessing potential effects to biophysical valued components, the effectiveness of mitigation measures, methods for monitoring and follow-up, as well as information regarding federal policies, standards, and regulations that may be relevant to the assessment. Once the scope of the Project and of the assessment are established by the Agency, this list may change if additional Project activities or components should come into scope.

Air quality: ambient air quality; sources of emissions; emissions estimation and measurement; atmospheric transport, transformation and dispersion modelling; and follow-up monitoring.

Greenhouse gas emissions and climate change: estimations of greenhouse gas (GHG) emissions (net and upstream); impact on carbon sinks; GHG mitigation measures and determination of Best Available Technologies/Best Environmental practices (BAT/BEP); credible plan to achieve net-zero GHG emissions by 2050; climate change science to inform evaluation of potential changes to the environment and Project resilience to effects of climate change; climate change policies; and national GHG Projections.

Water quality and quantity: surface water quality; contamination sources for surface water and groundwater, including effluent; wastewater; water quality predictions and modelling; seepage and runoff effects; management of contaminated soils or sediments; hydrology (streamflow rates data and modelling, flooding and extreme events management, drainage control, water levels, water balances); geochemistry; cumulative effects and follow-up and monitoring.

Wildlife, species at risk, and habitat: migratory birds, their nests, eggs, and habitat under authority of the Migratory Birds Convention Act 1994; species assessed by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC); species at risk (under the Species at Risk Act), individuals, their residences, habitat and critical habitat including recovery strategies, action plans and management plans under ECCC's mandate; ecological function of wetlands; and ecotoxicology.

Environmental emergencies: emergency management planning and guidance, including where the release of hazardous substances could affect species at risk and/or migratory birds; atmospheric transport and dispersion modelling of contaminants in air; fate and behaviour; and hydrologic trajectory modelling of contaminants in water.

Climate and meteorology: long-term climate patterns and norms and weather.

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3. Has your department or agency considered the Project; exercised a power or performed a duty or function under any Act of Parliament in relation to the Project; or taken any course of action that would allow the Project to proceed in whole or in part?

Specify.

ECCC has not considered, exercised a power or performed a duty, or taken any course of action as part of the Project.

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4. Has your department or agency had previous contact or involvement with the proponent or other party in relation to the Project? (for example: an enquiry about methodology, guidance, or data; introduction to the project)

Provide an overview of the information or advice exchanged.

Based on information readily available ECCC has not had any direct involvement with the Proponent or other parties that would be relevant to the assessment of this Project. ECCC Prairie and Northern Region has not been in contact with the Proponent regarding permitting or authorizations for the Project.

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5. Does your department or agency have additional information or knowledge not specified, above, including information on the geographic, environmental, economic or social context of the project? (e.g. location of protected or sensitive areas, previous history between local communities and proponent or similar projects, local or regional social or economic concerns)?

Specify as appropriate.

Not at this time.

6. What are the key issues likely to be relevant to the public interest decision, based on the mandate and area(s) of expertise of your department, and which should be addressed in an impact assessment of the Project, should the Agency determine that one is required?

For each key issue:

- Describe the effect or the nature of the issue, including any relevant context;
- Provide the rationale and/or evidence for why it is a key issue;
- Identify briefly solutions to the issue, including any information or studies that should be required in the Tailored Impact Statement Guidelines, potential mitigation measures, and/or regulatory requirements relevant to the issue;
- Provide a concise, plain-language summary of the issue for inclusion in the Summary of Issues.

The information provided will be used by the Agency to determine if and an impact assessment is required and where appropriate to develop project-specific draft Tailored Impact Statement Guidelines that focus on the key issues likely to be relevant to the public interest decision.

Please use table 1 to respond to this question

7. Where possible, identify any clarifications or additional information the Proponent could include in the Detailed Project Description or in the response to the Summary of Issues that would:

- give confidence that an issue or effect could be addressed and managed;
- inform the decision as to whether an impact assessment is required; or
- aid in tailoring the Impact Statement Guidelines, if an impact assessment is required.

