Federal Authority Advice Record (FAAR)
FAAR Response must be submitted by May 26, 2025
York Factory First Nation Ten Shilling Aerodrome Project – York Factory First Nation
Registry File: 89488

Department/Agency	Environment and Climate Change Canada
Lead Contact	Leah Dirk, Acting EA Officer
Full Address	11 Innovation Blvd Saskatoon, SK S7N 3H5
Email	Leah.Dirk@ec.gc.ca EASouthPNR@ec.gc.ca
Telephone	(306) 514-2363
Alternate Contact	EASouthPNR@ec.gc.ca

---

1. a) 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 or its critical habitat or the residences of its individuals; and if the activity will not jeopardize the survival or recovery of the species.

   SARA 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 further 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 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.

b) 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.

c) Indicate if the power, duty or function will be required **to construct** the project. Please choose from Required, Potential, Likely, Unlikely, or Not Required as appropriate

It is unlikely that a power, duty or function will be required to construct the Project.

---

2. Is your department or agency in possession of specialist or expert information or knowledge in its area of expertise 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, 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 (Note: ECCC does not assess proposed projects for regulatory compliance, but instead provides technical input to the Agency to inform 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; cumulative effects; effectiveness of mitigation measures; and follow-up monitoring.

Greenhouse gas emissions and climate change: estimations of greenhouse gas (GHG) emissions (net and upstream); carbon sinks; GHG mitigation measures and determination of Best Available Technologies/Best Environmental practices (BAT/BEP); credible plans 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 SARA, 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: Environmental emergency management planning advice and guidance related to potential accidents and malfunctions involving unplanned or uncontrolled releases or spills of hazardous substances into the environment, including scenarios where such releases could result in non-negligeable adverse environmental effects within ECCC's mandate. These effects include impacts to air quality, water quality, species at risk, fish and fish habitat, migratory birds, or changes to the environment resulting in non-negligible adverse impacts to Indigenous Peoples of Canada. Additionally, Environmental Emergencies coordinates expert review of atmospheric transport and dispersion modelling of airborne contaminants, the fate and behaviour of contaminants, and hydrologic trajectory modelling of contaminants in water.

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

Open Science Data Platform (OSDP)

The Open Science Data Platform (OSDP) provides information relevant to cumulative effects and development activities across Canada and is publicly available at the following website: https://osdp-psdo.canada.ca/dp/en. More specifically, the platform provides a single window to access data and scientific knowledge relevant to understanding cumulative effects from existing federal, provincial, and territorial on-line databases and registries, including publications from the federal government and its scientists. It provides an interactive geospatial mapping tool to enable mapping of multiple datasets from multiple sources. It offers various features, including keyword-based searching, interactive data visualization on maps, and educational resources covering key topics such as cumulative effects, water, air, climate, biodiversity, land, economy and industry, health, and society and culture.

OSDP information may be of value to persons preparing and reviewing projects assessments, including cumulative effects assessments. The following are some examples of ECCC information available on the OSDP.

Water – quality and quantity

- National long-term water quality monitoring data
- Real-time hydrometric data
- Canadian Aquatic Biomonitoring Network (CABIN)
- National Pollutant Release Inventory (NPRI)
  - Facilities that reported releases to water
- Find additional water-related resources (including publications, datasets and monitoring stations) from ECCC on the OSDP here.

Biodiversity (e.g., birds, species at risk, wetlands)

- Critical habitat for species at risk (terrestrial)
- Range map extents – Species at risk
- Canadian wetlands
- Canadian Protected and Conserved Areas Database (CPCAD)
- Canadian Breeding Bird Census plots
- Priority places for species at risk
- Find additional biodiversity-related resources (including publications, datasets and monitoring stations) from ECCC on the OSDP here.

