

De Havilland Field Project - Summary of Issues

This document provides a high-level summary of issues submitted to the Impact Assessment Agency of Canada (the Agency) about the De Havilland Field Project (the Project) during the comment period on the Summary of the Initial Project Description (IPD), submitted by 2150038 Alberta Inc. (the Proponent). The issues highlight information that support decision making by the Agency on whether an impact assessment is required under section 16 of the *Impact Assessment Act* and — if an assessment is required — inform the tailoring of planning phase documents. Original submissions are online, on the Canadian Impact Assessment Registry Internet site for the Project (Reference Number 84552).

The Proponent must provide the Agency with their response to the Summary of Issues that details how they intend to address the issues, and the Detailed Project Description. The Detailed Project Description must contain the information from the IPD with new information integrated throughout the main body of the document as appropriate to respond to the issues raised. This will facilitate understanding by assessment participants, including Indigenous groups and public groups, federal authorities, provincial ministries and municipalities.

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| Accidents and Malfunctions |
| Need for further information on potential accident and malfunction scenarios that could lead to the release of contaminants into the surrounding environment for each phase of the Project, the potential effects on human health, and emergency management plans. |
| Concerns regarding fuel storage including Proponent requirement to follow all storage limit regulations outlined in the <i>Canadian Environmental Protection Act, 1999</i> (CEPA) and have an emergency preparedness plan that follows CEPA. |
| Acoustic Environment |
| Need for further information on proposed noise mitigation measures during the construction phase, including details on the complaint resolution process and information on noise monitoring and follow-up measures. |
| Alternatives to the Project |
| Concerns regarding the "need for" and "purpose of" the proposed Project. |
| Atmospheric Environment |
| Need for ambient air quality monitoring to confirm results of modelling and to assess air quality against the Canadian Ambient Air Quality Standards to assess potential effects to human health from air pollutants, based on predicted concentrations. |
| Need for air quality assessment including baseline sampling and dispersion modelling, for all substances or air pollutants generated during each phase of the Project: nitrogen dioxide, sulphur dioxide, dust, particulate matter, carbon monoxide, ozone, volatile organic compounds, polycyclic aromatic compounds, metals and other substances that may be released. |
| Recommend using equipment with engines that meet Tier 4 emission standards that will assist in mitigating the air quality impacts of the Project. |
| Recommend including the location of sensitive receptors (e.g., hospitals, schools, retirement complexes, assisted care homes) and traditional land use areas when identifying potential Project-related air quality impacts on human health. |
| Climate Change and Greenhouse Gas Emissions |
| Clarify the Project's greenhouse gas emissions and contribution to climate change with consideration of the Strategic Assessment of Climate Change and the Government of |

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| Canada's long-term goal to achieve net-zero emissions by 2050. Provide a description of the planned mitigation measures, technologies, and best practices to be applied, including measures being considered to reduce the Project's greenhouse gas emissions on an ongoing basis. |
| Describe the Project's resilience to future climate change, and where relevant, how it is considered in project design. |
| Need for further study on the resilience of the Project to climate change including possible effects that may be associated with climate change, mitigation measures and potential for residual effects after mitigation has been applied. |
| Clarification required about the "one-time emissions" unit described in Table 14 of the IPD, as the value is described in terms of annual emissions. It is unclear if this is a portion of the carbon sink as it is described as a sample. Clarify what the estimate includes. |
| Cumulative Effects |
| Cumulative effects on Indigenous peoples, including impacts on their Aboriginal and/or treaty rights due to continuous development and urbanization in the traditional territories of potentially affected Indigenous peoples. |
| Economic and Social Conditions |
| Need for information on the proponent's hiring strategy, including anticipated training opportunities, description of the skills that may be required for potential candidates and whether there are employment barriers for under-represented groups in the labour market, such as Indigenous peoples, women, and persons with disabilities. |
| Given Wheatland County's proximity to Calgary, a significant proportion of the Project's workforce could come from that city. Recommend including the social and economic context of Calgary to provide a more fulsome picture of the potential project workforce. |
| Recommend using the most recent statistical data when describing labour force characteristics. |
| Fish and Fish Habitat |
| Project activities may lead to adverse effects on groundwater and surface water, ensure compliance with requirements under the <i>Fisheries Act</i> . |
| Human Health and Well-Being |
| Need for identification and locations of existing and potential future human receptors, including sensitive receptors. |
| Indigenous and Stakeholder Consultation and Engagement |
| Need for opportunities for meaningful Indigenous engagement throughout the regulatory process, including in effects assessment, baseline studies, development of mitigation measures, identification of mutual economic benefits, employment opportunities, and understanding how Indigenous concerns and impacts to rights will be addressed. |
| Indigenous Knowledge |
| Request to incorporate Indigenous knowledge in the Project assessment of effects, including the development of environmental management plans (e.g. Wildlife Management Plan). |
| Indigenous Peoples' Current Use of Lands and Resources for Traditional Purposes |
| Clarify potential or perceived project effects to current land use, including wildlife and vegetation, corresponding potential effects to traditional food sources and food security of Indigenous peoples, and how these effects will be addressed. |
| Indigenous Peoples' Health and Well-being |
| Need for information on how the potential effects of the Project will impact Indigenous health and well-being, including potential impacts to drinking water, country foods, and increased contaminants. |
| Recommend use of Health Canada guidance documents when assessing the health effects of the Project. |

