

**CARTWRIGHT JUNCTION TO HAPPY VALLEY-GOOSE BAY
TRANS LABRADOR HIGHWAY
ENVIRONMENTAL IMPACT STATEMENT AND COMPREHENSIVE STUDY
Issued April 2003**

**Editorial modifications or changes required to the
Environmental Impact Statement and Comprehensive Study**

General Comments

N A table of abbreviations will greatly enhance the readability of the EIS/CSR.

N The EIS/CSR should be proofread and reviewed for clarity. For example, there are too many words in the last sentence of Roadside pull Off locations; the first letter of many words are missing; there is something missing between the bottom of page 268 and the top of page 269; “(such as hydrocarbons)” is in the wrong place on page 276; and sentence 1, page 323, is ambiguous and the reader can only make assumptions.

N The EIS mentions in several places that a waterfowl and passerine birds study was conducted. In other places the EIS refers to migratory bird studies. The passerine birds study was not completed before submission of the EIS and will be ongoing subsequent to release of the undertaking as construction proceeds. All references to waterfowl and passerine bird studies and migratory birds studies should refer to waterfowl only.

1.1 The Project - The citation is wrong: the project is officially known as “Cartwright Junction to Happy Valley-Goose Bay Trans Labrador Highway”

1.3.1 Provincial Environmental Assessment Process - The decision making process described for the environmental assessment is missing key steps. Consult the *Environmental Protection Act* and the Memorandum of Understanding with the Innu Nation for the complete decision making process (and reflect the correct process in Table 2.1).

1.3.2 Federal Environmental Assessment Process - The use of the Comprehensive Study is not correctly described.

1.4.3.3 Caribou Component Study -Some of the contents of this section were not included as information in the Component Study submitted. This should be identified as supplementary information to the Caribou Component Study.

1.4.3.5 Resource Use and Users Component Study - The Component Study is called Land and Resource Use Component Study. This section should also reflect that land and resource use was covered in two parts, with a separate part for Labrador Innu land use.

- 2.2.1 Alternative to the Project** - It is difficult to believe that Phase I of the Trans Labrador Highway has and will continue to change the socio-economic environment of Southern Labrador. Perhaps this statement should refer to either Phase II or Western Labrador.
- 2.2.3 Alternatives for Crossing the Churchill River**
Muskrat Falls Crossing (A3) -This route is described as extending southwest but it actually appears to extend southeast.
- 2.2.2.4 Alternative Routes through Central Labrador**
Route through *Nekanikau* (A12) - It is not clear if this route was to be considered further or not.
- 2.3 Regulatory Approval Requirements** - WST Specification 802 should have been included in the Appendix.
- 2.4.4.1 Design Criteria for Crossing Structures** - Rollings (1997b) is not identified in the Literature Cited.
- 2.5.1 Project Schedule** - the text indicates that the annual construction season will extend from mid-May but Figure 2.10 indicates April of each year.
- 2.6 Operation and Maintenance** - Development activities along highways are controlled under the *Protected Road Zoning Regulations* only if that road has been designated a protected road under the regulations, not along all highways.
- 3.2.1.1 Ecological Land Classification** - If the Taiga Shield Ecozone lies on either side of Hudson Bay it should be the eastern segment occupying central Quebec and Labrador.
- 3.2.1.3 Rare and Endangered Vascular Plant Species** - The ACCDC contact is S. Gerriets, not Garriets.
- 3.2.2 Avifauna** - Rough-legged hawk is mentioned twice. Perhaps a different species was to have been included in place of one of the rough-legged hawk citations.
- 3.3 Fish** - Should “east-northeast” be “west-southwest?”
- 3.4.7 Tourism and Recreation** - This section states that there are a “number of existing and proposed parks and reserves (Section 3.4.5).” Section 3.4.5 states that “There are no existing provincial or federal parks in Central Labrador.” One of these statements should be changed.
- 4.2.1 Environmental Assessment Guidelines** - The Guidelines were issued by the Minister of Environment, not the Department of Environment, and they were issued on December 06, not December 19. Key subjects were also identified by the public.

- 5.0 ENVIRONMENTAL EFFECTS ASSESSMENT METHODS** - The EIS guidelines were issued by the Minister of Environment on December 06.
- 6.1.3 Existing Environment** - it might have proved instructive to have the LLTA and control area raptor nest sites superimposed on Figure 6.1. Footnote 2 in Table 6.1 references an adjustment to the proposed TLH Phase III route but the text does not describe the adjustment, nor are the two additional nests identified in August.
- 6.3.2 Methods** - The Caribou Component Study submitted for review consisted of Otto 2002a. Otto 2002b was never received by the Environmental Assessment Division.
- 6.5.1 Boundaries** - “The NWPA is enforced by the CCG of DFO.” should be written in full.
- 6.5.2 Methods** - The Fish and Fish Habitat Component Study states that fish sampling has been postponed indefinitely and the EIS/CSR states here that fish sampling has been deferred until the summer of 2003. The nature and extent of any fish sampling should be definitively stated.
- 6.5.6 Existing Knowledge** - The reference to proper mitigative steps in Section 2.6 is incorrectly referenced.
- 6.5.8.2 Operation** - The text of this section states that “effect will extend over the life of the highway” but Table 6.25 indicates that the duration in months is <1. These should be reconciled.
- 6.7.3 Existing Environment** - The statement is made that the closest activity is approximately 80 km to the southeast. Is this from Cartwright Junction, Park Lake or Happy Valley-Goose Bay?
- 6.7.9 Environmental Effects Evaluation** - The definition of significant environmental effect should not be the same as not significant environmental effect.
- 6.9.3 Existing Environment** - It is believed that the representative photos are in Appendix S, not Appendix R. Plant community descriptions are in Appendix R, not Appendix S. Only some, not all, plant species are contained in Appendix E. There is no Appendix X containing the detailed description of ground-truthed sites.
- 6.9.8.1 Construction** - The first line of the second paragraph states that the majority of wetlands found within 200 m of the centre line of the highway are bogs (72.5 percent). Table 6.48 states that 72.5% are found within 100 meters of the proposed highway right-of-way. These two should be reconciled.

WST’s detailed procedures are not contained in Section 2.10.2. That section contains Management and Reporting Structure.

6.11.2 Methods - The proposed highway route should be shown on Figure 6.29.

6.11.9 Environmental Effects Assessment - Bullet #7 in Table 6.54 should be changed to read “informing personnel of their responsibility to report suspected findings of historic resources will be part of all environmental awareness sessions.”

6.11.9 Environmental Effects Assessment - Bullet #11 in Table 6.54 should be changed to read “if required, develop in consultation with the PAO and Innu Nation appropriate mitigative measures if an archaeological site is encountered on the 40-m-right-of-way during future historic resources field assessment or construction.”

6.12.1 Boundaries - In both this section and 6.12.2 Methods, the Component Study prepared by JW (2003c) was called Land and Resource Use not resource use and users.

6.12.3.4 Hunting - Waterfowl and Seabird Management and Hunting - This section states that there are two different daily and possession limits after the first Monday in February.

6.12.3.6 Fishing - The Total Days Fished in 1990 in Table 6.57 don't seem to sum to the numbers included in the table.

6.12.9 Environmental Effects Evaluation - One paragraph is included twice in this section.

6.13.8.3 Accidental and/or Unplanned Events - The last sentence appears to be redundant.

6.16.3.1 Settlement and Demographics - The figures provided for lone-parent families do not add up to the totals given.

7.2 Monitoring and Follow-up Commitments - The provisions of the EIS should be added.