Air Quality

- National Pollutant Release Inventory (NPRI), including:
  - Facilities that reported release of criteria air contaminants
- Canadian Environmental Sustainability Indicators (CESI), including
  - Average ambient fine particulate matter concentrations
  - Peak ambient ozone concentrations
  - Ambient volatile organic compound concentrations
  - Average ambient sulphur dioxide concentrations
  - Peak ambient nitrogen dioxide concentrations
- Find additional air-related resources (including publications, datasets and monitoring stations) from ECCC on the OSDP here.

Climate, including climate change

- Hourly and daily climate observations
- Monthly climate observation summaries
- Climate normals, averages and extremes 1981-2020
- Climate data: homogenized surface air temperature data
- Homogenized Precipitation
- Find additional climate-related resources (including publications, datasets and monitoring stations) from ECCC on the OSDP here.

Beyond ECCC's mandate, the OSDP also contains resources on topics led by departments and other levels of government (e.g., human health, economy and industry). The OSDP also provides access to regulatory registries that list government authorizations of other developments (e.g., *Fisheries Act* Registry, which can be useful in understanding the cumulative pressures on an area.

---

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.

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.

   As indicated by the Proponent in the Initial Project Description and 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 (PNR) has not been in contact with the Proponent regarding permitting or authorizations for the Project.

---

5. Does your department or agency have additional information or knowledge on the project 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.

   Based on information readily available, ECCC Prairie and Northern Region has not had any involvement with the Proponent or other parties that would be relevant to the assessment of this Project.

---

6. Based on the mandate and area(s) of expertise of your department or agency, what are the key issues related to the project?

   For each key issue:

   - Describe the potential effect or the nature of the issue, including any relevant context e.g. how it falls under an area of federal jurisdiction as defined under the IAA;
   - Provide the rationale and/or evidence for why it is a key issue;
   - Provide advice on how to address 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 considered by IAAC and may be used to inform its decision on whether an impact assessment is required and, where appropriate, for next steps in the impact assessment process including to develop project-specific draft Tailored Impact Statement Guidelines.

   Please use Table 1 to respond to this question.

---

7. Where possible, identify any additional information the proponent could include in their response to the Summary of Issues, and, if IAAC requires it, in their Detailed Project Description, that would:

   - Give confidence that minor issues or effects could be addressed and managed by clear measures, existing guidelines, other regulatory processes or other existing tools;
   - Inform the decision as to whether an impact assessment is required; or
   - Aid in tailoring the Tailored Impact Statement Guidelines, if IAAC decides an impact assessment is required.

- Clarify if a federal permit, licence or authorization may be 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.

Jody Small

Name of Departmental / Agency Responder

Regional Director, Prairie and Northern Region, Environmental Protection Operations

Title of Responder

May 26, 2025

Date

Table 1: Key Issues to inform the impact assessment process

IAAC asks that federal authorities align expert advice with IAAC's approach to tailoring by project, which focuses on key project issues, clearly focused on the prevention of adverse effects within federal jurisdiction. 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 decision include:

- adverse effects within federal jurisdiction and direct or incidental adverse effects that may be to some extent significant, based on federal experts' knowledge and experience with past projects;
- potential impacts on 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;
- adverse effects within federal jurisdiction or direct or incidental adverse 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 groups or local communities.

Effects that are anticipated to be minor or which can be managed using well understood mitigation, 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 IAAC to focus assessments on issues that are important to participants and to decision-makers.

Comment ID	Relevant section of the Initial Project Description	Valued Component or Factor to Consider	Description of Key Issue (Context and Rationale)	Advice	Plain language summary for inclusion in Summary of Issues
Please identify comments by organization and comment number. *e.g.: IAAC-01*	*If the comment is related to a specific section of the Initial Project Description, please include that reference.*	*Identify valued component(s) or factor to consider—within the mandate of your department or agency—to which the potential effect or issue applies.*	*Provide a brief description of the issue and rationale for being a key issue.* *Include, where relevant,:* • *the pathway of effects;* • *relevant context on why it is a key issue;* • *key uncertainties that should be addressed in the impact assessment;* • *Indigenous or public concerns or perspective;* • *potential for differential effects among diverse subgroups;* • *scientific evidence or Indigenous Knowledge, including from past project experience, which supports inclusion as a key issue.*	*Where applicable, briefly provide solutions on how to address the potential issue or effects including:* • *Information or studies required to describe and characterize the potential effect; including any guidance for data collection and/or analysis or existing data sources to inform the assessment;* • *Any means, including any powers, duties or functions, that your department or agency has that may mitigate, manage, or set conditions related to the issue or effect;* • *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* • *Commitments the proponent could make to respond to the issue.* *Where available, please refer to existing text in the Tailored Impact Statement Guidelines template.*	*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.*

