

Comments from the Impact Assessment Agency of Canada (the Agency) on the Webequie Supply Road Revised Acoustic Study Plan (2020-06-22 Version)

Note: Any acoustic comments in relation to terrestrial wildlife valued components (VCs) will be covered in the feedback provided on study plans for terrestrial wildlife VCs

Comment #	Taken from the Comment Package Provided by the Agency on June 5, 2020			Revised Study Plan Section	COMMENTS/CONTEXT (Based on the revised study plan, received June 22, 2020)	REQUIRED ACTION FOR THE PROPONENT (Based on the revised study plan, received June 22, 2020)	
	Comment #	Tailored Impact Statement Guidelines Section ¹	Context				Required Action for Proponent
AC(2)-01	GC-01	Section 5 - Public Participation and views (including 5.1, 5.2)	As per Section 5 of the Tailored Impact Statement Guidelines (TISG), “the proponent must engage with the public and provide timely notification of proposed engagement activities to seek community knowledge and views, including on: baseline conditions; valued components and indicators, taking into consideration the requirements under Section 25 of this [TISG];” effects assessment and the assessment of the Project’s contribution to sustainability; mitigation and follow-up measures; and conclusions.”	Provide a clear description in the study plans of how public engagement opportunities have been and/or will be integrated into the impact statement phase. This must include detail on how the public will have opportunities to provide input to contribute to the development of the Impact Statement, as required in Section 5 of the TISG.	Section 3.1 Public Participation “The open houses will include display materials and handouts containing information on the Project, the EA study process, known existing environmental conditions, the results of studies that have been conducted to date; the development and evaluation of alternatives, including the rationale for use of criteria and indicators; the project schedule; and the results of the consultation program. The Webequie Project Team will be available to receive and respond to questions and have an open dialogue regarding the EA process. ...All comments received from the public engagement and consultation activities will be tracked (i.e., Record of Consultation) and considered by the Project Team with the objective that the public be provided meaningful opportunities to participate, including in meaningful discussions in the EA process.”	The revised study plan provides information about how the public will be provided with engagement opportunities (i.e. open house sessions that will occur) The revised study plan is unclear about where and how public perspectives and input, including community knowledge, will be integrated into and contribute to decisions including: <ul style="list-style-type: none"> • scoping, development and collection of baseline information; • design of studies conducted as part of the impact statement phase; • plans for construction (including location of project components), operation, and maintenance; and follow-up and monitoring. 	Provide details to demonstrate where and how public perspectives and input, including community knowledge, will be integrated into the assessment process, including the project workplan, and will contribute to decisions regarding the Project, as per the requirements in Section 5 of the TISG.
AC(2)-02	GC-02	Section 6 - Description of Engagement with Indigenous Groups (including 6.1, 6.2, 6.3)	As per Section 6 of the TISG, the Agency expects the proponent to engage with, at a minimum, the Indigenous groups listed in the Indigenous Engagement and Partnership Plan.	Provide a clear description in the study plans of how Indigenous groups will have opportunities to provide Indigenous knowledge, including the validation of how information they provided was applied. The	Section 3.2.1 Communities to be included in the Assessment “Based on these factors, the communities identified by WFN will be offered the deepest or	It is unclear, based on the information provided in Section 3.2.1 of the revised study plan, whether all Indigenous groups listed in the Indigenous Engagement and Partnership Plan will be engaged at a level	Provide details to demonstrate that all Indigenous groups listed in the Indigenous Engagement and Partnership Plan will be

¹ Refer to complete sections of the Tailored Impact Statement Guidelines for more context.