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| Indigenous Peoples' Rights |
| Clarity on the assessment of impacts to rights and its incorporation into Project effects assessment and potential mitigation measures. |
| Indigenous Peoples' Social and Economic Conditions |
| Request for funding and capacity building for Indigenous peoples to support adequate consultation and engagement activities to identify potential effects of the Project and review project materials. |
| Clarity on the intent to support diversity and inclusion through the Proponent's hiring and training strategies; need for a better understanding of the target percentage for hiring Indigenous peoples and if Indigenous peoples who live near the Project will receive priority employment and training opportunities. |
| Indigenous Peoples' Spiritual, Physical, and Cultural Heritage |
| Clarity on the potential effects to physical and cultural heritage, including sites of archaeological, and paleontological significance to Indigenous peoples due to the construction and operation of the Project. |
| Clarify how Indigenous peoples will be notified should any item of historical, archeological, paleontological or spiritual importance to Indigenous peoples be discovered. |
| Migratory Birds and their Habitat |
| Recommend the use of deterrents and water level management at the stormwater facilities to discourage their use by migratory birds. |
| Navigation |
| Clarity required on whether any project component (including incidental activities) may impact a navigable waterway and if so, more information required on potential impacts to navigable waterways and any potential mitigation measures. |
| Clarity required on whether any project component (including incidental activities) may cause an obstacle to air navigation. |
| Clarity on whether the Project will meet the requirements of the <i>Canadian Aviation Regulations</i> , including detailing how the lighting and marking of buildings and obstacles will be completed before flights begin. |
| Clarity on whether any proposed buildings are within the Obstacle Limitation Surface under the <i>Canadian Aviation Regulations</i> . |
| Recommend detailing how the Project will meet regulation TP 1247 Aviation - Land Use in the Vicinity of Aerodromes. |
| Species at Risk, Terrestrial Wildlife, and their Habitat |
| Recommend providing the amphibian survey methodology and timing, and detail appropriate mitigation measures for any potential impacts to Northern Leopard Frog and Western Tiger Salamander. |
| Vulnerable Population Groups (Gender Based Analysis Plus) |
| Clarity on the mitigation of negative impacts associated with an influx of workers in local communities such as safety and security plans. |
| Need for any further social and economic information to be disaggregated by identity factors (e.g. by sex/gender, age and ethnicity) to identify gaps or inequities among diverse group of the population. Proponent should ensure that GBA+ is applied throughout the impact assessment process. |
| Provide specific strategies to increase hiring of Indigenous community members as well as other vulnerable groups (i.e., women, visible minorities and persons with disabilities). |
| Recommend cultural sensitivity training for the whole workforce and plans to ensure safety of Indigenous peoples involved with the Project given concern regarding bias towards Indigenous peoples. |
| Water – Groundwater and Surface Water |

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| Clarify which water sources are anticipated to be affected by the Project and how potential effects will be addressed. |
| Consider potential effects to water quality due to surface water runoff. |
| Wetlands |
| Recommend providing additional information on what mitigation measures will be taken to offset permanent wetland loss due to the construction of the Project, such as wetland restoration and/or compensation. |
| Other - Editorial Comments on the Initial Project Description |
| Clarify distance of Siksika Reserve No. 146 from the Project. |
| Update Table 5 to include a holistic list of federal reserve lands. |
| Proponent should verify that the greenhouse gas emissions in Appendix I, Table 15 are accurate. |
| Need for clarification on the preliminary spatial boundaries of the Project (i.e., regional study area, local study area, and Project study area) and the rationale for the boundaries of these areas. |
| Recommend that the Proponent engage with the Indigenous Skills and Employment Training (ISET) service delivery providers throughout the project, sharing the scope and details pertaining to the Project activities (e.g., type and number of jobs, timelines, and any other relevant information) with ISET agreement holders, so that training partners can work to prepare their clients to be ready to access these jobs. |