ECCC-01	Initial Project Description	Air Quality – as potential to lead to a non-negligible adverse change, including to the health, social or economic conditions of the Indigenous peoples of Canada	The Initial Project Description (IPD) does not indicate if there could be a pathway of effect between project impacts to air quality and the health, social or economic conditions of the Indigenous peoples of Canada, however, should a pathway exist, the following information may be relevant to the impact assessment, should it be required. The construction, operation, and decommissioning of the Project can result in adverse effects on air quality. Air contaminant emissions from fuel combustion sources and earthwork activities during the construction phase may be considerable. The combustion of fuels produces a large amount of chemical substances that are emitted into the atmosphere. The use of fossil fuels to power, among other things, on-road and off-road vehicle engines, aircrafts, machinery, and equipment generates the emission of combustion products (engine exhaust gases), including but not limited to nitrogen oxides (NO_x) and sulfur oxides (SO_x); carbon monoxide (CO); volatile organic compounds (VOCs); any other products of fossil fuel combustion; and other air pollutants from mobile, stationary, and fugitive sources. Activities which cause a physical disturbance to land, such as tree clearing, topsoil stripping, earth moving, and 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. Furthermore, emissions of air contaminants resulting from the Project may add cumulatively to the emissions from other activities, which may contribute to degradation of air quality in the region. When contaminants settle out of the air in the surrounding environment, their deposition may result in adverse impacts to terrestrial and aquatic ecosystems. Emissions of NO_x and SO_2 may also 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.	If there is a potential a pathway of effect between project impacts to air quality and the health, social or economic conditions of the Indigenous peoples of Canada, provide the results of a baseline study on ambient air quality by identifying and quantifying emission sources for all relevant contaminants. To this end, describe the ambient air quality in the Project's local and regional study areas and identify existing emissions and sources of contaminants. Describe dust and acid deposits using existing monitoring data. To assess the effects on the atmospheric environment, provide a detailed description of all sources of air pollutant emissions; provide an inventory and description of activities and all equipment, including the list of on-road and off-road vehicles, etc. (engine type, power, group (Tier 0, 2, 3, or 4)); provide a comprehensive list of substances and air pollutants that will be generated by the Project as well as their quantification for the entire Project life cycle; quantify, without limitation, the emissions of the following contaminants: particulate matter (TSP, $PM_{2.5}$, PM_{10}); nitrogen dioxide and sulfur dioxide (NO_2, SO_2); carbon monoxide (CO); volatile organic compounds (VOCs); polycyclic aromatic compounds (PACs), specific aldehydes contained in fuel combustion products (e.g., acetaldehydes, formaldehydes, 1,3-butadiene, acrolein, benzene, diesel particulate matter [DPM], black carbon); and any other relevant air pollutant from mobile, stationary, and fugitive sources. Evaluate the effects of acidifying emissions on the receiving environment, where applicable. Take into account the principles of continuous improvement and the protection of unpolluted regions in the context of airshed and air zone management within the Air Quality Management System. Provide an air quality management plan that includes a dust management plan. This should encompass sources of air pollution, common mitigation measures for air contaminants (including a detailed complaint resolution process), the performance effectiveness of air contaminant control devices, best practice programs, as well as monitoring and follow-up.	Describe the ambient air quality in the Project's local and regional study areas and identify the existing emissions and sources for all relevant contaminants. Describe the effects on air quality for all relevant phases of the Project by providing: • a detailed description of all sources of air pollutant emissions; • an inventory and description of activities and all equipment; • a comprehensive, quantified list of air contaminants that will be generated by all components and activities of the Project for the construction and operational phases; and • a description of the best management practices, mitigation measures, and proposed monitoring and follow-up practices.
ECCC - 02	Initial Project Description	Climate change resilience	The IPD does not include details on decommissioning or abandonment of the proposed Project. Climate over the lifetime of the Project is likely to be different from past and current climate in the Project area. There is potential for climate change to affect the Project which, in turn, may have impacts on the	The Strategic Assessment of Climate Change (SACC) outlines information that the Proponent should provide during the impact assessment process related to climate change resilience. 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	Should the Project be subject to an impact assessment under the *Impact Assessment Act*, the Strategic Assessment of Climate Change would apply. The Project's resilience to future climate change should be described and, where relevant, considered in Project design.