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			<p>Section 6 of the TISG also states that “in addition to the requirements set out in Sections 6.1, 6.2 and 6.3, the proponent must provide Indigenous groups with an opportunity to:</p> <ul style="list-style-type: none"> • provide Indigenous knowledge during baseline data collection; • comment on the list of valued components and indicators; • inform the effects assessment and review the proponent’s conclusions; and • inform the development of mitigation measures and follow-up programs.” 	<p>study plan should include a description of the proposed methods for data collection, management of confidentiality, and information storage. This should also include a methodology for tracking information that has been approved by the group, to demonstrate that the guidance outlined in Section 6.2 of the TISG has been incorporated into the study plans.</p> <p>Describe what engagement with Indigenous groups has been done in the development of the study plans, and/or any planned engagement with Indigenous groups on the proposed study plans.</p>	intensive consultation/engagement.”	that will meet the requirements in Section 6 of the TISG.	<p>engaged with and provided opportunities to:</p> <ul style="list-style-type: none"> • provide Indigenous knowledge during baseline data collection; • comment on the list of valued components and indicators; • inform the effects assessment and review its conclusions; and • inform the development of mitigation measures and follow-up programs.
AC(2)-03	GC-03	Section 7 – Baseline Methodologies (Including 7.1, 7.2, 7.3, 7.4)	<p>Section 7.4 of the TISG states that “the spatial and temporal boundaries determined and established for the impact assessment will vary depending on the valued component and are considered separately for each valued component, including valued components related to the environmental, health, social and economic conditions of Indigenous peoples, or other potential effects and impacts...” Also, the same section states that “the proponent should engage with Indigenous groups when defining spatial and temporal boundaries for valued components, especially for those</p>	<p>Provide clear descriptions in the study plans of the proposed study areas and the criteria used to define the study areas.</p> <p>Describe how the Indigenous groups will be, or have been, engaged to provide input on spatial and temporal boundaries.</p> <p>Demonstrate how the Agency will be provided an opportunity to validate spatial and temporal boundaries.</p>	Section 1.1.1 Spatial Boundaries “The spatial boundaries to be used in the EA will be refined and validated through input from federal and provincial government departments and ministries, Indigenous groups, the public and other interested parties. Spatial boundaries will be defined considering the appropriate scale and spatial extent of potential effects of the Project; community knowledge and Indigenous Knowledge; current or traditional land and resource use by Indigenous communities; exercise of Aboriginal and Treaty rights of Indigenous	<p>It is unclear if Indigenous groups and the public were engaged with and provided an opportunity to provide input on the spatial boundaries defined in Section 1.1.1 of the revised study plan.</p> <p>If this engagement has not yet occurred, more detail is necessary to demonstrate how this opportunity will be provided to Indigenous groups and the public, and how the information they provide will be taken into account in the definition of the spatial boundaries, as per the requirement in Section 7.4.1 of the TISG.</p>	<p>Provide details to demonstrate how and when Indigenous groups and the public have been or will be engaged in defining the spatial boundaries for the project.</p> <p>Provide details on the timeline for engagement relative to the project workplan, including engagement relative to the schedule for baseline work, and in consideration of the project team’s timeline for the development of the Impact Statement.</p>

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			that are identified by Indigenous groups”, and that “the proponent should validate with the Agency the spatial and temporal boundaries for each valued component.”		peoples, including cultural and spiritual practices; and physical, ecological, technical, social, health, economic and cultural considerations.”		
AC(2)-04	GC-06	Section 19.2 - Impacts on the Exercise of Aboriginal and Treaty Rights	The study plan should demonstrate an approach for integrating impacts on rights considerations (changes to resource, access, and experience) into the assessment and collection of baseline information.	Describe an approach for identifying the potentially impacted rights of Indigenous peoples of Canada that are recognized and affirmed by section 35 of the <i>Constitution Act, 1982</i> , and for integrating the potential impacts on those rights into the collection of baseline information and the effects assessment.	<p>Section 3.2.1 Communities to be Included in the Assessment “Communities marked with an asterisk are those whose Aboriginal and Treaty rights may be affected by the Project.”</p> <p>Section 3.2.4 Aboriginal and Treaty Rights “The Webequie Project Team will be engaging with Indigenous communities regarding potential impacts of the Project on the exercise of rights, and where possible, the project’s interference with the exercise of rights.</p> <p>... Webequie First Nation and the Project Team will discuss with Indigenous communities their views on how best to reflect and capture impacts on the exercise of rights in the EAR/IS. Should impacts on the exercise of Aboriginal and Treaty rights be identified, Webequie First Nation and the Project Team will work with Indigenous communities to determine appropriate mitigation measures to reduce or eliminate such impacts”</p>	The study plan should demonstrate an approach for integrating impacts on rights considerations (changes to resource, access, and experience) into collection of baseline information and the effects assessment.	<p>Describe the approach for identifying the potentially impacted rights of Indigenous peoples of Canada that are recognized and affirmed by section 35 of the <i>Constitution Act, 1982</i>, and for integrating the potential impacts on those rights into the collection of baseline information and the effects assessment.</p> <p>Include details to demonstrate when Indigenous groups will be engaged in identifying potential impacts on rights.</p> <p>Provide detail on the timeline for engagement relative to the project workplan. Include details about engagement relative to the schedule for baseline work and effects assessment, including the identification of mitigation measures to address impacts, in consideration of the project team’s timeline for the development of the Impact Statement.</p>