These clarifications and additional information will be included as specific questions in the Summary of Issues provided to the proponent

Please use table 2 to respond to this question

Andrea McLandress

Name of Departmental / Agency
Responder

Regional Director, Environmental
Protection and Operations Directorate,
Prairie and Northern Region

Title of Responder

June 7, 2023

Date

Table 1: Key Issues to inform decision-making

The Agency asks that federal authorities align expert advice with the Agency’s approach to tailoring, which focuses on key issues or effects that are likely to be relevant to the public interest decision. In identifying key issues, federal authorities should be mindful of the Project’s context (size, scope, location), Indigenous knowledge and perspectives, and public concerns. Key issues that may be relevant to the public interest decision include:

- effects that may be significant, based on federal experts’ knowledge and experience with past projects;
- effects that may impact Indigenous peoples and their rights, based on Indigenous knowledge and perspectives or experience with past projects;
- effects on key species or habitats (e.g. at risk, important to Indigenous communities, commercial importance, provide important ecosystem function);
- issues or effects that may result from novel project activities, components or technology;
- effects with large uncertainties, including in the effectiveness of mitigation measures;
- transboundary effects where mitigation measures are limited;
- positive effects, including where project may support other governmental priorities, including reconciliation with Indigenous peoples; and
- key concerns raised by Indigenous or local communities.

Effects that are anticipated to be minor or which can be managed using well understood mitigation measures, existing guidance, and/or other regulatory processes may have simplified information requirements or may be removed entirely. Measured advice from federal authorities on key issues and solutions —and on the scope and detail of any required information and studies — will enable the Agency to focus assessments on issues that are important to participants and to decision-makers.

Comment ID	Valued Component or Factor to Consider	Description of Key Issue (Context and Rationale)	Solutions	Plain language summary for inclusion in Summary of Issues
<p><i>Please identify comments by organization and comment number.</i></p> <p><i>e.g.: IAAC-01</i></p>	<p><i>Identify valued component(s) or factor to consider—within the mandate of your department or agency—to which the effect or issue applies.</i></p>	<p><i>Provide a brief description of the issue and rationale for being a key issue.</i></p> <p><i>Include, where relevant,:</i></p> <ul style="list-style-type: none"> • <i>the pathway of effects;</i> • <i>social, economic or environmental context which are relevant to it being a key issue;</i> • <i>key uncertainties that should be addressed in the impact assessment;</i> • <i>Indigenous or public concerns or perspective;</i> • <i>potential for differential effects among diverse subgroups;</i> • <i>scientific evidence or traditional knowledge, including from past project experience, which supports inclusion as a key issue.</i> 	<p><i>Where applicable, briefly identify solutions to address the potential issue or effects including</i></p> <ul style="list-style-type: none"> • <i>Information or studies required to describe and characterize the effect, should an impact assessment be required; including any guidance for data collection and/or analysis or existing data sources to inform the assessment;</i> • <i>Any powers, duties or functions that your department or agency has that may mitigate, manage, or set conditions related to the effect;</i> • <i>Guidance or policies for mitigating effects or any standard and well-understood mitigation measures that would address the effect, including follow-up monitoring activities; and/or</i> • <i>Commitments the proponent could make to respond to the issue.</i> <p><i>Where available, please refer to existing text in the TISG template.</i></p>	<p><i>For issues to be included in the Summary of Issues, provide a concise, plain language synopsis of the key issue and any questions or directions for the proponent.</i></p>
<p><u>ECCC-T1-01</u></p>	<p><u>Air quality</u></p>	<p>The construction, operation and decommissioning of the Project can result in adverse effects on air quality. Activities associated with combustion (including transportation and jet engine testing) can result in the emission of contaminants such as sulfur oxides (SO_x), nitrogen oxides (NO_x), volatile organic compounds (VOCs), and particulate matter (PM_{2.5}, PM₁₀ and PM). Activities which cause a physical disturbance to land, such as tree clearing, grubbing, topsoil stripping, stockpiling, earth excavation, site grading, general construction, and</p>	<p>Uncertainties with the emission estimates are expected to decrease as more detailed engineering work is provided. A commonly employed and useful tool for estimating air quality impacts is the use of air dispersion models such as CALPUFF. These models may be run economically at high spatial resolution, and the outputs will aid in assessment of the magnitude of the Project’s air quality impacts, over acute and chronic time scales.</p>	<p>The Proponent should use an air dispersion model such as CALPUFF to provide more details on likely air contaminant pathways and concentrations, and to allow for an improved assessment of air quality impacts.</p>