			surrounding environment (e.g. through accidents or malfunctions). Climate changes in the Project area, such as possible changes in mean and extreme precipitation and temperature and related environmental conditions, may alter baseline conditions, with implications for climate sensitive aspects of Project design and associated effects on the environment. For example, project components and activities for which climate change resilience could be important for this Project include those related to surface water management.	resilient to, and at risk from, the current and future impacts of a changing climate. 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. **Links:** "Strategic Assessment of Climate Change" https://www.strategicassessmentclimatechange.ca/ "Draft technical guide related to the Strategic Assessment of Climate Change: Assessing climate change resilience" https://www.strategicassessmentclimatechange.ca/28896/widgets/117114/documents/77106	
ECCC-03	Initial Project Description Section 6.6.2	Water Quality and Quantity as potential to lead to a non-negligible adverse change to fish and fish habitat	The activities linked to the construction, operation, and decommissioning of the Project can have adverse effects on the quality and quantity of groundwater and surface waterbodies (i.e. any body of water either moving or stagnant of any size). The proposed Project includes the following activities: tree clearing, excavating or reworking of soils, the construction of a compacted gravel runway, taxiway, parking apron, placing of gravel base, maintenance building and radio room, impermeable storage for hazardous materials and fuel, and operation of the aerodrome. These activities could result in adverse effects to water quality through the release of hydrocarbons and other contaminants to surrounding waters through runoff and groundwater migration. 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 fish and fish habitat and/or migratory birds.	Increased impervious area has the potential to result in direct and indirect effects to site drainage patterns and water quality in the form of runoff, especially during the first flush of a rainfall event where the highest concentration of contaminants would be expected to occur. Baseline characterization of the existing hydrology and hydraulics of the site, and the water quality parameters of receiving waterbodies will allow identification of potential federal effects and inform subsequent mitigation strategies, such as waste- and stormwater management strategies which are still being considered (as stated in the IPD Section 6.6.2). Characterization of baseline conditions will provide details that will allow the Proponent to demonstrate the feasibility and success of mitigation strategies in mitigating potential effects. This would include a consideration of: • the source of granular material to construct the gravel runway, the testing planned to ensure the material will not generate acid rock drainage, metal leaching or leaching of nitrogen rich blast residue, and what erosion and sediment control measures would be put into place in the quarry or borrow pit. • whether de-icing fluids could be used at the aerodrome and if applicable, the containment measures planned to avoid their release to the environment. • how surface runoff and snow clearing from the runway will be managed to ensure there are no impacts to surface waters.	The Project has the potential for direct and indirect impacts to water quality, quantity thereby affecting fish and fish habitat. To understand the effects of the Project on water quality and quantity, characterize existing baseline conditions including the hydrology and hydraulics of the site, and water quality parameters of receiving waterbodies and used to identify potential effects and to inform mitigation strategies to minimize these effects. Describe the source of material for constructing the runway, testing of the material for acid generating potential and nitrogen rich blast residue, and erosion and sediment control measures. Describe if de-icing fluids could be used at the aerodrome and containment measures to prevent their release to the environment. Describe how surface runoff and snow clearing from the runway will be managed to ensure there are no impacts to surface waters.
ECCC-04	Section 6.6.2 Water	Water Quality and Quantity as potential to lead to a non-negligible adverse change to fish and fish habitat	Water withdrawals and disturbances to the natural flow of surface water could have adverse effects on the quantity, availability and hydrological regimes of waterbodies. Adverse effects to water quantity could, in turn, result in adverse effects to fish and fish habitat and/or migratory birds.	Section 6.6.2 of the IPD indicates that the Project has the potential for water use for dust control and other purposes. Once the Project's potential water uses and associated withdrawals are determined, the Proponent should identify and describe the effects on downstream water quantity as a result of the proposed water withdrawals from waterbodies (e.g. Hayes River or Ten Shilling Creek) as well as the potential effects to water quality, fish and fish habitat in the receiving environment.	Characterize the water usage requirements and evaluate potential changes to water quantity, water quality and characterize potential effects to fish and fish habitat.
ECCC-05	Section 4.2.3	Species at Risk and their Habitat	The activities linked to the construction, operation, and decommissioning of the Project and associated	Identify all species at risk listed on Schedule 1 of SARA and any critical habitat that may interact with the Project and	Identify all species at risk listed on Schedule 1 of the *Species at Risk Act* (SARA) and any critical habitat that may interact with