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AC(2)-05	AC-01	<p>Section 5 “The Agency expects the proponent to engage with, at a minimum, the members of the public listed in the <i>Public Partnership Plan</i>.”</p> <p>“The proponent must engage with the public and provide timely notification of proposed engagement activities to seek community knowledge and views on: baseline conditions; valued components and indicators, taking into consideration the requirements under Section 25 of [the TISG]; effects assessment and the assessment of the Project’s contribution to sustainability; mitigation and follow-up measures; and conclusions.”</p> <p>Section 6 “...The Agency requires the proponent to engage with, at a minimum, the communities listed in the Indigenous Engagement and Partnership Plan...”</p> <p>“...the proponent must provide Indigenous groups with an opportunity to: provide Indigenous knowledge during baseline data collection; comment on the list of valued components and indicators; inform the effects assessment and review its conclusions; and inform the development of mitigation</p>	<p>In Section 2.1.2, Webequie First Nation (WFN) appears to be the only Indigenous community that will be engaged to identify noise sensitive areas (NSA). It remains unclear whether other Indigenous groups and stakeholders, as required in Sections 5, 6 and 14.1 of the TISG, that may have views on how project-associated activities may impact receptors would be engaged. It is unclear how the selected NSAs would be representative of other noise sensitive receptors, including receptors identified by Indigenous group and the public. The NSAs should also consider non-human receptor locations that may be important to humans (for instance country food flora and fauna).</p> <p>Additionally, the selected NSAs do not specify whether they capture locations with representative noise sensitive receptors defined in the TISG Section 8.1, such as schools, hospitals, community centres, retirement complexes or assisted care homes. Although these have been referenced in the concordance table, they should also be reflected in the study plan. The locations of all noise sensitive receptors should be mapped along with the project components (as per TISG Section 3.1) and overlain with the predicted noise contours in order to better evaluate the potential for adverse effects related to noise. The locations of the selected NSAs should be justified that they represent reasonable worst-case</p>	<p>A) Provide detail to demonstrate how Indigenous groups and the public have been or will be engaged as is required in Sections 5, 6 and 14.1 of the TISG.</p> <p>B) Provide detail to demonstrate how Indigenous groups, beyond Webequie First Nation, and the public that may have views would be engaged in the selection of receptors and receptor locations.</p> <p>C) Provide detail to demonstrate how noise sensitive receptors, as defined in Section 8.1 of the TISG, will be documented, evaluated and mapped with details to demonstrate that they represent worst-case locations for noise exposure from project activities.</p> <p>D) Provide a clear description of how Indigenous groups will have opportunities to provide Indigenous knowledge, including the validation of how information they provided was applied, managed and stored to safeguard confidentiality.</p> <p>E) Provide detail on how engagement with Indigenous groups and the public will inform the effects assessment, as well as the selection of mitigation measures and follow-up program measures.</p>	<p>Section 2.1.2 Identification of Noise Sensitive Areas “SLR will work with the Webequie First Nation, other identified Indigenous Groups and Stakeholders listed in the Public Partnership Plan, and the socio-economic discipline staff for the Project to identify noise sensitive areas (“NSAs”), which are points of reception where noise impacts will be predicted.</p> <p>In order to meet the provincial/federal EA requirements, the NSAs considered will include the following:</p> <ul style="list-style-type: none"> • Permanent residences, including homes within the Webequie community; • Schools, hospitals, community centres, retirement complexes, or assisted care homes; • Seasonal residences, such as trapper cabins or hunting and fishing campsites, which are used by members of the Webequie First Nation/Other Indigenous Groups and Stakeholders; • Spiritual or sacred spaces which members of the Webequie First Nation/Other Indigenous Groups and Stakeholders may identify as requiring quiet or being sensitive to disruptions from noise; • Other locations which members of the Webequie First Nation/ Indigenous Groups and Stakeholders and/or the Wildlife and other Project disciplines may identify as requiring quiet or being sensitive to disruptions 	<p>The revised study plan does not address Part C of the comment in sufficient detail.</p> <p>The revised study plan includes additional sensitive receptors (i.e., schools, hospitals, community centres, retirement complexes, assisted care homes, locations important for country foods) as per the TISG requirements and federal comment. However, it does not clearly indicate whether the Impact Statement will provide geographical information of the sensitive receptors, and demonstrate that they represent the worst-case locations for noise exposure.</p>	<p>Provide details to demonstrate how noise sensitive receptors, as defined in Section 8.1 of the TISG, will be documented, mapped, and evaluated as representative of worst-case locations for noise exposure from project activities.</p>