		<p>transportation, can also introduce particulate matter (e.g., dust and soot) to the surrounding region. The emission of these air contaminants can result in local or regional degradation of ambient air quality, with potential impacts on sensitive ecosystem receptors.</p> <p>Furthermore, emissions of air contaminants as a result of this Project may add cumulatively to the emissions from other activities, contributing to degradation of air quality in the region.</p> <p>When contaminants settle out of the air in the surrounding environment, their deposition may result in adverse impacts to terrestrial and aquatic ecosystems. For example, emissions of NO_x and SO₂ may lead to acidification and potential exceedance of ecosystems' critical loads. Air contaminant emissions can result in contamination of nearby land and waterbodies and may affect sensitive ecosystem receptors.</p>		
<u>ECCC-T1-02</u>	<u>Air Quality</u>	<p>Projects which involve on-road vehicles and mobile off-road machines for construction, operation and decommissioning, or that lead to an increase in road traffic, have the potential to adversely affect air quality. More specifically, the combustion of fossil fuels can result in the emission of air contaminants such as sulfur oxides (SO_x), nitrogen oxides (NO_x), volatile organic compounds (VOCs), and fine particulate matter (PM_{2.5}). When some contaminants settle out of the air in the surrounding environment, their deposition may result in acidification and potential exceedance of ecosystems' critical loads. The emission of these air pollutants can result in local or regional degradation of ambient air quality, with potential impacts on sensitive ecosystem receptors.</p>	<p>The Proponent stated they may be using dozers, graders, excavators, trucks, generators, and cranes outfitted with combustion engines. The combustion of fossil fuels can result in the deposition of contaminants such as sulfur oxides (SO_x), nitrogen oxides (NO_x), volatile organic compounds (VOCs), and fine particulate matter (PM_{2.5}) in the air which can degrade local and regional ambient air quality. The Proponent should consider the use of equipment outfitted with engines meeting Tier 4 emission standards to mitigate air quality impacts.</p>	<p>The use of equipment with engines that meet Tier 4 emission standards will assist in mitigating the air quality impacts of the Project.</p>
<u>ECCC-T1-03</u>	<u>Greenhouse Gas Emissions and Climate Change</u>	<p>Canada's environmental obligations and climate change commitments include the Paris Agreement, the 2030 Emissions Reduction Plan and the Net-Zero Accountability Act. Canada's emissions reduction target is 40 to 45 percent below 2005 levels by 2030 and to achieve net-zero emissions by 2050.</p>	<p>The Strategic Assessment of Climate Change (SACC) provides guidance related to climate change throughout the impact assessment process. Should the Project be subject to an impact assessment under the IAA, the SACC would apply. The SACC outlines information that the Proponent should provide during the impact assessment process on GHG emissions, impacts of the Project on carbon sinks, impacts of the Project on federal emissions reduction efforts and on global GHG emissions, GHG mitigation measures and climate change resilience; the circumstances in which an upstream GHG assessment would be required; and the circumstances in which a credible plan to achieve net-zero emissions by 2050 will be required.</p>	<p>Should the Project be subject to an impact assessment under the IAA, the SACC would apply. The Project's GHG emissions and climate change impacts should be</p>