		(Should there be a pathway between a project impact and an adverse effect within federal jurisdiction, e.g. with respect to Indigenous peoples of Canada on their current use of lands and resources for traditional purposes)	infrastructure could have negative effects on species at risk (e.g. amphibians, arthropods, birds, lichens, terrestrial mammals, mosses, reptiles, and vascular plants) listed on the *Species at Risk Act* (SARA), and their habitat (e.g. wetlands) and critical habitat. The nature of effects to species at risk and their 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. 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.	describe how they may be adversely impacted by the Project. Describe what measures will be taken to avoid or lessen the effects of each Project activity and stage, and how these measures will be implemented and effects monitored to ensure they are avoided or minimized. Additionally, there is always the possibility that species assessed by The Committee on the Status of Endangered Wildlife in Canada (COSEWIC) may be added to Schedule 1 of SARA with potential critical habitat identified. As best practice it is recommended to also consider species assessed by COSEWIC to implement measures to lessen or avoid impacts and to monitor them.	the Project. Describe how these species may be impacted by the Project and measures to avoid or lessen the impacts measures to monitor effectiveness. As a best practice, consider species assessed by The Committee on the Status of Endangered Wildlife in Canada (COSEWIC), and that species may become listed by COSEWIC or SARA over the course of the Project.
ECCC-06	Section 4.2.3 Section 6.1.3	Migratory Birds	The nature of effects to migratory birds and their habitat (including nests) 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. Individual mortality and the destruction of nests and eggs or any other structure necessary for the reproduction and survival of species at risk could occur during all project phases, particularly during site preparation. Mortality in migratory birds and species at risk could also occur because of collisions with vehicles (including aircraft) or infrastructure related to the Project. Accidental oil or chemical spills could also have adverse effects if these substances make their way into the habitats frequented by migratory birds and species at risk. There is a higher risk that these effects would be more severe for migratory birds that are also species at risk and species where habitat is sensitive to disturbance (e.g., wetlands) or where there is already a high degree of cumulative effects to habitat or individuals. The construction and operation of an aerodrome could cause the loss, fragmentation and/or alteration of habitat, and could negatively impact the reproduction, migration and wintering of affected species. Construction of the Project and associated infrastructure will involve land clearing, which will remove habitat important for nesting, foraging, staging, and/or overwintering migratory birds. Some species like shorebirds will nest and roost on	The Project footprint should be minimized to the extent possible to reduce the amount of habitat removed. *The Migratory Birds Convention Act*, 1994 (MBCA) and the *Migratory Birds Regulations, 2022* (MBR 2022) protect migratory birds and prohibit the disturbance or destruction of migratory bird nests when they contain a viable egg or a migratory bird themselves (young or adult). Schedule 1 of MBR 2022 provides year-round nest protection for 18 species, with Pileated Woodpecker having the potential to occur in the Project area. The legislation and regulations apply to all lands and waters in Canada, regardless of ownership. The main sensitive period to consider is the breeding season. With respect to disturbance or harm to nesting birds, the principal risk factors are location and time of year. ECCC publishes a web site (Guidelines to avoid harm to migratory birds - Canada.ca) to aid in the planning of activities in order to reduce the risk of detrimental effects to migratory birds, their nest and eggs, in accordance with the MBCA. The Proponent has proposed to conduct vegetation and habitat clearing activities outside the migratory bird nesting season (Nesting Zone C7) to prevent the destruction of migratory birds and their eggs and nests to be compliant with the MBCA. Details and monitoring measures that will be completed for migratory birds that nest on human infrastructure or man-made features should also be provided. If moving nests is required, a permit under the MBR 2022 may be required. In addition, the Proponent will need to apply for an airport permit under the MBR 2022 to request authorization to scare migratory birds with a firearm or aircraft, or to kill and take them, if those birds are within the perimeter of the airport and considered a danger to aircraft operations.	Provide details and monitoring measures for migratory birds that nest on human infrastructure or man-made features. A permit under the MBR 2022 may be required if nests will be moved. An airport permit under the MBR 2022 will be required to authorize scaring migratory birds within the perimeter of the airport. Describe sources of sensory disturbances and measures to avoid or lessen these effects, and monitoring measures for effectiveness. Describe sources of light that may attract migratory birds and species at risk as well as other sources of potential collision risk (e.g., vehicles, aircrafts). Describe measures to minimize these risks and monitoring measures for effectiveness. Describe sources of accidental releases of deleterious substances that could impact migratory birds, including species at risk, mitigation measures to minimize the impacts and monitoring measures for effectiveness.