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		<p>measures and follow-up programs</p> <p>Section 8.1 “Provide the approximate number, distance and identity factors of likely human receptors, including any foreseeable future receptors, that may be impacted by changes in air, water, country food quality (e.g., dust deposition on vegetation), and noise levels. At minimum, provide a map showing approximate locations of permanent residences, temporary land uses (e.g., cabins and traditional sites) and known locations of sensitive human receptors (e.g., schools, hospitals, community centres, retirement complexes or assisted care homes).”</p> <p>Section 14.1 “Describe consultation with regulators, stakeholders, community groups, landowners and Indigenous groups about potential effects to the atmospheric, acoustic, and visual environment;”</p>	locations for noise exposure from project activities.		<p>from noise, for instance locations important for country food; and</p> <ul style="list-style-type: none"> • The mine exploration camp at the McFaulds Lake area operated by Noront Resources.” 		
AC(2)-06	AC-02	<p>Section 8.1. “Provide current ambient noise levels at key receptor points to traditional land users and sensitive human receptors, including the results of a baseline ambient noise survey and permissible sound levels for each receptor.When collecting baseline ambient noise survey data at human</p>	The study plan refers to ambient background noise level measurements, but does not refer to the collection of community feedback on existing noise perception. The TISG recommends that the proponent consider a baseline ambient noise survey, and provides examples of recommended questions for gathering community feedback as part of a baseline noise study.	<p>A) Provide details to demonstrate how the questions provided in Section 8.1 of the TISG were (or will be) considered when conducting baseline ambient noise surveys with community members.</p> <p>B) Provide detail on how annoyance with project-related noise will be evaluated, as per</p>	<p>2.1. Baseline Information Collection “A one-week site visit to the Webequie First Nation community, including field work to measure existing ambient background noise levels, will be completed in the fall of Year 3 of the Project.”</p> <p>2.1.3. Establish Background Ambient Sound Levels</p>	The revised study plan does not address Part A of the comment in sufficient detail. It is not clearly indicated whether the questions provided in Section 8.1 of the TISG will be used during Indigenous engagement.	Clarify whether the questions provided in Section 8.1 of the TISG will be considered when conducting baseline ambient noise surveys with community members.