		<p>Canada's updated Aviation Climate Action Plan sets an ambitious net-zero by 2050 vision for the sector, an aspirational target for the use of sustainable aviation fuel by 2030, along with key actions the government and the aviation sector will take to achieve this vision. More details are provided in Canada's Aviation Climate Action Plan</p> <p>The Government of Canada is also taking action to reduce greenhouse gas (GHG) emissions from the generation of electricity to achieve a net-zero electricity supply by 2035.</p> <p>The construction, operation, and decommissioning of the proposed Project may result in greenhouse gas (GHG) emissions, and/or impacts to carbon sinks, and may hinder or contribute to the Government of Canada's ability to meet its commitments in respect of climate change.</p> <p>The operation phase is expected to last until 2127; the Proponent did not make a commitment to be net-zero by 2050 for any activity that goes beyond 2050.</p>	<p>More details are provided in the draft Technical Guide Related to the Strategic Assessment of Climate Change: Guidance on quantification of net GHG emissions, impact on carbon sinks, mitigation measures, net-zero plan and upstream GHG assessment published in August 2021.</p>	<p>assessed consistently so that GHG emissions are mitigated, and the Project Proponent has a plan to achieve net-zero emissions by 2050 as it is expected that the Project's lifetime will go beyond 2050.</p>
ECCC-T1-04	<u>Climate Change Resilience</u>	<p>The Initial Project Description does not anticipate decommissioning or abandonment of the proposed Project. Climate over the lifetime of the Project is thus likely to be different from past and current climate in the Project area. Given these projected changes in future climate, climate change considerations are relevant to the Project review.</p> <p>Baseline conditions may be altered due to climate changes in the Project area such as possible changes in mean and extreme precipitation and temperature, along with related environmental conditions. These changes can have implications for climate sensitive aspects of Project design such as water management infrastructure. The Proponent should identify where there is potential for climate change to affect the Project which, in turn, may have impacts on the surrounding environment (e.g. through accidents or malfunctions).</p>	<p>The Strategic Assessment of Climate Change (SACC) (published in 2020) provides guidance related to climate change throughout the impact assessment process. Should the Project be subject to an impact assessment under the IAA, the SACC would apply. The SACC outlines information that the Proponent should provide during the impact assessment process related to climate change resilience.</p> <p>If the Proponent is required to prepare an Impact Statement, further information would be required through the Tailored Impact Statement Guidelines (TISG) on how the Project is resilient to, and at risk from, the current and future impacts of a changing climate.</p> <p>More details are provided in the "Draft technical guide related to the Strategic Assessment of Climate Change: Assessing climate change resilience" published in March 2022.</p> <p>Links:</p> <p>"Strategic Assessment of Climate Change" https://www.strategicassessmentclimatechange.ca/</p> <p>"Draft technical guide related to the Strategic Assessment of Climate Change: Assessing climate change resilience" https://www.strategicassessmentclimatechange.ca/28896/widgets/117114/documents/77106</p>	<p>The Project's resilience to future climate change should be described and, where relevant, considered in the Project design.</p>