			human infrastructure such as gravel pads (i.e. airstrips). Disturbances may also have other negative effects on wildlife, particularly by facilitating the movement of predators in the area, thereby increasing predator abundance, distribution and hunting efficiency or creating connectivity issues within the habitat. The construction of the Project may also promote access to the region and increased harvesting pressure, which may affect wildlife. Where a project requires an increase in capacity to existing road networks, the increase in road traffic volumes are likely to result in an increase in wildlife injury, mortality, and the introduction of invasive species (e.g., Common Reed (*Phragmites australis*)) and hunters/poachers. Migratory birds, including species at risk could be affected by sensory disturbances during the construction, operation, and decommissioning of the Project. Some examples of potential sources of sensory disturbance include noise from various project activities, lights, vibrations from excavation and blasting work and the operation of machinery, as well as the presence of workers. The amount, duration, frequency, and timing of noise are important to understand potential effects. Sensory disturbance may make adjacent habitats unsuitable for use by wildlife and cause avoidance effects in many species.	• Describe sources of sensory disturbances (i.e., indirect habitat loss) that might impact habitat use by migratory birds. Describe what measures will be taken to avoid or lessen the effects of sensory disturbances, and how these effects will be monitored to ensure they are avoided or minimized. • Describe sources of light that may attract migratory birds, including species at risk that could increase their risk of collision resulting in injury or mortality, as well as other sources of potential collision risk (e.g., vehicles, aircrafts). Lighting required for the construction, operation and decommissioning of the Project should be controlled and minimized to avoid adverse effects on migratory birds and species at risk. Other sources of collision risk should be identified as well as the measures that will be implemented to minimize those risks (e.g. posting vehicle speed limits and deterring migratory birds and species at risk from the aircraft runway). Finally, the Proponent should escribe sources and pathways of accidental deleterious substance release into the environment that could impact migratory birds, including species at risk. The Proponent should describe measures to be taken to minimize the risk and how these measures will be implemented and monitored for effectiveness.	
ECCC-07	Initial Project Description	Environmental Emergencies	The proposed aerodrome Project includes the construction and operation of an aerodrome that will consist of a 1,530 m gravel runway and supporting infrastructure including a taxiway, parking apron, electricity generators and fuel storage tanks. Construction will involve the use of diesel-powered heavy construction equipment and gasoline pickup trucks. Adverse effects to air quality, water quality, wildlife, fish and fish habitat, migratory birds, or changes to the environment resulting in non-negligible adverse impacts to Indigenous Peoples of Canada could result from the accidental release of hazardous substances to the land, air, or water.	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 *Canadian Environmental Protection Act, 1999* (CEPA) 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. It also addresses the reduction of any foreseeable likelihood of releases of toxic or other hazardous substances listed in Schedule 1 of the *Environmental Emergency Regulations, 2019*. CEPA may apply if Schedule 1 substances onsite meet or exceed the threshold to be regulated under CEPA. In the case of this Project, this may include (but is not limited to) aviation fuels, gasoline, and diesel.	Accidents and malfunctions arising from construction and/or operation of the aerodrome could result in releases of contaminants to the environment. The implementation of spill prevention, preparedness, and response measures and systems will be important to minimize this risk and should be thoroughly documented in plans.