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		receptor locations, consider the following recommended questions: Does the community or land users value certain non-anthropogenic (i.e., natural) sounds? Is there an expectation of quiet at any specific locations or times? What are typical sleep hours (10pm to 7am being the default assumption)? What is the baseline prevalence of noise annoyance toward existing noise sources (e.g., road traffic, aircraft, and other industrial sounds)?“	Additionally, the study plan does not specify whether the noise disturbances at particular locations will last longer than one year and if the linked change in community annoyance, calculated as percent highly annoyed (%HA), will be evaluated as per Health Canada’s guidance (2017). The change in %HA is a reliable and widely acceptable indicator of noise-induced human health effects for receptors exposed to long-term project noise (i.e., more than one year). For periods less than 1 year, refer to Table 6.2 of Health Canada’s guidance (2017) ² .	Health Canada’s guidance (2017).	“Existing background ambient sound levels at representative NSAs within the Webequie First Nation community and along the proposed WSR route will be determined through ambient noise level measurements.”		
AC(2)-07	AC-03	<p>Section 7 “If surrogate data from reference sites are used rather than site – specific surveys, the proponent should demonstrate that the data are representative of the project site conditions”</p> <p>Section 9 “Guidance for developing the appropriate baseline information relevant to human health is identified in Appendix 1. The proponent should refer to Health Canada guidance documents such that best practices are followed in the collection of baseline information to</p>	<p>The study plan describes a series of methodological approaches. Health Canada’s guidance (2017) on the collection and processing of baseline sound-level data to minimize uncertainty in the validity of measured baseline is not identified among the technical guidance documents consulted for the baseline measurement or data processing in the study plan.</p> <p>It is unclear whether data processing will consider any adjustments, as per Health Canada guidance (2017). Due to the expected heightened sensitivity to noise in remote communities, baseline levels measured in quiet rural areas should be adjusted by adding 10</p>	<p>A) Provide detail to demonstrate how the proposed baseline study methods/approaches (i.e. noise measurement guidelines, noise monitoring system, acoustic parameters, and data processing approach) align with Section 6.2.1 of Health Canada’s guidance (2017), as per Section 9 of the TISG.</p> <p>B) Provide detail to demonstrate that all applicable sound level adjustments (e.g. a +10 dB adjustment for “quiet rural areas” as per Health Canada’s guidance (2017) and ISO (1996-2016)³) will be applied in the assessment. Identify the appropriate sound level</p>	<p>Section 2.1.3. Establish Background Ambient Sound Levels “Measurement results will be supplemented using ambient background measurement data from the noise surveys conducted by Noront for the Eagle’s Nest Mine EA. Although somewhat dated, this appears to be the most recent data for parts of the project area. The applicability of the data will be fully determined and detailed during the EAR/IS work.”</p> <p>Section 2.3.1 Operational Noise “In evaluating the change in %HA, appropriate sound level adjustments will be provided,</p>	<p>The revised study plan does not address Part B of the comment in sufficient detail. The revised study plan includes a +10 dB adjustment for “quiet rural areas”. However, consideration of other adjustment factors in Health Canada’s guidance (e.g. for time-of-day and tonal and/or impulsive noise) is not clearly indicated.</p> <p>The revised study plan does not address Part C of the comment in sufficient detail. No rationale is provided on how the data from the noise surveys conducted at the Eagle’s Nest Mine are representative of the project site conditions and will be relevant in spatial and</p>	<p>Provide details to demonstrate that all applicable sound level adjustments (e.g., for time-of-day and tonal and/or impulsive noise as per Health Canada’s guidance (2017))² will be applied in the assessment. Identify the appropriate sound level adjustments that apply to the assessment and provide detail on why they were selected as the appropriate adjustments for the assessment.</p> <p>Provide details to demonstrate that the data from the noise surveys conducted at the Eagle’s</p>

² Health Canada. 2017. Evaluating Human Health Impacts in Environmental Assessments: Noise. Available at: <https://www.canada.ca/en/health-canada/services/publications/healthy-living/guidance-evaluating-human-health-impacts-noise.html>.

³ International Organization for Standardization (ISO). 2016. ISO 1996-1:2016 Acoustics – Description, measurement and assessment of environmental noise – Part 1: Basic quantities and assessment procedures. Available: <https://www.iso.org/standard/59765.html>

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		<p>assess real and perceived project-related impacts to human health due to changes in air quality, noise, drinking and recreational water quality, country foods and/or multiple pathways of exposure to contaminants. The proponent should provide a detailed rationale/explanation for any deviation from recommended baseline characterization approaches and methods, including from Health Canada's guidance, or when determining such characterization is not warranted."</p>	<p>dB. This 10 dB adjustment also applies to the predicted project noise levels for all phases of the project (i.e. construction, operation and decommissioning) in determining the percent highly annoyed (%HA) indicator.</p> <p>The study plan does not provide detail on how data from the Eagle's Nest Mine EA is representative of project baseline conditions.</p> <p>Health Canada provides the following technical guidance for noise monitoring (baseline, construction and operational noise levels):</p> <ul style="list-style-type: none"> - Atmospheric conditions should be representative of the monitoring locations and monitoring time period(s). - Atmospheric conditions can be based on measurements from the nearest weather station or the use of a portable meteorological (MET) station at the monitoring location. - Given the northern location of the proposed project, consideration of temperature effect is especially important as sound level meters may not function to their specifications under extremely low temperatures (below -10°C, unless provision is made to keep the equipment warm). - Noise should not be measured during precipitation events and when wind speeds exceed 14 km/hr. - For the measurement of A-weighted sound levels, the sound 	<p>adjustments that apply to the assessment and provide detail on why they were selected as the appropriate adjustments for the assessment.</p> <p>C) Provide details to demonstrate that the data from the noise surveys conducted at the Eagles Nest Mine are representative of the project site conditions for the Webequie Supply Road (WSR) and will be relevant in spatial and temporal coverage to the project.</p> <p>D) Provide detail to demonstrate that noise monitoring is conducted during conditions that are representative of maximum noise propagation at the receptor locations as per Health Canada's technical guidance (2017).</p>	<p>based on the measured sound levels and in accordance with HC guidance and ISO 1996-1. For example, for rural environments, a +10 dBA adjustment may be appropriate in some locations. This will be determined based on a review of the baseline background ambient sound level data."</p>	<p>temporal coverage to the Project.</p>	<p>Nest Mine are representative of the project site conditions for the Webequie Supply Road (WSR), and will be relevant in spatial and temporal coverage to the Project.</p>