ECCC-T1-05	<u>Water Quality</u>	<p>The activities linked to the construction, operation, and decommissioning of the Project can have adverse effects on the quality of groundwater and surface water, as well as on the hydrological regimes of watercourses and water bodies. The Project could include the following activities: dewatering, constructing and maintaining access roads, excavating or reworking of soils, sediments or rocks. These activities could result in adverse effects to water quality through the release of suspended solids and other contaminants to surrounding waters through erosion, sedimentation or runoff processes. These suspended solids can have adverse effects on water quality.</p> <p>Contaminants may be introduced into waterbodies through stormwater runoff, wastewater discharge, groundwater resurgence, or spills resulting in adverse effects on water quality. Contaminants may enter the environment through accidental release (e.g., seepage, overflow) of wastewater pond contents, resulting in adverse effects on groundwater and surface water quality.</p> <p>The deposition of airborne particulate matter generated by the Project could also be a source of surface water contamination. Adverse effects to water quality could, in turn, result in adverse effects to sensitive ecosystem receptors.</p>	<p>The federal minister of Environment and Climate Change is responsible for the administration (including the enforcement) of the pollution prevention provisions of the <i>Fisheries Act</i>, subsection 36(3), which states, unless otherwise authorized by regulations meeting specific criteria, “no person shall deposit or permit the deposit of a deleterious substance of any type in water frequented by fish or in any place under any conditions where the deleterious substance or any other deleterious substance that results from the deposit of the deleterious substance may enter any such water”. A deposit of a deleterious substance is only authorized pursuant to, and in a manner consistent with, a <i>Fisheries Act</i> regulation or by a regulation under other federal legislation. Deleterious substances can be any substance that, if added to any water would degrade or alter the water quality such that it could be directly or indirectly harmful to fish, fish habitat, or the use of fish by humans. This includes any substance with a potentially harmful chemical (e.g. acutely lethal), physical (e.g. water temperature), or biological effect (e.g. deformities) on fish or fish habitat. Compliance with the terms and conditions of provincial regulatory or permitting systems does not absolve the Proponent from responsibility to comply with the requirements of the <i>Fisheries Act</i> or other federal legislation.</p>	<p>It is the Proponent's responsibility to be aware of its obligations under the <i>Fisheries Act</i> and its regulations.</p>
ECCC-T1-06	<u>Wildlife, species at risk, and habitat</u>	<p>Project affected wetlands may provide suitable habitat for Northern Leopard Frog and Western Tiger Salamander (listed under the <i>Species at Risk Act</i> as a species of Special Concern). The Proponent stated that no rare amphibian or mammal species were identified during the field assessment. ECCC is unable to corroborate the Proponents' findings without the provision of survey methods and timing.</p> <p>The activities linked to the construction, operation, and decommissioning of the Project and associated infrastructure</p>	<p>The Initial Project Description states that no rare amphibian or mammal species were identified within the affected wetlands during the field assessment. ECCC requires the amphibian survey methodology and timing in order to verify the statement and adequately assess any potential impacts to Northern Leopard Frog and Western Tiger Salamander. If Northern Leopard Frog or Western Tiger Salamander are present in the Project area, the Proponent should provide detailed mitigation measures for any anticipated impacts.</p>	<p>Provide the amphibian survey methodology and timing and detail appropriate mitigation measures for any potential impacts to Northern Leopard Frog and Western Tiger Salamander.</p>

		<p>could have negative effects on terrestrial wildlife, migratory birds and species at risk (e.g. amphibians, arthropods, birds, lichens, terrestrial mammals, mosses, reptiles, and vascular plants) listed on the <i>Species at Risk Act</i> (SARA), and their habitat (e.g. wetlands) and critical habitat.</p> <p>The nature of effects to wildlife and habitat (including residences and critical habitat defined under the SARA) can vary based on a number of factors, including: project location, duration, scale, and configuration; ancillary project activities (e.g., land clearing); existing cumulative effects; the type of habitat that may be disturbed; and sensitivity of species found in the project area.</p> <p>The pathway through which potential effects are conveyed will depend on the land, air, and water constituents associated with the site along with the behavioral adaptability, presence and interaction with the species limiting factor (e.g. habitat supporting staging, nesting, roosting or foraging) and population resilience.</p>		
<u>ECCC-T1-07</u>	<u>Migratory birds and species at risk and their habitat</u>	<p>The 2.2 kilometer long stormwater management facility may be attractive to breeding and staging migratory birds if the facility retains water during the spring, summer and fall period. Large numbers of staging waterfowl could pose a hazard to air navigation. Additionally, birds that land on and/or frequent stormwater ponds and amphibians who breed in stormwater ponds have the potential to come into contact with water that contains sediments or other potentially toxic pollutants collected during runoff which can result in on and offsite mortality.</p>	<p>Migratory Birds Convention Act:</p> <ul style="list-style-type: none"> • 5.1 (1) No person or vessel shall deposit a substance that is harmful to migratory birds, or permit such a substance to be deposited, in waters or an area frequented by migratory birds or in a place from which the substance may enter such waters or such an area. • (2) No person or vessel shall deposit a substance or permit a substance to be deposited in any place if the substance, in combination with one or more substances, results in a substance — in waters or an area frequented by migratory birds or in a place from which it may enter such waters or such an area — that is harmful to migratory birds. <p>The stormwater facilities as designed may be attractive to breeding and staging migratory birds and have the potential to cause harm to these birds if the stormwater facilities contain contaminants collected during runoff. The Proponent should ensure the stormwater facility reduces the retention of water as much as possible and should use deterrents or other measures to discourage stormwater facility use by migratory birds.</p>	The Proponent should include the use of deterrents and water level management at the stormwater facilities to discourage their use by migratory birds.
<u>ECCC-T1-08</u>	<u>Wetlands</u>	<p>The activities linked to the construction, operation, and decommissioning of the Project will have negative effects on wetlands and their ecological functions. The loss and modification of wetlands is likely</p>	<p>It is understood that the Proponent has committed to implementing the Alberta Wetland Policy (GOA 2013) to mitigate potential effects to wetlands (i.e., permanent wetland loss). In line with the AWP, the Proponent is expected to provide an analysis of the in lieu fee required to mitigate the removal of temporary wetlands, based on the wetland's relative value score, for construction, restoration or enhancement of a wetland within the same watershed, to AEPA.</p>	The Proponent should provide additional information on what mitigation measures will be