Please insert additional rows as necessary.

Table 2. Clarifications or additional information the Proponent could include 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
Please identify comments by organization and comment number. *e.g.: IAAC-01*	*If the comment is related to a specific section of the Initial Project Description, please provide a reference.* *You may also choose to copy the relevant text here.*	*Provide a description of the issue, concern or uncertainty the proponent could address in their response to Summary of Issues and, if IAAC requires it, in their Detailed Project Description that would give confidence that the issue will be addressed and managed, by clear measures, existing guidelines, regulatory processes or other existing tools, and thus be the subject of simplified information requests in the guidelines, or simply be removed. Include any uncertainty related to federal permits, licences or authorizations that may be required for the project*	*Provide recommended clarification or additional information to be included in their response to the Summary of Issues and, if IAAC requires it, in their Detailed Project Description to address the issue, concern or uncertainty, for example:* • *Clarifications to elements of the project description (e.g. components, activities, locations or alternatives);* • *Proposed project design changes that could avoid effects;* • *Evidence that could be presented to demonstrate there is no effect pathway of effect or that effects would 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.* • *Information needed to clarify whether a federal permit, licence or authorization may be required*	*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.*
ECCC-01	Section 4.2.1, Table 9, p.31 Section 5.3, Table 17, p.49-51 Section 6.1, p.52	The Proponent indicated that the design of the facilities for hazardous materials and fuel storage will align with WHIMIS guidelines. WHMIS guidelines are primarily intended to ensure occupational health and safety but do not necessarily address the environmental risks associated with fuel storage. It is ECCC's understanding that the Project will be located within York Factory First Nation Traditional Land (TLE) Entitlement lands. As such, the *Storage Tank Systems for Petroleum Products and Allied Petroleum Products Regulations* and the associated Code of Practice for Storage Tank Systems Containing Petroleum and Allied Petroleum Products, under the *Canadian Environmental Protection Act*, 1999, may apply. These regulations establish requirements for storage tank systems under federal jurisdiction. While the Proponent has indicated in the IPD that the design of the fuel storage tanks has not yet been finalized, recognizing potential applicable federal statutes at this stage is important to ensure compliance and inform design decisions.	Since this Project will be built on TLE land, the *Storage Tank Systems for Petroleum Products and Allied Petroleum Products Regulations* under the *Canadian Environmental Protection Act, 1999* may apply. These regulations set standards for how fuel tanks should be built and maintained to prevent spills that could harm the environment. The Proponent hasn't yet finalized the design of the fuel storage tanks. ECCC recommends the Proponent consider these regulations early in their planning.	The Proponent should consider the potential applicability of the *Storage Tank Systems for Petroleum Products and Allied Petroleum Products Regulations* and incorporate these requirements into the design and planning of the fuel storage system for the Project.

Please insert additional rows as necessary.