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			<p>level meter should be located in an open area with limited vegetation and situated as close to the ground as possible with an appropriate windscreen, because all of these factors influence sound and can lead to inaccuracies in the measurements (other considerations may apply for dBC levels).</p> <ul style="list-style-type: none"> - Pre- and post-monitoring calibration is essential to ensure proper functioning of equipment. - All sounds of nature should be removed from the baseline noise measurements (i.e., using the audio function in the sound level meter). 				
AC(2)-08	AC-04	<p>Section 8.1. "Provide current ambient noise levels at key receptor points to traditional land users and sensitive human receptors (...). Information on typical sound sources (both natural and anthropogenic), geographic extent and temporal variations will be included."</p>	<p>It is assumed that the two monitoring locations defined in Section 2.1.3 of the study plan represent residential receptor and traditional land use receptor locations. It is unclear how the study plan will account for temporal variation.</p> <p>Section 2.1.2 of the study plan provides a list of Noise Sensitive Areas (NSAs) that will be considered, however Section 2.1.3 of the study plan suggests that there are only two locations where baseline data will be collected.</p> <p>It is unclear if only two key receptors have been identified or if more key receptors will be studied as they are identified.</p>	<p>A) Provide detail to demonstrate how the proposed monitoring locations are representative of baseline conditions at all sensitive receptor locations as required in Section 8.1 of the TISG.</p> <p>B) Provide detail regarding the timing of monitoring and how temporal variability will be considered (e.g., seasonal variation in levels and types of community activity) as per Section 8.1 of the TISG.</p> <p>C) Provide details to demonstrate that current ambient noise levels at all key receptor points will be included in the Impact Statement.</p>	<p>Section 1.1.2 Temporal Boundaries "Temporal variation or patterns in potential effects associated with different criteria will also be considered (e.g., differential worst case noise impacts and related effects to sensitive receptors associated with the staging/movement of construction along the length of the supply road corridor during the construction period)."</p> <p>Section 2.1.3. Establish Background Ambient Sound Levels "Existing background ambient sound levels at representative NSAs within the Webequie First Nation community and along the proposed WSR route will be determined through ambient noise level measurements. For</p>	<p>The revised study plan does not address any of the comments in sufficient detail.</p> <p>The revised study plan repeats the original study plan statement that baseline sound levels at Noise Sensitive Areas (NSAs) will be determined from ambient noise data collected at two proxy locations. A third monitor location could be added only if the proposed second site is not representative of the site conditions</p> <p>The revised study plan addresses temporal variability of noise effects to sensitive receptors to a limited extent, such as the movement of the construction stage and location and seasonal differences in noise exposures. However, it is</p>	<p>Provide details to demonstrate how the proposed monitoring locations are representative of baseline conditions at all sensitive receptor locations, as required in Section 8.1 of the TISG.</p> <p>Provide details regarding the timing of monitoring and how temporal variability will be considered (e.g., seasonal variation in levels and types of community activity) as per Section 8.1 of the TISG.</p> <p>Provide details to demonstrate how current ambient noise levels at all key receptor points will be</p>