		to have adverse effects on migratory birds and species at risk that use these areas for breeding, foraging, resting and migration.	<p>Prior to considering the requirements for offsetting/in-lieu fees, the Proponent should follow and document how the mitigation hierarchy was applied: beginning by applying all possible avoidance measures to reduce potential adverse effects caused by the Project; then applying all possible minimization measures to reduce potential adverse effects further and applying all possible restore on-site measures to reduce potential adverse effects even further. The Proponent should demonstrate prioritization of restoration of drained or altered naturally occurring wetlands of the same type and function as those impacted. Restored wetlands are preferred over enhanced wetlands, both of which are preferred over newly created wetlands.</p> <p>The Proponent should also consider compensating lost wetland functions with preference for those in the same watershed from which they were lost, and the next preference is for those in the same ecosystem from which they were lost. The Proponent should also incorporate compensation measures to minimize the time lag in availability of habitat and functions between when the adverse effects occur to when they have been fully replaced.</p>	taken to offset permanent wetland loss due to the construction of the Project.
<u>ECCC-T1-09</u>	<u>Environmental Emergencies</u>	The Project includes a stormwater pond, a fueling area, potential above ground storage tanks and natural gas. As such, there is potential for adverse environmental effects from accidents and malfunctions, such as fuel spills and fire hazards. Adverse effects to air quality, water quality, wildlife and wildlife habitat could result from the accidental release of high concentrations of contaminants to surrounding waters. Optimized spill prevention, preparedness and response measures and systems will be important given the risk of spills of hazardous substances to the environment, especially to nearby waterways and environmentally sensitive areas.	Part 8 of the <i>Canadian Environmental Protection Act, 1999</i> (CEPA 1999) on environmental emergencies (sections 193 to 205) addresses the prevention of, preparedness for, response to and recovery from environmental emergencies caused by uncontrolled, unplanned or accidental releases. The Proponent will need to adhere to this act when developing an emergency preparedness plan. It also addresses the reduction of any foreseeable likelihood of releases of toxic or other hazardous substances listed in Schedule 1 of the <i>Environmental Emergency Regulations</i> . This Act may apply if Schedule 1 substances onsite meet or exceed the threshold to be regulated under CEPA 1999.	The Proponent will be required to submit a emergency preparedness plan to indicate that they are following all the regulations required under part 8 of CEPA 1999 on environmental emergencies (sections 193 to 205)..The Proponent should also follow all storage limits and regulations within the Act.

Please insert additional rows as necessary.

Table 2. Clarifications or additional information the Proponent could include in the Detailed Project Description or in the response to Summary of Issues

Comment ID	Relevant section of the Initial Project Description	Description of Issue, Concern or Uncertainty	Clarification or additional information	Plain language summary for inclusion in Summary of Issues
<p>Please identify comments by organization and comment number.</p> <p>e.g.: IAAC-01</p>	<p>If the comment is related to a specific section of the Initial Project Description, please provide a reference.</p> <p>You may also choose to copy the relevant text here.</p>	<p>Provide a description of the issue, concern or uncertainty the proponent could address in their detailed project description that would give confidence that the issue will be addressed and managed, or which could aid in tailoring the Guidelines</p>	<p>Provide recommended clarification or additional information to be included in the Detailed Project Description to address the issue, concern or uncertainty, for example</p> <ul style="list-style-type: none"> • Clarifications to project description (e.g. components, activities, locations or alternatives); • Project design changes that could avoid effects; • Evidence that could be presented to demonstrate there is no effect pathway or that effects will be negligible; • Evidence that standard mitigations will address potential effects; • Commitments the proponent could make to respond to the issue, including the implementation of federal operational policies or guidance documents. 	<p>For issues to be included in the Summary of Issues, provide a concise, plain language synopsis of the issue and of the question or direction for the proponent.</p>
ECCC-T2-01	Appendix I Table 15	<p>The values for years 2039, 2040, 2041, and 2042-2127 should be confirmed. For example the annual CO2 emissions for 2039 for Building Heating is 4,127 tCO2 but the total emissions from Building Heating are 2,551 tCO2e with CH4 and N2O added.</p> <p>Furthermore, there is no explanation as to why the Building Electricity Consumption for 2042-2127 is higher than other years. It is assumed that these values are still annual emission values, hence the reason behind the increase during 2042-2127 is unclear.</p>	The Proponent should verify that the GHG emissions in Appendix I, Table 15 are accurate.	The Proponent should verify that the GHG emissions in Appendix I, Table 15 are accurate.
ECCC-T2-02	Initial Project Description, Section 23.0 and Section 24.3 Appendix I	<p>The Proponent estimates emissions beyond 2050 to be 18,184 t CO2e / year until 2127 (Section 23.0 and Appendix I).</p> <p>Additionally, the Proponent listed proposed mitigation measures for air emissions that would also affect the proposed Project's GHG emissions (Section 24.3).</p>	The Detailed Project Description should include information on how these mitigation measures, and other future mitigation measures, may reduce the Project's GHG emissions. Further, the Project lifetime is expected to extend beyond 2050 with the operations phase continuing up to 2127. If the Project is subject to an impact assessment, the Proponent should proactively prepare a net-zero plan for any activities beyond 2050 and consider other mitigation measures to further reduce the Project's GHG emissions.	The Proponent should proactively consider mitigation measures to further reduce the Project's GHG emissions and prepare a net-zero plan for any activities beyond 2050 if the Project is subject to an impact assessment.
ECCC-T2-03	Appendix I Table 14	<p>Table 14 and the equation below it describes the "One-time emissions" due to loss of carbon from a disturbance such as wetland clearing. However, the value is shown as an annual value of 1,594 tonnes / year of CO2 Emissions.</p> <p>It is also unclear if this is only a partial estimate of the carbon sink impact, as it is described as a "sample".</p>	It is recommended that the Proponent verify if the unit is meant to represent a one-time emission and fix or clarify the unit for this one-time emission. The Proponent should also clarify whether this estimate accounts for the entirety of the carbon sink impact.	The Proponent should check the unit and fix or clarify it. The Proponent should also clarify what the estimate includes.
ECCC-T2-04	Appendix I Table 15	Table 15 note (f) mentioned that the decommissioning phase will be similar to the construction phase without any clarifying details on emissions estimates, however the Initial Project Description does not anticipate decommissioning or abandonment of the proposed Project.	The Proponent should confirm if there will be a decommissioning phase for the proposed Project, and either provide an emissions estimate for the decommissioning phase, as done with the construction and the operation phase, or ensure that Table 15 reflects the lack of a decommissioning phase. Further information on emissions estimates are available on the SACC Technical Guide.	The Proponent should confirm if there will be a decommissioning phase and either provide an emissions estimate for the decommissioning phase or ensure that Table 15 does not reference a decommissioning phase.

Please insert additional rows as necessary.