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					<p>this project, a minimum of two receptor locations will be selected (refer to Figure 3):</p> <ul style="list-style-type: none"> › One, within the community, at the western terminus of the proposed WSR route; and › One, at a distance of a few kilometres along the proposed route (away from the community), which will be used as representative of conditions along the corridor... <p>... As a result, measurements will be conducted during the spring to fall period, excluding winter months. This is representative of the potential for worst-case impacts, as it is during this period that windows on residences may be open and people will be out on the land."</p>	not clear whether temporal variations in noise levels, types, and sources will be documented and reflected in the baseline data and predicted effects.	included in the Impact Statement.
AC(2)-09	AC-07	<p>Section 8.1 "For the aquatic environment, provide current underwater soundscape and vibration descriptions of the study area and at the project site from various sources based on acoustic measurements. Provide information on vibration and sound sources, geographic extent and spatial and temporal variations within the water column."</p> <p>Section 13.1 "The Impact Statement must describe in detail the project's potential adverse and positive effects in relation to</p>	<p>It is unclear what activities the concordance table is referring to that are "temporary in nature". The following is noted in the study plan: "adherence to relevant standards, such as the Department of Fisheries and Oceans <i>Guidelines For The Use Of Explosives In Canadian Fisheries Waters</i>". Detail is needed to understand what construction activities will fall under this guideline and how the proponent will avoid or minimize harm to aquatic life. It is not clear how the requirement in Section 8.1 to provide a description of the current underwater soundscape and vibrations will be met.</p>	<p>Provide a description of what activities may cause vibration and sound sources and when they may occur, including activities that are temporary.</p> <p>Provide details regarding activities that will fall under the <i>Guidelines For The Use Of Explosives In Canadian Fisheries Waters</i>⁴.</p> <p>Provide details to demonstrate how the underwater soundscape and vibration levels will be described, as per the requirement in Section 8.1.</p>	<p>Section 2.3.2 Permanent Aggregate / Bedrock Extraction Site "Vibration from blasting activities must meet the following limits: ...Department of Fisheries and Oceans ("DFO") <i>Guidelines For The Use Of Explosives In Canadian Fisheries Waters</i>."</p>	<p>Section 2.3.2 in the revised study plan mentions DFO's guidelines, but does not sufficiently address the comment as it does not state details of in-water works, undertakings or activities that will affect fish and fish habitat. For example, if blasting bedrock below the high water mark or pile driving for bridge construction will be required in selected watercourses, then monitoring must be done in accordance with DFO guidelines.</p>	<p>Provide a description of what activities may cause vibration and sound sources and when they may occur, including activities that are temporary.</p> <p>Provide details regarding activities that will fall under the <i>Guidelines For The Use Of Explosives In Canadian Fisheries Waters</i>⁵.</p> <p>Provide details to demonstrate how the underwater soundscape and vibration levels will be</p>

⁴ <http://publications.gc.ca/pub?id=9.557379&sl=0>

⁵ <http://publications.gc.ca/pub?id=9.557379&sl=0>

Comment #	Taken from the Comment Package Provided by the Agency on June 5, 2020				Revised Study Plan Section	COMMENTS/CONTEXT (Based on the revised study plan, received June 22, 2020)	REQUIRED ACTION FOR THE PROPONENT (Based on the revised study plan, received June 22, 2020)
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		each phase of the Project (construction, operation, maintenance, suspension, decommissioning, and abandonment)."	The Impact Statement must consider all phases of the Project (including construction) as required in Section 13.1 of the TISG.				described, as per the requirement in Section 8.1 of the TISG.
AC(2)-10	AC-08	Section 14.1 "Consider the expectation of peace and quiet at receptors (e.g., in a quiet rural area or during Indigenous land use) and the applicable community-based policies concerning noise (e.g., complaints resolution processes)."	It is unclear if the requirement in Section 14.1 of the TISG, in relation to expectation of peace and quiet at receptors and applicable community-based policies concerning noise, has been considered in the study plan.	Provide detail to demonstrate how the expectation of peace and quiet at receptors and community-based policies concerning noise will be considered in the development of the "code of practice" described in the study plan.	Section 2.3.3 Construction Noise and Vibration "The Code of Practice will outline: Applicable noise emission limits for equipment; Applicable noise and vibration guidelines for blasting, including impacts on fisheries; Considerations for operating times; Considerations for equipment selection and maintenance; and Complaints procedures."	The revised study plan does not provide any details to demonstrate how the expectation of peace and quiet and community-based policies concerning noise will be considered.	Provide details to demonstrate how the expectation of peace and quiet at receptors and community-based policies concerning noise will be considered in the development of the "Construction Code of Practice" described in the revised study plan.